

Edward Mountain MSP  
Convener  
Net Zero, Energy and Transport Committee  
Scottish Parliament

19/03/26

Dear Edward,

Thank you for inviting me to attend the committee in February to discuss our most recent Annual Report and Accounts and future priorities as set out in our new Corporate Plan for 2026-2030 'Nature thrives, People flourish'. During the session I agreed to provide further information to members on several matters. I have confirmed with your clerking team the specific areas on which the committee is seeking further detail and have included the relevant information in this letter.

I described during the session a number of comments about NatureScot in the Scottish Parliament as having crossed a line. I have included examples in Annex A of this letter. As I said during my evidence, while I welcome careful scrutiny of NatureScot as a public body, I also have a responsibility to consider the welfare of my staff and to call out any comments that I see as being unacceptable.

Turning to other matters raised:

**Examples of where we are working to help people to run their businesses in a way that supports nature.**

During the session, I was clear that an important aspect of our work is to support businesses that rely on nature in a way that is sustainable in the long term and protects the assets on which their businesses are based. I said that I would provide examples and I have done so below.

### *Peatland restoration - Armadale Farm*

I referenced Armadale Farm, a 2,000-hectare traditional hill sheep and suckler cow farm in Sutherland. The farm has had a continuous flock of sheep on it since 1791, but now has a mix of sheep, cattle, and a holiday cottage business. It also has a significant amount of damaged peatland.

Using a combination of Peatland ACTION funding, and support from the Flow Country Green Finance Initiative, farmer Joyce Campbell has so far carried out peatland restoration on almost 900 hectares of peatland. The work has reduced her black loss and, she feels, future-proofed her business.

Joyce is one of many farmers and crofters now engaged with NatureScot through our various programmes to support farming with nature. Here is a link to [further information](#) about this work for Members' interest.

### *Agri Environment & Climate scheme - Easter Rattray Farm near Blairgowrie*

Supported by the Agri Environment and Climate Scheme (AECS), farmer Jock McFarlane has improved soil health and water cycling which are at the heart of his regenerative farming ethos. Over eight years, he introduced cover crops and a no-till method that enhances soil structure and its organic content. He is now seeing yields in line with neighbours in his part of Scotland and wildlife in greater abundance on the farm, including beavers, badgers, otters, buzzards, red kites, sparrow hawks, grey partridge, tawny owls, snipe, and woodcock.

### *Sea Eagle Management Scheme*

In 2025, NatureScot supported 174 holdings across the west coast and islands, including sustaining thirty-six shepherding roles. Early results for our pilots of smarter adaptive management have been positive, with one upland sheep farm increasing weaning success to 88% through enhanced shepherding, compared with just 54% under traditional approaches.

### **As part of the species licensing review, did we review whether species licences that are currently issued by NatureScot are legally compliant with international law and conventions?**

The remit for the Species Licensing Review, as laid out in the Bute House Agreement, did not explicitly include the consideration of international law and conventions. However, the legislation we work to has been drafted to transpose relevant international law and conventions into UK law. Therefore, any approach deemed to be compliant with national law should inherently comply with such conventions.

In this instance, the Wildlife and Countryside Act (1981 as amended) is the mechanism through which the Bern Convention has been transposed into UK law for implementation. Our lawyers considered our approaches in the context of this legislation, as well as the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) (Habs Regs), which were introduced to implement the EU Birds and Habitat Directives in the UK. The legal advice we received assures us that our current approach to species licencing is compliant with these UK laws and therefore with the above referenced international conventions. It is also important to note that the Species Licensing Review only investigated our licences issued for lethal control, not the entire breadth of licences that we issue.

**Can we provide details of any planning or energy consenting that has been delayed due to capacity issues and how many times have NatureScot failed to meet its target times?**

We remain committed to helping the Scottish Government and planning authorities to deliver a modern planning system that is fast and inclusive, and which delivers sustainable economic growth. The scale of casework has always been at a high level as Scotland's economy continues to grow, diversify and decarbonise. We also know that, between now and the end of this decade, demand on our statutory role in development consents is going to rapidly expand, especially as low carbon energy and associated infrastructure is deployed.

The statistics that we record for response times include instances where the relevant authorities have agreed to an extension. Requests made for extensions follow discussion and agreement with the relevant authorities. It is important to note that asking for an extension on a specific case does not necessarily cause a delay and can in some cases lead to more timely determination through resolution of key issues.

The table below provides an overview of the numbers of specific types of application we have received over the past two years and the percentage we have responded to within the required timescale. Required dates include those where a new extended deadline has been agreed with the regulatory body.

**Table 1 – NatureScot Response Times for planning and energy consents**

Consultation Type	2024/25		2025/26 (to date)	
	Number Received	% responded to in required timescale	Number Received	% responded to in required timescale
S36 (Energy Generation)	120	<b>83%</b>	131	<b>74%</b>
S37 (Overhead Electric Lines)	41	<b>68%</b>	44	<b>84%</b>
Planning Applications	859	<b>79%</b>	710	<b>78%</b>

We are continually working to improve our performance and have several ongoing mechanisms in place which include:

- The introduction of a new system, InformedDECISION, which is a decision-making support platform for our protected areas statutory and regulatory casework. This is a fully integrated platform that brings the benefits of artificial intelligence and automation to the consultation and decision-making process.
- Increasing certain specialist staffing capacities in key bottle-neck areas, for example in ornithology, peatland advice and in relation to our landscape advisory capabilities.
- Increasing case officer capacity for energy casework.
- Concentrating our resource on cases of national interest.

### **Can we provide local examples for tackling invasive non-native species (INNS) and how these have demonstrated progress?**

Many of our iconic species and habitats are threatened by the impacts of INNS. As well as the direct impacts on biodiversity, INNS costs Scotland's economy an estimated £499 million every year, affecting agriculture, forestry, tourism, and our health and wellbeing. As is set out in [the Scottish Biodiversity Delivery Plan 2024-2030](#), investing in prevention can provide economic returns up to fifty times higher than trying to manage an INNS after it arrives.

A series of ambitious INNS programmes are already being delivered across Scotland, in collaboration with a range of organisations and communities. These include island INNS eradication projects, such as the Hebridean Mink and Orkney Native Wildlife projects. Here are few examples:

- *The Orkney Native Wildlife Project* is safeguarding Orkney's native wildlife against invasive stoats. The world leading project has removed over 6,000 stoats from Orkney since 2019, using a network of over 8,000 lethal humane trap boxes, Europe's first stoat detection dogs, a team of professional trappers, and the support of local volunteers. The reduction of the stoat population has led to an increase in nest success rates among key native species, and to date, stoats have been prevented from colonising any more of the Orkney Islands.
- *The Scottish Invasive Species Initiative* is, by geographical footprint, the largest INNS control programme in the British Isles: a 10-year partnership project working with local organisations, volunteers, and land managers and owners and focuses on the American mink and a suite of riparian invasive non-native plant species. SISI has included a range of localised case studies on its [website](#) showing the progress that has been made in sites across northern Scotland. The impact of this project has been to enable regeneration of native riparian plants and species.

- *Saving Scotland's Red Squirrels* has developed a proven approach to grey squirrel control focused on the most impactful locations: Southern Scotland, a coast-to-coast Highland Line, and Aberdeenshire. It is delivering tangible success, including the potential to achieve the first mainland urban grey squirrel eradication in Aberdeen. Grey squirrel control supports the recovery of red squirrel populations, with a range of ecological and economic benefits.

### **How can we demonstrate that we have better targeted peatland restoration other than through case studies?**

To date, the Peatland ACTION Partnership has focused on restoring as many hectares of damaged peat as possible within available budgets. Last year (2024/2025) the Partnership put 14,860ha of degraded peatland on the road to recovery, which represents a 42% increase over the 10,360 hectares restored during 2023-24.

A range of assessment criteria is currently used to maximise the number of hectares delivered by assessing risk (to ensure viable and deliverable projects are funded) and value for money (to ensure maximum return on investment).

During 2026-27, the Partnership will start to target investment in line with the new priorities set out in the *Peatland ACTION five-year partnership plan 2025-2030*. This will include assessment criteria which measure the impacts on:

- Carbon emissions
- Nature
- Drinking water catchments
- Crofting areas
- Climate resilience

A balanced approach will be taken across these criteria to select projects which deliver the most benefit overall. This will be combined with ongoing assessment of value for money and scale to deliver against Scottish Government targets. Taking this approach will broaden the measures by which we can quantify the effectiveness of ongoing work and of how it is targeted.

### **Why are NatureScot's land values going down?**

In our 2024/25 annual accounts (page 112), the Land Asset Class Cost has reduced by £75k following a revaluation. This is not related to changes in our land holdings but rather reduced valuation on our current land assets. This primarily relates to Dromore Farmland which reduced in value by £70k. The remaining £5k relates to Isle of Rum Byre and Workshop Land.

I trust this information answers the Committee's questions. Please do not hesitate to contact me if you require further clarification or additional information.

Yours sincerely,

Nick Halfhide  
**Chief Executive**

## Annex A - Extracts from the public record

*“The guga hunt can take place legally only under a special licence issued by NatureScot—our old friends in NatureScot, which is the least effective organisation in the western world. That is a personal observation.”* – Meeting of the Citizens Participation and Public Petitions Committee, Wednesday 21 January 2026. [New Petitions](#).

*“It has been a recurring feature in my education as convener of this committee over this parliamentary session, but I wish that NatureScot would become a more proactive organisation and not resemble a dead sheep with its legs up in the air. It seems to parrot desktop surveys and other party-political things—actually, I do not want to use the term “party political.” Time and again, I have found it depressing.”* – Meeting of the Citizens Participation and Public Petitions Committee, Wednesday 11 February 2026. [Continued Petitions](#).