

## **Landscape scale nature restoration in Scotland**

### **Engagement paper response**

**November 2025**

#### **Introduction to Scottish Environment LINK**

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

#### **Response:**

##### **Question 1: Do you agree that the projects listed in annex 1 are the right projects to select as exemplars ? If not, why not ?**

We have concerns about both the direction and rationale behind the selection of the exemplar projects.

While many of the listed projects are valuable in their own right and several demonstrate strong partnership and community leadership (e.g. the Arkaig Landscape Restoration, Morvern's Rainforest, Knoydart, Moray Farm Cluster, and Tweed Catchment projects), the overall portfolio still leans toward well-established initiatives with significant agency or government involvement.

This means that, while the projects are good examples of ongoing landscape-scale restoration, they don't fully show the range of approaches or new areas that Action 2.1 was intended to support and bring forward.

Such a shift:



- Prioritises rationalisation of effort over strategic expansion and ambition;
- Risks concentrating public and philanthropic funding (e.g., via the Heritage Fund) in a small number of well-supported, familiar landscapes;
- Misses opportunities for innovation and transformation in underrepresented or ecologically critical regions;
- May reinforce existing institutional structures, rather than respond to the nature and climate emergency with new delivery models and leadership.
- Fails to address what needs to be done to stimulate further action across the country.

It is also notable that there are no specific pollinator projects included in the list, despite there being a dedicated Pollinator Strategy for Scotland 2017–2027. Through projects such as B-Lines and [Ayrshire Nectar Network](#), wildflower habitat can be strategically prioritised by local authorities, landowners, and the public at multiple scales, offering a clear opportunity that has so far been overlooked.

There are no specific mentions of species-rich grassland restoration. Grasslands seem to be completely overlooked in the document, despite their importance for biodiversity, pollinators, carbon storage and climate resilience. They are also at risk of being lost to inappropriate tree-planting, which could be exacerbated by the current approach. It's vital that a strategic approach is taken and that we invest in all habitats to create the rich, connected mosaics that nature needs.

Finally, it is unclear whether it is NatureScot's intention to restore these six landscape-scale projects and, once they are deemed to have reached maturity, to then consider the duty towards landscape-scale restoration fulfilled, or whether new exemplar projects will be introduced when others are considered complete in an ongoing pipeline. Although the intention may be that once a project is considered mature, resourced and delivering, agencies will be able to reduce their input and move on to other projects, further clarity around this commitment and the means by which this pipeline of landscape-scale restoration projects are reviewed and evaluated is needed. Similarly, commitments to long-term resources to support this pipeline must be made if this effort to restore nature at landscape-scale is to be meaningful.

**Question 2: Do you have other suggestions for exemplar projects? If so, where are they and why do you think they are important? What lessons can we learn from them?**

Yes. We urge the inclusion of exemplar projects that:

- Address ecological and geographical gaps in the existing landscape-scale portfolio;



- Involve a wide range of delivery partners, including NGOs, communities, land managers and regional collaborations;
- Demonstrate innovation in governance, finance (e.g. blended or private finance), and community stewardship;
- Provide insights into the practical application of flexible regulatory tools (e.g. Regulation 9D).
- Focus on restoring landscape-scale habitat connectivity between existing high quality habitats.

Examples include:

- Lowland, peri-urban, and intensively farmed landscapes where connectivity, resilience, and community engagement are crucial, yet often underprioritised;
- Upland and marginal agricultural areas where there is scope for significant ecosystem gain but less existing government focus.

These kinds of projects are essential not only for ecological gain but also for learning and replicability, testing models of delivery that go beyond traditional agency-led frameworks.

**Question 3: Do you agree that the Areas of Focus we have identified in annex 2 are the right places for agencies to focus our efforts ? If not, please provide evidence to support changes to the priorities identified.**

Not fully. While many listed areas are high-value, they overrepresent landscapes with existing agency involvement, at the expense of other initiatives, especially those led by NGOs, communities or partnerships with less formal institutional participation.

This risks skewing resource allocation and diminishing the diversity of Scotland's landscape-scale restoration portfolio.

We strongly believe that:

- Prioritisation should be guided by ecological need, opportunity for transformation, and long-term public benefit, not institutional convenience;
- A transparent, criteria-based selection process is essential to avoid reinforcing current power structures or funding inequalities;
- Greater inclusion of less institutionally embedded but ecologically strategic areas, especially in lowland and transitional landscapes, is needed to meet SBS objectives.

**Question 4 What more can be done to accelerate and scale up nature restoration at landscape scale?**



To scale and accelerate effective nature restoration, we recommend:

1. Restore the ambition of Action 2.1: Focus on identifying and enabling new, strategic landscape-scale projects, not just consolidating existing ones.
2. Strengthen agency collaboration, but without sidelining independent actors or reducing diversity in leadership models.
3. Clarify and unlock the use of existing regulatory powers, particularly:
  - We believe there is untapped flexibility within Regulation 9D, though it has rarely been used.
  - For example, we've engaged with CNPA on how perceptions around designations have hindered restoration ambitions.
  - As highlighted in recent Rural Affairs and Islands Committee evidence (28 May), NatureScot staff themselves have acknowledged constraints and lack of clear guidance from the Scottish Government as barriers to using these powers.
4. Support system change by:
  - Establishing transparent, ecologically driven selection criteria for exemplars;
  - Ensuring a diversity of habitats and ecosystems are properly represented across projects;
  - Supporting a pipeline of restoration projects to become investment-ready, with access to blended finance and private capital;
  - Elevating NGO and local partnership efforts, particularly those lacking core funding but showing strong ecological leadership;
  - Ensuring that community engagement is built in from the outset, rather than added later as an obligation.
5. Bridge the gap between rhetoric and delivery:
  - Ministers frequently stress the urgency of nature and climate action. But without sufficient funding and bold new delivery models, this rhetoric risks becoming disconnected from reality.
  - The current approach may unintentionally undermine the SBS's credibility. If we can help in articulating that case more broadly, we would be happy to do so.

We urge NatureScot and the Scottish Government to match their language with action, by investing in bold, inclusive, and scalable nature restoration across all landscapes, sectors and delivery partners. Only then can we ensure that the ambitions of the SBS are met in full, and in time.



**This response is supported by:**

The Froglife Trust

Keep Scotland Beautiful

Scottish Wildlife Trust

Bumblebee Conservation Trust

Badenoch & Strathspey Conservation Group

Cairngorms Campaign

Butterfly Conservation

Action to Protect Rural Scotland

Chartered Institute of Ecology and Environmental Management

RSPB Scotland

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