IMPACT ASSESSMENT – INTEGRATED IMPACT ASSESSMENT

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Comhairle na Gàidhealtachd

ISLAND AND MAINLAND RURAL COMMUNITIES – FULL IMPACT ASSESSMENT

Author Details

Name and Title	Diffley Partnership, external
Email Address	n/a
Service	n/a

Data and Evidence

What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this Policy, Strategy or Service Change?	☐Consultations ☒National or Local Data ☒National or Local Research ☐Customer Complaints ☐Customer Feedback
Are there gaps in the available data that you have?	☒Yes ☐No
If yes, please describe the data gaps that exist.	Diffley Partnership have been commissioned to independently conduct this IIA by The Highland Council (THC). This is based upon published information up to 24 November 2025. We have been instructed not to include the Visitor Levy consultation responses in this IIA. Diffley Partnership has consulted public sources, including: Visitor_Levy_Consultation_Document (1).pdf Visitor_Levy_Consultation_Impact_Assessments.pdf

	TVLPre_Consultation (1).pdf
	Visitor Levy (Scotland) Act 2024
	Visitor Levy Guidance for Local Authorities I VisitScotland.org
	There are data gaps in establishing the movement of people within the Highlands area and their use of paid accommodation within the Highlands area for any purpose.
	Published statistics of tourism in the highlands show the interdependency between Highlands and the rest of Scotland. The main source is publications from the Scottish Visitor Survey 2023.
	scotland-visitor-survey-2023-local-area-fact-sheet-highlands (1).pdf
	scotland-visitor-survey-2023-local-area-fact-sheet-inverness (1).pdf
	Published data is not available in order to examine the data further for regional dependencies (see Scotland Visitor Survey I VisitScotland.org).
	Furthermore, the Great Britain Tourism Survey annual data tables for Great Britain have a base size of 96 for 'North of Scotland' overnight holiday trips and 15 for 'North of Scotland' overnight business trips.
	https://www.visitbritain.org/media/4674/download?attachment
	The International Passenger Survey published reports and data do not contain breakdowns smaller than Scotland level.
	Inbound visits and spend: annual, regional | VisitBritain.org

Stakeholder Engagement or Consultation

This section gives an opportunity to engage with the people likely to be affected by your policy, strategy, or service change. For example, if there is no impact-related data or information available, then you may need to consult to fill in the gaps. You may wish to consider Area Committees, Community Councils, working with subject area experts and contacts from different organisations. The most appropriate stakeholders to engage with or more formally consult, will vary from case to case and you may wish to give more detail around the relevant stakeholders. There may also be information or data from other consultations, customer feedback and monitoring exercises that could be referred to.

Questions	Answers
Have any stakeholders been involved in the development of this Policy, Strategy or Service Change at this stage? *For example - involving stakeholders in the development of the Policy, Strategy or Service Change may include activities such as holding user/staff workshops, undertaking user experience surveys or customer journey mapping or any other input from interested parties (Key stakeholders) such as this*	☒Yes ☐No
Please specify any stakeholders that have been involved in the development of this Policy, Strategy or Service Change.	Diffley Partnership has been commissioned to independently conduct this IIA. We have not been commissioned to conduct stakeholder consultation. THC has conducted stakeholder consultation.
In addition to involving stakeholders, has there been any more formal consultation undertaken on this Policy, Strategy or Service Change to date? *For example - more formal consultation may include Community Councils, Area Committees, Ward Managers, Council Boards or Committees, Executive Leadership Team, Community Planning Partnership, or other partner organisations such as Highlife Highland, Highland & Island Enterprise or UHI.*	☒Yes ☐No
Please specify what you have consulted on, who you have consulted with and/or if any concerns were raised and any outcomes?	Diffley Partnership has been commissioned to independently conduct this IIA. THC has held a public consultation and stakeholder consultation.
Will there need to be any more formal consultation undertaken on this Policy, Strategy or Service in the future?	☐Yes ☐No

How will you carry out your more formal consultation and in what timescales? **Guidance** *You should make it easy for people to give their views and you may wish to give consideration around meetings (including virtual) as well as written consultations, ensuring materials are available in different formats such as large print or Gaelic.* *You may also wish to consider & seek guidance on most appropriate ways to consult Children & Young People. Community Councils and Area Committees could assist in the best approach that would ease participation.* *If undertaking in person consultation, then weather and travel need to be factored into timescales. You may want to consider developing a communication plan for reaching your target audience.*	Diffley Partnership has been commissioned to independently conduct this IIA.

Island and Mainland Rural Communities - Impact

What are the impacts on island and mainland rural communities? *If they related to specific areas, please identify them. List all impacts including mitigations for negative impacts.*	Published statistics of tourism in the highlands show the interdependency between Highlands and the rest of Scotland. The Scottish Visitor Survey 2023 surveyed 1041 overnight visitors to the Highlands, excluding Inverness. These Highland visitors stayed on average 11.2 nights in Scotland, 4.1 of which were in the Highlands. This data does not show what the general pattern of stays are for those average 4.1 days within the Highlands and/ or Inverness. scotland-visitor-survey-2023-local-area-fact-sheet-highlands (1).pdf The Scottish Visitor Survey 2023 surveyed 717 overnight visitors to Inverness. These Inverness visitors stayed on average 10.7 nights in Scotland, of which 2.3 nights were in Inverness. This data does not show what the general pattern of stays are for those average 2.3 days within the Highlands and/ or Inverness.

scotland-visitor-survey-2023-local-area-fact-sheet-inverness (1).pdf

Published data is not available in order to examine the data further for regional dependencies (see Scotland Visitor Survey I VisitScotland.org).

Furthermore, the Great Britain Tourism Survey annual data tables for Great Britain have a base size of 96 for 'North of Scotland' overnight holiday trips and 15 for 'North of Scotland' overnight business trips.

https://www.visitbritain.org/media/4674/download?attachment

The International Passenger Survey published reports and data do not contain breakdowns smaller than Scotland level.

Inbound visits and spend: annual, regional | VisitBritain.org

In Highland Tourism Stats Update presentation April 2025 explains in 2023 from the International Passenger Survey, 'limited analysis available below Local Authority level but top towns data from IPS highlights 30% of trips are allocated to Inverness.'

STEAM Data 2023 provided by THC to Diffley Partnership gives breakdowns for nine sub-regions in the Highlands with some data on supply and demand:

Lochaber has 15724 beds and Nairn 1941. Lochaber has the highest percentage (20.95%) of bed supply and Nairn (2.58%) the lowest. This indicates the capacity of paid accommodation in each of the sub-regions.

Inverness Loch Ness has the largest number of visitors staying in paid accommodation 1.194million with Nairn the lowest 0.122millon.

The supply of accommodation is different in different parts of the highlands, in terms of volume, type and size of business. The visitor patterns in terms of volume of visitors, length of stay and type of accommodation will be different in different parts of the Highlands. However published data limitations make this difficult to dissect and draw conclusions for relative impacts on sub-areas within the Highlands.

Other sources of information on how the policy may impact different parts of the Highlands is available as accounts from tourism businesses sessions and meetings:

In May and June 2019, Council officers convened six round-table meetings with representatives from the tourism industry across Highland as part of a TVL 'Pre-Consultation'. Meetings were arranged in partnership with destination groups and held in Kingussie, Isleornsay, Fort William, Ullapool, Inverness and Wick. THC published findings, including discussions relating to smaller geographies as follows:

'The question of whether levies raised in a specific area should be ring-fenced to be spent in that area elicited strong reactions, confirming the need to consult on this.

In favour of geographical ring-fencing:

The immediate reaction of most groups was that "what is raised locally should be spent locally" is the fairest model. It was also posited that this approach is considerably more palatable to potential Consultation respondents.

Against geographical ring-fencing:

Discussions also repeatedly cited potential limitations of ring-fencing, principally: i. Depending on the scheme design, some regions could be short-changed, raising little income and thus having little to invest ii. The point of visitor payment and the areas of visitor use/impact are often not clearly correlated. For example – a visitor may pay for a tour in Inverness, but almost all infrastructure used and impact occur in other regions. Who would retain any levy? iii. The sub-regions of Highland are intra-dependent and benefit from being part of the whole 'Highland' destination. To isolate rural areas from urban, or north from south, was seen by some to be short-sighted iv. Full geographical ring-fencing could lead to busy places getting busier and others 'losing' more visitors. This would not be good long term for Highland as a destination.

Two sessions advocated the potential for a consistent split of income between local 'pots' and a Highland 'pot'. In this model, a certain percentage would be retained locally, and the rest allocated to a pan-Highland fund. This, it was argued, would enable regional decision-making and response to immediate pressures, whilst developing the wider industry.

Scale of ring-fencing:

Participants, in general were reticent to recommend at the preferred scale any geographical ring-fencing. A need for balance was recognised: between achieving 'local impact' and ensuring any revenue is not split into so much it loses spending power That said, all groups were unanimous that if a scheme was implemented, income could not be centralised further than 'Highland'. Concerns remain that it could become a national tax. It was generally felt this issue of scale would be too complex to consult on accurately and would likely need to be decided by the Council, in line with wider policy.'

TVLPre_Consultation (1).pdf

Another consideration for THC would be whether the policy would disproportionally impact residents of the Highland's more remote areas travelling to larger settlements to access services, for example Highland residents staying in Inverness. It cannot be ascertained whether an additional

	cost would prohibit these types of trips or lead to a drop in volume of overnight stays in a year. Diffley Partnership is not aware of any mitigating actions published by THC at this time.
Will the delivery of the proposal vary between impacted communities? *For example, provision of in-person versus online services or travel costs varying between islands.*	☒Yes ☐No Local level impacts of the policy and whether this will disproportionately negatively impact different parts of the Highlands is a topic of concern. However, there is no published data available to robustly ascertain sub-area impacts of a visitor levy. This concern as to whether the policy will disproportionally impact smaller geographies, connects to discussions about mitigations of the policy, including the relative spend on areas from the revenues raised through the visitor levy. A relevant source on Rural and Regional Disadvantage in the Highlands and Islands, published by Highlands and Islands Enterprise explained about establishing disadvantages connected with rurality. This was published in 2022: 'Rural and regional disadvantage is understood as a structural form of disadvantage with peripherality, and population sparsity associated with constrained economic growth. OECD and EU policy frameworks point to the need to address rural disadvantage by targeting activity on accessibility and connectivity, and the need to build on rural community assets and opportunities. They also suggest the need for different policy approaches for remote rural areas. A strong focus on peripherality and demography, as in the European Peripherality Index and the Nordic Regional Potential Index provide examples of how to target resources to ease rural disadvantage.' 'Rurality is not an uncontested term, so defining rurality in the Scottish context is the first step in considering geographic inequalities. Most of the data available for Scotland is based on the Scottish Government's Urban Rural Classification, which captures population size and accessibility. 18 In the simplest terms, 'rural' is defined as a settlement with fewer than 3,000 residents while urban is any settlement larger than this. Rural areas are split into 'accessible' and 'remote', with accessible rural being those with a less than 30-minute drive time to the nearest settlement with a population of 10,000 or more; and remote rural being those with a greater than 30-minute drive time to the nearest settlement with a population of 10,000 or more. Within the 'urban' category, settlements are categorised into large urban areas, other urban areas, accessible small towns, and remote small towns. While much of the Highlands and Islands is classified as 'remote rural' there are

	accessible rural areas within the region, and some accessible and remote small towns and other urban areas. The urban rural classification offers a means of comparing areas but, even within remote rural areas there is a lot of complexity, with some varied and highly nuanced experiences, meaning that policy impacts in different ways in different places to respond to the reality on the ground.' rural-and-regional-disadvantage-in-the-highlands-and-islands-report.pdf
If yes, provide details of what the different delivery methods will be.	Diffley Partnership have been commissioned to independently conduct this IIA. We are not aware of THC plans for different delivery methods.

Monitor and Review: Please provide details of arrangements to monitor and review the policy, strategy or service change and any associated actions.	Diffley Partnership unaware of this internal matter for THC.

Summary of Conclusions

All Full Impact Assessments should be referenced, and a summary of findings included in any relevant committee report(s), at which the proposed Policy, Strategy or Service Change will be discussed. Based on the information provided in this Full Impact Assessment, please provide a summary of your own conclusions.	Local level impacts of the policy and whether this will disproportionately negatively impact different parts of the Highlands is a topic of concern. However, there is no published data available to robustly ascertain sub-area impacts of a visitor levy. This concern as to whether the policy will disproportionally impact visitor economies and communities in smaller geographies, connects to discussions about mitigations of the policy, and relative spend on areas from the revenues raised through the visitor levy.
Please enter the name & date of the committee(s) at which this	Diffley Partnership unaware of this internal matter for THC.

proposal will potentially be Considered.	
Publication Full Impact Assessments will be published on the Highland Council's Impact Assessment Register	

Islands and Mainland Rural Communities – Impact Assessment Sign Off:

For completion by the Responsible Manager

Please check if you are satisfied that the following elements of the Island Communities Impact Assessment have been considered:	☐Gathering information ☐Consultation and involvement ☐Assessing impact for Island and Mainland Rural Communities ☐Mitigating actions identified (if required) ☐Opportunity to promote Island and Mainland Rural Communities ☐Arrangements to monitor and review ☐Publication arrangements
Are you prepared to sign off the Islands and Mainland Rural Communities Impact Assessment?	☐Yes ☐No
Responsible Manager Name	
Responsible Manager Position	
Responsible Manager Date	
If no, provide details of why and next steps	