

# The Highland Council

<b>Agenda Item</b>	<b>8</b>
<b>Report No</b>	<b>ECI/05/26</b>

**Committee:** Economy and Infrastructure

**Date:** 12 February 2026

**Report Title:** Highland Local Development Plan: Progress Update (Part 2)

**Report By:** Assistant Chief Executive - Place

## **1 Purpose/Executive Summary**

- 1.1 This report summarises the second and final part of the evidence necessary to produce a single Highland Local Development Plan (HLDP) to replace the current four local development plans.
- 1.2 It covers arguably the most important evidence in respect of housing, economic and infrastructure issues and what this means for the future HLDP. Other updates including liaison with Scottish Government agencies are also provided. Approval of the Evidence Report is reserved to Full Council and therefore Committee is invited to discuss and note the further matters outlined.

## **2 Recommendations**

- 2.1 Members are asked to:-
- i. **Note** progress on gathering, analysing, and reporting sufficient evidence to produce the new Highland Local Development Plan (HLDP), including ongoing engagement with the public, Scottish Government and other stakeholders;
  - ii. **Note** the next steps, including requirements for completion of the Evidence Report documentation for approval by Full Council and subsequent submission to Scottish Ministers for independent Gate Check; and
  - iii. **Agree** the content of the remaining chapters of the Evidence Report as summarised in Section 7 of this report.

### 3 Implications

- 3.1 **Resource** – most evidence gathering has been resourced through the relevant Service budget. However, a new Housing Need and Demand Assessment (HNDA) has been procured at additional cost, but this is a Scottish Government prescribed requirement of the Council for both its housing and planning authority functions. Online consultation options have been used to minimise cost. Each planning authority must fund the Gate Check and Examination of each of its LDPs, and these will be unavoidable costs later in the HLDP process. Producing a single LDP for Highland, gathering sufficient evidence to get through the Scottish Government Planning and Environmental Appeals Division (DPEA) Reporter's Gate Check, and minimising the number of objections to the HLDP are ways to minimise the costs of these statutory procedures. Other authorities have confirmed that a typical Gate Check assessment costs between £20,000 and £40,000.
- 3.2 **Legal** – the evidence gathering part of the wider Plan process has been undertaken in line with the relevant primary and secondary legislation and taking account of Scottish Government published guidance therefore minimising the risk of a future legal challenge to the Council's process and decision making.
- 3.3 **Risk** – there are no risks to the Council other than those described in the legal section.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – there are no implications.
- 3.5 **Gaelic** – the future HLDP will contain Gaelic headings and subheadings in accordance with the Council's Gaelic Language Plan.

### 4 Impacts

- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 This is an update report and therefore an impact assessment is not required.

### 5 Background

- 5.1 The HLDP [November 2025 report to committee](#) summarised evidence in respect of most topics but other important matters including those in respect of housing, economic and infrastructure issues were not finalised at that point. This report provides the remaining summaries.

5.2 The November 2025 report highlighted the delay caused to the new LDP process across Scotland by the lack of clarity on what evidence is essential and sufficient for plan making. **Appendix 1** provides an updated latest position on each authority's LDP in respect of overcoming the initial Gate Check stage. Sixty-five percent of authorities have now failed to clear the Gate Check at first attempt. At Scottish Ministers' request, Scottish Government and Planning and Environmental Appeals Division (DPEA) officials convened a Planning Summit in early December 2025 to explore ways of providing more certainty for all parties navigating this new process. A draft Action Plan and Supplementary Advice document has been issued (In January 2026) by Scottish Government which offers many useful clarifications but no formal amendment to existing requirements.

## 6 Further Progress to Date

- 6.1 Ongoing monitoring and data analysis is good practice for any local planning authority. On this subject, since the report to November 2025 committee, the Play Sufficiency Assessment (PSA) has been completed and is now subject to public consultation. This required an assessment whether there is a sufficient level of formal and informal play spaces for children across our communities and what opportunities there may be for improvements, which can be taken forward through formal policies within the HLDP. As well as a number of surveys and audits, the [Highland Play Park Strategy and Action Plan 2023-2033](#) was used to inform some aspects of the PSA.
- 6.2 Also, further analysis of short term let data, and the Highland housing market has been provided to Members during 2025 which reveals that parts of Highland are subject to significant pressure caused in part by higher rates of residential accommodation being used as short term lets. A separate item to this Committee provides proposed next steps for this work.
- 6.3 Two more Local Place Plans (LPPs) at Sleat and Caol have been registered, taking the total so far to 16, all of which can be viewed via the Local Plan Register [directory](#) and [map](#). Their content has been analysed for inclusion in each relevant Evidence Report chapter. We will continue to update each chapter with the content of any newly registered LPP up to the point of approval for submission of the Evidence Report to Scottish Government.
- 6.4 The revised HLDP timeline agreed by Committee in November 2025 has been communicated to local communities preparing LPPs and other interested parties. The formal update to the HLDP process has been announced via the publication of the Development Plan Scheme in January 2026.
- 6.5 The remaining drafts of individual Evidence Report chapters have been shared with Key Agencies, other topic-specific internal and external stakeholders and the DPEA to minimise the prospects of the Report being rejected at Gate Check. Obtaining "sign-off" from all parties or at least accurately recording differences of opinion and evidence gaps and how, when and by whom they will be resolved are key to success. The DPEA have offered constructive feedback but little certainty over Highland's future Gate Check outcome.

## 7 The Remaining Evidence Report Chapters and Implications for Plan Preparation

7.1 The remaining Evidence Report chapters are included as hyperlinks within **Appendix 2** but are summarised in the following paragraphs.

7.2 Chapter 8 **Business, Economy, Tourism and Productive Places** presents evidence in relation to the economy, business and industry, the cultural and creative sectors, the tourism industry and minerals. Headlines for this Chapter are as follows:-

- Engagement with economic development partners, HIE, the Inverness and Cromarty Firth Green Freeport, and major Highland industries through ongoing work to produce the Council's Housing Need and Demand Assessment (HNDA) has estimated the scale of anticipated additional employment as 17-18,000 Full Time Equivalent, direct, additional jobs created by projects in Highland over a 20-year period.
- Good evidence on future jobs-led growth is crucial to justifying and defending a higher housing target and in making a case for Highland infrastructure investment from national agencies.
- There is sufficient evidence to justify a tailored, more positive approach to economic development within the new HLDP relative to that set out in NPF4.
- For example, a better understanding and mapping of social and economic fragility will justify a more positive policy approach in certain parts of Highland.
- Evidence suggests that the diversification of the rural economy away from a traditional local resource extraction economy to encompass nature stewardship, renewables, tourism and supporting hybrid/remote working for those linked to urban centres can be further supported.
- Highland socio-economic fragility also justifies future policy focused on *who* benefits from these new economic opportunities and the importance of embedding community wealth building, community asset transfers and the social values charter.
- Business developer and other user contributions should also be in scope whether impacts relate to the industrial, business or tourism sectors to address pressures on infrastructure.

7.3 Chapter 9 **Housing** has been completed as much as possible pending the completion of the Council's ongoing HNDA which is anticipated in April 2026. Headlines for this Chapter are as follows:-

- A demographic overview of Highland shows how continued net (in-) migration is forecast to counter-balance a worsening natural change (deaths exceeding births).
- The newly released, nationally generated, Household Projections, which are the first projections available since the 2022 census, are positive for Highland. In contrast with previous 2018-based projections which presented a relatively pessimistic view of growth, these new projections anticipate significant growth in Highland's population and households.
- By the programmed adoption date of HLDP in 2029, the revised projections suggest there could be 117,859 households in Highland, which is 3,306 more than was previously projected. By the end of the HLDP lifespan in 2039, there could be 123,136 households in Highland, which is 6,226 (or 5.3%) more than was previously projected. These projections provide a basis for an ambitious approach to land allocation in the HLDP, even before economic and employment-led housing needs are considered.

- Highland-specific challenges in terms of a dispersed, ageing and sparse population justify more positive future HLDP policies.
- A principal housing target, the draft, indicative Local Housing Land Requirement for Highland (iLHLR) is set and how the Council believes it should be estimated. A figure of 17,100 based on the Council's current Local Housing Strategy is specified until the full HNDA results are known.
- Following an assessment of the current and likely future housing land supply to meet this target and how deliverable it is, a medium-term shortfall will occur unless supporting infrastructure investment is implemented notably strategic road investment in Inverness City.
- Highland-specific challenges to affordable housing provision justify more positive future HLDP policies on this topic.
- National planning policy and better local data will likely justify a more positive tailored approach to fragile rural communities across Highland.
- We also need to plan for different kinds of housing because more newly forming households are expected to be comprised of smaller sized families, older age groups and individuals living alone with accessibility requirements.

7.4 Chapter 11 **Infrastructure** has a crucial crossover with the preceding economy and housing chapters and the projections within them. Headlines for this Chapter are as follows:-

- We have differing confidence in the quantity and quality of evidence on the capacity of existing and programmed future education, waste, primary health care, social care, other community, water, sewerage and transport facilities/networks.
- The future capital programmes of public and private infrastructure agencies are fluid and offer only limited certainty for planning 10 years ahead as the new HLDP must do.
- The quantity and quality of evidence is important if we want to seek developer contributions for new facilities such as GP practice accommodation and recycling centres.
- We do not have certainty that the capacity in all infrastructure networks will be sufficient relative to the level of growth sought within the HLDP (principally using the iLHLR referenced above).
- We therefore need to plan for the best available spatial and temporal fit between existing infrastructure capacity and the locations of new growth identified within the new HLDP.
- Where additional infrastructure investment is required then the new HLDP should be used to lobby for it and seek proportionate developer contributions towards its cost.

## 8 Next Steps

- 8.1 The immediate next step is to complete all of the HLDP Evidence Report documentation and report it to Full Council for approval before submission to Scottish Government for Reporter Gate Check. Committee Members will be kept up to date through this process via email and via the relevant [webpage](#)

Designation: Assistant Chief Executive - Place

Date: 12 January 2026

Authors: Tim Stott, Development Plans Manager  
Meadhbh Maguire, Principal Planner  
David Cowie, Principal Planner

Background Papers: Hyperlinked within report

Appendices: Appendix 1 - Local Development Plan Evidence Report  
Progress Across Scotland  
Appendix 2 - Remaining Evidence Report Chapters

## Local Development Plan Evidence Report Progress Across Scotland

Table 2 below sets out how many of Scotland's 34 local planning authorities have progressed to Gate Check stage and how many of these have passed that initial stage. So far, of the 34 only 8 have been cleared to proceed with Plan preparation. 11 Evidence Reports were rejected at first submission stage.

**Table 2: Evidence Report Progress Across Scotland**

Local Authority	Date of submission /resubmission – with links to Evidence Reports		Outcome with links to Reporters Recommendations
Fife	13 May 2024	<a href="#">First Submission</a>	<a href="#">Returned</a>
	30 June 2025	<a href="#">Second Submission</a>	<a href="#">Returned</a>
Moray	30 May 2024	<a href="#">First Submission</a>	<a href="#">Notice to Proceed</a>
Glasgow	27 Jun 2024	<a href="#">First Submission</a>	<a href="#">Returned</a>
	25 Feb 2025	<a href="#">Second Submission</a>	<a href="#">Notice to Proceed</a>
Midlothian	28 June 2024	<a href="#">First Submission</a>	<a href="#">Notice to Proceed</a>
East Renfrewshire	19 Sept 2024	<a href="#">First Submission</a>	<a href="#">Notice to Proceed</a>
Falkirk	25 Oct 2024	<a href="#">First Submission</a>	<a href="#">Notice to Proceed</a>
East Lothian	07 Jan 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
	06 Oct 2025	<a href="#">Second Submission</a>	<b>Pending Decision</b>
Dumfries and Galloway	29 Jan 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
	05 Sept 2025	<a href="#">Second Submission</a>	<a href="#">Notice to Proceed</a>
Perth and Kinross	02 Apr 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
Stirling	28 Mar 2025	<a href="#">First Submission</a>	<a href="#">Notice to Proceed</a>
Inverclyde	15 Apr 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
Aberdeenshire	07 Jul 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
Orkney Islands	21 Jul 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
Aberdeen City	31 Jul 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
East Dunbartonshire	18 Aug 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
West Lothian	30 Jul 2025	<a href="#">First Submission</a>	<a href="#">Returned</a>
Renfrewshire	30 Oct 2025	<a href="#">First Submission</a>	<a href="#">Notice to Proceed</a>
Loch Lomond and the Trossachs National Park	18 Dec 2025	<a href="#">First Submission</a>	
<b>Overall Outcome</b>	<b>35% Pass Gate Check at First Submission 50% Pass Gate Check at Second Submission</b>		

Reporters' most common reasons for rejecting or "returning" local planning authority Evidence Reports vary but include insufficient:-

- evidence of engagement/consensus reached between the authority, Key Agencies, and the development industry on the evidence;
- transparency over the methodology used to derive the principal housing target;
- explanation of the implications of the housing target for infrastructure provision,
- evidence on infrastructure capacity, particularly health and social care, and lack of Key Agency agreement on what this means for the plan;
- evidence on each NPF4 policy topic; e.g., community wealth building, blue and green infrastructure, and culture and creativity; and
- evaluation of whether the previous plan has delivered on its outcomes, spatial strategy, delivery, and any lessons learned for the new plan.

**Draft Evidence Report Chapters**

[Highland Local Development Plan | HLDP Evidence Report Chapter 8 - Economy Business Tourism and Productive Places - Draft](#)

[Highland Local Development Plan | HLDP Evidence Report Chapter 9 - Housing - Draft](#)

[Highland Local Development Plan | HLDP Evidence Report Chapter 11 - Infrastructure - Draft](#)