

# The Highland Council

<b>Agenda Item</b>	<b>9</b>
<b>Report No</b>	<b>ECI/06/26</b>

**Committee:** Economy and Infrastructure

**Date:** 12 February 2026

**Report Title:** The Flow Country World Heritage Site – Progress Report

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

## **1 Purpose/Executive Summary**

- 1.1 The Highland Council and NatureScot are accountable bodies for The Flow Country World Heritage Site (WHS), which was inscribed by UNESCO in July 2024. This report provides an update on progress made on the Site's governance, management and planning matters since inscription. It also proposes a timeline for future works, including the updating of the Management Plan, preparation of a Sustainable Tourism Strategy, submission of funding bids and presentation of Committee papers for approval.
- 1.2 At the Economy and Infrastructure Committee meeting on 29 May 2025, Members noted updated versions of the Planning Position Statement and associated tailored Heritage Impact Assessment Toolkit for the Site and agreed that an Article 4 Direction be prepared covering Permitted Development. The Planning Permission Statement and associated Heritage Impact Assessment Toolkit were published in June 2025. The Article 4 Direction is currently in preparation and will be brought to Committee for approval at its next meeting (May 2026).
- 1.3 Officers are updating and finalising the WHS Management Plan, as well as inputting to the preparation of further planning guidance on the WHS's setting. The intention is that the Management Plan and related setting guidance will be brought to the August 2026 Economy and Infrastructure (E&I) Committee meeting for approval as material planning considerations in the assessment of future development proposals that might impact on the Site.

## **2 Recommendations**

- 2.1 Members are asked to:-
- i. **Note** progress made and future proposals in relation to The Flow Country World Heritage Site; and
  - ii. **Agree** the proposed timeline for future reports in relation to planning and development within and close to the Site.

### **3 Implications**

- 3.1 **Resource** – There will be officer time involved in updating the WHS Management Plan and associated planning guidance, producing a Sustainable Tourism Strategy, and compiling funding bids. Additional funding has been secured from NatureScot, and the additional works can be accommodated within the expanded resource. Input from the Council’s Legal Team will be required on the planning-related work.
- 3.2 **Legal** – There is a statutory process to be followed to advance the Article 4 Direction. The WHS Management Plan and setting guidance will, once finalised, be promoted for use, including as material considerations in determining planning applications, noting that it is for the decision maker to identify which considerations are material in any particular case. In due course however, the Council can consider content for its Proposed Highland Local Development Plan that can assist this, and there is statutory process for preparing the Local Development Plan.
- 3.3 **Risk** – Failure to protect the WHS from inappropriate development which impacts on the Site’s Outstanding Universal Value could result in de-inscription and the loss of UNESCO World Heritage status.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – No implications.
- 3.5 **Gaelic** – No implications.

### **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 WHS Governance and Management**

- 5.1 The Flow Country was inscribed as a World Heritage Site by UNESCO on 26 July 2024, in recognition of the Outstanding Universal Value (OUV) of its blanket bog ecosystem. It is the World’s first and only peatland WHS and as such, plays a critical role in the advancement of the understanding and appreciation of peatland habitats, for nature and people.
- 5.2 The site is managed by the Flow Country Partnership, which was registered as a Scottish Charitable Incorporated Organisation in 2024, and its recently expanded non-executive WHS Steering Group. Highland Council and NatureScot are the official ‘accountable bodies’ who were responsible for the site’s nomination. Following inscription, the Council holds the project resources and continues to act as a responsible and accountable body (alongside NatureScot), particularly for planning matters within the area.

- 5.3 The Steering Group has over 30 members, including stakeholders from public, private and third sector organisations and expertise relevant to the Site's OUV. It meets quarterly under the chair-ship of Flow Country Partnership Trustee Frances Gunn. Members work together to develop and agree strategy and policies, and to influence decision-making in respect of the WHS. Highland Council is represented on the Steering Group by local Members Cllr Marianne Hutchinson, Cllr Jan McEwan and Cllr Raymond Bremner, who is also a Flow Country Partnership Trustee.
- 5.4 The Group's collective vision for the Site, as set out in the recently updated Governance Handbook and the WHS Management Plan, is:-
- “Our vision is that World Heritage Status for the Flow Country will ensure that its world- class blanket bog, associated biodiversity and carbon storage ability is protected and enhanced, that it is an unparalleled and accessible natural resource for education and well- being, and that the status is beneficial both for our vibrant communities and our visitors.”*
- 5.5 The Council appointed two new staff in Summer 2025, with funding from Highland Council, NatureScot, RSPB and the University of the Highlands & Islands: the WHS Co-ordinator and the Flow Country Partnership Manager. They are responsible for the Site's governance and management including supporting the Steering Group and Working Groups, managing the budget, and co-ordinating action to deliver and report on the Management Plan. They join a team of four Flow Country Partnership staff currently employed by North Highland Initiative and RSPB, who are delivering peatland restoration through the Partnership's Green Finance Initiative, in addition to general promotion, communication and project-related activities.
- 5.6 Future work will be guided by the WHS Management Plan, which was drafted prior to inscription and is currently being updated. An associated Strategic Environmental Assessment (SEA) is in progress to inform the content of the Management Plan ahead of its finalisation, having regard to the aims of the WHS and wider environmental considerations. A Habitats Regulations Appraisal (HRA) screening will also be undertaken, followed, if necessary, by an HRA assessment and preparation of an HRA record.
- 5.7 The Flow Country Partnership intends to submit Expressions of Interest to two large funding sources early in 2026: the Endangered Landscapes and Seascapes Fund and the National Lottery Heritage Fund. If there is sufficient interest, applications for planning grants will be submitted in June 2026, with the potential to apply for larger packages of funding to deliver World Heritage Site actions from 2028 onwards.
- 5.8 The WHS budget supports the employment of the two staff, and it has been augmented in 2025/2026 by a contribution from NatureScot to provide additional consultancy support for a number of discrete projects. This will support further planning guidance on the Site's setting (see below), enable the production of a Sustainable Tourism Strategy and help develop a suite of projects for inclusion in funding applications. This work, and its budget, is managed by the WHS Management Group, which meets fortnightly and comprises representatives from Highland Council, NatureScot and the Flow Country Partnership.

- 5.9 The partners recognise the potential that the WHS's unique natural and cultural heritage offers in terms of sustainable tourism that balances environmental protection, local benefits and climate reliance, and they identified this as an early priority for further work. A two-day Tourism Gathering was held with representatives from local tourist businesses in Wick and Armadale in November 2025. The events were well attended, views were sought on the challenges and opportunities brought by the WHS, and a Tourism Working Group has been set up to take forward the findings and guide the production of a Sustainable Tourism Strategy. The Gathering was funded by the Ward Budgets and the Nuclear Restoration Services Dounreay Socio-Economic Fund, and a second event is planned for March 2026 to present and discuss the draft Strategy, ensuring it reflects local voices and circumstances.

## 6 WHS Planning & Development

- 6.1 In June 2025, following a report to the May meeting of this Committee, an updated [Flow Country World Heritage Site Planning Position Statement and associated Heritage Impact Assessment Toolkit](#) was published. It reflects the Site's inscription as a WHS and incorporated a number of other updates. It sets out the Council's position on how World Heritage should be factored into the consideration of proposed developments for which effects on the inscribed site are likely to be a consideration. We may further update it from time to time.
- 6.2 One of the matters that was added to the Planning Position Statement in May 2025 was reference to the agreed practice whereby the Council would consult NatureScot on all planning applications and developments that may affect The Flow Country WHS's Outstanding Universal Value, that NatureScot would strongly encourage early consultation on any developments that could adversely affect the OUV of the Site and that if NatureScot lodges an objection to development proposals on the grounds of impacts on the OUV of the Site, the Council would notify Scottish Ministers. On 25 September 2025, Scottish Government issued a [Chief Planner letter and The Town and Country Planning \(Natural Criteria World Heritage Sites\) \(Scotland\) Consultation and Notification Direction 2025](#) which, in essence, formalises that previously agreed practice. We will update our Planning Position Statement in due course to specifically reference the letter and notification direction.
- 6.3 In line with the Committee decision in May, an Article 4 Direction is currently being prepared by the Council under [The Town and Country Planning \(General Permitted Development\) \(Scotland\) Order 1992, as amended](#). If brought into effect, it will remove certain (not all) permitted development rights within the World Heritage Site, whereby a planning application would be required for such development proposals. We are working to bring a draft of the Article 4 Direction to Committee for approval at its next meeting.
- 6.4 Officers are updating the WHS Management Plan, as well as inputting to the preparation of guidance on the consideration of effects on the WHS's setting. On the matter of 'setting,' it is important to consider this from a UNESCO World Heritage perspective, as being a consideration for all types of site, including natural, rather than being limited to cultural. The definition of setting should be considered in terms of both the functional component and the experiential component. The setting study and related guidance will define setting for the purposes of The Flow Country WHS specifically. It is important to note that this will be influenced by the criterion for which the particular WHS is inscribed, not by those for which it is not inscribed.

6.5 The intention is that the Management Plan and the Setting study/guidance will be used as material considerations in planning decisions. We intend also in due course to prepare and include planning policy and guidance for the WHS in the forthcoming Proposed Highland Local Development Plan, to be used alongside the policies of NPF4, and Committee noted progress with the drafting of the Evidence Report at its meeting in November 2025, with a further progress report on that being on the agenda for this February 2026 meeting of Committee.

## **7 Next Steps**

7.1 The next steps are as follows:-

- finalise Article 4 Direction in relation to permitted development rights (for consideration and approval at May 2026 E&I Committee);
- update and finalise the WHS Management Plan, accompanying SEA and related guidance including the work on the Site's setting (for consideration and approval at August 2026 E&I Committee);
- prepare a WHS Sustainable Tourism Strategy (consultation planned for March, Strategy to be finalised and launched at Steering Group meeting in June 2026); and
- develop a suite of projects for inclusion in funding applications (work planned for early 2026, bids to be submitted in June).

Designation: Assistant Chief Executive - Place

Date: 22 December 2025

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Background Papers: Hyperlinked within report

Appendices: None