



National Planning Improvement

NATIONAL PLANNING IMPROVEMENT FRAMEWORK

# Improvement Action Progress Update 2025 Highland Council



# Highland NPIF Annual Report (Year Two - 2025)

## Foreword

The Highland Council is pleased to present its Year 2 Survey Report under the National Planning Improvement Framework. During 2024/25, the Planning and Environment Service made significant progress in strengthening workforce capacity, enhancing digital tools, and embedding continuous improvement across operations.

Key milestones included the launch of the interactive Energy Projects Map, the appointment of additional officers, delivering the first phase of the workforce plan and the implementation of an annual staff survey within the service to support wellbeing and development.

Challenges remain in balancing resource demands with service delivery expectations, particularly in areas of digital transformation and stakeholder engagement. Looking ahead, the Council remains committed to delivering a robust planning service that supports sustainable development, effective governance, and meaningful customer involvement.

The recorded improvement actions were scheduled alongside several competing priorities within the service, for example, work around the introduction of Short Term Let Control Areas, Planning Circular 3/2025 on planning fees for local reviews and appeals (effective 9 June 2025) and the Town and Country Planning (Notification of Applications) (10 or more homes on non-allocated land) (Scotland) Direction 2025, which came into force in September 2025.

## Introduction

The National Planning Improvement Framework (NPIF) was piloted incrementally in three separate cohorts throughout the 2024/25 financial year. This was to test a new approach to measuring the performance of planning authorities. The pilot aimed to test the new framework, to explore what works and what doesn't. This resulted in each planning authority producing an improvement action plan and performance assessment.

Each improvement action plan sets out:

- What the planning authority has agreed as its priority activities
- Whether these have short-, medium- or long-term timescales
- The owner of the actions
- The resources needed

[Link to action plan for 2023/24.](#)

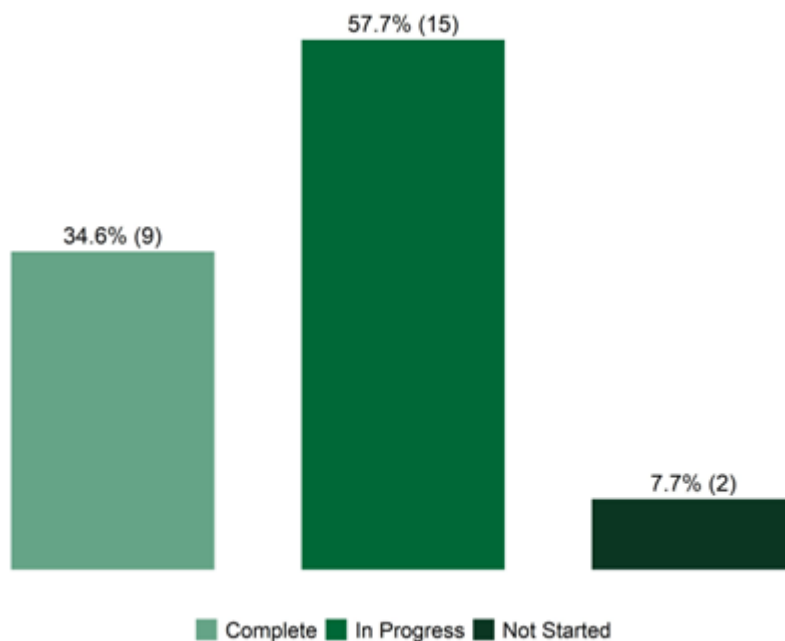


In year two of the NPIF the planning authorities are to update on their progress with the improvement actions. This report sets out the progress The Highland Council has made, detailing any updates to actions, any further actions and plans for further collaboration with peer partners.

## Planning Improvement Actions Progress Update

This section details each of the improvement actions and the progress the planning authority has made.

**Highland has 26 improvement actions. The status of the actions is shown below:**



### Action 1: Continue to build and monitor staff levels.

#### In Progress

Progress against this action: When we carried out the staff survey in December 2024, more than half of the people who responded raised concerns about staffing levels. Some said that although staff numbers had gone up, there were still pressure points in the service that made it hard to meet targets. They also felt that because there weren't enough experienced staff, extra time had to be spent training and supervising newer team members. Staff also said that not having enough people in the teams they needed to consult with caused delays in getting responses.

Changes in staffing over the last several years have reflected the supply of planning staff and the wider market demand. By 2023/24 we had recruited and achieved a staffing compliment equivalent to pre-Covid levels. In the 2024/25 period, we recruited an additional 2 Principal



Planners and 2 Professional Support Officers (PSO) to build capacity in our Strategic Projects Team. These PSO posts were backfilled. One PSO and one Enforcement Officer were successful in achieving RTPI accreditation through the experienced practitioner route that enabled them to take up Planning Officer roles with their previous roles backfilled. We have also recruited an additional Planning Enforcement Officer in this time. In our Development Plans Team, we recruited an additional two Planning Officers.

The following next steps are proposed: We anticipate this action will remain active, as this is an area of work that will require constant monitoring.

## **Action 2: Seek appropriate opportunities to upskill existing staff.**

### **In Progress**

Progress against this action: We have established the key competencies for Graduate Planners to progress towards achieving RTPI, including job re-evaluation to provide commensurate pay grading that will match the expected level of responsibility and experience.

We have developed a system for evaluating the progress of each Graduate Planner post against the competencies in order that this can be applied consistently and equitably. This aspect of workforce planning continues with a similar exercise being undertaken for Professional Support Officers (PSO), that will build in a potential career pathway to Chartered Planner as well as recognising the different levels of technical and professional support offered by this post.

Within the Environment and Active Travel Team, a new team structure is actively being pursued to ensure that the team is appropriately supported. We continue to support the upskilling of staff, actively supporting four PSOs through an RTPI accredited degree qualification. We have supported two members of staff through the experienced practitioner route to achieve RTPI Membership.

The following next steps are proposed: Once the work to develop the PSO post competencies and career progression is well underway, it is the intention to undertake a similar exercise for the Enforcement Team. We will also look at the potential to develop a Modern Apprentice route into the planning profession, at both PSO entry level or directly into Graduate Planner, particularly now that University of West Scotland offers an opportunity to do so.

## **Action 3: Conduct an annual staff survey so staff can share their work experiences.**

### **Complete**

What was the outcome of completing this action?



In December 2024, we carried out a staff survey within the Planning and Environment Service to gather insights into staff experiences, development and wellbeing. The survey included both structured questions and a 'Tell us more' option to encourage detailed feedback. Key findings:

- 92% of respondents felt their health and wellbeing were supported.
- 88% had engaged in personal development or upskilling.
- 73% regularly participated in peer review and shared good practice.
- 65% highlighted staff resourcing as a key concern.

Staff generally felt well supported by their team leaders and managers. Management reviewed suggestions and implemented several improvements at both team and service levels.

## **Action 4: Implement wider corporate workforce planning strategy to create a service specific workforce plan. This plan will identify key competencies and training requirements consider remuneration, career progression and skills development.**

### **In Progress**

Progress against this action: This attribute crosses over with Attribute 1. We have made progress in developing a service-specific workforce plan that aligns with the corporate workforce planning strategy. This plan is designed to identify key competencies, training needs, and career progression pathways within our service area. This initiative strengthens our service by developing our current team members and providing clear pathways for career advancement and offering opportunities to other support staff to skill up.

The following next steps are proposed: Continue to develop our service specific workforce plan. Develop a 'Professional Competency Framework' and training program for all roles, taking advantage of the current Planning Skills Programme delivered by IS, the National Skills Commitment Plan coordinated by Scottish Government as well as any internally derived training material (Action 5). This can inform and be informed by annual staff performance reviews and other feedback.

## **Action 5: Develop training programs in a digital format to support both new and existing staff.**

### **In Progress**

Progress against this action: This action is ongoing. We have taken advantage of, indeed have contributed to, the development of the National Skills Commitment Plan training program developed by the Scottish Government. This programme has superseded some of the



planned activity. We have introduced training videos for officers and managers on Idox Insights. We make use of the corporate digital training platform 'Traineasy' for mandatory and other corporate training needs. The corporate initiative 'Digital Week' running from 22-26 September 2025 was available to all staff and enabled them to learn more about how to enhance their digital skills. As part of Digital Week, staff were encouraged to take part in the Digital Maturity Assessment Survey set by Scottish Government.

The following next steps are proposed:

We have begun to collate training/skills gaps that will help develop a training programme for staff. This will draw from existing training material provided by the Improvement Service, Scottish Government and other relevant sources. Any new training delivered through the Council will be in a digital format. The aim will be to retain this in one location thereby creating a catalogue of training that staff can benefit from.

In response, the following changes to the action are proposed: We will create a catalogue in a SharePoint site of planning specific training using resources drawn from existing training material provided by the Improvement Service, Scottish Government and other relevant sources and regularly update and add to this as additional training is developed.

## **Action 6: Submission of awards and performance accreditation will be prioritised.**

### **In Progress**

Progress against this action: We entered several submissions to the RTPI Scotland Awards for Planning Excellence. In June 2025 we were pleased to be announced the winner of the RTPI Scotland Awards for Planning Excellence in the Best Plan Category for their planning position statement for the Flow Country World Heritage Site - RTPI | Best Plan 2025. In July 2024, UNESCO inscribed The Flow Country as a World Heritage Site, marking the site as globally significant, as important as the Great Barrier Reef or the Serengeti and worthy of protection and restoration. The planning position statement sets out the council's position with regards to proposed developments within the site. The need for this guidance stems from the lack of precedent, with no site in Scotland previously nominated for wholly natural World Heritage criteria, nor one in a location where there is significant development pressure, specifically from onshore wind energy and electricity.

The following next steps are proposed: Being a finalist for the Excellence in Plan Making Practice category at the RTPI National Awards on 27 November 2025 has provided the impetus to continue to celebrate the success this year and nominate other projects in the future.



## **Action 7: Seek to amend the Scheme of Delegation to allow for officers to Raise an Objection to Electricity Act applications.**

### **Complete**

What was the outcome of completing this action?

A report proposing amendments to the Scheme of Delegation was presented to the full Council on 27 March 2025 and subsequently approved. These changes relate specifically to the delegation of responses to Section 36 and Section 37 energy consent applications under the Electricity Act 1989, which are determined by Scottish Ministers. The revised Scheme introduces two key updates: 1. Consultation Response Delegation Officers may respond to Section 36 or 37 consultations following discussion with the Chair and Vice Chair of the relevant Planning Applications Committee, where time constraints prevent reporting to Committee before statutory deadlines (typically 2 or 4 months, or any agreed extension). 2. Further Environmental Information (FEI) Delegation Officers may respond to FEI consultations, in consultation with the Chair and Vice Chair of the appropriate Planning Applications Committee, without further Committee consideration—provided the FEI does not:

- materially increase the scale of the proposed development;
- introduce new significant adverse environmental effects;
- undermine or remove previously agreed mitigation measures.

These amendments aim to streamline decision-making processes while maintaining appropriate oversight and accountability.

## **Action 8: Consider opportunities for increasing productivity and proportionality by continuously reviewing the Scheme of Delegation.**

### **In Progress**

Progress against this action: In addition to reviewing the scheme of delegation for consultation responses and FEI for energy consents we have amended the scheme of delegation for Short Term Lets in October 2025. Masterplan Consent Areas as well as other minor changes that can improve the speed of decision making, particularly around housing, will be considered in December 2025.

The following next steps are proposed: Masterplan Consent Areas will be considered in December 2025.



## Action 9: Appoint Chief Planning Officer.

### In Progress

Progress against this action: An interim appointment was made in December 2024. The Place Service is currently reviewing its structure, the outcome of which will determine the final arrangements.

The following next steps are proposed: Await outcome of structure review.

## Action 10: A live Delivery Programme for Highland (excluding CNPA area). THC officers to update capital project costs and timescales and use projected developer contributions income stream in their infrastructure planning.

### Complete

What was the outcome of completing this action?

The Highland Council has transitioned from producing separate Delivery Programmes for three local development plans every two years to a single, unified Highland-wide Delivery Programme, which was introduced in June 2025. This change aims to improve coordination between developer contributions and funding sources. The new programme is updated more frequently to reflect:

- Changes in capital programmes: Modifications to national and local capital investment plans.
- New information: Includes community facility plans, school roll forecasts affecting education needs, and revised infrastructure costs. The consolidated Delivery Programme is structured into three color-coded sections aligned with the existing area plans: Inner Moray Firth, Caithness and Sutherland, and West Highland and Islands. It is also aligned with the latest Housing Land Audit and considers school roll forecasts. The programme identifies infrastructure requirements, helps determine developer contribution requirements, and coordinates investment.

This work has coincided with amended governance around how developer contributions are monitored and spent within the Council. A Developer Contributions Board, chaired by the Chief Planning Officer, and comprised of senior officers of the Council's spending services, has been established. This sits as a Sub-Board of the Council's Capital Programme Board. The Developer Contributions Working Group supports the Developer Contributions Board and ensures that spending services are drawing down contributions for projects timeously and thereby reducing the build-up of unclaimed contributions. This is already having a significant positive impact. Moving forward, the positioning of the Developer Contributions Board should ensure greater alignment with the Capital Programme and Development Plan land allocations.



## **Action 11: Engage with agents to improve application quality, review online guidance to reduce invalid submissions. Explore third party automation.**

### **In Progress**

Progress against this action: The Service has committed to industry through the Highland Housing Challenge Forum and Housing Hub, to hold a seminar and produce training material that will assist developers in providing all the necessary information to create a quality valid application. We are actively engaging, through a HoPS Digital Planning Working Group, with the Scottish Government's Digital Development Programme, particularly to ensure that validation and data capture is improved through the proposed 'apply' project. We have rolled out the use of Idox Insights to aid case and performance management.

We have identified 3 key process areas that could benefit from the potential development of AI;

- AI driven report writing to reduce officer time spent on documentation;
- An AI email extraction agent to process correspondence and free up staff for more, higher value work, and
- AI inputting of emailed applications or online forms into Uniform.

We are in the process of agreeing to the implementation of an AI work programme, with a third party provider, to look at developing AI agents.

The following next steps are proposed: Continue to progress development of AI agents with third party provider. Continue to engage with Scottish Government's Digital Development Programme. Arrange seminar and/or training material such as a short online video that explains what information we need from an applicant to validate their application.

## **Action 12: Engage with Heads of Planning Scotland and Scottish Government to establish a single validation standard across Scotland.**

### **In Progress**

Progress against this action: We are actively engaging, through a HoPS Digital Planning Working Group, with the Scottish Government's Digital Development Programme, particularly to ensure that validation and data capture is improved through the proposed 'apply' project.

The following next steps are proposed: Continue engagement.



## Action 13: Real Time Mapping of Major Electricity Development applications.

### Complete

What was the outcome of completing this action?

In April 2025, The Highland Council launched an interactive Energy Projects Map on its website to improve public access to information on major energy-related developments across Highland.

Updated weekly with data from the Development Management case recording system, the interactive mapping tool allows users to:

- see what projects already exist on the ground
- track the stage of any project within the planning process
- access the planning case file for further details via direct links

The mapping tool brings together a wide range of energy-related applications, including pump storage, wind, energy storage, transmission grid infrastructure and corridors, substations, converters, hydro schemes, and other relevant projects. It visualises planning submissions such as scoping/screening requests, pre-applications, full applications, and Section 36/37 Electricity Act proposals. Users can filter and explore project types individually or in combination.

A dedicated team supports ongoing development and maintenance of the map.

While the map is now live, the Council continues to explore ways to automate data extraction from its back-office system to reduce manual effort.

## Action 14: Encourage Idox to introduce Biodiversity Net Gain (BNG) tabs to Uniform throughout Scotland.

### In progress

Progress against this action: We are currently exploring the integration of Biodiversity Net Gain (BNG) with Exacom. To support this, discussions with Idox are required to enable the introduction of BNG-specific tabs within its Uniform back-office system. Once in place, Exacom will use this data to generate relevant visualisations and report outputs.

The following next steps are proposed: We will soon begin the process of renegotiating our contract with Idox and there is a real opportunity for this functionality to form part of a revised package. The introduction of this functionality could also assist other LPAs in adopting a similar approach. Assuming an agreement can be reached then we will progress this action with Exacom. If that is not possible, we may have to consider this action as not feasible.



## **Action 15: Update our Enforcement Charter.**

### **Complete**

What was the outcome of completing this action?

The council reviewed the Planning Enforcement Charter 2025 with a report presented to the Economy and Infrastructure Committee on 29 May 2025. No changes were proposed to the Charter's content, as its key principles remain relevant and unaffected by any legislative or policy updates from the Scottish Government. The core performance target - to provide an update to complainants within six weeks - will be retained. This timeframe has proven realistic for progressing most investigations to a stage where meaningful updates can be provided. Written correspondence is issued alongside any email updates to ensure a clear audit trail.

## **Action 16: Recruit additional resource for enforcement.**

### **Complete**

What was the outcome of completing this action?

The structure of the Planning Enforcement Team has been strengthened through a doubling of full-time Planning Enforcement Officers. The team now comprises four full-time Planning Enforcement Officers. They are supported by three part-time Access Officers, who assist with information gathering and investigating potential breaches of planning control. While the core team sits within Inverness, the team as a whole is designed to operate geographically over three operational areas, North, South and West, to respond effectively to enforcement issues arising across all of Highland. We will look to continue to monitor pressures and ensure sufficient staffing levels are maintained. We will look for opportunities to develop further capacity in the team to undertake all licensing consultation duties and explore the opportunity for more proactive monitoring and enforcement, particularly within Inverness City Centre as part of a wider City Strategy - Area Place Plan activity.

## **Action 17: Streamline the validation of enforcement cases, to either automate or reduce the manual recording required by officers.**

### **In Progress**

Progress against this action: We have established a focus group to progress this action. As it was not identified as a priority action, progress on this has not been at pace. However, as we are now within the penultimate reporting period for this Improvement Action Plan this will be picked up.

The following next steps are proposed: The focus group will report its findings by end of Jan 2026 and develop a plan for implementation of an amended process by the end of the 25/26 reporting period.



## **Action 18: Publish planning decision making statistics on our webpages.**

### **Complete**

What was the outcome of completing this action?

We've published statistics on planning decision-making, which were created using data analytics tools. These figures offer insights into how planning decisions are being made and how the service is performing. These planning application statistics cover:

- types of application received
- the average time taken to determine applications
- number of applications approved
- enforcement activity

The statistics have been published alongside the NPIF (National Planning Improvement Framework) performance assessment and action plan and are available on our Planning Performance pages. Together, these resources help provide a fuller picture of current performance and future improvement priorities. We will explore ways to present this information in a more informative way.

## **Action 19: Improve Planning and Environment webpages as part of redesign and launch of a new website.**

### **In Progress**

Progress against this action:

The Council is replacing its current website with a single, streamlined online platform designed to make it easier for citizens and customers to find information and access services online. This initiative aims to provide a modern, user-friendly experience that supports self-service wherever possible and improve customer care.

The new website is being developed with customer needs at its core. Improvements will include clearer navigation, enhanced search functionality, accurate and up-to-date content, and information presented in plain language. The most frequently visited pages will be written in a way that's easy to understand, and the entire site will meet accessibility standards to ensure it is usable by everyone.

A dedicated resource has been allocated to support the transformation of Planning and Environment webpages as part of this project.

The new website is scheduled to launch in February 2026. The following next steps are proposed: Once live, the webpages will be reviewed and updated as necessary.



## **Action 20: Review My Council project, if any gaps identified, address them by our own Development Management Customer Charter.**

### **Not Started**

Reason(s) action has not been progressed: This action has relied upon implementation of Corporate change that, while making progress, has yet to consider the customer service expectations of the Planning Service, other than the website redesign.

The following next steps are proposed: We will carry out a review after the new website launches in February 2026 to identify any gaps. However, we will be developing a Service Standard for Planning, Development Management in particular, that will set out clear expectations of developers and the public in their interactions with the Council, all to improve customer care.

## **Action 21: Deliver the Integrated Housing Delivery Service.**

### **Complete**

What was the outcome of completing this action?

Highland Council declared a Housing Challenge following an event in November 2023 and agreed a number of strategic objectives in June 2024, with the aim of finding solutions to a Highland Housing Challenge.

At the Housing Summit, convened in October 2024, we agreed a number of initiatives to address this, ensuring that the Council is doing what it can to assist with building the projected 24,000 houses that will be required over the next 10 years.

The Integrated Housing Delivery Service was launched in March 2025. This new approach allows applicants, with a development of 10 houses or more, to participate in a roundtable discussion with senior planning staff and consultees to address any challenges or delays that might be experienced. Since launch eight applicants have requested meetings. Three have now received positive decisions.

## **Action 22: Engagement strategy with development industry.**

### **In Progress**

Progress against this action: There has been a high level of engagement with the housing industry, particularly on the lead in to and following the Call for Sites exercise undertaken in March 2025. In all 250 sites came forward that could help the Council to plan for the expected 24,000 homes that will be required within the area to support economic development and address the Highland Housing Challenge.

More recent engagement includes working with Homes for Scotland on how the Council and industry could collaborate to produce guidance that would assist with resolving roads and street design conflicts at planning and RCC stage. The Integrated Housing Development



Service and Pre-application Advice Service have contributed to how we engage with industry. The Service has regular meetings with the Highland Housing Hub and the Council's Housing Development Team to assist with programming workload and resolving challenges.

The following next steps are proposed: These initiatives need to be brought together and supplemented by other communication techniques to set out a formal strategy that could include an annual seminar and/or online updates. This needs to include a broader range of customer, particularly agents.

## **Action 23: Review engagement with Community Councils to encourage the use of consultee access for planning responses.**

### **Not Started**

Reason(s) action has not been progressed: The action was set as a low or medium priority.

The following next steps are proposed: Include information about consultee access in the annual survey to increase awareness and knowledge of consultee access, how it works and how they can sign up.

## **Action 24: Review and update the Community Council training library to provide more specific elements of training.**

### **In Progress**

Progress against this action: On 29 May 2025, Planning Aid Scotland delivered a 90-minute training session via Zoom for The Highland Council, which focused on understanding and responding to energy-related planning applications. The session was open to all Community Councils, with an invitation to register for the event. Key topics covered included:

- The different consenting processes for energy proposals
- What determines whether a project is considered local, major, or national
- How to make effective and timely representations
- Where communities and individuals can get involved
- Real-life examples of how planning policies apply to energy developments We have added a recording, which was made available by PAS, to our Community Council support pages on our website for reference and for those who were unable to attend. 6 monthly meeting with our onshore wind forums.

The following next steps are proposed: Distribute an annual survey (open for 6 months) to engage Community Councils and ask them what kind of training they would wish to have and create a training plan. Training will be in digital format as per Action 5.



## **Action 25: Continue to support the delivery of sustainable, liveable and productive places.**

### **In Progress**

Progress against this action: We have applied National Planning Framework 4 through our day-to-day development management decision making and will embody NPF4's principles within its new Highland Local Development Plan. Long term - Delivery Plan completion scheduled for 2029

The following next steps are proposed: Reflect and refine the action to ensure a clearer outcome. Delivery Plan completion scheduled for 2029.

## **Action 26: Review the wording of conditions and reduce their number and extent on planning permissions to take a more proportionate approach.**

### **Complete**

What was the outcome of completing this action?

We have reviewed the wording of standard conditions related to energy development applications, taking into account the standard conditions used by the Energy Consent Unit that Heads of Planning Scotland had input to. These are now being used.

For many years the Council has had a suite of standard conditions and, in the main, these remain relevant and compliant with Circular 4/1998 on the use of conditions. The Service has recently updated this suite of conditions to include conditions that address the Ecology and Biodiversity requirements within NPF4.

The implementation of this action will be largely dependant upon Action 12 and Action 22, whereby proportionality is directly dependent upon ensuring that appropriate detail is included at the submission of an application. Work on that is ongoing.



# New Proposed Planning Improvement Actions

The table below details further improvement actions added.

<b>Improvement action</b> What action will you take? What will the outcome be?	<b>Owner</b>	<b>Importance</b> High Medium Low	<b>Timescale</b> Short term- 1 year Medium term – 3 year Long term 3+ year	<b>Resources</b>
<p>Challenging Development Management Performance</p> <p>A workshop will be held to challenge current process and practice, and identify improvements that could benefit performance across all key performance indicators.</p> <p>Outcome: The workshop will identify opportunities for streamlining the process and defining consistent practice that fosters a focus on outcome rather than process.</p>	<p>Chief Planning Officer/                      Area Planning Managers</p>	<p>High</p>	<p>Short</p>	<p>Staff time</p>



An improvement plan will be developed with a focused timescale for the implementation of the agreed measures.

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# Peer Collaborative Review Follow Up

As part of the pilot, each planning authority held a peer collaborative review workshop. This brought together key stakeholders and customers to discuss and provide constructive feedback on the improvement action plan.

Status of the peer review follow-up meeting: We already held a peer collaborative follow-up meeting.

The peer review collaborative follow-up meeting was held on: 2025-09-16

The following organisations/groups/individuals were invited: We invited all attendees who took part in the Peer Review Workshop in March 2025.

Those in attendance at the follow-up meeting were: Scottish and Southern Energy Renewables Highland Housing Alliance (Housing developer) Spean Bridge, Roy Bridge and Achnacarry Community Council Craig McLaren – National Planning Improvement Champion Susan Rintoul – National Planning Improvement Officer. A separate catch-up meeting was held with our partner Argyll and Bute Council.

