

## Further Review of Highland Council area

### For discussion

1. At its 9 December 2025 meeting the Commission considered Paper BS-202 - further review of Argyll and Bute and Highland Council areas. After considering the direction from the Scottish Minister and the Commission's obligations under s17A Local Government (Scotland) Act 1973 (s17A), it was agreed that a further review of both Argyll and Bute and Highland Council areas should be started.
2. The Commission asked the Secretariat to draft a paper which (a) summarises the original review reports and proposed recommendations (b) the Scottish Parliament representations (c) the relevant Council's reaction to the original recommendations and concerns raised at the time (d) Boundaries Scotland's response to the recommendations being rejected and (e) an assessment of potential engagement approaches with likely timescales.
3. The Commission is invited to consider the background information provided in this paper, the possible options and agree its approach to the further review of Highland Council area.

### Legislation

4. Section 17A sets out the requirements for a further review – see Appendix A. In summary, the Commission has a discretion to determine the manner and extent of the review but is required to:

“(a)consider the representations (if any) of the Scottish Parliament, and

(b)reconsider the proposals and make any further or supplementary proposals as it thinks fit.”

There is also a requirement to provide an explanation if the Commission agrees to recommend two councillors for a ward which does not contain an inhabited island (s17A(7)).

### 2019 Reviews of Electoral Arrangements (Islands Reviews)

5. Below is a summary of the 2019 Reviews of Electoral Arrangements (Islands Reviews) for Highland Council area and how the Commission conducted it. The full report with its recommendations can be viewed on the Commission's website [www.boundaries.scot/wp-content/uploads/2025/09/Highland\\_Final\\_Report\\_Low-Res\\_1758892795.pdf](http://www.boundaries.scot/wp-content/uploads/2025/09/Highland_Final_Report_Low-Res_1758892795.pdf).
6. The Islands (Scotland) Act 2018 required the Commission to review the six councils containing inhabited islands (Argyll and Bute, Highland, North Ayrshire, Orkney Islands, Shetland Islands and Na h-Eileanan an Iar) as soon as practicable.
7. The Commission reviewed these six council areas during its 5th Reviews of Electoral Arrangements, which reported in 2016, but Scottish Government did not implement the proposals for the Orkney Islands, Shetland Islands and Na h-Eileanan an Iar council areas because of the introduction of the Bill on the Scottish Islands, which became the Islands (Scotland) Act 2018. The recommendations for Argyll and Bute were also not implemented.

8. The 5<sup>th</sup> Reviews methodology for determining councillor numbers proposed 72 councillors for Highland Council. This was calculated by dividing its electorate of 178,838 by 2,800. This would have resulted in 64 councillors except for a 10% cap on change rule ( $80 - 8 = 72$ ). During the 5<sup>th</sup> Reviews Highland Council “was content with the majority of the Commission’s proposals, the Council unanimously agreed to a number of alternative suggestions which it was felt would enhance the Commission’s proposals. These alternative proposals relate to Caithness, Black Isle, Nairn/ Cawdor, Culloden/Ardersier and the central ward in Inverness.” Their full response can be viewed on the [Commission’s website](#). The 5<sup>th</sup> Reviews recognised special geographic considerations in Highland Council area and recommended 74 councillors.
9. The current electoral arrangements for Highland Council area have been in place since the recommendations from the 5<sup>th</sup> Reviews came into effect in 2017.
10. The Commission agreed to apply the same methodology for the Islands Reviews as that used during its 5<sup>th</sup> Reviews, with a proposed ratio of one councillor per 2,800 electors for Highland. However, the Commission noted that applying the Commission’s methodology to the existing councillor numbers of 74 would result in 67 councillors and could be seen as a significant change in councillor numbers within a short 5-year period (80 councillors in early 2017 to 67 by 2022). It therefore agreed to apply its methodology to the higher baseline of 80 councillors which was the number applicable before the 5<sup>th</sup> Reviews.
11. At the start of the Islands Reviews there were 21 wards within Highland Council area. Eight wards had variation from the electoral parity over 10% (2018 electorate data). The five year forecasts expected 11 wards electoral parity over 10% or more (Badenoch and Strathspey (12.5%); Black Isle (10.3%); Culloden and Ardersier (49.9%); East Sutherland and Edderton (-18.0%); Eilean a’ Chèo (-17.4%); Fort William and Ardnamurchan (-14.8%); Inverness South (19.0%); Inverness West (13.1%); Inverness Ness-Side (22.8%); North, West and Central Sutherland (-39.3%); and Tain and Easter Ross (-10.4%)).
12. The Commission met with all Councils before the reviews commenced to discuss its approach to the review and how to engage with local communities. When the Commission met with Highland Council in October 2019 there was opposition to the Commission’s methodology and a desire for different ratios across Highland Council area.
13. The Commission consulted Highland Council on both councillor numbers and ward boundaries for a statutory two-month period. Its proposals:
  - took account of the Islands (Scotland) Act 2018 and retained Eilean a’ Chèo (Skye) as an island ward, and renamed Caol and Mallaig to include a reference to the Small Isles and so recognise the island communities within the ward. The Commission considered special geographical considerations as they apply to Skye and concluded that the level of forecast variation from electoral parity with 4 councillors (-20% with a total of 72 councillors) was not justifiable and therefore proposed a 3 member Eilean a’ Chèo ward, a reduction of one member from the existing ward;
  - took account of the Scottish Elections (Reform) Act that allowed the use of 2-member and 5-member wards to design wards that considered local ties in Caithness and Dingwall and created more easily identifiable ward boundaries in Inverness and to the south of Inverness;

- made no changes to the boundaries of six of the existing wards: Badenoch and Strathspey; Caol, Mallaig and the Small Isles (previously named Caol and Mallaig); Cromarty Firth; Eilean a' Chèò; Fort William and Ardnamurchan; and Nairn and Cawdor.
- reduced variation from electoral parity in Caithness and Sutherland whilst recognising historical boundaries in the area;
- considered special geographic considerations in relation to variation from electoral parity in the proposed Fort William and Ardnamurchan ward due to its remoteness and poor transport links;
- recognised local community ties in the Black Isle, Thurso and Wick; and
- took account of the expected electorate growth in the proposed Culloden and Ardersier ward.

14. Highland Council did not respond to the consultation. The Commission was aware that its proposals were discussed at the Highland Council meeting of 10 September 2020 according to the minutes of that meeting where members agreed to “reject these proposals in their entirety as they stand” and “approach the Scottish Government to review the remit of the Boundary Commission in regard to rural Authorities to lift the cap on total councillor numbers and provide for greater discretion in the application of parity ratios”.
15. The Commission agreed not to amend its Initial Proposals for its 12-week public consultation.
16. There were 276 responses to the public consultation including a petition with over 1,000 signatures.
17. The majority of responses received: opposed the review; opposed a reduction in councillor numbers in Caithness, Sutherland, Skye and Wester Ross; opposed the proposed ward boundaries in Caithness, Sutherland, Wester Ross and Loch Ness; and expressed a belief that Inverness was gaining more representation at the expense of rural areas. There was also some support for the proposals particularly where there was no change to the existing electoral arrangements.
18. Highland Council responded during the public consultation. They opposed the review, rejecting the proposals and stating the Commission should: only conduct a review of inhabited island wards and not mainland wards; adopt the same ratio for determining councillor numbers in island council areas (1:800) in remote and rural areas within Highland; retain a 4-member Skye ward; apply special geographical considerations consistently across the council area; and retain the existing number of councillors in Caithness and Sutherland.
19. Included in the Council response were comments from individual councillors. There was some support from them for the proposals by: Black Isle; Culloden; Dingwall; Fort William; Inverness; Nairn; Badenoch and Strathspey; and Tain. They also made some alternative suggestions for minor boundary changes by Laggan and Knoydart.
20. The Commission agreed to retain 10 ward boundaries but also: amended the boundary by Laggan to follow the Cairngorm National Park boundary; placed Knoydart in a single constituency; reverted to the existing Caithness and Sutherland ward boundaries; and amended the ward boundaries by Fort Augustus and Wester Ross to maintain local ties.
21. The Final Recommendations were submitted to Scottish Ministers on 10 June 2021. A draft Scottish Statutory Instruments (SSI) was laid in Parliament, and the recommendations were referred to the Scottish Parliament Local Government,

Housing and Planning (LGHP) Committee.  
[www.legislation.gov.uk/sdsi/2021/9780111050989/contents](http://www.legislation.gov.uk/sdsi/2021/9780111050989/contents)

### Highland Council letter to LGHP Committee

22. Prior to the meeting discussing the recommendations, Highland Council wrote to the LGHP Committee stating they strongly objected to the Commission's recommendations and asked for a further review to be undertaken after the local government elections in May 2022. They objected to:

- a reduction of councillor numbers in Sutherland because it does not consider Scottish Government's policy of addressing depopulation in rural areas.
- a reduction of councillor numbers in Skye because an island impact assessment had not been considered.
- proposed boundaries in the Aird ward that break local community ties.
- the proposed Culloden and Ardersier ward with wide forecast electoral parity (+54%); and
- the recommendations "fails to recognise the specific Highland context, particularly in relation to parity, sparsity, rurality and deprivation and, if implemented, would result in a significant democratic deficit for the Highlands."
- See letter <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-local-government-housing-and-planning/correspondence/2021/review-of-electoral-arrangements-for-the-highland-council-area>
- Appendix B also provides a summary of Highland Council meetings discussing the Island Reviews.

### LGHP Committee Meeting 14 September 2021

23. The LGHP Committee met on 14 September 2021 to discuss the reports. At that meeting the Committee heard evidence from five of the councils, North Ayrshire Council had submitted written evidence. Submissions were heard from council officials for all Councils who gave evidence except Highland Council who were represented by their Council Leader (member for Aird and Loch Ness ward).

24. At that meeting Highland Council stated:

- all members of Highland Council rejected the proposals;
- they objected to vast rural wards in the north and west (Sutherland, Skye and Loch Ness) losing representation while the east is gaining representation. They believed rural communities had not been listened to and sought more flexibility on parity for sparsely populated areas;
- they objected to Skye becoming a 3-member ward because the Islands (Scotland) Act 2018 was to recognise the challenges island communities face. That Skye's population can quadruple with visitors;
- they objected to splitting communities by Loch Ness;

- at the start of the review they had a good discussion with the Commission and mentioned they wished no reduction in councillor numbers especially in rural areas;
- “we were genuinely dismayed by the proposals when they came out. We were so upset that we did not reply to the Commission in the form that it requested; we actually went straight to Parliament and said, “This is appalling. Can you look at what the Commission is doing here?”;
- that both Argyll and Bute and Highland Councils share many similar issues; and
- poor transport and broadband links remain for councillors to meet with electors.

25. See minute of LGHP Committee meeting 14 September 2021:

[www.parliament.scot/api/sitecore/CustomMedia/OfficialReport?meetingId=13303](http://www.parliament.scot/api/sitecore/CustomMedia/OfficialReport?meetingId=13303)

### **LGHP Committee Survey**

26. The Committee conducted a short two-week public survey which closed on 17 September 2021. The survey asked residents of the six island council areas for their views on the island reviews and the recommendations.

27. There were 75 responses to the survey relating to Highland Council. Most of the responses opposed: a reduction of councillor numbers in rural areas while Inverness was gaining more councillors and highlighted poor transport links in those rural areas; an Aird ward because it included rural and urban communities with different issues; a reduction in councillor numbers in Skye; the methodology used by the Commission should consider other factors such as access to amenities rather than population. Highland Council did not respond to the survey.

28. See summary of survey responses [www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-local-government-housing-and-planning/business-items/regulations-on-proposals-made-by-boundaries-scotland/summary-of-responses-to-boundaries-scotland-proposals](http://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-local-government-housing-and-planning/business-items/regulations-on-proposals-made-by-boundaries-scotland/summary-of-responses-to-boundaries-scotland-proposals)

### **LGHP Committee Meeting 21 September 2021**

29. The Committee met on 21 September 2021 and heard evidence from the Commission.

30. When discussing the recommendations for Highland Council the Committee raised various topics including: why less representation in northern rural wards; why amend the boundaries by Aird (western side of Loch Ness); future population changes; and interaction between the Council and the Commission.

31. The Commission explained that it had conducted the review under the legislative rules and highlighted that the population of more rural areas had not grown at the same extent as other areas such as Inverness. The Commission also reported that Highland Council had not engaged with the Commission at the start of the review and had made suggestions outwith the legislation (different councillor number to electors ratios for different parts of the council area).

32. The Committee's final question was "if the Parliament were to reject one or more of the recommendations, what would Boundaries Scotland do next? Ronnie Hinds: It is not entirely clear what we could do. It is clear what we could not do, because there would not be time to carry out a full review of a whole council area ahead of the elections that are scheduled for next year. That would mean that a given area would go into those elections with the current form of representation that they got through the previous reviews. For some, that might not be such a difficulty—that would not change anything at all for Orkney, for example. However, the proposed changes are significant in Highland in particular, as well as in Argyll and Bute. The levels of disparity in those areas do not serve the electorate well and it would be a mistake to allow that to prevail for the coming elections. The main point is that we could not do anything in advance of the elections. That would be the price of rejecting the regulations. What happens after that would be new ground for all of us. We are not entirely sure about that, but the commission stands ready to act on instructions from ministers and, ultimately, the Parliament about what has to happen following the reviews that we have just completed."

33. See minute of LGHP Committee meeting 21 September 2021  
[www.parliament.scot/api/sitecore/CustomMedia/OfficialReport?meetingId=13319](http://www.parliament.scot/api/sitecore/CustomMedia/OfficialReport?meetingId=13319)

#### **LGHP Committee Meeting 28 September 2021**

34. The Committee met on 28 September 2021 and heard evidence from John Swinney (Deputy First Minister and Cabinet Secretary for Covid Recovery).

35. Mr Swinney was aware of the opposition to some aspects of the proposals for Highland Council area but was "confident that Boundaries Scotland has discharged its duties competently and professionally, and there would need to be very strong reasons for rejecting its recommendations." He acknowledged the challenges faced by the Commission as it has to consider electoral parity and local ties in remote, rural areas with a declining population. He noted that the Commission had engaged with local communities during the review but Highland Council had not cooperated. He discussed that the needs of localities "should never come down just to what is said on a locality's behalf by a local elected member for that locality. It is a question of how Highland Council can reach all of Highland and do the right thing by all of Highland, rather than only doing the right thing by a particular locality because its voice is strong enough. That is not representative democracy and that is not how we listen to communities or respond to the agendas about which they are concerned."

36. The Committee concluded "I want to record our thanks to Boundaries Scotland. It is important that we recognise the substantial work that it has undertaken. However, from the correspondence that I and, I know, all committee members have received, I am aware that there are still real concerns about the proposals for Argyll and Bute and Highland. With that in mind, I suggest that we reject this set of boundary changes." All members of the Committee agreed with the motion.

37. See minute of LGHP Committee meeting 28 September 2021  
[www.parliament.scot/api/sitecore/CustomMedia/OfficialReport?meetingId=13337](http://www.parliament.scot/api/sitecore/CustomMedia/OfficialReport?meetingId=13337)

38. Below is a link to the Committee's final report which sets out the representations that the Commission is required to consider under s17A.

[www.parliament.scot/chamber-and-committees/committees/committee-reports/lghp/2021/9/30/lghps062021r1/pdf](http://www.parliament.scot/chamber-and-committees/committees/committee-reports/lghp/2021/9/30/lghps062021r1/pdf)

39. The representations in full were:

“The Committee notes that where the recommendations have been welcomed by local authorities, those authorities have also been very positive about the consultation and engagement work undertaken by Boundaries Scotland. This points to the value of effective dialogue between local authorities and Boundaries Scotland and the Committee would encourage all parties to participate in such conversations in the context of the re-examination of proposals for Argyll and Bute and Highland Council areas with a view to reaching recommendations acceptable to all parties.

The Committee recommends the benefits from building in additional time for discussion with councils in advance of the formal consultation stage of a review should be incorporated into all future reviews of local authority boundaries.

The Committee notes the benefits of digital engagement, but also recognises the challenges it will present to others. The Committee asks that these concerns are taken into account in any future engagement.”

The Committee asks the Scottish Government to provide detail of whether the further reviews of the boundaries in Highland and Argyll and Bute will be carried out in as a separate piece of work or as part of a suite of other reviews.”

40. Appendix C provides a summary of the correspondence between the Commission and Minister after the recommendations were rejected.

### **Further Proposals - Options**

41. The legislation states the Commission must “reconsider the proposals and make any further or supplementary proposals as it thinks fit.”

42. The Secretariat has set out some options that Commissioners may wish to consider as part of the further review. Possible timelines are also provided.

43. These options include the most recent electorate data available to the Secretariat (the electorate data, used during the Second Review of Scottish Parliament Boundaries, at 1 September 2022). The existing electoral arrangements are also provided for information (with the December 2024 electorate data). Further, the options in this paper do not include 5-year electorate forecasts, which electoral reviews must consider.

44. More recent electorate data can be requested from the relevant Electoral Registration Officer’s (Dunbartonshire and Argyll and Bute and Highland & Western Isles). It can take up to 3-4 months to collate electorate data and calculate 5-year electorate forecasts.

### **Minimal change to recommendations from the Island Reviews**

45. The Commission could minimise change to the Island Review recommendations and add or remove a councillor from a ward(s) to improve variation from electorate parity.

46. The table below proposes that two wards (Black Isle and Culloden and Ardersier) both become 4-member wards. This option results in five wards with variation

from electoral parity over 10% but increases the overall number of councillors by two.

47. A map of this option is available at Appendix D. To improve electoral parity in those wards over 10% variation from parity the Commission could consider amending the following ward boundaries:

- East Sutherland (-20.3%) - the boundary could be amended between this ward and Wick and East Caithness ward to the north or Tain, Easter Ross and Edderton ward to the south (there is currently an East Sutherland and Edderton ward);
- Eilean a' Chèo (+16.7%), but this would create an island-mainland ward;
- Aird (+14.2%), but Loch Ness and Strathconon act as natural boundaries between neighbouring wards;
- Inverness North West (+12.3%) but the River Ness acts as a strong natural boundary between it and the other Inverness wards; and
- Fort William and Ardnamurchan (-10.3%). The Commission applied special geographical considerations there).

Ward No.	Ward Name	Cllrs	Electorate (1 Sept 2022)	Variation from Parity %
1	North, West and Central Sutherland	2	4,979	-1.3
2	Thurso and Northwest Caithness	4	9,940	-1.5
3	Wick and East Caithness	4	10,225	1.3
4	East Sutherland	3	6,030	-20.3
5	Wester Ross and Lochalsh	3	8,148	7.7
6	Cromarty Firth	4	9,772	-3.2
7	Tain, Easter Ross and Edderton	3	7,540	-0.4
8	Dingwall and Seaforth	5	11,994	-4.9
9	Black Isle	4	9,171	-9.1
10	Eilean a' Chèo	3	8,833	16.7
11	Caol, Mallaig and the Smal Isles	3	7,139	-5.7
12	Aird	3	8,640	14.2
13	Inverness North West	5	14,161	12.3
14	Inverness North East	4	9,851	-2.4
15	Inverness South West	5	12,465	-1.2
16	Inverness South East	4	10,453	3.6
17	Culloden and Ardersier	4	9,410	-6.8
18	Nairn and Cawdor	4	10,650	5.5
19	Badenoch and Strathspey	4	10,761	6.6
20	Fort William and Ardnamurchan	4	9,056	-10.3
	<b>Totals</b>	<b>75</b>	<b>189,218</b>	

48. The advantages of this option are:

- improves variation from electoral parity;
- recognises local ties in the Black Isle;
- retains six existing ward boundaries; and
- creates more recognisable boundaries by Inverness, Tain and Knoydart.

49. The disadvantages of this option are:

- Highland Council were unhappy with the recommendations to ward boundaries from the Island Reviews and this is unlikely to be addressed by increasing councillor numbers; and
- there are five wards with variation from electoral parity over 10%, although the Islands Reviews recommended seven wards with variation from electoral parity over 10%, both for the electorate at 2018 and five-year forecast electorate data.

### Recommendations from the Island Reviews and no further or supplementary proposals to make

50. This option presents the ward boundaries recommended from the Island Reviews with no further proposals made.

51. The table below shows how many electors are in each of the recommended wards from the Island Reviews. The latest electorate data available to the Secretariat has been used (September 2022).

Ward No.	Ward Name	Cllrs	Electorate (1 Sept 2022)	Variation from Parity %
1	North, West and Central Sutherland	2	4,979	-4.0
2	Thurso and Northwest Caithness	4	9,940	-4.1
3	Wick and East Caithness	4	10,225	-1.4
4	East Sutherland	3	6,030	-22.5
5	Wester Ross and Lochalsh	3	8,148	4.8
6	Cromarty Firth	4	9,772	-5.7
7	Tain, Easter Ross and Edderton	3	7,540	-3.0
8	Dingwall and Seaforth	5	11,994	-7.5
9	Black Isle	3	9,171	17.9
10	Eilean a' Chèò	3	8,833	13.6
11	Caol, Mallaig and the Smal Isles	3	7,139	-8.2
12	Aird	3	8,640	11.1
13	Inverness North West	5	14,161	9.3
14	Inverness North East	4	9,851	-5.0
15	Inverness South West	5	12,465	-3.8
16	Inverness South East	4	10,453	0.8
17	Culloden and Ardersier	3	9,410	21.0
18	Nairn and Cawdor	4	10,650	2.7
19	Badenoch and Strathspey	4	10,761	3.8
20	Fort William and Ardnamurchan	4	9,056	-12.7
	<b>Totals</b>	<b>73</b>	<b>189,218</b>	

52. The advantages of this option are:

- special geographical considerations were recognised in the proposed Fort William and Ardnamurchan ward;
- recognised local ties in the Black Isle;
- retained six existing ward boundaries; and
- created more recognisable boundaries by Inverness, Tain and Knoydart.

53. The disadvantages of this option are:

- Highland Council strongly opposed these recommendations;

- there are six wards with variation from electoral parity over 10%, although the Islands Reviews recommended seven wards with variation from electoral parity over 10%, both for the electorate at 2018 and five-year forecast electorate data.

54. For this option it is open to the Commission to submit a report stating it has reconsidered its recommendations from the Islands Review, considered submissions made including the representations in the LGHP Committee report, is satisfied with the recommendations from 2021 and would make no further proposals.

### Existing electoral arrangements

55. The existing electoral arrangements with electorate data from 2024 are shown below:

Ward No.	Ward Name	Cllrs	Electorate (Dec 2024)	Variation from Parity %
1	North, West and Central Sutherland	3	4,898	-35.7
2	Thurso and Northwest Caithness	4	9,866	-2.8
3	Wick and East Caithness	4	9,992	-1.6
4	East Sutherland and Edderton	3	6,419	-15.7
5	Wester Ross, Strathpeffer and Lochalsh	4	9,969	-1.8
6	Cromarty Firth	4	9,613	-5.3
7	Tain and Easter Ross	3	7,090	-6.9
8	Dingwall and Seaforth	4	10,008	-1.4
9	Black Isle	3	8,581	12.7
10	Eilean a' Chèò	4	8,667	-14.6
11	Caol and Mallaig	3	7,180	-5.7
12	Aird and Loch Ness	4	10,164	0.1
13	Inverness West	3	8,365	9.8
14	Inverness Central	3	8,357	9.7
15	Inverness Ness-side	3	9,200	20.8
16	Inverness Millburn	3	7,316	-3.9
17	Culloden and Ardersier	3	9,540	25.3
18	Nairn and Cawdor	4	10,303	1.5
19	Inverness South	4	12,587	24.0
20	Badenoch and Strathspey	4	10,914	7.5
21	Fort William and Ardnamurchan	4	8,816	-13.2
	<b>Totals</b>	<b>74</b>	<b>187,845</b>	

56. The existing electoral arrangements have variation from electoral parity over 10% in eight wards. Although the Commission's recommendations from the 5<sup>th</sup> Reviews recommended eight wards over 10% but only four wards were forecast to be over 10%.

57. The Commission could consider reaching the view that the recommendations made in the Islands Review are no longer insisted upon and no proposal for changes to the electoral arrangements for Highland Council are advanced at this time.

### Interim Reviews of Electoral Arrangements

58. There is one further possibility the Commission may wish to consider.
59. The Commission could submit a report to Ministers recommending no changes are made to the existing electoral arrangements for Highland Council area but then undertake a fresh review later. As discussed at the 9 December 2025 meeting, this could be undertaken either as an interim review under s16(3) or as a second report under s16(2A)(b).
60. In recent years the Commission has considered undertaking Interim Reviews of Electoral Arrangements at a point halfway between the scheduled electoral review cycle.
61. When NRS publishes its annual electorate statistics in April 2026 or April 2027 the Commission may wish to analyse the data and consider whether it should undertake an interim review for the six 'island review' council areas. It will consider the forecast electorate from the island reviews, the latest electorate and evaluate if there are any wide electoral disparities that could be addressed. An interim review could start after the local government elections in May 2027.
62. The Commission previously considered interim reviews in 2019 following its Fifth Reviews. At that time the Commission agreed not to undertake any interim reviews. [www.boundaries.scot/wp-content/uploads/2025/09/LGBCS\\_2485\\_Interim\\_Reviews\\_2019\\_Combined\\_1758892800.pdf](http://www.boundaries.scot/wp-content/uploads/2025/09/LGBCS_2485_Interim_Reviews_2019_Combined_1758892800.pdf)

### Timeline - further review

63. There is no direction from the Minister in terms of timing. Therefore, the Commission must complete a further review of Highland Council and Argyll and Bute Council within a reasonable time.
64. The Commission will wish to note the timing of any further review and the possible impact on it by the Scottish Parliament election in May 2026 and local government elections in May 2027. Further, the Scottish Parliament Easter recess is from 26 March to 8 April 2026 and Parliament dissolves on 9 April ahead of the 7 May 2026 election. Also, if any changes are to be made, it is good practice for these to be in place 6 months prior to the next election (Gould principle). The Sponsor Team has confirmed that a report would need to be submitted by approximately August 2026 at the latest.
65. As set out in s18, the Commission has an obligation to take such steps as it thinks fit to secure that persons who may be interested in the review are informed of the proposal to conduct it and of any directions of the Secretary of State which are relevant to it. As referred to above, the Minister has not made any directions on timing or process. While there are no requirements to consult, as discussed at the 9 December meeting, the Commission was of the view that it would be good practice to do so if there are any proposed changes.
66. If the Commission agreed to make further proposals to its final recommendations from its Island Reviews, an outline timeline could be:
- February 2026 - write to Highland Council, advising them the Commission is undertaking a further review under s17A, its general

approach to the review and expected timeline. Also ask the Council for expected home build data and likely timeframe for providing.

- February 2026 – request electorate data from ERO
- February – March 2026 – collate and check electorate data and calculate 5-year forecast electorate data.
- April 2026 – develop alternative proposals (for consultation)
  - May - June 2026 conduct shortened consultation with Highland Council and public at same time (6 weeks), or
  - May – November 2026 follow usual electoral review schedule of 2-month consultation with council, consider their response and revise proposals if required, then 12-week public consultation
- if shortened consultation – responses considered in summer, report drafted and submitted to Ministers in August 2026.
- if full consultation – responses considered in late 2026, report drafted and submitted to Ministers in March 2027.

67. If the Commission agreed to make no further or supplementary proposals from its Island Reviews or a recommendation of no change to the existing electoral arrangements, an outline timeline could be:

- February 2026 - write to Highland Council, advising them the Commission is undertaking a further review under s17A, its general approach to the review and expected timeline.
- February – April 2026 Draft report discussing background to Islands Reviews with reasons for no further proposals.
- mid to late May 2026 (after election) – submit report to Scottish Ministers.

### **Conclusion**

68. Scottish Ministers directed the Commission to conduct a further review of Argyll and Bute Council and Highland Council and the Commission agreed at its 9 December 2025 to commence its further review.

69. This paper provides background information on the Commission’s approach to the Islands Review for Highland Council area and summarises the concerns raised at the time.

70. The Commission is invited to consider the possible options set out in this paper, the proposed timelines and agree its approach to the further review. The Commission is required to inform Highland Council of this further review.

71. The approval process (positive affirmation) which applied to the Islands Review applies to the further review process unless there is proposal of no change to existing electoral arrangements. However, if the Commission’s further or supplementary proposals are rejected, a Scottish Parliament resolution is required before a further review can be directed by the Minister (s17A(9)).



# Local Government (Scotland) Act 1973

## 1973 CHAPTER 65

### PART II

#### CHANGES IN LOCAL GOVERNMENT AREAS

#### *[<sup>F1</sup>Proposals by Boundaries Scotland]*

#### **[<sup>F1</sup>17A Further reviews and reports by Boundaries Scotland**

- (1) Boundaries Scotland must conduct a further review of proposals to alter any local government area or electoral arrangements where it has been notified by the Scottish Ministers under section 17(6)(b).
- (2) Boundaries Scotland may determine the manner and the extent of the review under this section, provided that the purpose of the review is to—
  - (a) consider the representations (if any) of the Scottish Parliament, and
  - (b) reconsider the proposals and make any further or supplementary proposals as it thinks fit.
- (3) Sections 18 (except subsections (2) and (3)) and 19 apply to a review under this section as they apply to a review under section 17 (but subject to the modification in subsection (4)).
- (4) The modification is that the reference in subsection (2A) of section 18 to a consultation under subsection (2)(a) of that section is to be read as if it were a reference to any consultation carried out by Boundaries Scotland in connection with a review under this section.
- (5) Boundaries Scotland may take such steps under section 18(3) as it thinks fit in relation to a review under this section.
- (6) Boundaries Scotland must—
  - (a) before such date as the Scottish Ministers may direct, or in the absence of such direction, within such reasonable time as it may determine, submit a report to the Scottish Ministers on its further review under this section, and

---

*Changes to legislation: Local Government (Scotland) Act 1973, Section 17A is up to date with all changes known to be in force on or before 25 September 2025. There are changes that may be brought into force at a future date. Changes that have been made appear in the content and are referenced with annotations. (See end of Document for details) View outstanding changes*

---

- (b) include in the report either—
  - (i) any further or supplementary proposals it has formulated following the review, or
  - (ii) a notification that it has no further or supplementary proposals to make.
- (7) Where the report includes a further or supplementary proposal that the number of councillors to be returned in an electoral ward is two, Boundaries Scotland must include in the report an explanation as to why it considers the proposal to be appropriate unless the proposal relates to an electoral ward consisting wholly or partly of one or more inhabited islands (within the meaning of section 1(2) of the Islands (Scotland) Act 2018).
- (8) Subsections (4) to (9) of section 17 apply to a report submitted under this section as they apply to a report submitted under section 17.
- (9) But where a report has already been submitted under this section, the Scottish Ministers may notify Boundaries Scotland under subsection (6)(b) of section 17 that it is required to conduct a further review only if the Scottish Parliament has by resolution directed them to do so.
- (10) A further review under this section is to be disregarded for the purposes of calculating the intervals between reviews under this Part.]

---

**Textual Amendments**

- F1** Ss. 17, 17A substituted for s. 17 (14.5.2021) by [Scottish Elections \(Reform\) Act 2020 \(asp 12\)](#), ss. [31\(2\)](#), [35](#); S.S.I. 2021/124, [reg. 2](#), [sch.](#) (with [reg. 3](#))

**Changes to legislation:**

Local Government (Scotland) Act 1973, Section 17A is up to date with all changes known to be in force on or before 25 September 2025. There are changes that may be brought into force at a future date. Changes that have been made appear in the content and are referenced with annotations.

[View outstanding changes](#)

**Changes and effects yet to be applied to :**

- Sch. 7 para. 7(3) inserted by [1989 c. 42 Sch. 11 para. 36](#)

**Changes and effects yet to be applied to the whole Act associated Parts and Chapters:**

Whole provisions yet to be inserted into this Act (including any effects on those provisions):

- Sch. 7 para. 7(3) inserted by [1989 c. 42 Sch. 11 para. 36](#)

## Appendix B – Summary of Highland Council meetings discussing the Island Reviews

Date	Summary	Link to Highland Council website
27 June 2019	<ul style="list-style-type: none"> <li>• “the issues of ‘remote’ and ‘rural’ should have been included in the Islands Bill;</li> <li>• there was a need for early engagement with the Boundary Commission on the principles to be followed in future reviews; and</li> <li>• the unintended consequences of what was being proposed within the report was a concern, particularly in regard to any future changes which could perhaps adversely affect remote and rural areas in particular.</li> </ul>	<a href="#">Meeting papers and minute</a>
10 Sept. 2020	<ul style="list-style-type: none"> <li>• urgent political lobbying was required;</li> <li>• more representation was required in Caithness to deal with de-population;</li> <li>• it was unacceptable that rural Caithness, Sutherland and Skye were losing representation at the expense of urban Inverness</li> <li>• that population should be considered and not electors;</li> <li>• that the proposals did not consider rural areas or the Islands Act;</li> <li>• a cross-Council Working Group be established to analyse the proposals;</li> <li>• the proposals were not addressing issues in the Highlands but making them worse; and</li> <li>• “it was imperative that structures were put in place across the Highland area which worked effectively for each type of community and met local priorities wherever possible and as such these proposals were being viewed as an insult to democracy and had to be robustly challenged.”</li> </ul>	<a href="#">Meeting papers and minute</a>
29 Oct. 2020	<ul style="list-style-type: none"> <li>• the proposals did not consider remote and rural areas</li> <li>• objected to the methodology . Should include in determining representation, there was a need to take account of geography, remoteness, travel time and spread of population within an area;</li> <li>• agreed to lobby Scottish Ministers to increase the number of Councillors for Highland;</li> <li>• did not consider the Islands (Scotland) Bill, as of Skye and Raasay would lose a Councillor. The Act should have included rural mainland areas as well;</li> </ul>	<a href="#">Meeting papers and minute</a>

	<ul style="list-style-type: none"> <li>• the island councils had a ratio of 1:800 but the mainland was 1:2,800 even though massive rural areas</li> <li>• island councils had their own MPs and MSPs and were receiving additional funding while areas of a similar size to the islands in Caithness and Sutherland had little parliamentary representation.</li> <li>• need to at least retain the same level of representation in Caithness to help tackle depopulation</li> <li>• proposals did not take account of local ties;</li> <li>• should consider population growth in the summer with great increase in visitors;</li> <li>• consider representation in Norway as they have a lower number of electors per ward than the UK.; ·</li> <li>• preference to retain existing ward boundaries rather than recommendations; and</li> <li>• supported some changes such as the Black Isle.</li> </ul>	
25 March 2021	A report was discussed but is not available on Highland Council website. The minute of the meeting mentioned an action from the meeting was to “lobby for a change in the Boundary Commission’s approach.”	<a href="#">Meeting papers and minute</a>
24 June 2021	<ul style="list-style-type: none"> <li>• they noted the draft Statutory Instrument could be either approved or rejected (but not amended)</li> <li>• support had been received from Highland MSPs to oppose recommendations</li> <li>• need to gather support from local communities to oppose recommendations</li> <li>• oppose methodology which had been used,</li> <li>• final proposals did not consider Islands Act by reducing the representation of the Islands; ·</li> <li>• Boundaries Scotland had failed to listen to local communities</li> <li>• that the Council should maintain its opposition to the final review and reject the methodology used,</li> <li>• agreed to write to the Deputy First Minister, Highlands and Islands MSPs and the Chair of the Local Government and Communities Committee to express the concerns raised by the Review’s proposals.</li> </ul>	<a href="#">Meeting papers and minute</a>
9 Sept. 2021	The minute replicated the meeting of 24 June 2021	<a href="#">Meeting papers and minute</a>

### Appendix C – Summary of correspondence between Boundaries Scotland and Ministers after LGHP Committee decision

Date	Meeting/ correspondence
August 2021	The Chair met the Deputy First Minister regarding a number of matters including an overview of the Islands Reviews and Highland Councils approach to the review.
4 Oct 2021	<p><b>The Chair wrote to the Convenor of the LGHP Committee and Deputy First Minister following the Committee’s decision to reject the recommendations for Argyll and Bute and Highland Council areas.</b></p> <p>The letter to the Convenor stated the Commission was “deeply disappointed by the rejection of its proposals”; that Highland Council had objected to the review before it had started, had made little effort to engage with the Commission and had made suggestions outwith the legislation; and that the Committee report had implied it would need the acceptance of councils before the recommendations could be adopted but this was outwith the legislation of our reviews.</p> <p>The letter to the Deputy First Minister mirrored the points made to the Convenor but also highlighted that: international best practice is that electoral boundaries are to be designed by an independent body and free from partisan influence; the Committee has also ignored principles such as electoral parity that are in the legislation and has created a principle not in the legislation, consent of administrators or elected officials.</p>
12 Oct 2021	<p><b>The Deputy First Minister wrote to the Chair</b></p> <p>He understood the concerns raised and noted international best practice. As this was the first review since the commencement of the Scottish Elections (Reform) Act 2020 that any lessons learned should be collated to see if any aspects of the Act needs to be reconsidered.</p>
19 October 2021	<p><b>The Chair wrote to the Deputy First Minister following a Commission meeting held on 12 October 2021.</b></p> <p>The letter stated that the Commission has serious reservations about conducting further reviews of electoral arrangements and the next review of Scottish Parliament boundaries under the current arrangements where our recommendations can be rejected with no substantive reason. The letter also highlighted that the Minister must notify us that we must undertake a further review of our proposals in Highland and Argyll and Bute.</p>
November 2021	<p><b>The Chair met with the Deputy First Minister and then wrote to him on 12 November 2021.</b></p> <p>The Chair thanked him for acknowledging that the Commission conducted the reviews in a professional and competent manner.</p>

	<p>That both parties had agreed that the new procedures introduced by the Scottish Elections (Reform) Act 2020 for the approval of reviews of electoral arrangements have been shown to be less than satisfactory. Raised concerns that without improvements to the approval process there was a serious risk to the implementation of the forthcoming review of Scottish Parliament boundaries. That further consideration is required on how to make improvements of the approval process for boundary reviews.</p>
20 December 2021	<p><b>Deputy First Minister wrote to the Chair</b></p> <p>He stated “we should seek to improve the parliamentary process for boundary setting where possible, learning from recent experience and from international practice. It is our intention to reflect on possible approaches ahead of the Government’s planned consultation on electoral reform next year.” At that time he also wrote to the Convenor and mentioned I am required to write to Boundaries Scotland, to ask them to carry out a further review for Highland and Argyll and Bute. I intend to work with Boundaries Scotland and with the parliament to learn from the recent experience and see where the process could potentially be improved before writing to request further reviews.</p>
June 2022	<p><b>The Deputy First Minister wrote to Chair</b></p> <p>He advised he had met with the Presiding Officer to discuss the consideration of legislation relating to boundary changes and importance of encouraging MSPs to take a non-partisan approach to the consideration of changes to boundaries. He mentioned the Scottish Government consultation on Electoral Reform this year with a view to introducing a Bill in 2023.</p>