

Council Headquarters  
Glenurquhart Road  
Inverness  
IV3 5NX

12 December 2025

Dear Member

A Special Meeting of the **City of Inverness Area Committee** will take place in the **Council Chamber, Council Headquarters, Glenurquhart Road, Inverness** on **Wednesday 7 January 2026 at 10.00 am**.

**Webcast Notice:** This meeting will be filmed and broadcast over the Internet on the Highland Council website and will be archived and available for viewing for 12 months thereafter.

You are invited to attend the meeting and a note of the business to be considered is attached.

Yours faithfully

**Stewart Fraser**  
**Chief Officer - Legal and Corporate Governance**

### **Business**

- 1. Calling of the Roll and Apologies for Absence**  
**Gairm a' Chlàir agus Leisgeulan**
- 2. Declarations of Interest/Transparency Statemen**  
**Foillseachaidhean Com-pàirt/Aithris Fhollaiseachd**

Members are asked to consider whether they have an interest to declare in relation to any item on the agenda for this meeting. Any Member making a declaration of interest should provide some information on the nature of the interest and leave the meeting at the appropriate time. Advice may be sought from officers prior to the meeting taking place.

- 3. Short Term Let Control Area**  
**Sgìre Smachd Màil Gheàrr-ùine**

**PP 1 - 20**

There is circulated Report No. CIA/01/26 by the Assistant Chief Executive - Place.

The Committee is invited to:

- i. **note** the evidence presented demonstrating that the housing market within parts of the Inverness Area is subject to significant pressure, exacerbated by high rates of potential dwellings being converted to Short Term Lets;
- ii. **note** that the designation of any new STLCA will have no retrospective impact on existing Short Term Lets where no material change of use had occurred at the time of their establishment, and will therefore only require planning permission from new Short Term Lets established after a STLCA comes into force;
- iii. **note** that in Inverness City Centre, Short Term Lets display different characteristics and present different issues relative to those in rural areas, which warrants further analysis of evidence on matters such as parking, anti-social behaviour, waste services and Environmental Health;
- iv. **agree** that the City of Inverness Area Committee therefore seeks to progress with the process of considering the introduction of two distinct STLCA's corresponding to the City of Inverness and wider rural areas, and in so doing;
- v. **agree** that progressing with consideration of a STLCA enables communities within the area to participate in that consultation at the appropriate stage, and
- vi. **agree** that progressing with the consideration of a STLCA enables further analysis of evidence on matters defined in recommendation iii. to be undertaken and made available to the public within that consultation exercise.

### **City of Inverness Area Committee Membership**

Mr C Ballance	Mrs J Hendry
Mr B Boyd	Ms E Knox
Mr I Brown	Mrs I MacKenzie
Mr M Cameron	Mr A MacKintosh
Mrs G Campbell-Sinclair	Mr R MacKintosh
Mr A Christie	Ms K MacLean
Ms H Crawford	Mr D Macpherson
Mr D Fraser	Mr D McDonald
Mr K Gowans	Mrs M Reid
Mr A Graham	Mrs T Robertson
Mr D Gregg	Mr A Sinclair
Dr M Gregson	

Agenda Item	3
Report No	CIA/01/26

# The Highland Council

**Committee:** City of Inverness Area

**Date:** 7 January 2026

**Report Title:** Short Term Let Control Area

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

## 1 Purpose/Executive Summary

1.1 At the meeting of The Highland Council on 18 September 2025, Members considered an item setting out the process and options for implementing further Short Term Let Control Areas. The regulatory process to designate a Short Term Let Control Area (STLCA) follows three steps: notification and consultation; submission to, and approval from, Scottish Ministers; followed by public notice of the designation. Reaching a decision on whether to progress with the implementation of a Short Term Let Control Area will require a number of decision points to consider; the supporting evidence, the analysis of the outcome of consultation, and whether ultimately to designate an area. A new structure for how such decisions can be reached was agreed by Members, where:-

- i. Area Committees will first decide on whether to progress with the introduction of a Short Term Let Control Area covering all or part of their Area;
- ii. The Economy and Infrastructure (E&I) Committee take the decision to formally commence the process with the evidence gathering and consultation;
- iii. The E&I Committee, having taken into account the evidence and feedback, decide on whether or not to continue with the process;
- iv. The final decision to designate a Short Term Let Control Area is for E&I Committee; and
- v. That a report would come to the next E&I Committee that explored the options for the Council to work in partnership with the UK and Scottish Governments to include Rural Housing in any new growth deal for the Highlands. With the aim to bring additional finance for housing delivery; identify and remove barriers across public agencies that currently hindered development; act as an enabler for innovative community-led housing solutions; and unlock development opportunities where these were supported by local communities.

- 1.2 This report summarises the prevalence of Short Term Lets in the Inverness Area specifically, the majority of which have been converted from former residential dwellings. Of the 1,714 Short Term Lets across the Inverness Area, 1,508 (or 88%) were therefore potential dwellings, in contrast with 'purpose-built' Short Term Lets. The Area of Inverness is a highly diverse area, comprising the four city wards and three surrounding rural wards that extend a considerable distance from central Inverness. Owing to this context, it is not surprising that Short Term Lets display varying characteristics across this context. Within the four City Wards (13, 14, 15 and 16) Short Term Lets are spatially concentrated as shown within the [Highland Short Term Lets](#) Map and **Appendix 7**. In rural areas, there is less spatial concentration but owing to the lower overall number of dwellings, recent conversions to Short Term Lets have removed significant shares of housing stock, particularly in Ward 12. Relative to other areas of Highland, Inverness City and the Loch Ness vicinity are seeing proportions of Short Term Lets grow at a faster rate than Highland as a whole. An assessment of the Inverness Housing Market Area undertaken as part of the Highland Housing Need and Demand Assessment similarly indicates that some parts of the area's housing market are showing signs of this pressure, are relatively less contained, with less affordable properties than other areas of Highland, and higher proportions of sales to those outwith the local area, and these are spatially consistent with the areas with higher rates of Short Term Lets. There are three registered Local Place Plans in Inverness where communities have presented evidence and, in some cases, expressed concerns on short term let matters in relation to housing challenges.
- 1.3 On balance, the evidence at this time therefore indicates that the establishment of two distinct Short Term Let Control Areas would be justified in Inverness; one covering the four city wards (Ward 13, 14, 15 and 16) and one covering the rural Ward 12 which can be progressed as part of a larger rural Short Term Let Control Area with neighbouring Area committees. Members were informed of the process to designate further Short Term Let Control Areas in September, which involves a mandatory process of consultation with communities potentially affected by the proposal alongside the Council's statement of reasons. Should the Area Committee decide to progress with the process of considering the introduction of a Short Term Let Control Area covering all or part of the Area, this would be referred to the Economy and Infrastructure Committee to formally commence the process and would afford communities in the Area with the opportunity to participate in that process.

## 2 Recommendations

### 2.1 Members are asked to:-

- i. **Note** the evidence presented demonstrating that the housing market within parts of the Inverness Area is subject to significant pressure, exacerbated by high rates of potential dwellings being converted to Short Term Lets;
- ii. **Note** that the designation of any new STLCA will have no retrospective impact on existing Short Term Lets where no material change of use had occurred at the time of their establishment, and will therefore only require planning permission from new Short Term Lets established after a STLCA comes into force;
- iii. **Note** that in Inverness City Centre, Short Term Lets display different characteristics and present different issues relative to those in rural areas, which warrants further analysis of evidence on matters such as parking, anti-social behaviour, waste services and Environmental Health;

- iv. **Agree** that the City of Inverness Area Committee therefore seeks to progress with the process of considering the introduction of two distinct STLCA's corresponding to the City of Inverness and wider rural areas, and in so doing;
- v. **Agree** that progressing with consideration of a STLCA enables communities within the area to participate in that consultation at the appropriate stage, and
- vi. **Agree** that progressing with the consideration of a STLCA enables further analysis of evidence on matters defined in recommendation iii. to be undertaken and made available to the public within that consultation exercise.

### 3 Implications

- 3.1 **Resource** – any decision taken to progress work on bringing into effect a Short Term Let Control Area will have resource implications that will not be met through existing budgets. This will relate to officer time and consultancy fees in establishing a control area and, if agreed, thereafter its implementation. While fees can be recovered for any subsequent processing of planning applications, these do not necessarily result in full cost recovery, and it is likely to result in a significant increase in enquires where fee income will not cover cost.
- 3.2 **Legal** –The Council has the power under Section 26B of the Town & Control Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019, to designate a Short Term Let Control Area. Potential risks of legal challenge can be mitigated by careful consideration of the evidence to support such proposition.
- 3.3 **Risk** – any decision taken to progress with a Short Term Let Control Area may be subject to legal challenge. This risk can be mitigated by careful consideration of the evidence to support such proposition.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – no specific implications to highlight.
- 3.5 **Gaelic** – there are potentially disproportionate impacts on specific Gaelic-speaking communities stemming from a lack of housing availability and affordability in some areas of Highland. Any evidence in relation to Short-Term Lets and their impact on housing availability may therefore have related impacts on specific Gaelic-speaking communities.

### 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 report does not relate to the formal implementation of a Short Term Let Control Area but considers whether there is an evidence base that would justify progressing to a full evidence gathering and consultation phase, and therefore an impact assessment is not required. If a decision was taken to progress to the next stage, which would involve evidence gathering and consultation, an impact assessment would be required in order to inform the decision on whether to progress with such a scheme.

## 5 Background

- 5.1 Members will recall from the [previous report to Highland Council](#) in September 2025 that The Planning (Scotland) Act 2019 introduced provision for Planning Authorities to designate all or part of their area as a STLCA:-

- to help manage high concentrations of STLs (where it affects the availability of residential housing or the character of a neighbourhood);
- to restrict or prevent short term lets in places of types of building where it is not appropriate; and
- to help local authorities ensure that homes are used to best effect in their areas;

- 5.2 There is currently one STLCA within Highland, established in Ward 20 Badenoch and Strathspey. Members were reminded in the [previous report to Highland Council](#) in September 2025 of the scope of what development would and would not be considered within an STLCA. In summary:-

- Within an STLCA, a change of use of a dwellinghouse to STL (as defined) will be deemed to be a material change of use and so require planning permission.
- However, this only applies to **new** STLs established after an STLCA comes into force and cannot be applied retrospectively.
- A STLCA will therefore not be able to control existing STLs where no material change of use had occurred at the time of establishment, or other types of short-term accommodation such as guest houses, B&Bs, annexes and pods.
- It would also have no effect on second homes, empty homes or purpose-built holiday accommodation.
- STLs are also subject to separate licensing requirements. Following the designation of a STLCA, the Council, as licensing authority, will require evidence that planning permission has been sought or is in force for when granting future STL licences within a STLCA.

- 5.3 Members were reminded of the process of designating an area as a control area essentially follows three steps as set out in regulation 3 of [The Town and Country Planning \(Short-term Let Control Areas\) \(Scotland\) Regulations 2021](#). Should the Economy and Infrastructure (E&I) Committee take the decision to formally commence the process with the evidence gathering and consultation described in Para 1.1 (ii), the Planning Authority must undertake:-

- notification and consultation: publish notice of their proposal to designate a control area and consult on the proposal;
- submission and approval: submit their proposal to the Scottish Ministers and obtain their approval; and
- publicity: subject to approval of the Scottish Ministers, the planning authority must give notice of the designation, setting out the area to be covered and the date on which the control area will come into effect.

5.4 The [Short-Term Lets and Planning Circular 1/2023](#) states that Planning authorities should consider whether there are systemic material planning considerations across one or more areas in the planning authority area as part of deciding whether to designate one or more control areas. Systemic might mean the same consideration repeated many times or that there is a cumulative impact from the use of dwellinghouses as short-term lets. Example indicators include:-

- Lack of affordable and appropriate housing for local residents, perhaps indicated by a high share of sale volumes to, and high prices paid by, non-residents.
- Detrimental impact on local amenity, with some businesses, schools or other services that serve, and are reliant on, permanent residents closing or relocating
- Changes to the look and feel of a neighbourhood, such as multiple keyboxes on many buildings or structures or noise on streets and in stairwells.
- Signs that local services are struggling, such as many instances of overflowing bins.
- A significantly higher level of complaints relevant to use of dwellinghouses as short-term lets from neighbours spread across a number of tenements or 5 properties than in a comparable area, within or outside the planning authority area.

5.4 This report is structured to respond to this and present evidence regarding housing indicators from the Housing Need and Demand Assessment, before considering other matters such as detrimental impact on local amenity, and impact on local services. Using records from the mandatory [STL Public Register](#), the [previous report to Highland Council](#) in September 2025, detailed initial analysis undertaken on STL prevalence to allow consideration of impacts on the availability of residential housing, as informed by the [Short-Term Lets and Planning Circular 1/2023](#). Across Highland 6% of potential dwellings are licensed as short term lets, and around 5% of new housing completions across Highland within the last 5 years are now licensed short term lets, yet it is evident that there were marked differences across the authority as a whole. This report provides greater assessment of this analysis as it relates specifically to the Inverness Area to support Members decide whether to progress to the first stage of the implementation of a short term let control area, namely the evidence gathering and consultation phase.

## 6 **Assessment of Short Term Lets and Housing Availability in Inverness**

6.1 Conducted as part of the ongoing Highland Housing Need and Demand Assessment (HNDA) a robust 'containment analysis' of sub-Highland Housing Market Areas, highlights areas with a high proportion of sales to those outwith the local areas, the Highlands or indeed outwith Scotland. While some degree of transfer between Housing Market Areas is expected in a large authority such as The Highland Council, high proportions of external sales completed to buyers outwith the Highlands, Scotland and the UK could indicate that the local housing market may be distorted owing to increasing external demand.

- 6.2 The Inverness Housing Market Area (HMA) shares the same boundary as the Inverness Area Committee and has high levels of self-containment at 81%, where 65% of house sales were purchased by buyers already living in Inverness, a further 15% were purchased from buyers from elsewhere within Highland and 19% of sales were from outwith Highland, Scotland, and the UK, as shown in **Table 1**. Inverness is also an area where both average house prices and market entry house prices are less affordable than in other Highland HMAs but median household incomes are also higher in the area. The change in average house prices in Inverness has increased by 16% in the last 5 years which is lower than the equivalent rate for Highland (22%).

**Table 1 Inverness Housing Market Area**

	<b>Inverness</b>	<b>Highland</b>
Median Household Income	£45,730	£42,195
<b>HMA Containment</b>	<b>81%</b>	<b>71%</b>
HMA Internal Self-Containment	65%	
HMA Containment Highland	15%	
Sales from Scotland, UK & Elsewhere	19%	29%
Average House Price Change (2019-2025)	16%	22%
Average House Price	£212,076.88	£209,125.12
Income Required to Afford Average House Price	£56,332.92	£55,548.86
% CAN'T afford Average House Price	<b>62%</b>	<b>64%</b>
Market Entry House Price	£141,000.00	£132,310.00
Income Required to Afford Market Entry House Price	£37,453.13	£35,144.84
% CAN'T afford Market Entry House Price	41%	41%
Empty Homes	4%	5%
Second Homes	1%	3%
<b>Short Term Lets</b>	<b>3%</b>	<b>5%</b>

- 6.3 In Inverness, 3% of potential dwellings are currently licensed STLs, which is lower than 5% across Highland as a whole. The indicators within **Table 1** suggest that at Area level, the Inverness Housing Market demonstrates a clear contained area that people seek to reside in, coupled with less affordable property prices. The share of the Inverness population that cannot afford the average property price or the market entry property price is broadly comparable with the Highland-wide rates. Owing to the variation with the Area however, officers have disaggregated this evidence at smaller statistical areas known as data zones to understand the impacts on specific communities. While the share of total Inverness Area property sales to buyers outwith Highland is 19%, **Table 2** highlights that in specific data zones, the share of property sales to buyers outwith Highland over the last five years has been considerably higher, in some instances exceeding 50% of total sales. These areas are spatially concentrated as demonstrated in the map provided in **Appendix 1** in the Loch Ness Area, West Rural Inverness, and City centre locations such as Inverness Central, Merkinch, Crown and Haugh. These findings are consistent with wider assessments of the STL market ([Colomb 2025](#)), which suggest that impacts may not be always quantitatively significant at the level of an entire city if compared to other factors, but are highly concentrated in particular neighbourhoods, most often central popular tourist areas, or desirable, smaller, rural, mountain or coastal towns and villages.

- 6.4 Instances where higher shares of house sales to buyers outwith the local area, where median incomes may be higher, provide indications of where housing markets may be distorted due to external influence. **Table 2** should therefore be interpreted as meaning that such impacts are likely not felt consistently across the Inverness Area but rather are likely to be significantly felt in specific locations, which cover both rural and urban contexts, mainly in areas within the four City wards (13, 14, 15 and 16) and the rural Ward 12, where all the Loch Ness data zones are situated.

**Table 2 Inverness Data Zones with Higher Shares of External Property Sales**

Data Zone	Number of House Sales (2019-2024)	External Sales (%) purchased by buyers outwith Highland
Loch Ness - 05	147	65%
Loch Ness - 02	79	58%
Inverness Merkinch - 04	14	50%
Loch Ness - 01	70	50%
Inverness West Rural - 01	60	43%
Inverness East Rural - 01	52	40%
Loch Ness - 03	102	40%
Loch Ness - 04	49	39%
Inverness Central, Raigmore & Longman - 02	80	36%
Inverness West Rural - 03	36	36%
Inverness Scorguie - 05	83	31%
Inverness West Rural - 08	129	30%
Inverness Drummond - 05	60	30%
Inverness Crown & Haugh - 02	75	29%
Inverness Lochardil & Holm Mains - 06	24	29%
Inverness Ballifeary & Dalneigh - 02	88	27%
Inverness East Rural - 03	313	27%
Inverness West Rural - 04	71	27%
Inverness Crown & Haugh - 03	85	26%
Inverness Central, Raigmore & Longman - 05	8	25%
Inverness West Rural - 09	48	25%

- 6.5 The [Highland Short Term Lets](#) Map uses records from the [STL Public Register](#) and the National Records of Scotland [Small area Statistics on Households and Dwellings](#) (2024) to identify concentrations of STLs within data zones which illustrate precise areas where STLs are concentrated. A breakdown of registered STLs in Inverness wards (12, 13, 14, 15, 16, 17 and 19) as of 30 July 2025 is shown in **Table 3**. Overall, the majority of STLs in the Inverness area are self-contained flats (597), followed by detached dwellings (540) out of a total of 1,714 STLs. In total, Inverness has 206 STLs which are unconventional accommodation. In Aird and Loch Ness (Ward 12), detached dwellings predominate followed by self-contained flats and unconventional accommodation.

Inverness West (Ward 13) has predominantly self-contained flat STLs. In Inverness Central (Ward 14), self-contained flats predominate as STLs. By comparison to Wards 12, 13 and 14, the other Wards in Inverness - 15, 16, 17 and 19 - have fewer STLs. Inverness Ness-side (Ward 15), Inverness South (Ward 19) and Culloden and Ardersier (Ward 17), detached houses and self-contained flats are most common, though the numbers of STLs are relatively low. In Inverness Milburn (Ward 16), self-contained flats are the most common STL type. A map depicting the most common forms of STLs across Inverness wards is shown in **Appendix 2**.

**Table 3 Profile of STLs in Inverness Area Wards**

	Ward 12	Ward 13	Ward 14	Ward 15	Ward 16	Ward 17	Ward 19
<b>All Short Term Lets</b>	<b>632</b>	<b>225</b>	<b>474</b>	<b>69</b>	<b>99</b>	<b>71</b>	<b>144</b>
Unconventional Accommodation STLs (Pods, chalets etc)	112	18	19	14	7	9	27
<b>All Potential Dwelling STLs</b>	<b>520</b>	<b>207</b>	<b>455</b>	<b>55</b>	<b>92</b>	<b>62</b>	<b>117</b>
Detached STLs	311	45	66	16	22	24	56
Semi-Detached STLs	59	37	79	15	23	16	22
Terraced House STLs	18	29	54	8	3	4	4
Self-Contained Flat STLs	132	96	256	16	44	18	35
<b>Previous Long-Term Empty*</b>	<b>34</b>	<b>27</b>	<b>72</b>	<b>4</b>	<b>17</b>	<b>8</b>	<b>7</b>
% of Potential Dwelling STLs	6.5%	13.0%	15.8%	7.3%	18.5%	12.9%	6.0%
<b>Previous Second Homes*</b>	<b>15</b>	<b>4</b>	<b>14</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>4</b>
% of Potential Dwelling STLs	2.9%	1.9%	3.1%	1.8%	1.1%	1.6%	3.4%

- 6.6 Given that the majority of Registered STLs have been converted from previous dwellings, it is valuable to assess the profile of the dwellings that have been converted. Officers have used the Council Tax Register for this purpose. While licensed STLs are not considered residential properties and are often removed from the Council Tax Register when operational, their prior status on previous years Council Tax Registers (2022, 2023, 2024) indicates whether they were recorded as Long Term Empty or Second Homes. **Table 3** indicates that modest numbers of STLs have been converted from previous Long Term Empty properties or in some instances from Second Homes. The share of former Long Term Empty properties now used as STLs is highest in the City Centre Wards (13, 15 and 16). While it is positive that some Long-Term Empty dwellings have been brought back into use, it is accepted that in the majority of cases, STLs are converted from occupied dwellings.
- 6.6 Unconventional accommodation STLs (pods, chalets and other forms of accommodation not transferrable back to housing stock) are excluded to arrive at the Adjusted Rate of STL, which reflects the potential dwellings used as STLs. In Inverness HMA 3% of potential dwellings are used as STLs. At smaller data zone level, a Map is provided in **Appendix 3**, which illustrates that there are numerous data zones in Inverness where the Adjusted Rate of STLs is higher than the Highland average (5%). Three data zones in Inverness Central ward have an Adjusted Rate of STL over 17.27% (orange) and the Loch Ness – 05 data zone which has an Adjusted Rate of STL over 23.35% (red).

- 6.7 The threshold for a 'high' Adjusted STL Rate arrived at is 11.17%. This means that data zones with Adjusted STL Rates above 11.17% are considered to be outside the statistical normal range, relative to Highland as a whole. There are 10 data zones in Inverness that exceed this threshold, concentrated within Inverness Central and west of Loch Ness as can be seen in the map provided in **Appendix 3**. The impact of high concentrations of STLs at street-level is discussed separately in **Section 7 Impact on Residential Amenity**.
- 6.8 Officers have also identified areas with the 'fastest growing' Adjusted Rates of STL, by comparing the current rates with those from 2024 and 2023. This highlights areas which may have average or low Adjusted STL Rates but appear to be on an increasing trajectory and warrant observation and monitoring. A map showing where Adjusted Rates of STLs are changing in Inverness is shown in **Appendix 4**. There were more than 30 data zones in Inverness where Adjusted STL Rates increased faster than the Highland average, and more than 20 data zones where Adjusted STL Rates increased more slowly than the Highland average. The [Highland Short Term Lets](#) Map allows users to interrogate specific areas and view the rates of change. Areas where Adjusted Rates of STLs have increased faster than the Highland average for more than 1 or 2 consecutive years are shown in **Appendix 5**. In rural Inverness there are eight areas with Adjusted STL rates increasing faster than the Highland average for one year, and three for 2 consecutive years. In Inverness City, there are widespread areas across many data zones where Adjusted STL rates are increasing faster than the Highland average for one year, and there are 12 data zones where Adjusted STL rates are increasing faster than the Highland average for two consecutive years.
- 6.9 Analysis of Total New Housing Completions and the STL Licence Register reveals that of the total 2,746 housing completions in Inverness in the past 5 years, 58 have since become STLs, which equates to 2.1% of completions. This is less than the Highland average of 5%, but there is evidently variation between the wards as shown in **Appendix 6**, with Ward 12 having the highest share of newbuild completions that became STLs, at a rate similar to the Highland average.

## 7 Impact on Residential Amenity and Council Services

- 7.1 Regarding the [Short-Term Lets and Planning Circular 1/2023](#) suggested indicator of detrimental impact on local amenity, such as some businesses, schools or other services that serve, and are reliant on, permanent residents closing or relocating, it is noted that Foyers primary school has been mothballed since 2023 owing to declining school roll forecasts. This report should not be interpreted as meaning that Short Term Lets are the sole contributor to this development, as the area has consistently higher rate of second homes than other areas of Highland. It is however, accepted that there is an established history of Short Term Let accommodation within the area.
- 7.2 The concentration of STLs within particular streets is evident within the map shown within **Appendix 7**, with over 600 situated in the most central data zones of Inverness. The concentrations within some streets result in the majority of properties being now Licensed STLs, including many instances of consecutive STLs within the same street frontage, which has the potential to change the character of the area, and the sense of community among remaining residents. Regarding the [Short-Term Lets and Planning Circular 1/2023](#) suggested indicators of signs that local services are struggling, such as many instances of overflowing bins, and a significantly higher level of complaints relevant to use of dwellinghouses, officers have liaised with Environmental Health on these aspects.

**Appendix 8** outlines the recorded log of 58 Environmental Health Complaints for STLs for the past 3 years, and 20 instances where bins/waste or noise have been specifically recorded within the case files. These are considered relatively small numbers of complaints in real terms but reflect only formal complaints logged with Environmental Health. The majority of complaints to Environmental Health for STLs are complaints that the property may not be licensed, which requires a process or engagement with the proprietor if found to be true. Where the proprietor does not engage, this is progressed to Police Scotland to take enforcement action under the Civic Government (Scotland) Act 1982 and the Licensing of Short-Term Lets Order 2022. Police Scotland have only been required to intervene in one unlicensed STL in the Inverness Area.

7.3 For complaints where waste issues were raised, this is often due to neighbouring bins being used instead of those reserved for the property, bins not being placed for refuse collection on the correct day, or bins overflowing. As Licensed STLs are not residential properties, many owners switch their property from the Council Tax Register onto the Non-Domestic Rates (NDR) Register, provided that they can evidence that they have let the property for 70 nights within the financial year and that it was available to let for 140 nights in the financial year. The Environmental Protection Act 1990 sets out the law regarding the management of waste from both domestic households and NDR (business) premises. All businesses no matter their size are required to comply with waste regulations and have appropriate waste management arrangements for the collection and disposal of waste and recycling. NDR do not include a charge for waste collection, and any waste services provided to Non-Domestic Rated properties are chargeable separately. Licensed STL which are on NDR are required to have a waste and recycling collection contract in place. It is evident however that many have not done so and continue to use Council residential waste collection services despite no longer paying Council Tax. Officers have liaised with the Waste Services Team on these matters and have been made aware of approximately 550 licensed STL premises in the Inverness Area, that are on NDR yet not paying for waste and recycling collections. Of these, approximately 280 are located in the Inverness City wards (13, 14, 15 and 16). Officers are following up with the operators of the respective properties on these matters as this a loss of income to the Council from either Council Tax or Business Waste Contract charges and also places additional financial and operational burden on waste collection services for the collection, haulage, treatment and disposal of the waste and recycling.

7.4 A review of registered Local Places Plans has been undertaken to identify communities that have expressed concern regarding prevalence of STLs, or that have explicitly prioritised designation of a STLCA in their area. Planning authorities are to take into account any registered LPP when they are preparing or amending a Local Development Plan. At the time of writing this report, the Highland Council has registered a total of 14 Local Place Plans (LPPs), and the [Local Place Plan Register Map](#) shows the status of areas that have formally registered LPPs, in addition to those that have notified us that they intend to submit one. There are presently three registered LPPs in the Inverness Area – Fort Augustus and Glenmoriston, Stratherrick and Foyers, and Dores and Essich Community – which mention STLs in various ways:-

- Fort Augustus and Glenmoriston - Short term let control to manage future growth of second homes/holiday lets, as in Badenoch and Strathspey.
- Stratherrick and Foyers - No mention of STL

- Dores and Essich Community - The level of properties being used as second homes was marginally lower than Highland, but greater than Scotland (5.2% for Dores and Essich in comparison to 1.5% for Scotland). Anecdotal evidence suggests that this may have changed since the 2011 Census, with Dores and Essich seeing an increase in the use of properties for second and holiday homes. Owner-occupation was the predominant tenure, followed by private rented accommodation.

7.5 There are nine notified LPPs in the Inverness area. Among those that have prepared a draft LPP, there is little mention of short term lets:-

- Kirkhill and Bunchrew - Notice of intent received.
- Strathglass - Notice of intent received.
- Glen Urquhart - Notes that the LDP lists Balnain as an area with opportunity to develop local tourist facilities and commendation on the back of an increase in the promotion of the A831 tourist route and to the Western Glens, and based on Glen Urquhart's archaeological, fishing and forest-based recreation assets.
- Holm - Notice of intent received.
- Strathnairn - Notice of intent received.
- Croy and Culloden Moor - Notice of intent received.
- Balloch Community Council Area - No mention of STLs in draft LPP submitted to Council.
- Strathdearn - Notification of intent received.
- Beauly - No mention of STLs in draft LPP submitted to Council.

7.6 A Local Place Plan can only be placed on the register if it is valid, meaning if the requirements for Local Place Plans set out within paragraphs 1(4) and 2(1) of [Schedule 19](#) of the Town and Country Planning (Scotland) Act 2019 as amended, and Regulations 2, 3, 4 and 5 of [The Town and Country Planning \(Local Place Plans\) \(Scotland\) Regulations 2021](#), have been complied with in relation to it. Communities may wish to come forward in due course with further LPPs, which would be duly considered at the appropriate stage, but at the present time, only registered LPPs in Inverness can be taken into consideration regarding STLs in their communities.

7.7 The [Inverness Strategy](#) serves as the Inverness Area Place Plan, with a focus on development opportunities. It notes that tourism is by far the largest sector of the economy across the wider-Inverness area, with accommodation alone contributing over 25% to local economic activity and supporting over 5,300 jobs, however there is no specific mention of short-term lets.

## 8 Conclusion

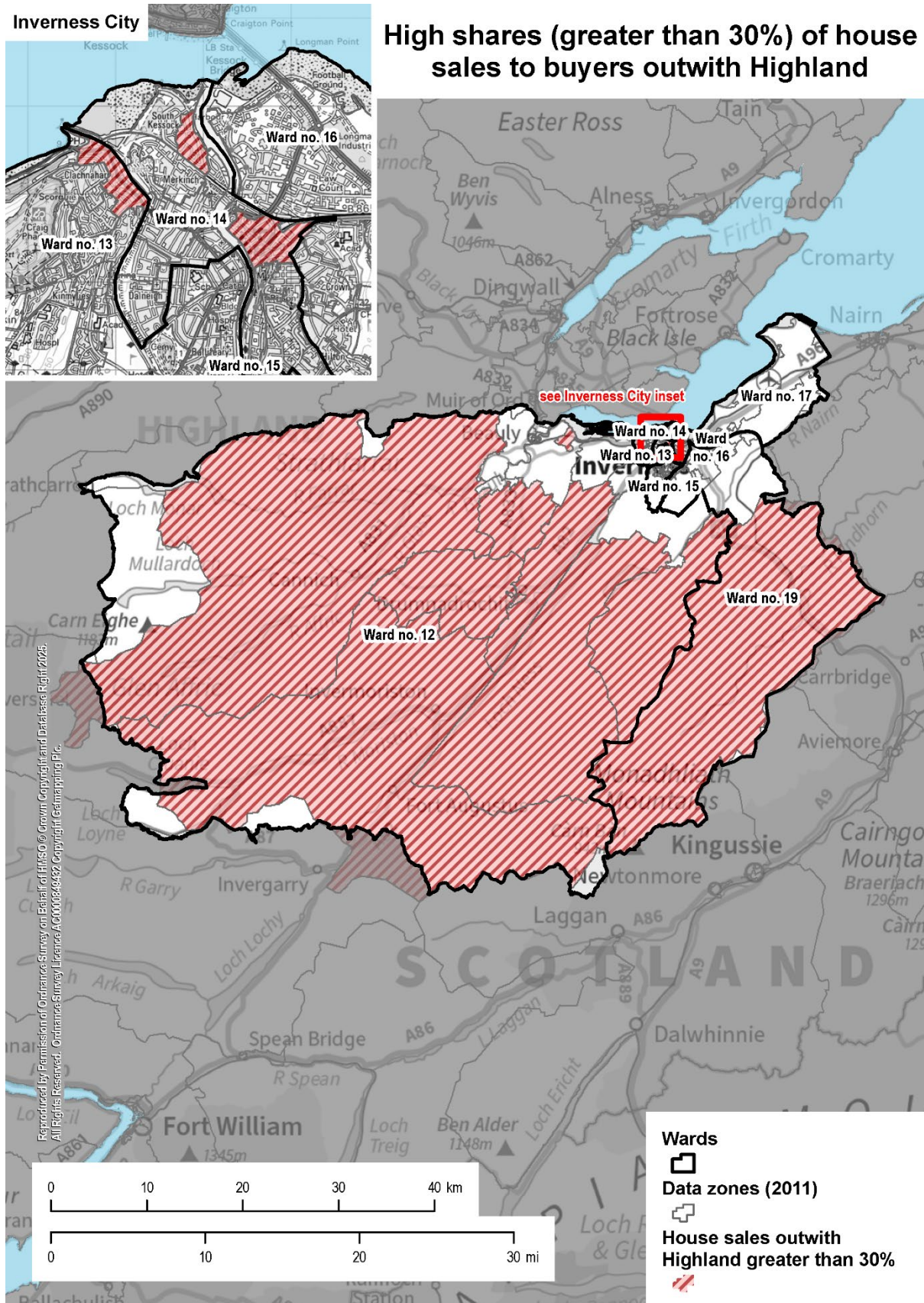
8.1 This report summarises the prevalence of Short Term Lets in Inverness and potential impacts on availability of residential housing in Inverness specifically. The variation between urban and rural contexts in the Area means that Short Term Lets affect communities and housing supply differently. While the whole Inverness Area has a lower share of potential dwellings used as Short Term Lets than other areas of Highland, there are clearly concentrations within specific communities, such as Inverness City Centre and Ward 12 Aird and Loch Ness. In Inverness City Centre, there are four data zones where over 15% of potential dwellings are Short Term Lets, and in one data zone in Ward 12, over 27% of potential dwellings are Short Term Lets.

While there is growth occurring in almost all areas, the rate of potential dwellings used as Short Term Lets is higher in Ward 12 while lower in Ward 17 and Ward 19. An assessment of the Inverness Housing Market Area undertaken as part of the Highland Housing Need and Demand Assessment similarly indicates that some parts of the area's housing market are showing signs of this pressure, are relatively less contained, with less affordable properties than other areas of Highland, and higher proportions of sales to those outwith the local area. Within Inverness City Centre, there are concentrations of Short Term Lets within individual streets, and complaints to Environmental Health regarding noise and issues with bins and waste have been recorded. There are three registered Local Place Plans and an Area Place Plan in Inverness where communities have expressed concerns on Short Term Lets.

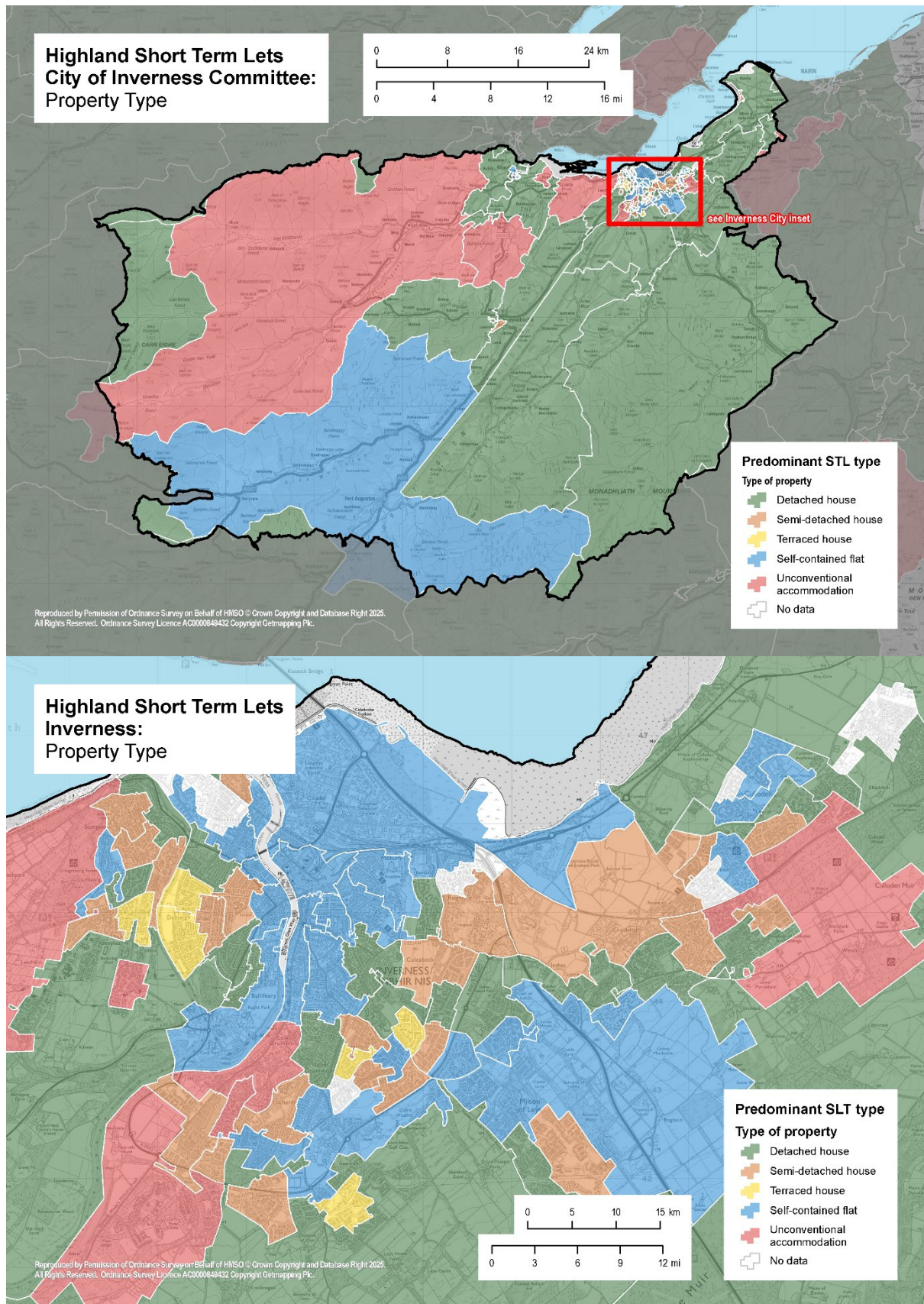
- 8.2 On balance, the evidence at this time indicates that further consideration of a Short Term Let Control Area would be justified in Inverness. The process of doing so has been outlined in this report and requires consultation on the Planning Authority's statement of reasons. Owing to the two different contexts of Inverness City and the surrounding rural Ward 12, the statement of reasons for these would likely be different. It is therefore considered reasonable that the Area Committee agree further consideration of two distinct Short Term Let Control Areas; one for the Inverness City wards (13, 14, 15, and 16), and one for rural Ward 12, which can be progressed as part of a larger rural Short Term Let Control Area with neighbouring Area committees. Progressing with further consideration of a Short Term Let Control Area enables communities within the proposed area to participate in that consultation at the appropriate stage and would define the exact boundaries of any proposed Short Term Let Control Area for further consideration. While there is undoubtedly strong tourist demand in the area, further purpose-built tourism accommodation could be provided following the usual planning process. Housing is evidently a finite resource and continued loss of housing stock in areas characterised by limited available land for development has significant potential to exacerbate housing availability in the area.

Designation:	Assistant Chief Executive - Place
Date:	2 December 2025
Authors:	Meadhbh Maguire, Principal Planner Meredith Dale, Graduate Planner
Background Papers:	Short Term Lets Control <a href="#">Report</a>
Appendices:	Appendix 1 - High Shares of House Sales to Buyers Outwith Highland Appendix 2 – Short Term Lets Predominant Property Type Zone Appendix 3 - Adjusted Short Term Lets Rates by Data Zone Appendix 4 - Adjusted STL Rate Change 2023-2024 Appendix 5 - High & Fastest Growing Adjusted STL Rates Appendix 6 - Newbuild Completions in Inverness Wards since used as STLs Appendix 7 - Concentrations of Short Term Lets in Inverness City Centre Appendix 8 - Logged Environmental Health STL Complaints in Inverness Wards

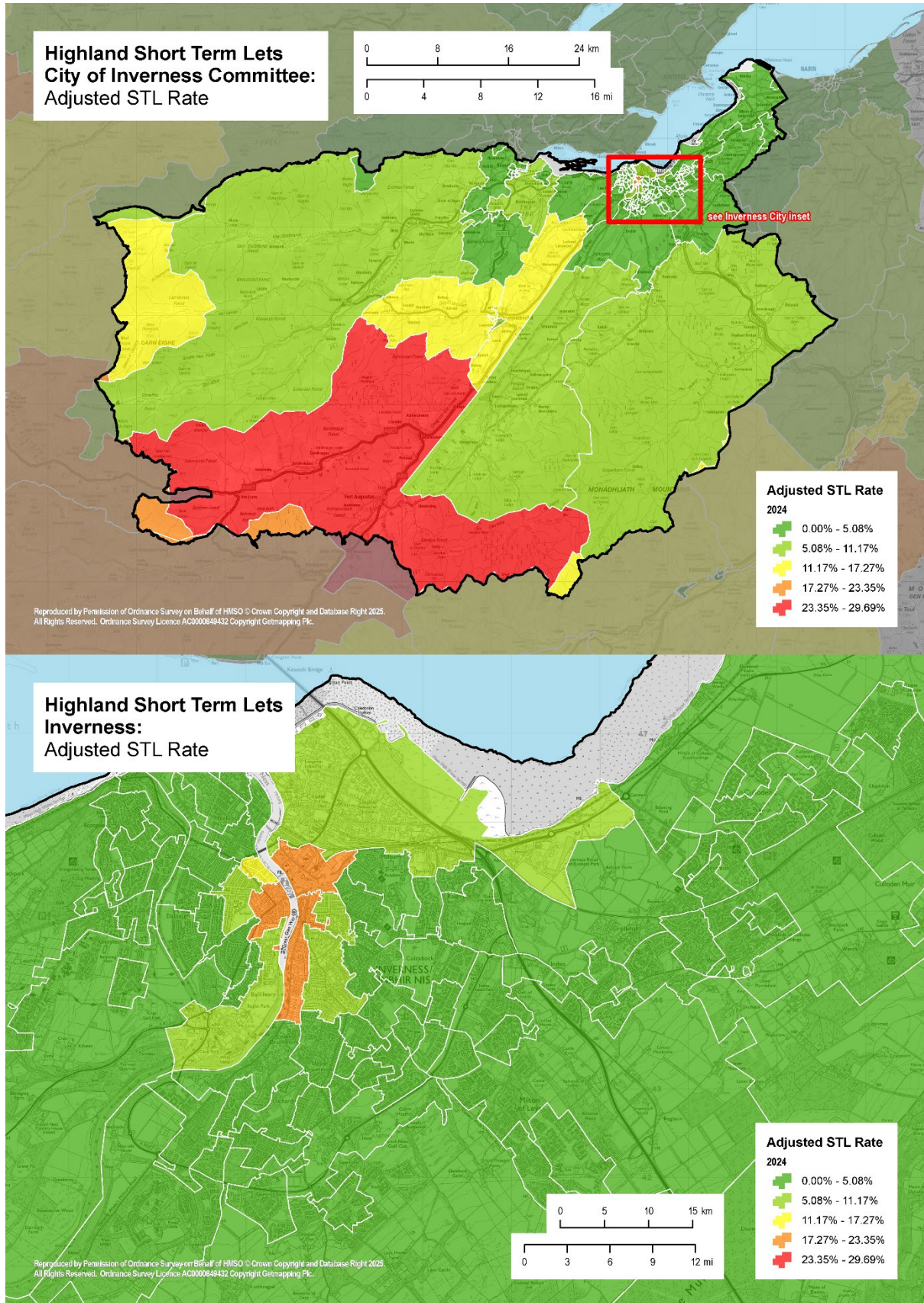
## Appendix 1 – High shares of house sales to buyers outwith Highland



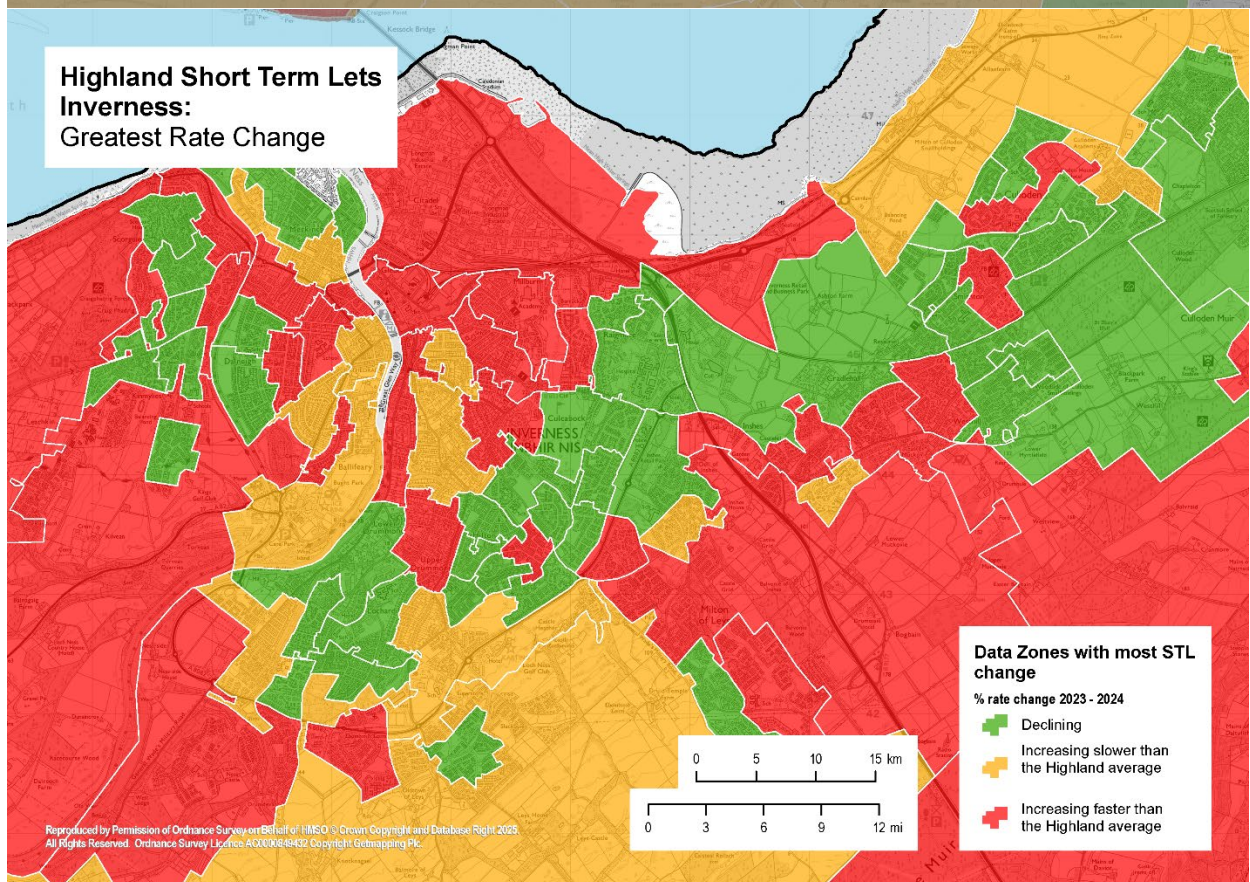
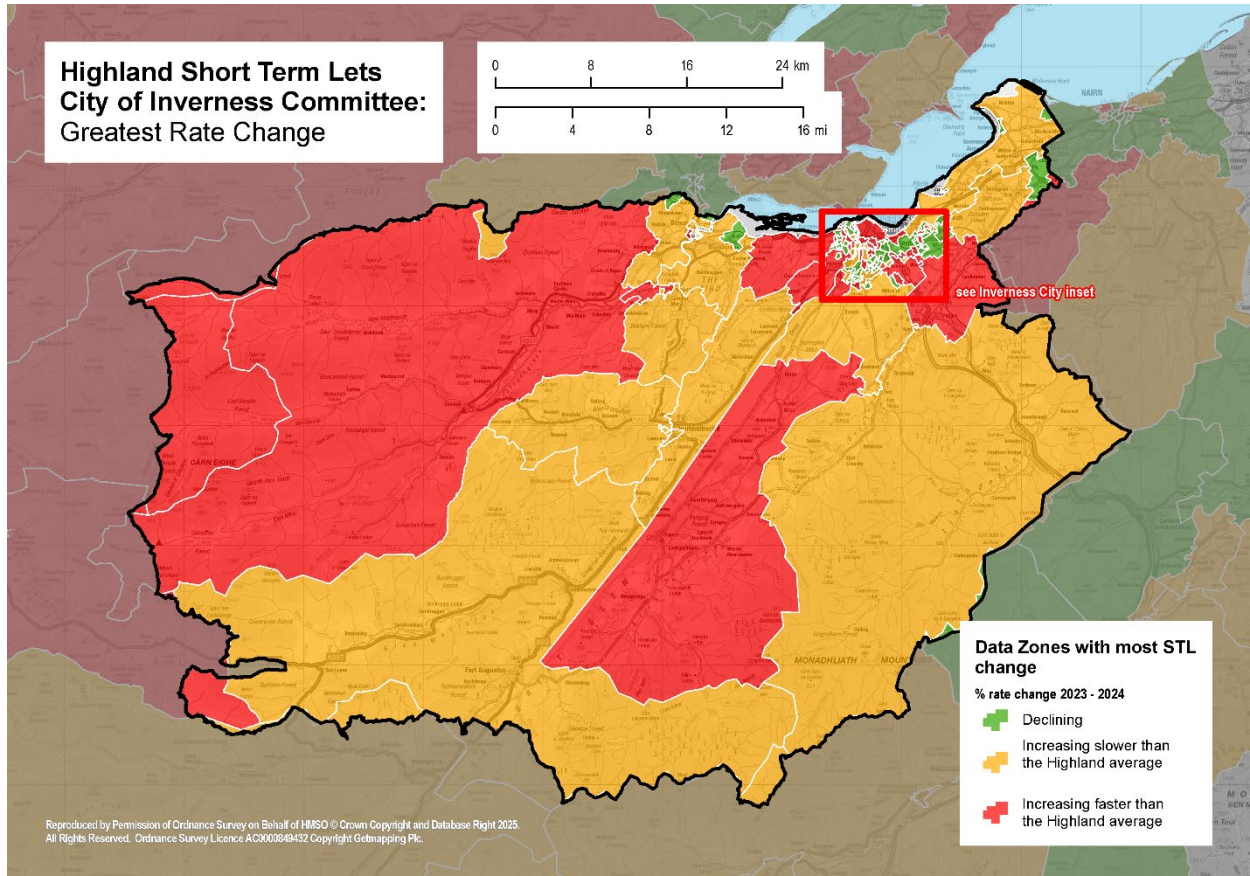
## Appendix 2 - Short Term Lets Predominant Property Type



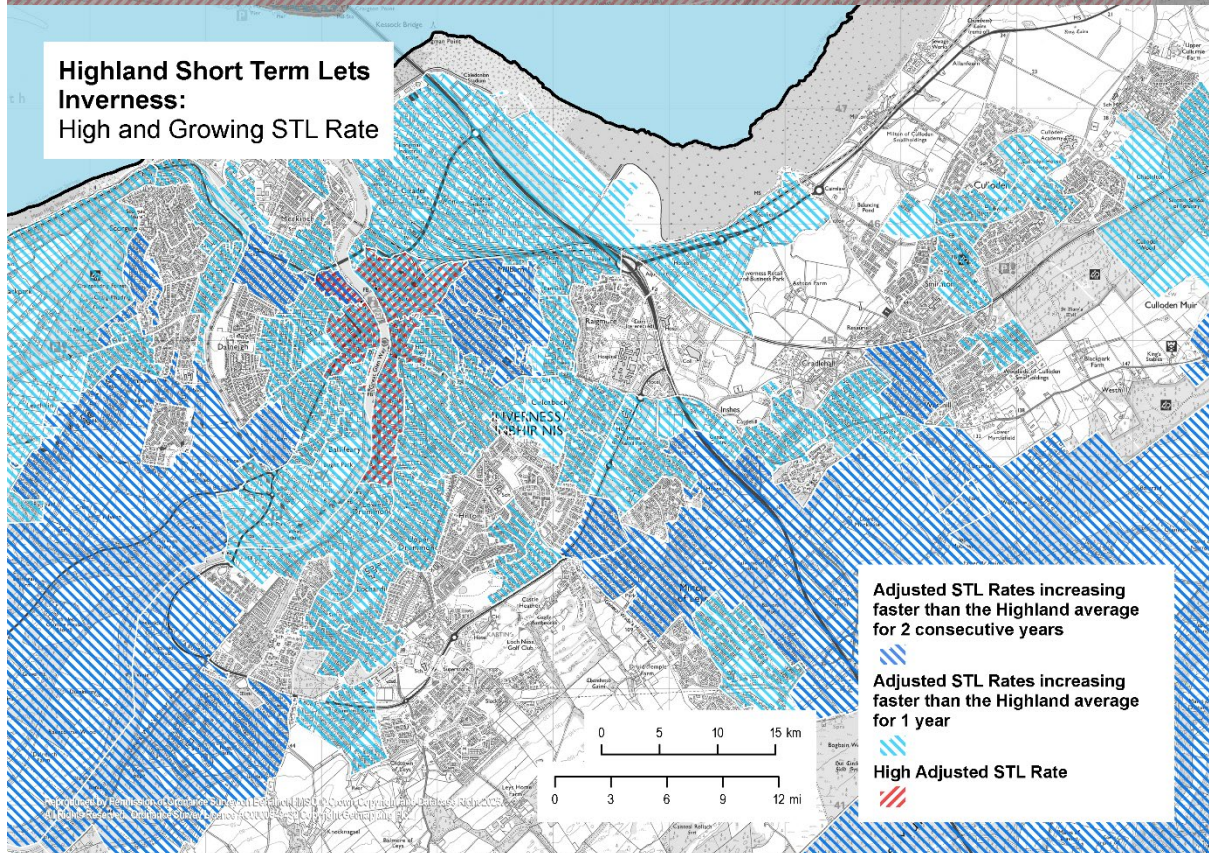
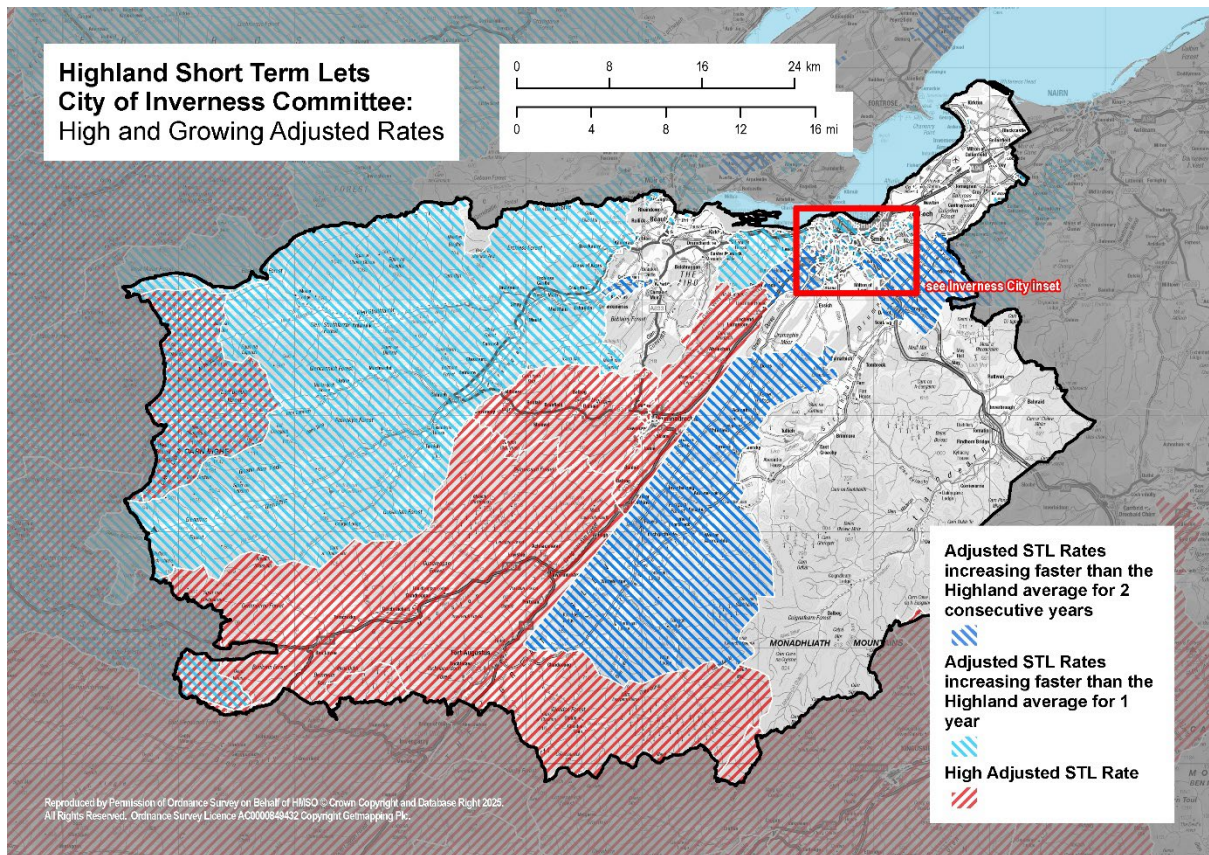
### Appendix 3 - Adjusted Short Term Lets Rates by Data Zone



## Appendix 4 - Adjusted STL Rate Change 2023-2024



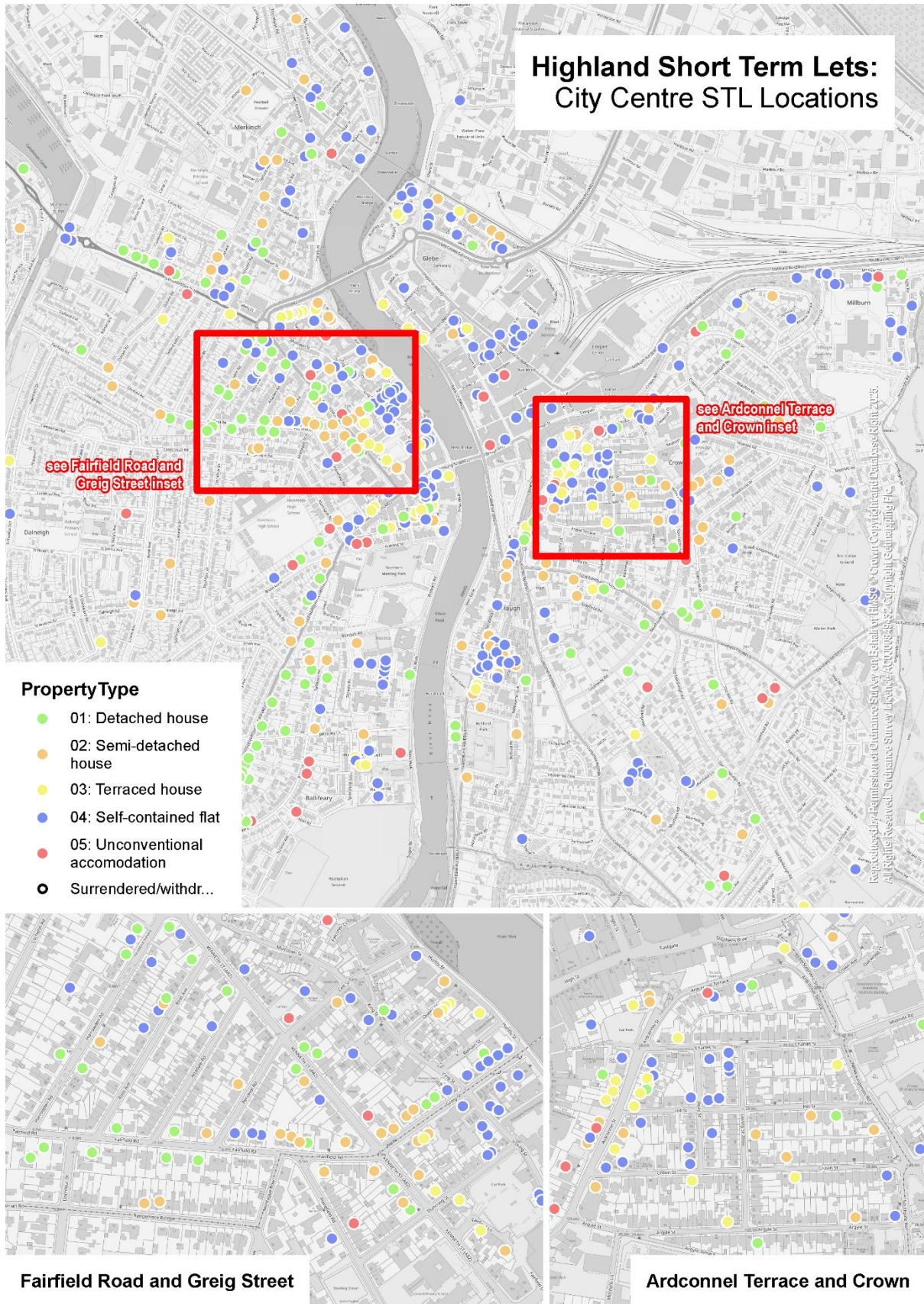
## Appendix 5 - High & Fastest Growing Adjusted STL Rates



## Appendix 6 - Newbuild Completions in Inverness Wards since used as STLs

		2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	5 yr Total
Ward 12	Total Completions	24	77	55	95	81	332
	Became STLs	-	12	1	4	2	19
	%	-	15.6%	1.8%	4.2%	2.5%	5.7%
Ward 13	Total Completions	25	98	64	50	58	295
	Became STLs	5	3	2	-	2	12
	%	20.0%	3.1%	3.1%	-	3.4%	4.1%
Ward 14	Total Completions	41	10	64	-	7	122
	Became STLs	-	-	1	-	2	3
	%	-	-	1.6%	-	28.6%	2.5%
Ward 15	Total Completions	73	250	111	110	79	623
	Became STLs	-	-	1	1	1	3
	%	-	-	0.9%	0.9%	1.3%	0.5%
Ward 16	Total Completions	31	37	1	10	28	107
	Became STLs	1	-	-	-	1	2
	%	3.2%	-	-	-	3.6%	1.9%
Ward 17	Total Completions	141	172	231	115	104	763
	Became STLs	-	3	2	1	-	6
	%	-	1.7%	0.9%	0.9%	-	0.8%
Ward 19	Total Completions	68	214	128	34	60	504
	Became STLs	2	6	1	2	2	13
	%	2.9%	2.8%	0.8%	5.9%	3.3%	2.6%
Inverness Area Total	Total Completions	403	858	654	414	417	2746
	Became STLs	8	24	8	8	10	58
	%	2.00%	2.80%	1.20%	1.90%	2.40%	2.10%

## Appendix 7 - Concentrations of Short Term Lets in Inverness City Centre



### Appendix 8 - Logged Environmental Health STL Complaints in Inverness Wards

		2022/ 2023	2023/ 2024	2024/ 2025	3 yr Total
<b>Ward 12</b>	Total Complaints	-	6	7	13
	Associated with bins/waste	-	2	-	2
	Associated with Noise	-	-	3	3
<b>Ward 13</b>	Total Complaints	1	3	7	11
	Associated with bins/waste	-	-	2	2
	Associated with Noise	-	1	2	3
<b>Ward 14</b>	Total Complaints	-	3	8	11
	Associated with bins/waste	-	-	-	-
	Associated with Noise	-	-	-	-
<b>Ward 15</b>	Total Complaints	2	-	2	4
	Associated with bins/waste	-	-	-	
	Associated with Noise	-	-	-	
<b>Ward 16</b>	Total Complaints	2	4	2	8
	Associated with bins/waste	-	-	-	
	Associated with Noise	-	1	-	1
<b>Ward 17</b>	Total Complaints	1	1	2	4
	Associated with bins/waste	-	-	1	1
	Associated with Noise	1	1	-	2
<b>Ward 19</b>	Total Complaints	2	5	-	7
	Associated with bins/waste	-	2	-	2
	Associated with Noise	2	2	-	4
<b>Inverness Area Total</b>	Total Complaints	8	22	28	58
	Associated with bins/waste	-	4	3	7
	Associated with Noise	3	5	5	13