

Agenda item	<b>16.3</b>
Report no	<b>HLC/15/26</b>

**THE HIGHLAND COUNCIL**

**Committee: THE HIGHLAND LICENSING COMMITTEE**

**Date: 13 January 2026**

**Report title: Application for the grant of a short term let licence – Shiro, Juniper Bank Caravan Park, Juniper Bank, Janet Street, Thurso, KW14 7EF (Ward 2 – Caithness, Sutherland and Easter Ross)**

**Report by: The Principal Solicitor – Regulatory Services**

**1. Purpose/Executive Summary**

1.1 This report relates to an application for the grant of a short term let licence.

**2. Recommendation**

2.1 Members are asked to determine the application in accordance with the Council's hearings procedure.

### 3. Background

- 3.1 In terms of The Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022, a licence is required for residential accommodation for use as a short term let.
- 3.2 In terms of the abovementioned Act, the Licensing Authority have twelve months from receipt of the application to determine the same, therefore this application must be determined by 15 January 2026. Failure to determine the application by this time would result in the application being subject of a 'deemed grant' which means that a licence would require to be issued on 16 January 2026 for a period of 12 months. The application is before this Committee as this is the last meeting before the determination date expires.
- 3.3 Short term let means the use of residential accommodation provided by a host in the course of business to a guest, where all of the following criteria are met:
- The guest does not use the accommodation as their only or principal home
  - The short term let is entered into for commercial consideration
  - The guest is not:
    1. An immediate family member of the host
    2. Sharing the accommodation with the host for the principal purpose of advancing the guest's education as part of an arrangement made or approved by a school, college, or further or higher educational institution, or
    3. an owner or part-owner of the accommodation
  - the accommodation is not provided for the principal purpose of facilitating the provision of work or services by the guest to the host or to another member of the host's household
  - the accommodation is not excluded accommodation, and
  - the short-term let does not constitute an excluded tenancy

### 4. Application

- 4.1 On 15 January 2025 a validated application for the grant of a short term let licence was received from Mr Richard Lawrence on behalf of Shiro Holidays LTD (company number SC811770) and having their registered office at Shiro, Juniper Bank, Thurso, KW14 7EF.
- 4.2 The property to which the application relates is Shiro, Juniper Bank Caravan Park, Juniper Bank, Janet Street, Thurso, KW14 7EF (the "Premises"). A site plan was provided by the applicant as part of the application process and is attached as an appendix to this report (**Appendix 1**). The Premises are those edged in Red on the plans on page 1 and page 2 of Appendix 1.
- 4.3 The application for the short term let licence has been made on the basis that the said Shiro Holidays LTD will be the host/operator of the Premises. The host/operator has applied for a short term let licence as an 'existing host' on the basis that the Premises were operated as a short term let property prior to 1 October 2022.
- 4.4 The applicant provided that the owner and host/operator are the same parties. Barry's House Ltd was initially named as the owner and host/operator on the application. On 23 January 2025 this was subsequently amended to Shiro Holidays LTD being host/operator due to the dissolution of Barry's House Ltd.

- 4.5 The person named on the application as being responsible for the day-to-day management of the Premises is the said Mr Lawrence.
- 4.6 The type of letting which has been applied for is 'secondary letting', which means the host/operator is letting a property where they do not normally live.
- 4.7 The Premises is described as unconventional accommodation which can accommodate a maximum capacity of twelve guests.

Floor plans of the Premises were provided by the applicant as part of the application process, and these can be found on pages 3, 4 and 5 of Appendix 1.

## **5. Process**

5.1 The application was circulated to the following Agencies/Services for consultation:

- Police Scotland; and
- Highland Council Environmental Health Service.

5.2 Police Scotland and the Highland Council's Environmental Health Service have both confirmed that they have no objections to the application.

5.3 The Scottish Fire & Rescue Service was not further consulted on the application as the fire safety checklist, which was completed by the applicant, pertaining to the application was deemed satisfactory.

## **6. Certificate of Compliance**

6.1 The applicant has yet to return a certificate of compliance, which confirms that a public notice of application for their short term let licence was displayed at or near the Premises for a period of 21 days. Such certificate of compliance must be completed by the applicant and returned to the licensing team as confirmation that the public notice of application has been displayed in terms of the legislation, before the licence can be issued. If available, a verbal update can be provided to the Committee by the Principal Solicitor – Regulatory Services.

## **7. Public objection**

7.1 It is open to any member of the public to submit an objection or representation in relation to an application for a licence for a short term let licence. During the notice of display period, the following presumed timeous objection was received and is attached as an Appendix to this report.

- Objection received by emails of 11 and 13 November 2025 from Mr Hugh Black (**Appendix 2**).

## **8. Determining issues**

8.1 Paragraph 5(3) of Schedule 1 of the Civic Government (Scotland) Act 1982 states that a licensing authority shall refuse an application to grant or renew a licence where:

- a) The applicant or, where the applicant is not a natural person, any director of it or partner in it or any other person responsible for its management, is either:

- i. for the time being disqualified under section 7(6) of the Civic Government (Scotland) Act 1982, or;
  - ii. is not a fit and proper person to be the holder of the licence.
- b) The activity to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant or renewal of such licence if he made the application himself;
- c) where the licence applied for relates to an activity consisting of or including the use of premises or a vehicle or vessel, those premises are not or, as the case may be, that vehicle or vessel is not suitable or convenient for the conduct of the activity having regard to—
  - (i) the location, character or condition of the premises or the character or condition of the vehicle or vessel;
  - (ii) the nature and extent of the proposed activity;
  - (iii) the kind of persons likely to be in the premises, vehicle or vessel;
  - (iv) the possibility of undue public nuisance; or
  - (iv) public order or public safety; or
- d) there is other good reason for refusing the application.

If required, the Principal Solicitor – Regulatory Services will offer particular advice on the criteria relating to this particular application.

- 8.2 A copy of this report has been sent to the applicant and objector both of whom, in the terms of paragraph 4(2) of the Civic Government (Scotland) Act 1982, have been invited to attend and will be provided with an opportunity to be heard by the Committee.
- 8.3 Both parties have also been advised of the procedure which will be followed at the meeting which may also be viewed via the following link:

[Licensing hearings procedures | Licensing hearings procedure \(Licensing Committee\) \(highland.gov.uk\)](https://www.highland.gov.uk/licensing-hearings-procedures)

## **9. Observations on objections/representations**

- 9.1 In the emails of objection found at Appendix 2, points have been made which should not be taken into account by the Committee when determining this licence application, as they are outwith the scope of the grounds that a licensing authority can consider in terms of the refusal of an application to grant or renew a licence, as detailed at point 8.1 of this Report.
- 9.2 If required, the Principal Solicitor – Regulatory Services will offer further advice or clarification on these points.

## **10. Policies**

### **10.1** The following policy is relevant to this application:

- Short-term let licensing policy statement (which includes the mandatory and additional licence conditions attached to all Short Term Let Licences):-

A copy of this policy can accessed [here](#) or a hard copy can be supplied where requested.

## **11. Implications**

11.1 Not applicable.

Date: 3 November 2025

Author: David Sumner

Reference: [FS550876818](#)

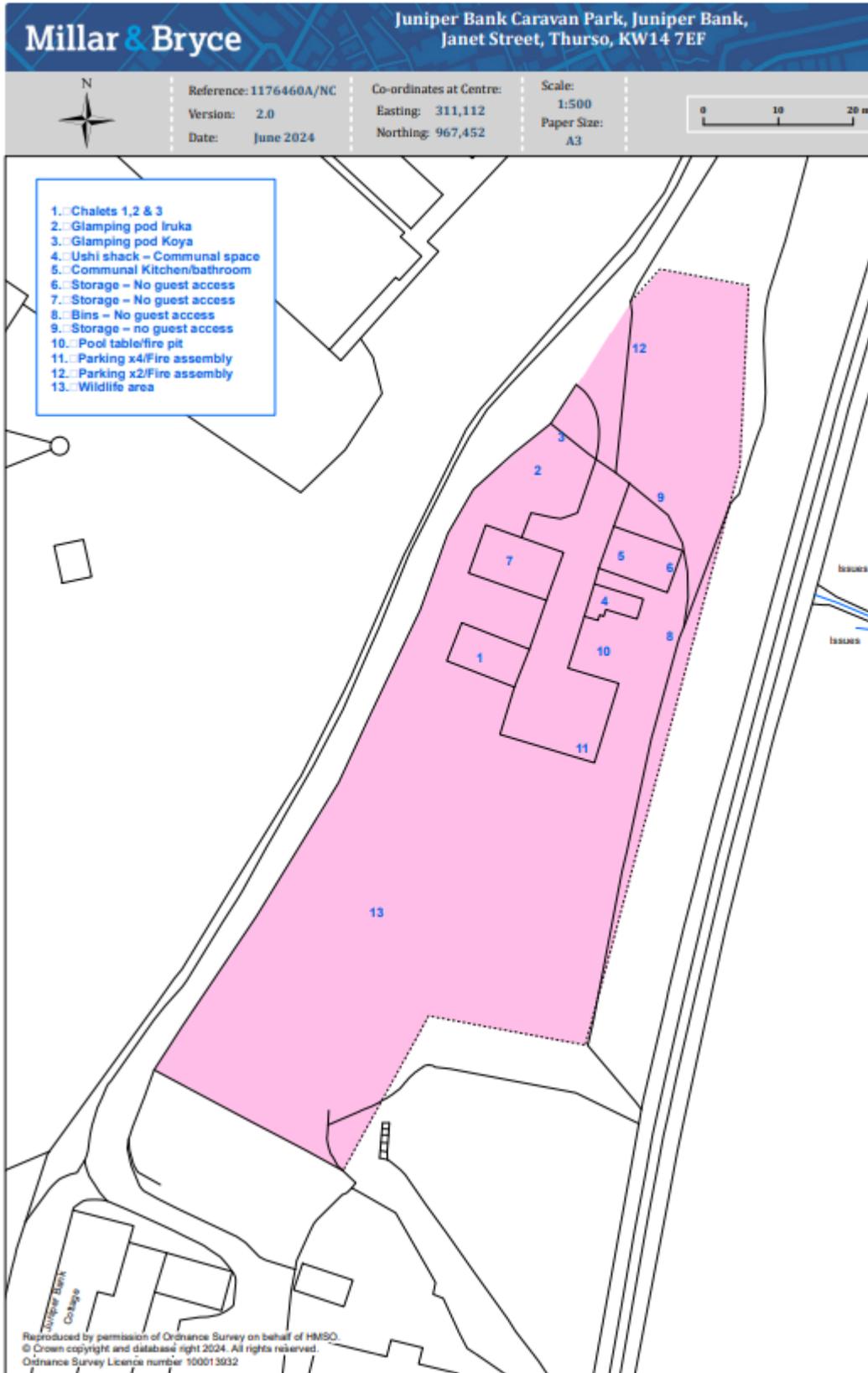
Background Papers:

- Civic Government (Scotland) Act 1982
- The Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022

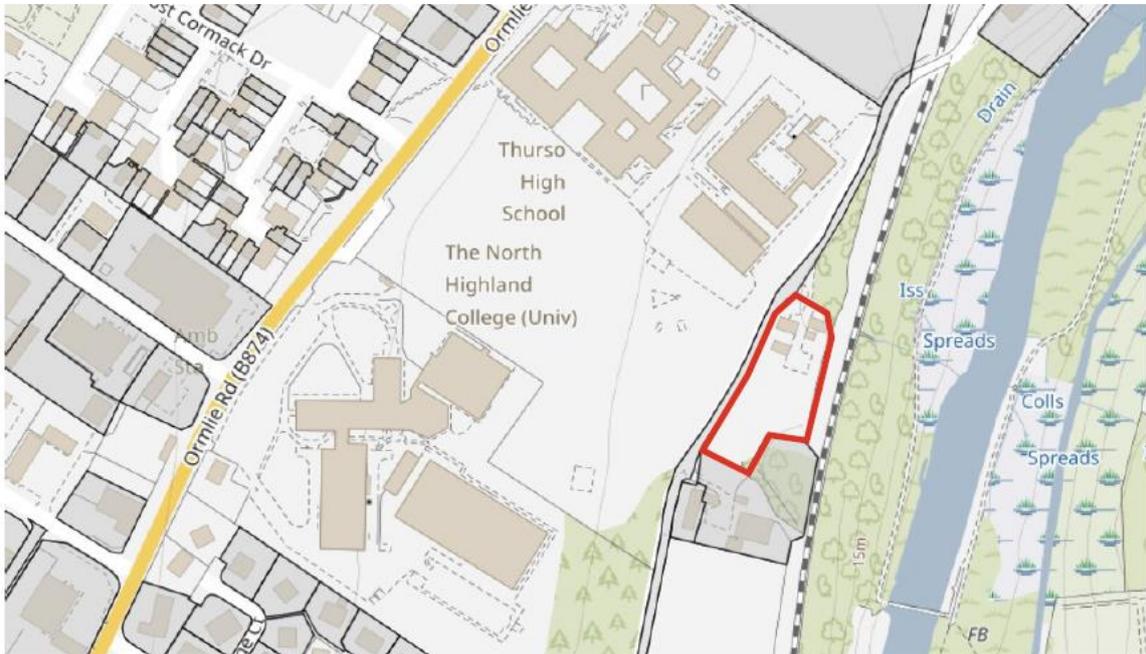
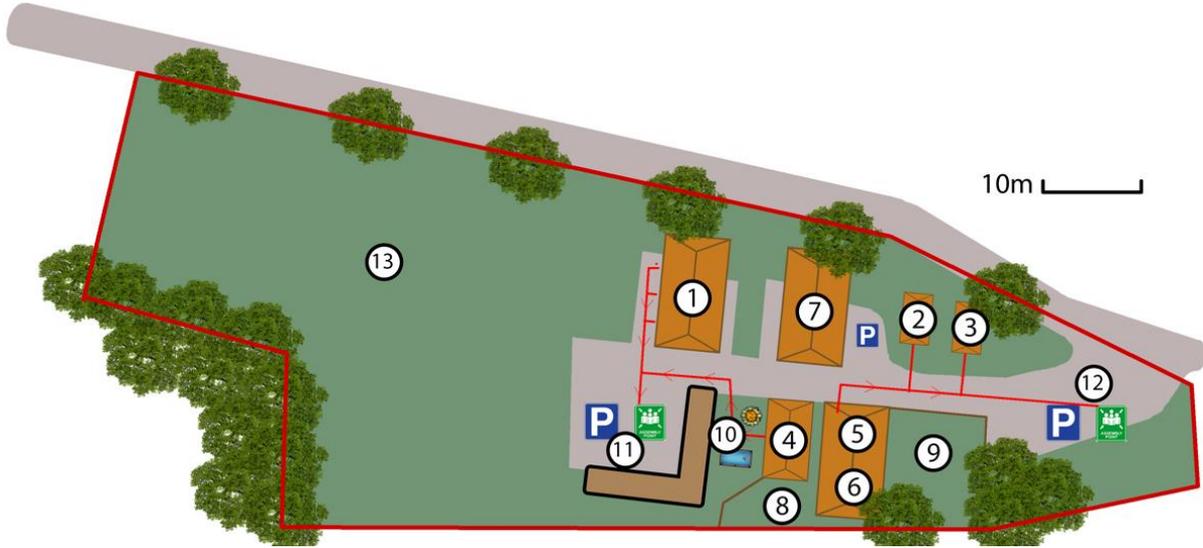
Appendices:

Appendix 1: Site plan detailing the extent of the Premises and floor plans for the Premises.

Appendix 2: Objection received by emails of 11 and 13 November 2025 from Mr Hugh Black.

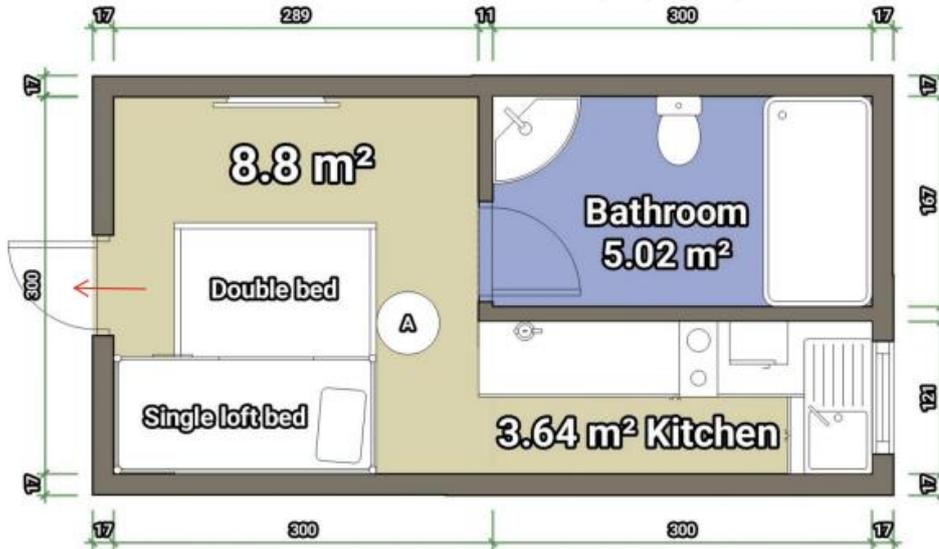


- ① Chalets 1, 2, & 3
- ② Glamping pod Iruka
- ③ Glamping pod Koya
- ④ Ushi shack - Communal space
- ⑤ Communal Kitchen/bathroom
- ⑥ Storage - No guest access
- ⑦ Storage - No guest access
- ⑧ Bins - No guest access
- ⑨ Storage - No guest access
- ⑩ Pool table/fire pit
- ⑪ Parking x 4/Fire assembly
- ⑫ Parking x 2/Fire assembly
- ⑬ Wildlife area
- Boundary line
- ➔ Fire escape route



# Shiro Chalet 1 Floor Plan

- 1 x Double bed
- 1 x Single loft bed
- Max capacity: 3
- Total area: 17.5m<sup>2</sup>
- Fire safety: Smoke alarm
- Fire blanket, Fire extinguisher
- Fire escape plan
- Emergency lighting torch



# Shiro Chalet 2 Floor Plan

- 1 x Double bed
- 1 x Single loft bed
- Max capacity: 3
- Total area: 17m<sup>2</sup>
- Fire safety: Smoke alarm
- Fire blanket, Fire extinguisher
- Fire escape plan
- Emergency lighting torch



# Shiro Chalet 3 Floor Plan

- 1 x Double bed
- Max capacity: 2
- Total area: 17.5m<sup>2</sup>

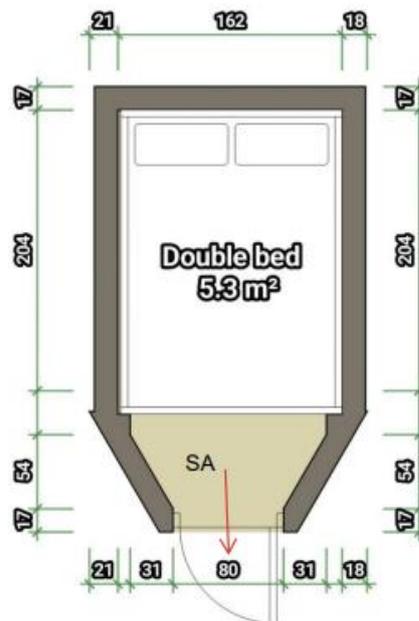
- Fire safety: Smoke alarm
- Fire blanket, Fire extinguisher
- Fire escape plan
- Emergency lighting torch



# Iruka Glamping pod Floor Plan

- 1 x Double bed
- Max capacity: 2
- Total area: 5.3m<sup>2</sup>
- Fire safety: Smoke alarm
- Fire extinguisher
- Fire escape plan
- Emergency lighting torch

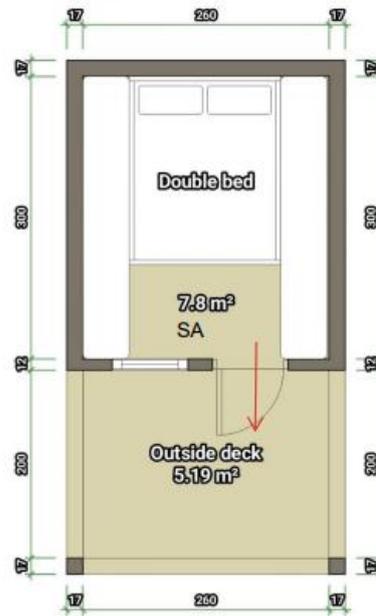
Fire escape route is out to the secondary fire assembly point which is the car park at the front of the site as on the site map. The property opens onto a large drive and open land so there are multiple escape routes.



# Koya Glamping hut Floor Plan

- 1 x Double bed
- Max capacity: 2
- Total area: 7.8m<sup>2</sup>
- Fire safety: Smoke alarm
- Fire extinguisher
- Fire escape plan
- Emergency lighting torch

Fire escape route is out to the secondary fire assembly point which is the car park at the front of the site as on the site map. The property opens onto a large drive and open land so there are multiple escape routes.



**David Sumner (Legal (Licensing))**

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**From:** hugh black: [REDACTED]  
**Sent:** 13 November 2025 16:24  
**To:** STL Licensing  
**Subject:** Re: Juniper bank caravan park  
**Categories:** David

**CAUTION:** This email was sent from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

 [IMG\\_0508.mov](#)

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 [IMG\\_4096.png](#)

 [IMG\\_0508.mov](#)

 [IMG\\_4093.png](#)

 [IMG\\_4092.png](#)

 [IMG\\_4095.png](#)

For the attention of  
Maureen Duffy  
David Summers

Ref juniper bank caravan park / Shiro  
Janet street  
Thurso  
Kw14 7EF

Objection name  
Hugh Black  
[REDACTED]



Please see photos provided of units let by Shiro ,or juniper bank house caravan / Richard  
Application was for 5 units

Shiro 1

Shiro 2

Shiro 3

Koya=shed

Iruka = boat

Please note that iruka (the boat ) has been moved and replaced with a vintage Dodge Van ,which has been advertised as A Room on air bnb ,the boat has been moved to another part of the site .beside the cinema .

Now only 3 units are available for rent on Airbnb after STL license application has been displayed.  
My concern that koya .iruka ,and the room / dodge van .we're not fit for STL license rules but were still being let out ,and will be let out again at risk to the public after license application.  
That would make 6 letting units on site at time of application.

Regards

Hugh Black

Contact



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From: hugh black [REDACTED]  
Sent: 11 November 2025 18:44  
To: STL Licensing <[STL@highland.gov.uk](mailto:STL@highland.gov.uk)>  
Subject: Re: Juniper bank caravan park

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**PUBLIC NOTICE OF APPLICATION FOR SHORT TERM LETS LICENCE**  
**The Civic Government (Scotland) Act 1982 (Licensing of Short Term Lets) Order 2022**

Application type: New application

Richard Lawrence of Juniper Bank Caravan Park Juniper Bank, Janet Street, Thurso, KW14 7EF has applied to The Highland Council for a short term lets licence, for the below property.

**Address of the property to be licensed:** Juniper Bank Caravan Park Juniper Bank, Janet Street, Thurso, KW14 7EF

Licence type applied for: Secondary letting

The day-to-day managers are:

- Richard Lawrence

### Representations

Representations must:

- be in writing;
- specify the grounds of the objection or the nature of the representation;
- set out the name and address of the person making it;
- must be signed by the person, or on their behalf; and
- be made within 28 days of public notice of the application being given.

Copies of any representations will be given to the applicant. If a representation is made to The Highland Council after this date but before a final decision is taken on the application, then The Highland Council may consider the late representation if it is satisfied that it was reasonable for the representation to have been made after the deadline.

Representations should be sent to [planning@highland.gov.uk](mailto:planning@highland.gov.uk) or one of the following offices:

Cairness, Sutherland & Easter Ross	Roos & Skye	Lochaber	Inverness, Nairn, Badenoch & Strathpeffer
The Highland Council Cairness House Market Place Cairness IV11 4BB	The Highland Council Highlands Signs Park Lane Pitlochry PC23 2JL	The Highland Council Charles Kennedy Building Machmore Road Fort William PH23 7HQ	The Highland Council Charles Kennedy Building Achnore Road Fort William PH23 7HQ

This application was submitted on: 30/09/2023

This notice was displayed from: 27/10/23

The last date for representations is 28 days from the date this notice was displayed.

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Representations should be sent to [sp@highland.gov.uk](mailto:sp@highland.gov.uk) or one of the following offices:

Cairness, Sutherland & Easter Ross	Ross & Skye	Lochaber	Inverness, Nairn, Badenoch & Strathspey
The Highland Council Cairness House Market Place Wick, KW1 4AS	The Highland Council Tigh Na Sgìre Park Lane Pitres IV51 8QP	The Highland Council Charles Kennedy Building Achnore Road Fort William PH33 7RQ	The Highland Council Charles Kennedy Building Achnore Road Fort William PH33 7RQ

The application was submitted on: 20/09/2023  
This notice was displayed from: 27/10/25

The last date for representations is 28 days from the date this notice was displayed.

For the attention of David summers

Hi ,I would like to object to a STL license notice application for ,

Juniper bank caravan park /shiro

Juniper bank

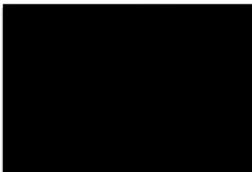
Janet street

Thurso

Kw14 7EF

Objection name and address below

Mr H Black



Please see photos of application notice blocked by parked l200 .

I would like to object to application of 5 STL units ,as of notice being recently displayed,there has previously been 5 units for let ,now there are only 3 available on line for booking ,2 others have been removed from available booking sites and removed from the highland council valuation board rates as from the 9<sup>th</sup> November.

So only 3 unit licence applications at time of STL notice displayed for pupillc should be discussed.

Other objections are listed below .please see video of road access to Shiro ,/juniper bank caravan park .plus photos of former units that have been let under different names and removed will be forwarded on separate email ,

One unit is still pinned on Airbnb on my address ,after many complaints to Shiro ,

As stated to the STL license before in February 2024 ,there is no planning whatsoever for this site or indeed for the 3 full time dwellings... planning enforcement is still ongoing. or change off use to holiday letting on this site ,so how can a STL be granted or consider till planning has been approved.

1 There is no address of that name ,we own juniper bank house and caravan and cottage ,we had to remove the caravan and cottage from the Gazateer .to stop Shiro using that addresses.

2 ,the correct trading name of this accommodation on air BNB is Shiro .juniper bank thurso .they are also using 2 other names on Airbnb for this accommodation.

3 There is no planning for this accommodation,( I do believe that planning notice has been served seeking application for the accommodation from a planning officer .

4 The owner is using our address for the application but has just added park after caravan ,because there is no such address as Juniper caravan park ,also he has added this to Airbnb so we have his guests driving into our court yard at all times of night at high speed ,they are also wandering through our gardens.and driving down a walking path trying to access his accommodation.

5 The main access to our property and Shiro is via a single track narrow dirt track from Janet street .that is also access to the high school ,that we have spent thousands of pounds on upgrading,due to the now volume of traffic to Shiro is now heavily damaged ,it is only a matter of time that a school child will be injured by one of his guests due to the narrow road and rail bridge and excessive speed of permanent residence and guests.

6 the land this accommodation is on ,was once a caravan park back in the day but the caravan park license lapsed many years ago .So is it being classed as non residential park ect ,

7 the letting accommodation was a log cabin converted to 3 units last year with no building warrants ect ,also the shed on a trailer and the boat is the same and dodge van

8 The accommodation is burning Stuff ,plastic ect in a fire pit that they use for guests ,that sends fumes and smoke over our gardens and property most dry nights ,this has been getting a lot worse when Shiro's commercial bins were stopped due to non payment..

Our main concern if there is approval of this license ,they have applied for 12 guests and five units ,there are 4 people already living on this site on a permanent basis and only 5 units ,and my concern is they will just keep adding ad hoc units ,sheds ,boats ,Yerts ,ect ,with no care or consideration for planning rules ,as has already been done within the last year.also there has been no building warrants ,building control ,or professionals over seeing the construction

of these make shift buildings that are being let out to paying guests .At the very least these buildings should be checked and approved for safe habitation .All of these conditions should of been outlined on a planning application,that has never been submitted.



Homes in map area

Weekend in Jun

Add guests



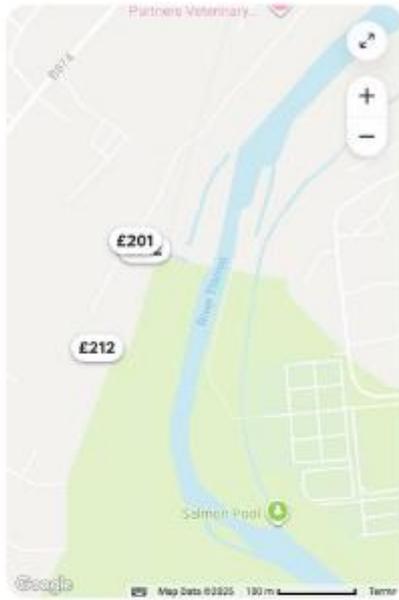
Filters



**Holiday home l...** ★ 4.76 (385)  
 No.1 Shiro, Juniper bank  
 Business host  
 5-7 Jun  
**£201**  
 for 2 nights  
 Free cancellation



**Holiday home l...** ★ 4.77 (287)  
 No.3, Shiro, Juniper bank  
 Business host  
 5-7 Jun  
**£212**  
 for 2 nights  
 Free cancellation



**Holiday home l...** ★ 4.74 (291)  
 No.2, Shiro, Juniper bank  
 Business host



Edit



Show all photos

### Room in Highland Council, United Kingdom

1 bed - Shared bathroom

★ 4.81 · 31 reviews



Hosted by Richard  
5 years hosting



#### Room in a tiny home

Your own room in a home, plus access to shared spaces.



#### Self check-in

Check yourself in with the lockbox.



#### Free cancellation before 28 Feb

£35 night

CHECK-IN	CHECKOUT
01/03/2025	06/03/2025
GUESTS	
1 guest	

Reserve

You won't be charged yet

£35 x 5 nights	£175
Cleaning fee	£10
Airbnb service fee	£31



**Your search** | Countryside | Farms | Rooms | Amazing views | Filters



**Holiday home in Juniper Bank** ★ 4.74 (119)  
No.1 Sherri, Juniper bank  
2 beds  
Professional Host  
£106 night - £106 total



**Holiday home in Juniper Bank** ★ 4.75 (61)  
No.3 Sherri, Juniper bank  
1 double bed  
Professional Host  
£197 night - £197 total



**Boat in Highland Council** ★ 4.6 (5)  
Julia  
1 bed  
Professional Host  
£106 night - £106 total

Show map



Map 13-13 Jun... Add to Airbnb your home

**Your search** | Countryside | Farms | Rooms | Amazing views | Filters

There weren't many places left in Thurso, so now's a good time to book.

5 places in Thurso



**Holiday home in Juniper Bank** ★ 4.64 (80)  
No.2 Sherri, Juniper bank  
2 beds  
Professional Host  
£117 night - £117 total



**Cabin in Highland Council** ★ New  
Kaye  
1 bed  
Professional Host  
£99 night - £99 total



Show map



