

Agenda Item	<b>6.5</b>
Report No	<b>HLC/73/26</b>

**THE HIGHLAND COUNCIL**

**Committee: THE HIGHLAND LICENSING COMMITTEE**

**Date: 23 June 2026**

**Report title: Application for the grant of a short term let licence – 15 Inverlochry Place, Fort William PH33 6BX (Ward 21 – Fort William and Ardnamurchan)**

**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 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 24 March 2026 a validated application for the grant of a short term let licence was received from Miss Asmat Abro on behalf of BKazmi Properties Ltd (Company number 15510803) and having their registered office at Flat 18 Javelin House, 61 Lismore Boulevard, London, England, NW9 4EP.
- 4.2 The property to which the application relates is 15 Inverlochy Place, Fort William PH33 6BX (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 and coloured pink on the plan on page 1 of Appendix 1.
- 4.3 The application for the short term let licence has been made on the basis that the said BKazmi Properties Ltd. will be the host/operator of the Premises. The application was made after 1 October 2023 and, as such, the host/operator cannot operate the premises as a short term let until they have obtained a licence.
- 4.4 BKazmi Properties Ltd. is named on the application as the owner of the Premises.
- 4.5 The person named on the application as being responsible for the day-to-day management of the Premises is the said Miss Abro.
- 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 a semi-detached dwellinghouse which can accommodate a maximum capacity of six guests.

Floor plans of the Premises were provided by the applicant as part of the application process, and these can be found on page 2 of Appendix 1.

## **5. Process**

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

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

5.2 Police Scotland, the Highland Council's Environmental Health Service and the Highland Council's Building Standards Team have all 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 provided a certificate of compliance confirming 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 from 25 March 2026.

## **7. Public objections**

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 timeous objection received and is attached as Appendix 2 to this report:

- Objection received by email on 15 April 2026 from Mr Gregor Davidson and Ms Deborah Davidson (**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 who, in the terms of paragraph 4(2) of the Civic Government (Scotland) Act 1982, have both 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:

[Highland Licensing Committee Procedure for Hearings Applicants for License/License Holders](#)

## **9. Observations on objection**

- 9.1 In the email 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**

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: 24 April 2026

Author: Tina MacInnes

Reference: [FS808517736](#)

Background Papers:



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

Appendices:

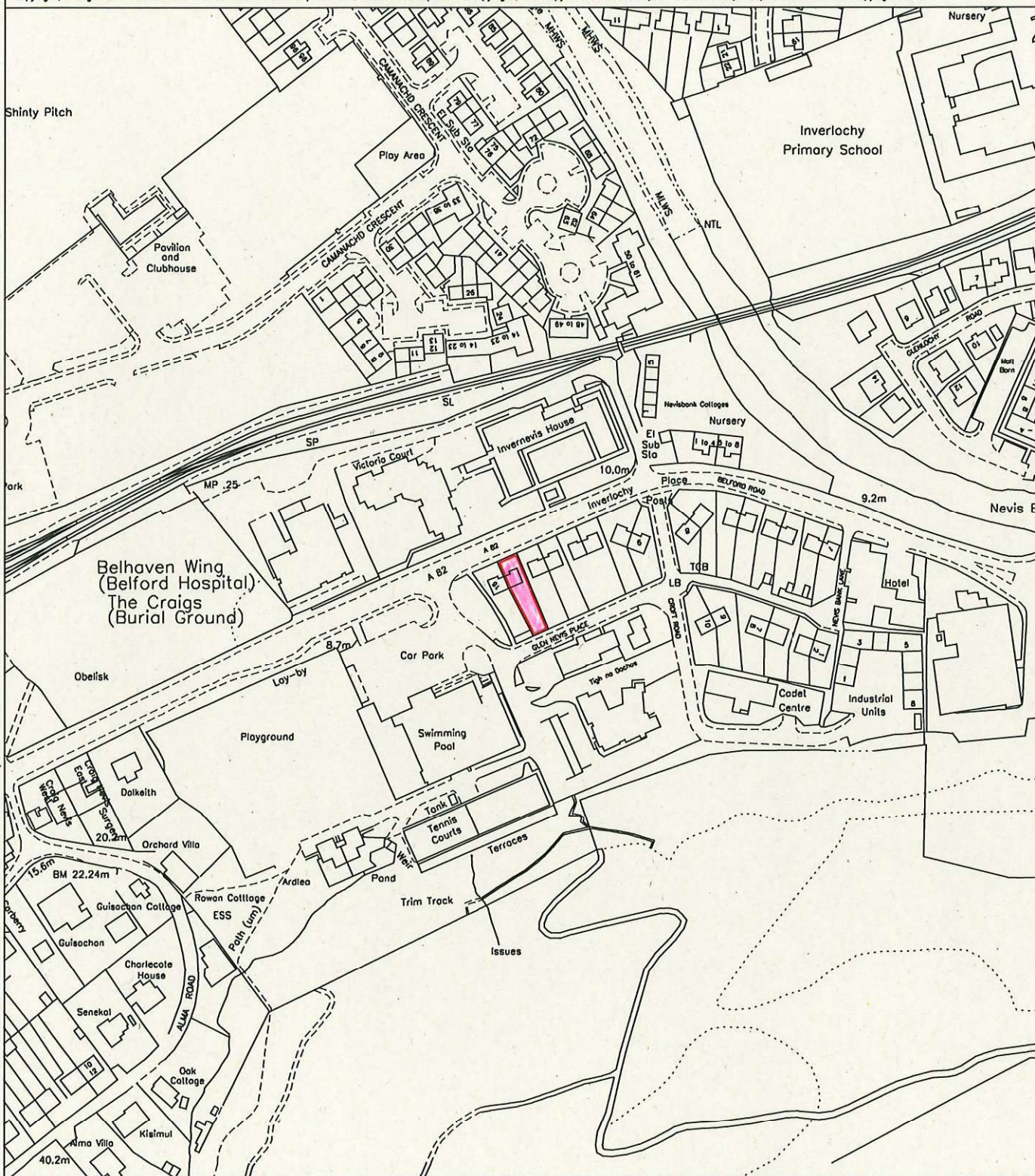
Appendix 1: Site plan detailing the extent of the Premises and floor plans for the Premises;

Appendix 2: Objection received by email on 15 April 2026 from Mr Gregor Davidson and Ms Deborah Davidson.

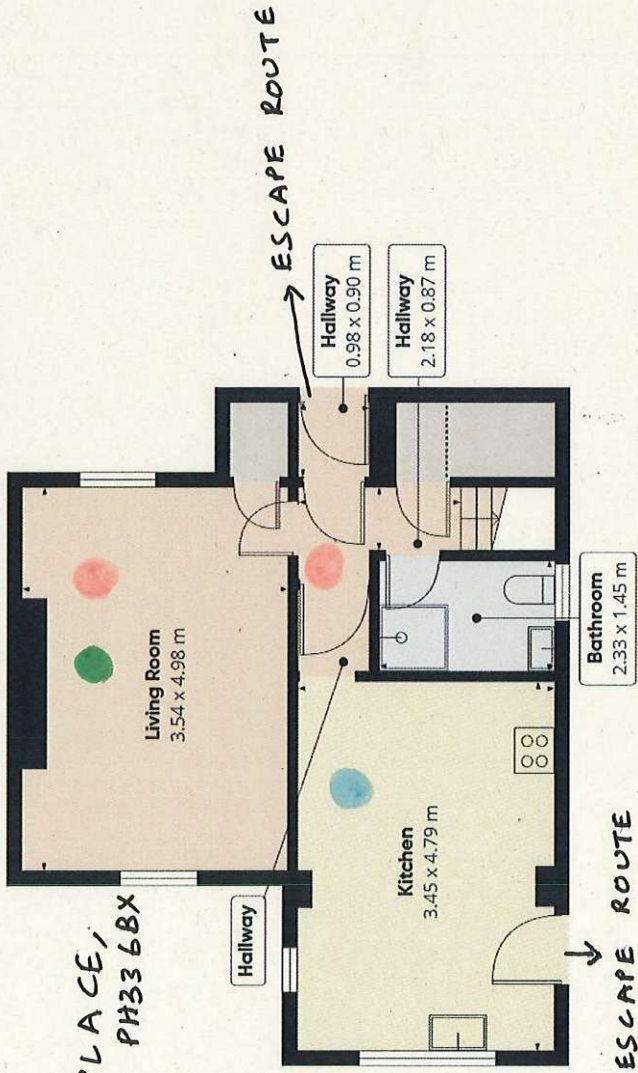
# Appendix 1

 <b>LAND REGISTER OF SCOTLAND</b>	Officer's ID / Date	TITLE NUMBER
	4548 12/4/2012	<b>INV29403</b>
	ORDNANCE SURVEY NATIONAL GRID REFERENCE	140m
	NN1073 NN1074 NN1174 NN17SW	Survey Scale 1/2500

CROWN COPYRIGHT © - This copy has been produced from the ROS Digital Mapping System on 18/04/2012 and was made with the authority of Ordnance Survey pursuant to Section 47 of the Copyright, Designs and Patents Act 1988. Unless that act provides a relevant exception to copyright, the copy must not be copied without the prior permission of the copyright owner.



15 INVERLOCHY PLACE,  
PH33 6BX  
FLOOR PLAN



Ground Floor

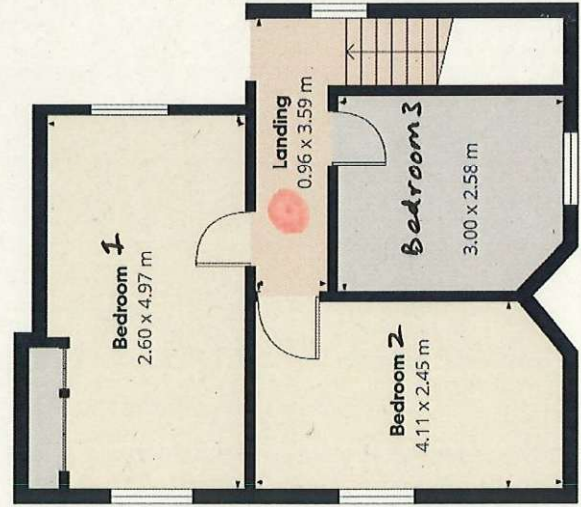
Approximate total area<sup>m<sup>2</sup></sup>  
80 m<sup>2</sup>



Total no. of guests: 6  
Bedroom 1: 2 (Double bed)  
Bedroom 2: 2 (twin bed)  
Bedroom 3: 2 (single bed)

PROPERTY NOT SUITABLE  
WITH FOR PEOPLE WITH  
MOBILITY IMPAIRMENT.

SMOKE DETECTORS  
HEAT DETECTORS  
CO DETECTORS



Floor 1

(1) Excluding balconies and terraces

Reduced headroom  
..... Below 1.5 m

Calculations reference the RICS IPMS 3C standard. Measurements are approximate and not to scale. This floor plan is intended for illustration only.

**From:** [REDACTED]  
**Sent:** 15 April 2026 10:43  
**To:** STL Licensing  
**Subject:** Objection

**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.

Dear Sir/Madam,

I am writing to formally object to the short-term let licence application for the property at 15 Inverlochy Place Fort William PH33 6BX.

I wish to make this representation on the basis of the statutory grounds for refusal under the Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets), in particular that the premises are not suitable for the proposed use, having regard to the location, character of the area, and the risk of public nuisance and safety concerns.

Firstly, the property is situated within a quiet, established residential street primarily occupied by permanent residents and families with young children. The introduction of a short-term let, with a high turnover of transient visitors, is fundamentally at odds with the residential character of the area. Under the licensing framework, the Council must consider whether the premises are suitable in terms of location and the type of guests likely to occupy it, and I do not believe this test is met in this case.

Secondly, there are legitimate concerns regarding public safety and the wellbeing of residents. The presence of regularly changing, unknown occupants reduces community cohesion and increases safeguarding concerns, particularly for children and vulnerable residents. The legislation specifically allows refusal where there are risks relating to public safety or disorder, and I believe this proposal gives rise to such risks.

Thirdly, the cumulative impact of short-term lets in the surrounding area is already becoming evident. There has been a noticeable increase in Airbnb-style properties locally, and further approvals risk overprovision. This undermines the stability of the residential community and contributes to a shift away from long-term housing. The Council has powers to take account of the wider impact on communities, particularly where there is an imbalance between residential use and commercial short-term letting.

In addition, the proposed use is likely to give rise to public nuisance, including increased noise, late-night disturbance, and additional traffic. Parking within the street is already constrained, and increased demand from short-term visitors will exacerbate these issues, potentially creating hazards and inconvenience for residents.

I understand that objections must be based on relevant statutory grounds. My concerns are specifically related to the suitability of the premises, the character of the locality, and the risks of

nuisance and safety issues, all of which are recognised considerations for refusal by Highland Council.

For the reasons outlined above, I respectfully request that this application be refused.

I would be grateful if you could confirm receipt of this objection and advise of any further steps in the process.

Yours faithfully,

Gregor and Deborah Davidson



Sent from my Galaxy