

Agenda Item	7
Report No	CIA/35/26

The Highland Council

Committee: City of Inverness Area

Date: 17 August 2026

Report Title: Short Term Let Control Areas – Post Consultation Update

Report By: Assistant Chief Executive - Place

1 Purpose/Executive Summary

1.1 This report informs Members of the outcome of the statutory consultation processes for the establishment of a City of Inverness Short Term Let Control Area and a Highland Rural Short Term Let Control Area which was agreed to be undertaken by the Economy and Infrastructure Committee (E&I) at its meeting on 12 February 2026. It specifically provides details of responses from City of Inverness Area residents, businesses and operators, alongside those living elsewhere but operating short term lets within the City of Inverness Area.

1.2 The report also invites Members to determine, in light of the consultation responses, if they wish to progress:-

- the Inverness City Short Term Let Control Area; and
- Rural Inverness-shire (Ward 12 and the remainder of Ward 19) within the Highland Rural Short Term Let Control Area

If so, any decisions to submit the proposals to designate the Short Term Let Control Areas to Scottish Ministers for formal approval would be taken by E&I Committee.

2 Recommendations

2.1 Members are asked to:-

- i. **Consider** and **note** the consultation feedback and the potential implications that a STL Control Area will have on communities within the City of Inverness as set out in **Appendix 3** and summarised in **Section 8, and 10**;
- ii. **Consider** and **note** the consultation feedback and the potential implications that a STL Control Area will have on communities within rural Inverness-shire as set out in **Appendix 4** and summarised in **Section 9 and 10**;

- iii. **Agree to recommend to** Economy and Infrastructure Committee that the proposed City of Inverness Short Term Let Control Area be progressed, should any decision to submit a proposal for designation to Scottish Ministers be taken; and
- iv. **Agree to recommend to** Economy and Infrastructure Committee that rural Inverness-shire be included within the proposed Highland Rural Short Term Let Control Area, should any decision to submit a proposal for designation to Scottish Ministers be taken.

3 Implications

- 3.1 **Resource** - The work undertaken in progressing the Inverness City and the Highland Rural STL Control Areas to date has been extensive and has involved a significant number of officers across a variety of services prioritising this work. This has undoubtedly had an impact on other work streams. Should the progression of these STLCAs be agreed, then financing the statutory process would have to be met from existing Service budgets and by existing staff resource. The ongoing need to consider and determine STL planning applications within a STL Control Area will have an ongoing impact on performance, staffing and budgets. The Council will need to consider whether the additional fees generated can be utilised to support the resource needed to process these new applications.
- 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 STL Control Area.
- 3.3 **Risk** - The risks (and benefits) of the STL Control Area for Highland Rural are explored in detail, as part of the body of this report.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – There are no specific health and safety implications.
- 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 of Short-Term Lets and their impact on housing availability may therefore have related impacts on 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 Integrated Impact Assessment - Summary

4.3.1 The Inverness City STLCA and the Highland Rural STLCA are distinct proposals with their own relevant geographies. Integrated Impact Assessment screening has been undertaken for each of the proposals on 27 July 2026. The conclusions have been subject to the relevant Manager Review and Approval.

4.3.2 The Screening process for the **Inverness City STLCA** has concluded that there are mixed impacts from the proposed Control Area should this be implemented. Overall, any impacts are likely to be indirect, limited and would depend on future planning decisions relating to individual short term let proposals. Members are asked to consider the summary in **Appendix 1** to support the decision-making process.

4.3.3

Impact Assessment Area	Conclusion of Screening/Full Assessment
Equality	No impact
Socio-economic	Positive and negative impact – both the direct and indirect benefits of retaining homes within the housing supply with the operator costs for preparing and submitting planning applications or certificates of lawfulness where required.
Human Rights	No impact - Considers Scottish Government's view in relation to ECHR Article 1 Protocol 1.
Children's Rights and Well-being	No impact
Island and Mainland Rural	No impact
Climate Change	No impact
Data Rights	No impact

4.3.4 The Screening process for the **Highland Rural STLCA** has concluded that there are mixed impacts from the proposed Control Area should this be implemented. Overall, any impacts are likely to be indirect, limited and would depend on future planning decisions relating to individual short term let proposals. Members are asked to consider the summary in **Appendix 2** to support the decision-making process.

4.3.5

Impact Assessment Area	Conclusion of Screening/Full Assessment
Equality	No impact
Socio-economic	Positive and negative impact – both the direct and indirect benefits of retaining homes within the housing supply with the operator costs for preparing and submitting planning applications or certificates of lawfulness where required.
Human Rights	No impact - Considers Scottish Government's view in relation to ECHR Article 1 Protocol 1.
Children's Rights and Well-being	No impact
Island and Mainland Rural	Minor differences – Overall, the proposal is assessed as having a mixed but generally neutral to positive impact.
Climate Change	No impact
Data Rights	No impact

5 Background on the proposed Short Term Let Control Areas

- 5.1 On [18 September 2025](#), it was agreed that Area Committees would first decide on whether to progress the introduction of a STLCA in all or part of their area. To support that decision, information on the prevalence of short term lets in the City of Inverness Area, relative to Highland as a whole, was presented on [7 January 2026](#) and this committee agreed to progress with the process of considering the introduction of two STLCAs within the City of Inverness Area by undertaking a statutory consultation recognising that the impacts of Short Term Lets may differ between urban and rural contexts. It should be noted that Ward 17 Culloden and Ardersier does not form part of the proposals.
- 5.2 Following Area Committee decisions on whether to progress with the process of considering the introduction of an SLTCA within all or part of their area, the Economy and Infrastructure Committee took the decision on [12 February 2026](#) to formally commence the statutory consultation process for two proposed STLCAs:-
- [Inverness City](#) which includes Ward 13, 14, 15, 16 and part of Ward 19 (Slackbuie, Milton of Leys and Westhill); and
 - [Highland Rural](#), which includes Ward 12 Aird and Loch Ness, and the remaining majority of Ward 19 Inverness South, in addition to Sutherland, Wester Ross, Strathpeffer and Lochalsh, Lochaber, and Skye and Raasay).
- 5.3 The [Town and Country Planning \(Scotland\) Act 1997 section 26B](#) establishes that a planning authority may designate all or part of its area as a STLCA. In a STLCA, the use of a dwellinghouse for the purpose of providing short-term lets is deemed to involve a material change of use. As such, in a STLCA planning permission will always be required for the change of use of a dwellinghouse or flat (which is not the host's only or principal home) to a secondary letting, STL. This only applies to changes of use that occur after an STLCA comes into force and cannot be applied retrospectively. A STLCA will 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. For completeness, existing secondary letting STL operators who do not have any outstanding planning requirements can apply for a Certificate of Lawfulness where certainty is required.

6 Overview of the Inverness City and Highland Rural STLCA Consultation Steps

- 6.1 The consultations for the Inverness City and Highland Rural STLCAs commenced on 12 May 2026 and ran for a six-week period closing on Tuesday 23 June 2026 5pm. Regulation 4 (1) of the [Town and Country Planning \(Short-term Let Control Areas\) \(Scotland\) Regulations 2021](#) sets out the requirements that must be met as part of consulting on a proposed Control Area. All of these required steps were followed. Notice of the proposed Inverness City STLCA was circulated in the Inverness Courier while notice of the Highland Rural STLCA was circulated in the Press and Journal. Both notices appeared on 12 May 2026. Notice and details of the proposals were placed on the Council's webpages at www.highland.gov.uk/STLCAConsult which directed the public to make any representations to the survey within the [Inverness City STLCA](#) consultation portal or the [Highland Rural STLCA](#) consultation portal. Respondents could participate in both surveys if they wished. All Community Councils wholly or partially within the proposed areas were notified of the proposals directly by email.

- 6.2 During the consultation, the [Inverness City STLCA Statement of Reasons](#) and map were available for inspection during normal opening hours at the Inverness Service Point in the Town House. The [Highland Rural STLCA Statement of Reasons](#) and map were also available for inspection within all Service Points and Access Points within the proposed Control Area.
- 6.3 The Council made additional steps other than those required within Regulation 4(1) to increase awareness of, and engagement with, the proposals. Community Councils were invited to a webinar briefing on the proposals, where 14 attended a Highland Rural STLCA webinar and 3 attended an Inverness City STLCA webinar. A summary and outputs from the Q&A were subsequently disseminated afterwards to all the community councils within the proposed areas.
- 6.4 Informal in-person drop in events were held in the following locations:-
- Inverness (circa 20 in attendance);
 - Plockton (circa 25 in attendance);
 - Lochinver (circa 20 in attendance);
 - Fort Augustus (circa 15 in attendance);
 - Portree (circa 20 in attendance);
 - Fort William (circa 25 in attendance); and
 - Ullapool (circa 15 in attendance)

These events were typically from the late afternoon into the evening and provided an appropriate forum for members of the public to ask officers queries about the proposal and view display boards and printed materials.

- 6.5 A [STL Development Enquiry Form](#) was launched and promoted to provide STL operators with a view as to whether their STL would have likely required planning permission in any case (regardless of the Control Area) owing to it being operational development (building works) or a material change of use. This remains available for operators to consult with no application fee. In total, 89 STL Development Enquiries were received during the consultation, but this remains open on an ongoing basis for operators to engage with the Planning Service and clarify the planning status of their STL. The view received from the STL Development Enquiry can inform the operator's next steps; either to apply for planning permission if their STL already would require planning permission, or the option of applying for a certificate of lawfulness.
- 6.6 The Council Corporate Communications team led a series of steps through a communications plan. This included a tailored press briefing alongside a regular schedule of social media releases related to events, general social media posts and continued responses to heightened media attention on the issue throughout the consultation. Owing to the geographies of the areas, additional targeted social media posts were issued to promote the consultation within the relevant parts of Highland.
- 6.7 The Council held a webinar briefing for operators and the wider tourism industry, where 25 attended. Further supporting information was available on the consultation portals including Frequently Asked Questions, all recent Council and Area Committee reports on the STLCA's, the [Planning Circular 1/2023 on short term lets and planning](#) and [Research into the Impact of Short Term Lets on Communities across Scotland](#).

7 Consultation Surveys

- 7.1 For the Highland Rural STLCA consultation survey, a total of **608** responses were received, of which **407** were from individual respondents who reside within the proposed Highland Rural STLCA. For the Inverness City STLCA consultation survey, a total of **202** responses were received, of which **147** were from individual respondents who reside within the Inverness City STLCA.
- 7.2 The consultation surveys gathered a range of descriptive characteristics of respondents, their awareness and experience of STLs, and their views on the proposed Control Area. It used several questions from [Research into the impact of short-term lets on communities across Scotland](#) which was conducted by the Scottish Government and carried out independently by the Indigo Group in 2019. The exact questions adapted from this previous study are contained within *Section 4 Awareness and Experience of Short Term Lets* (pg. 21) of the [Supporting Material](#) to the study.
- 7.3 Adapting many of the same survey questions for a STLCA consultation has several key benefits. Firstly, it ensures consistency in the responses collected, allowing comparison of views across different groups. This makes it easier to identify clear patterns in perceived issues. Secondly, standardised questions improve the reliability of the data by ensuring that all respondents have the same questions to consider and answer. In addition, it allows results to be compared with previous studies or consultations, helping the council track changes over time.
- 7.4 The surveys also required existing or prospective short term let operators to indicate the kinds of short term let(s) that they operate and/or intend to operate, recognising that as a diverse sector, there could be a range of views among operators. The following Section 8 details the breakdown of responses for the Inverness City STLCA consultation survey, while Section 9 details the breakdown of responses for Rural Inverness-shire responses to the Highland Rural STLCA Consultation survey.

8 Inverness City STLCA Respondents

- 8.1 A full summary of responses to the Inverness City STLCA consultation survey is presented in **Appendix 3**. Table 1 shows the total number of responses to the Inverness City STLCA consultation attributed to individual respondents. The 147 individuals comprise those responding as residents, resident operators, other businesses and resident prospective operators. In addition, 1 Community Council based also responded.

Table 1: Number of Consultation Survey Respondents by Area of Residence

Respondent type	Resides in Inverness City STLCA	Total Responses
Individual Respondents	147	198
Resident (Not a short term let operator)	114	139
Business (Not a short term let operator)	2	3
Short term let operator	27	50
Prospective short term let operator	4	4
Visitor	-	2
Community Council, Group, Organisation	1	4
TOTAL responses	148	202

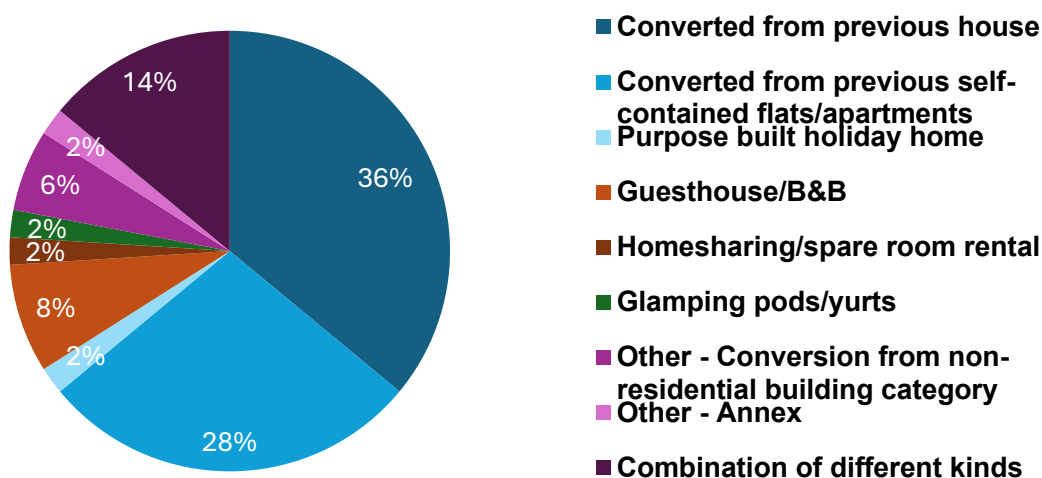
8.2 In addition, a further 54 respondents were non-resident in Inverness City as shown in Table 2, of which 23 indicated that they were operators within the area, where 13 reside elsewhere in Highland and 10 reside outwith Highland. This means that of the 50 Short Term Let Operators who responded, these are fairly split between 27 resident operators (who live and work within the proposed Control Area) and 23 non-resident operators. These have all been analysed in preparing this report owing to their relevance to the area, and the total number of responses received is therefore 202. Operators who responded operate different kinds of Short Term Lets. Within the survey, respondents were informed if their type of Short-Term Let already requires planning permission including purpose-built holiday homes, home sharing, Guesthouses and B&Bs, Lodges and Chalets and glamping pots and yurts.

Table 2: Number of Non-Resident Consultation Survey Respondents

Respondent type	Reside elsewhere in Highland	Reside outwith Highland
Individual Respondents		
Resident (outwith proposed STLCA)	21	4
Business (Not a short term let operator)	1	-
Short term let operator	13	10
Prospective short term let operator	-	-
Visitor	-	2
Community Council, Group, Organisation	-	3
TOTAL Non-Resident Responses	35	19

8.3 Among operators who responded to the Inverness City STLCA Consultation, the dominant form of STL properties were conversions from previous houses or self-contained flats. There were not marked differences between the profile of STL properties operated by resident and non-resident operators in Inverness City.

Figure 1: Profile of Short Term Let Properties operated by respondents to the Inverness City STLCA Consultation Survey (n=50)



8.4 The 1 response from Community Councils, groups and organisations specifically based in the Inverness City area, included Lochardil and Drummond Community Council.

8.5 Other Organisations that responded regarding the proposed Inverness City STLCA area were:-

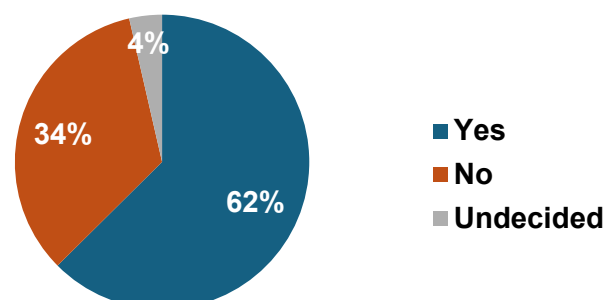
- The Scottish Tourism Alliance;
- Association for Scotland's Self-Caterers; and
- Living Rent

The points raised by all respondents, including Community Councils, Groups and Organisations are provided within **Appendix 3**.

8.6 The key findings from respondents are summarised as:-

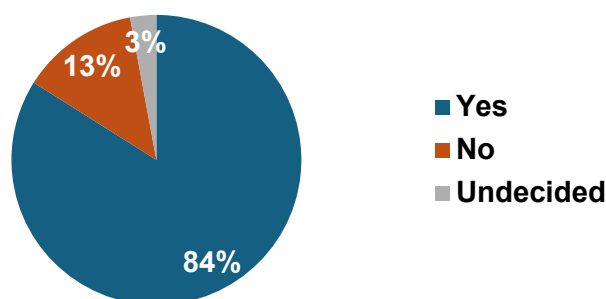
- A majority (62% or 122 of 195 respondents) of respondents support the proposal to establish the Inverness City Short Term Let Control Area, while 66 respondents (34%) oppose it (**Figure 2a**).
- Support is notably stronger among residents and businesses, with 115 of 137 respondents (84%) in favour (**Figure 2b**).
- Most STL operators and prospective operators oppose the proposal, with 45 of 52 respondents (86%) indicating they do not support it (**Figure 2c**).
- Lochardil and Drummond Community Council agrees with the proposal to designate the Inverness City Short Term Let Control Area.
- Of the other organisations, both the Scottish Tourism Alliance and the Association of Scotland's Self Caterers oppose the proposal, while Living Rent support the proposal. Their submissions and the responses to the matters raised are detailed in **Appendix 3**.
- Overall, the results indicate a clear divergence of opinion between residents and businesses - who generally support the proposal – and short term let operators (both resident and non-resident) - who are largely opposed.
- The clear divergence of opinion between residents/businesses and operators, extends beyond whether to support the proposed control area. The category of respondent (Resident, Business, or Operator) is a dominant predictor of responses provided to many other questions within the consultation as shown in **Appendix 3**, signalling that different groups and stakeholders perceive the prevalence and the impact of Short Term Lets very differently.

Figure 2a: All responses to 'Do you agree with the proposal to establish the Inverness City STLCA?' (n=195)*



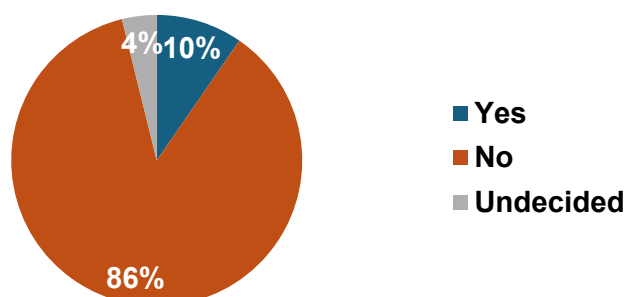
**Note: 7 respondents did not answer this question*

Figure 2b: Resident and business responses to ‘Do you agree with the proposal to establish the Inverness City STLCA?’ (n=137)*



**Note: 5 respondents did not answer this question*

Figure 2c: Operator and Prospective Operator responses to ‘Do you agree with the proposal to establish the Inverness City STLCA?’ (n=52)*



**Note: 2 respondents did not answer this question*

8.7 The main themes emerging from open comments given in support of the proposal to designate the Inverness City STLCA included:-

- Too many residential properties are being converted to STLs decreasing housing supply.
- Rising house prices/rent linked to increase in STLs.
- Requirement for planning controls, regulation and oversight.
- The STLCA does not go far enough and additional measures are required.
- Concerns about preserving communities and neighbourhood character.
- Negative impact of STLs on residential amenity (noise, traffic, parking, antisocial behaviour, waste/bins).
- Prioritise the needs of residents over tourists/visitors.
- Balance the needs of residents, housing supply and communities with the need for visitor accommodation and tourism.
- STLs have a negative impact on employment, recruitment, workforce availability by reducing accommodation for workers.
- Concerns regarding absentee ownership, external investors and loss of local economic benefit.
- STLs create tourism dependency/over tourism/seasonality/importance of tourism is overstated.
- View that STLs harm community cohesion/sustainability.

- View that lack of housing is harming recruitment and retention of key workers and essential services.
- Impacts on parking need to be considered.
- Negative impacts on roads and traffic need to be considered
- Negative impacts on other infrastructure
- Negative amenity/antisocial impacts
- Suggested alternative proposal more tightly drawn around central areas of highest STL concentrations (See IC-174-1 within **Appendix 3**)

The main themes emerging from open comments given in opposition to the proposal to designate the Inverness City STLCA included:-

- Insufficient evidence to suggest STLs cause housing problems/critical of evidence submitted.
- STLs do not adversely impact housing prices.
- Build more houses or address housing supply through development.
- Opposed to additional planning controls but favours licensing, compliance and enforcement.
- The STLCA represents overreach/overregulation or is an unnecessary burden on operators.
- The STLCA should not be applied retrospectively: grandfathering or protection of existing operators.
- STLs are already sufficiently regulated/no further controls needed.
- The STLCA should be bigger/cover a wider area.
- The STLCA is too large/covers inappropriate area.
- Distrust of government or suspicious of motives for STLCA.
- Concern about impact on the tourism industry.
- STLs support employment and jobs through economic activity.
- No evidence that it will work or that it has worked in Badenoch and Strathspey.
- View that STL operators have invested heavily in their properties and maintain them to a higher standard than residential property owners.
- No economic impact assessment.

9 Highland Rural STLCA: Rural Inverness-shire Respondents

- 9.1 A full summary of responses to the Highland Rural STLCA consultation survey for Rural Inverness-shire and all respondents to the Highland Rural Short Term Let Control Area consultation is presented in **Appendix 4**. The total number of responses to the Highland Rural STLCA consultation attributed to individual respondents residing in Rural Inverness-shire is **57** as shown in Table 3. This 57 comprises those responding as residents, resident operators, and other businesses. No community councils/ groups or organisations based specifically within the Inverness-shire area responded. Members should note that these 57 responses therefore represent a small share of the overall responses received.

Table 3: Number of Resident Consultation Survey Respondents by Area

Respondent type	Resides in Rural Inverness-shire	Resides in Highland Rural STLCA
Total Residing in Area	57	407
Resident (Not a short term let operator)	35	268
Business (Not a short term let operator)	1	12
Short term let operator	21	121
Prospective short term let operator	-	6
Community Council, Group, Organisation	-	6
TOTAL Resident responses	57	413

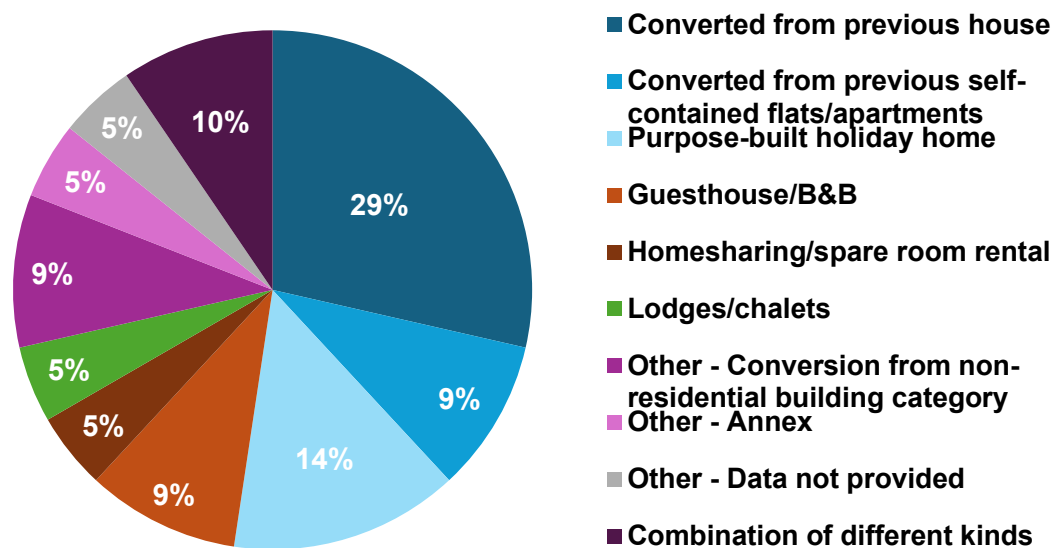
- 9.2 In addition to responses from residents, the Highland Rural STLCA consultation survey received a substantial number of responses from individuals who do not reside within the proposed control area as shown in Table 4, most of whom are not residents of the Highland Council area. The profile of non-resident respondents differs from that of resident respondents. Among non-resident respondents, 64% were STL operators, compared with 29% of resident respondents. For rural Inverness-shire specifically, 6 respondents were non-resident in Rural Inverness-shire but indicated that they were operators within the area, while a smaller number of 3 other non-resident respondents indicated that they were prospective operators within the area. These have been analysed in preparing this report owing to their relevance to the Inverness-shire area, but it is recognised that these are considerably smaller numbers of non-resident responses specific to the Inverness-shire Area in contrasts with other Committee Area sub-samples with more notable shares of non-resident responses.

Table 4: Number of Non-Resident Consultation Survey Respondents by Area

Respondent type	Rural Inverness-shire	Highland Rural Total
Total Non-Residing in Area	9	188
Short term let operator	6	103
Prospective short term let operator	3	11
Business (Not a short term let operator)	0	2
Other resident (outwith proposed STLCA)	-	39
Other (Visitor, former resident, and other)	0	33
Community Council, Group, Organisation	-	5
TOTAL Non-Resident Responses	9	193

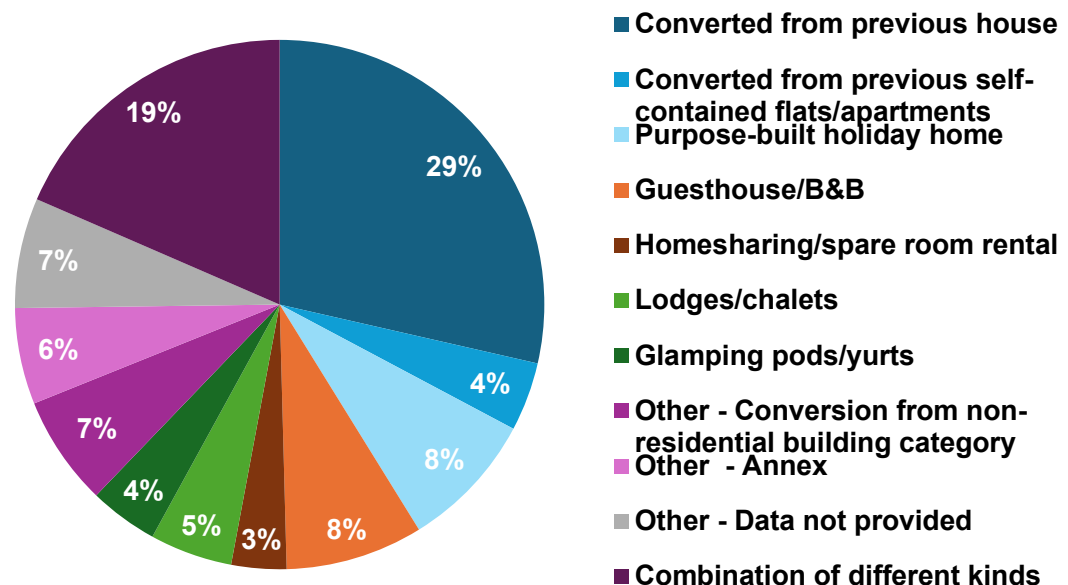
- 9.3 Among operator responses to the Highland Rural STLCA consultation survey, there are two distinct cohorts; resident operators (who both live and operate STLs within the Area), and non-resident operators, the majority of which do not reside within the Highland Council area. There are differences in the profile of Short Term Lets reportedly operated by these cohorts, where resident operators operate a broader range of STLs, several of which are a form that likely requires planning permission in any event such as the siting of annexes, glamping pods, and conversions of non-residential buildings. The profile of Short Term Lets operated by operator's resident in Rural Inverness-shire is shown in **Figure 3a**.

Figure 3a: Rural Inverness-shire Resident Operator Respondents' Type of Short Term Lets - (n=21)



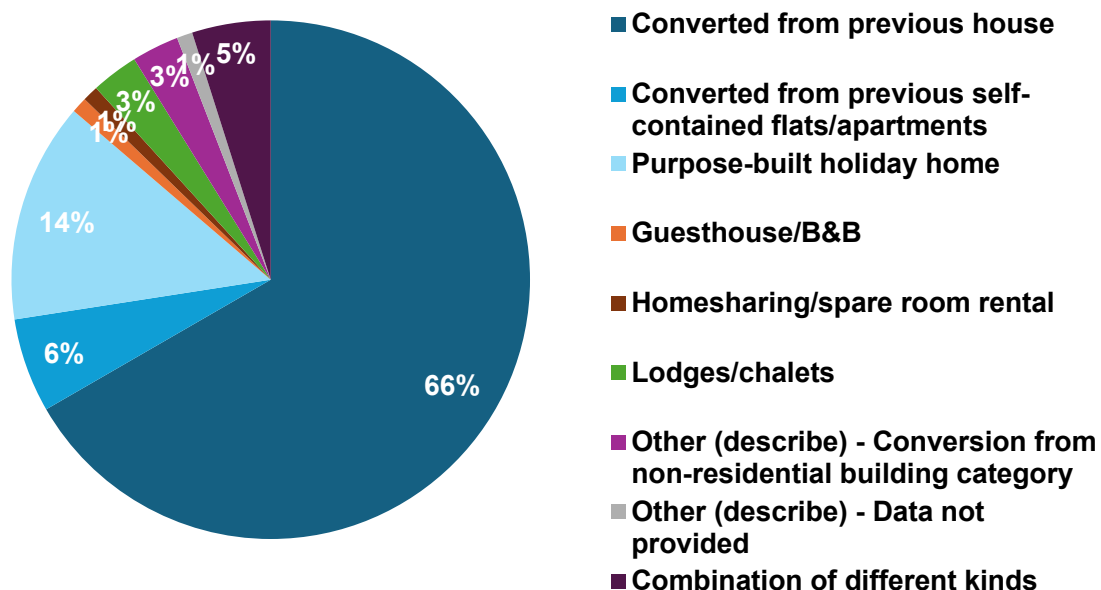
9.4 The profile of Short Term Lets operated by operator's resident in Rural Inverness-shire does not differ significantly from those operated resident elsewhere within the Highland Rural STLCA as shown in **Figure 3b**.

Figure 3b: Highland Rural Resident Operator Respondents' Type of Short Term Lets (n=119)



9.5 Non-resident operator respondents by contrast indicated that they operate a different profile of Short Term Lets within the proposed Highland Rural STLCA as shown in **Figure 3c**, with two thirds (66%) being conversions from previous houses, with a slightly higher share of purpose-built holiday homes also. Given that only 6 non-resident operators of Short Term Lets within Rural Inverness-shire responded to the consultation, this sub-sample is small and limits the weight attached to any conclusions drawn for the non-resident operator Rural Inverness-shire sub-sample.

Figure 3C: Highland Rural Non-Resident Operator Respondents' Type of Short Term Lets (n=102)



9.6 No community councils/ groups based specifically within rural Inverness-shire responded. Organisations that submitted a response relating to all of the Highland Rural proposed STLCA area were:-

- Scottish Crofting Federation;
- Scottish Land and Estates;
- The Scottish Tourism Alliance;
- Association for Scotland's Self-Caterers; and
- Nairn BID

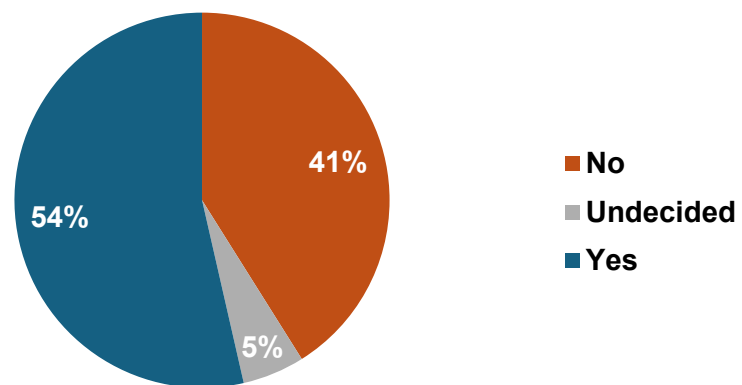
An additional written response was received (outside of the consultation platform) by the North Highland Chamber of Commerce, with comments in relation to Sutherland specifically. The points raised by all Community Councils, Groups and Organisations are provided within **Appendix 4**.

9.7 The key findings from respondents in Rural Inverness-shire are summarised as:-

- A narrow majority (54%, 30 of 56 respondents residing in the Area) support the proposal to establish the Highland Rural Short Term Let Control Area, while 23 respondents (41%) oppose it (**Figure 4a**).
- Support is notably stronger among residents and businesses, with 29 of 36 respondents (81%) in favour (**Figure 4b**).
- In contrast, most operators living in the area oppose the proposal, with 16 of 20 respondents (80%) indicating they do not support it (**Figure 4c**).
- Similarly, for non-resident operators operating within Rural Inverness-shire 4 of 6 respondents (67%) are opposed to the proposal.
- Of the wider organisations that responded, the Nairn BID, the Scottish Tourism Alliance and the Association of Scotland's Self Caterers oppose the proposal, Scottish Land and Estates are undecided, while the Scottish Crofting Federation support the proposal. Their submissions and the responses to the matters raised are detailed in **Appendix 4**.

- Overall, the results indicate a clear divergence of opinion between residents and businesses - who generally support the proposal - and short term let operators (both resident and non-resident) - who are largely opposed.
- The clear divergence of opinion extends beyond the question of whether to support the proposed control area. The category of respondent (Resident, Business, or Operator) is a dominant predictor of responses provided to many other questions within the consultation as shown in **Appendix 4**, signalling that different groups and stakeholders perceive the prevalence and the impact of Short Term Lets very differently.

Figure 4a: All responses to ‘Do you agree with the proposal to establish the Highland Rural STLCA?’, residing in Rural Inverness-shire (n=56)*



**Note: 1 respondent did not answer this question*

Figure 4b: Resident and business responses to ‘Do you agree with the proposal to establish the Highland Rural STLCA?’, residing in Rural Inverness-shire (n=36)

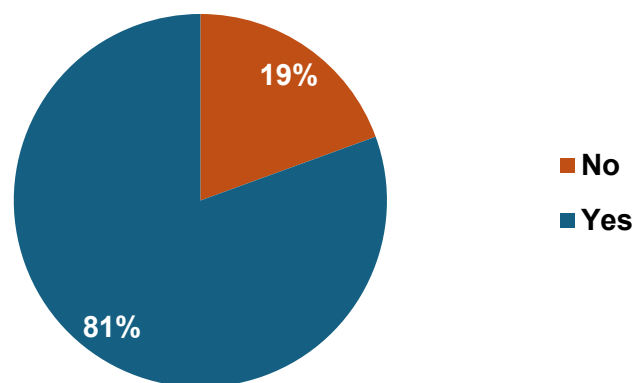
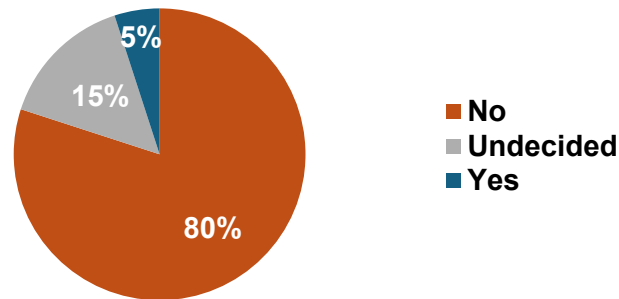


Figure 4c: Operator responses to ‘Do you agree with the proposal to establish the Highland Rural STLCA?’, residing in Rural Inverness-shire (n=20)*



**Note: 1 respondent did not answer this question*

9.8 The main themes emerging from open comments given in support of the proposal to designate the Highland Rural STLCA included:-

- Need/desire for control of and managing short term lets.
- Need for a balance with STL, between housing and tourism.
- View that the proposal is an obvious and necessary response.
- View that the proposal does not go far enough by not applying retrospectively.
- Need to protect housing availability.
- View that it could help cost/affordability of housing.
- View that tourists should be staying in tourist accommodation/supporting serviced providers.
- Concern about homes being bought for investment purposes by people outside of Highland and converted to STL.
- View that STLs harm community cohesion/sustainability.
- View that lack of housing is harming recruitment and retention of key workers and essential services.
- Impacts on parking need to be considered.
- Negative impacts on roads and traffic need to be considered.
- Negative impacts on other infrastructure.
- Negative amenity/antisocial impacts.

The main themes emerging from open comments given in opposition to the proposal to designate the Highland Rural STLCA included:-

- Concern about impact on the tourism industry.
- Loss of jobs from tourist sector will fuel depopulation.
- Overregulation/bureaucracy.
- Licensing process is sufficient.
- View that Property rights/fairness are impacted.
- View that Second/empty homes are the main issue.
- View that Campervans are the main issue.
- Other causes of pressure not STLs (Overtourism in general, NC500 etc.).
- Proposed area is too large and broad-brush.
- View that there is a difference in economic contribution between resident and non-resident operators.
- No evidence that it will work or that it has worked in Badenoch and Strathspey.

- View that STL operators have invested heavily in their properties and maintain them to a higher standard than residential property owners.
- No economic impact assessment.
- Council should be building more homes, including affordable homes.
- Supports fragile economies with little other economic industry present.

10 Officers' Analysis and Recommendation

- 10.1 Both STLCA consultations attracted responses from a range of stakeholders, including local residents, community organisations, businesses and short term let operators. Given the differences between the urban and rural contexts, there are differences in the profile of Short Term Let properties within the proposed Control Areas, and the impacts that they have within their contexts on surrounding communities. The key views and concerns raised within both surveys are therefore different and speak to the respective applicable issues. It is notable that for each consultation a large proportion of objections were submitted by respondents who were not resident within the proposed Control Areas and, in some cases, not resident within the Highlands. This does not diminish the legitimacy of any of these views but reflects the differing perspectives of different groups responding to each consultation. While operators may be principally concerned with business impacts, residents and community bodies are more likely to focus on housing availability, population retention, access to local services and neighbourhood amenity. In assessing consultation responses, it is important not only to consider the number of representations received, but also the different perspectives and interests they represent. The purpose of the consultations is not to determine which group forms a majority, but to understand the range of views and to inform a balanced judgment on how best to reconcile the competing public interests associated with housing provision, community sustainability, residential amenity and tourism accommodation.
- 10.2 While the majority of short term let operators oppose the proposals, representations from hotel owners and serviced accommodation providers demonstrate that there is not a single tourism-sector view on the proposed control area. Some accommodation providers support the proposal because it helps maintain a balanced accommodation market and reduces the risk of visitor demand being diverted away from traditional hotels to an expanding short term let sector where barriers to entry are perceived as lower. They argue that this supports year-round employment, business investment and the long-term sustainability of the local visitor economy.
- 10.3 The consultation responses each therefore highlight a spectrum of opinion, but one characterised by two legitimate but directly opposing views about how best to balance competing public interests. Those supporting the designations generally viewed it as a necessary planning tool to address concerns regarding housing availability, community sustainability and the cumulative impact of short term lets on residential amenity which are not grounds for consideration within short term let licence applications.

- 10.4 Some respondents who supported the introduction of either Control Area were concerned that it represents only a partial solution, considered that it did not go far enough and were concerned that the designation does not apply retrospectively and therefore does not automatically bring existing short term lets within planning control or compel them to return to the housing supply.
- 10.5 In response, the proposal can be viewed as a means of managing future changes of use rather than addressing the full extent of existing concentrations of short-term letting. Some were concerned that the proposals did not cover wider areas (Culloden, Nairn, Tain or the whole of Highland), and alternatively others suggested smaller areas be considered for designation around the areas of the highest STL concentrations. Those opposed generally regarded it as an unnecessary and disproportionate intervention in an already regulated sector and that property owners should not be inhibited from converting further residential properties to short term let use in response to market demand to generate further tourism growth and economic benefits in the area.
- 10.6 Those opposed to the proposals overwhelmingly disputed the Council's evidence base, notwithstanding analysis demonstrating spatial concentrations in both Control Areas, and in the Highland Rural proposal, a significant proportion of new-build homes and properties sold in the area that have subsequently been converted to short term lets.
- 10.7 The proposed Control Areas for Highland Rural and Inverness City sit between these positions. They would neither prohibit short-term letting nor leave future changes of use entirely unmanaged. Similarly, they are focussed on future changes of use that occur after a designation comes into effect and therefore would not alter the planning requirements of current operators within the area. Rather, they provide a mechanism through which future conversions can be assessed on their individual merits through the planning system, allowing decision-makers to balance the benefits and impacts of proposals in the circumstances of each case. Given that a STLCA does not retrospectively alter planning requirements for existing operators, the Council does not agree that the proposed STLCAs will have a significant adverse impact on the current short term let sector. The overwhelming majority of existing operators are expected to continue operating as they do at present. Each proposal is concerned with future changes of use, not existing provision. The Council therefore considers claims that the designations would substantially damage tourism or lead to the loss of the sector to be unconvincing. The proposals do not prohibit short term lets; they simply ensure that future conversions of residential properties are subject to planning scrutiny. They are a measure to manage future growth in the sector, not to curtail existing tourism accommodation.
- 10.8 This balanced approach is particularly important in the Highland context. Many respondents to both consultations indicated that the main measure to address the Highland Housing Challenge is the delivery of new homes. Increasing affordable housing supply and managing the loss of existing housing stock are not mutually exclusive approaches. Increasing the delivery of affordable housing is important but not a simple or immediate solution in Highland. Within the Highland Rural Area housing delivery is constrained by factors including infrastructure capacity, development viability, land ownership, ground conditions, workforce availability and limited market interest across large parts of the region, including rural Inverness-shire. New housing can take many years to bring forward.

Even with new housing provided, over 7% of new houses built within Rural Inverness-shire and in the last 5 years have since become STLs which is more than the equivalent rate for the whole of Highland (4.7%), which suggests that building homes without adequate management of that supply will not be effective in ensuring that houses remain available for residential occupation within the local housing supply.

- 10.9 Viewed through a forward-looking lens, it is imperative that this trend is not replicated, or even worsened in future housing development, and that new housing stock contributes to the area's identified housing needs on a long-term basis. Similar challenges exist in Inverness City, where opportunities for new housing in central historic neighbourhoods are limited, meaning that housing demand in Inverness is increasingly met within the expanding suburbs. While several successful housing developments have come forward within more centrally located areas, these units are vulnerable to future conversion owing to their proximity to the city centre with its many tourist facilities and hospitality sector. It is recognised that existing concentrations of Short Term Lets in central areas of Inverness has become increasingly controversial in recent years reflecting growing tensions between the need to sustain established residential communities and the demand for tourist accommodation.
- 10.10 The proposed Control Areas do not prevent such uses where they are appropriate; but ensures that the merits of proposals to convert homes intended to contribute to each area's housing supply are assessed against the development plan, material considerations, the public interest and the circumstances of the locality before housing is removed from residential use within the development management process. On balance, it is therefore proposed to progress the Inverness City Short Term Let Control Area, to progress Rural Inverness-shire within the proposed Highland Rural Short Term Let Control Area and recommend to E&I Committee to proceed.

11 Next Steps

- 11.1 As demonstrated in the Section 8 and **Appendix 3**, the consultation responses demonstrated, on balance, support for the proposed Inverness City STLCA among respondents residing in the Area. Based on the evidence set out in the Inverness City [Statement of Reasons](#), consultation feedback on the proposal, and views on the impacts of short term lets, on balance it is concluded that the evidence supports progression of the Inverness City Short Term Let Control Area.
- 11.2 As demonstrated in the Section 9 and **Appendix 4**, the consultation responses demonstrated, on balance, support for the proposed Highland Rural STLCA among respondents residing within Rural Inverness-shire. Based on the evidence set out in the Highland Rural [Statement of Reasons](#), consultation feedback on the proposal, and views on the impacts of short term lets, on balance it is concluded that the evidence supports progression of Rural Inverness-shire within the Highland Rural Short Term Let Control Area.

- 11.3 The purpose of the consultation for each STLCA is to inform the Council's assessment of whether a Control Area would assist in managing the use of residential property as short term let accommodation in the public interest, rather than to secure consensus amongst all stakeholder groups. The results indicate that concerns, priorities and perceptions of the prevalence and impacts of Short Term Lets vary significantly between residents and short term let operators, in each Area which is consistent with responses received elsewhere in the Highlands, and elsewhere as noted within [Research into the impact of short-term lets on communities across Scotland](#).
- 11.4 Following consultation, Regulations provide that the planning authority may modify the proposal, having regard to any representation made in response to the consultation, except to any modification to include an area outwith the area shown on the map consulted on (Regulation (4)(2)(b)). Each Area Committee within the proposed Highland Rural STLCA are considering the consultation responses to the proposed Highland Rural STLCA in their area and will decide whether to progress in the consideration of their area within the Highland Rural STLCA. Following all Area Committee decisions, officers will prepare a report to E&I Committee outlining the resultant proposed area to designate for the Highland Rural STLCA. The E&I Committee will take the decision on whether to proceed to designate the Highland Rural STLCA and to give notice of the proposal to Scottish Ministers. Approval of the designation by Scottish Ministers is required in order for a local authority to designate the STLCA.
- 11.5. The proposed Short Term Let Control Areas would enable Officers to assess the cumulative impact of STLs on residential amenity and housing availability across the designated area. While planning permission is already required for a range of short term let types in Highland, the control area would bring secondary letting under planning consideration providing clarity and consistency as compared to the current situation.
- 11.6 The designation cannot alter planning requirements retrospectively, however it is recognised that once a Control Area is in force, the separate Licensing Regime must take account of it, and operators applying for new or renewed short term let licenses within a Control Area will have to demonstrate that they can comply with mandatory Licensing condition 13 either by evidencing that they have planning permission in place, have applied for planning permission or alternatively can exhibit evidence that they do not require planning permission as part of the processing of their licence application. Some operators will already be able to provide this evidence, having obtained planning permission or a Certificate of Lawfulness before the Control Area came into effect. Others may need to seek clarification from the planning service by submitting a short term let development enquiry. In response, the planning service will advise whether the use constitutes a material change of use and whether an application for planning permission or a Certificate of Lawfulness is required. As a result, existing short term lets operating lawfully will not be adversely affected by the designation of a Control Area.

- 11.7 The designation of the Control Areas does not in itself determine the outcome of planning applications, nor does it ban short term let changes of use or set the policy framework that applies to these applications. Planning applications within the Control Area would require to be determined in accordance with the adopted development plan. Members will be invited to a workshop to discuss relevant planning policy and how it is used in the planning application process.

Designation: Assistant Chief Executive - Place

Date: 27 July 2026

Author: Meadhbh Maguire – Principal Planner
Meredith Dale – Principal Planner

Background Papers: Short Term Let Control Area [Report to Highland Council](#) 18 September 2025
Short Term Let Control Area [Report to CIAC](#) 7 January 2026
Short Term Let Control Area [Report to EIC](#) 12 February 2026
[Inverness City STLCA Statement of Reasons](#)
[Highland Rural STLCA Statement of Reasons](#)

Appendices: Appendix 1 – Inverness City STLCA Integrated Impact Assessment
Appendix 2 – Highland Rural STLCA Integrated Impact Assessment
Appendix 3 – Inverness City STLCA Summarised Consultation Responses
Appendix 4 – Highland Rural STLCA Summarised Consultation Responses

Integrated Impact Assessment Screening

About proposal

What does this proposal relate to? Policy

Proposal name: Inverness City Short Term Let Control Area

High level summary of the proposal: To progress the proposed Inverness City Short Term Let Control Area, where any decision to submit a proposal for designation of the Short Term Let Control Area to Scottish Ministers for formal approval will be taken by the Economy and Infrastructure Committee.

Who may be affected by the proposal? Highland Council residents, Short Term Let Operators, and prospective Short Term Let operators seeking potential use of residential property for secondary letting.

Start date of proposal:

End date of proposal:

Does this proposal result in a change or impact to one or more Council service? Yes

Which Council services will be impacted by this proposal? Corporate, Place

Does this relate to an existing proposal? Yes

Provide details of the existing proposal: At the meeting of The Highland Council on 18 September 2025, Members agreed a new internal process to consider designation of further Short Term Let Control Areas (STLCA) beyond Ward 20: Badenoch and Strathspey.

Author details

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Service: Place

Responsible officer details

Name: Tim Stott

Job title: Development Plans Manager

Email address: Tim.Stott@highland.gov.uk

Sign off date: 2026-07-27

Equalities, poverty, and human rights

Protected characteristics

Select what impact the proposal will have on the following protected characteristics:

Sex: No impact

Age: No impact

Disability: No impact

Religion or belief: No impact

Race: No impact

Sexual orientation: No impact

Gender reassignment: No impact

Pregnancy and maternity: No impact

Marriage and civil partnership: No impact

Protected characteristics impact details: Any Short Term Let Control Area would apply consistently across the designated area and would regulate the change of use of properties to short-term lets through the planning system, regardless of the personal characteristics of property owners, operators, residents or visitors. Instead, it introduces a planning framework through which applications for new short-term lets can be assessed on their individual merits. While individuals with protected characteristics may be represented among both residents and short-term let operators, any effects arising from the proposal would relate to a person's role as a resident, property owner or business operator rather than to a protected characteristic itself. As such, no disproportionate impact on any protected group has been identified.

Poverty and socio-economic

What impact is the proposal likely to have on the following?

Prospects and opportunities: No impact

Places: Positive

Financial: No impact

Poverty and socio-economic impact details: The proposal does not restrict individuals' ability to access education, employment, training, childcare or support services, nor does it alter the provision of these services.

The Control Area would introduce a planning requirement for the future change of use of residential properties to short-term lets, but it would not prevent the operation of short-term lets where planning permission is granted. As such, the proposal is not expected to directly affect employment opportunities within the tourism sector or other industries.

The proposal is not expected to have a significant adverse impact on vulnerable areas or communities, including those identified through the Scottish Index of Multiple Deprivation (SIMD), fragile rural communities, or areas experiencing housing and transport challenges.

The purpose of the Short Term Let Control Area is to provide greater oversight of the conversion of residential properties to short-term let use through the planning system. It does not prevent short term lets from operating but allows the Council to assess proposals on a case-by-case basis, taking account of local circumstances and potential impacts on communities. Within Inverness, the Control Area may help to protect the availability of housing for permanent residents by providing a mechanism to manage the concentration and distribution of short-term lets in areas where demand for housing is high. By supporting the retention of residential accommodation for local households and workers, the proposal could contribute positively to sustaining mixed and balanced communities, maintaining access to housing, and supporting the long-term social and economic wellbeing of the city.

There may be some indirect positive impacts over the longer term if the proposal contributes to retaining housing stock for permanent residential use in Inverness City. Improved availability of housing could support recruitment and retention of workers in key sectors such as health, education, social care, hospitality and public services, thereby helping people access employment opportunities closer to where they live. Increased housing availability may also assist younger people, families and lower-income households to remain within their communities, supporting access to local schools, training opportunities and employment.

A potential economic impact relates to businesses by requiring planning permission or securing confirmation of lawful planning status with a Certificate of Lawfulness meaning additional costs. However this would bring Short-Term Letting into line with other accommodation businesses that already require planning permission for their siting or change of use. Overall, any impacts on prospects and opportunities are likely to be indirect, limited and would depend on future planning decisions relating to individual short-term let proposals.

Human rights

Which of the below human rights will be affected by this proposal?

Article 1 Protocol 1.

What impact do you consider this proposal to have on the human rights of people? No impact

Human rights impact details: The proposal has the potential to engage Protocol 1, Article 1: Right to peaceful enjoyment of property because it introduces additional planning controls relating to the use of private property as a short-term let. Property owners may be required to obtain planning permission before changing the use of a dwellinghouse to a short-term let within the Control Area.

The principle of requiring planning permission for changes of use to short-term lets has already been considered by the Scottish Government as part of the legislation introducing Short Term Let Control Areas. The Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 provide a lawful mechanism for local authorities to designate control areas where justified by local circumstances.

The Council has considered the view of the Scottish Government on this matter. Cabinet Secretary for Housing Màiri McAllan MSP accepted in February that the regulation of short-term lets via planning and licensing regimes represents a control of the use of a host's property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were "satisfied that the creation of powers for a local authority to designate a short-term let control area is a proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity."

The proposal does not remove property rights or prevent ownership of property. Any interference with property rights would be lawful, proportionate and in pursuit of a legitimate public interest, namely the management of housing supply, community sustainability and the balanced development of the area through the planning system.

As the Control Area operates within an established legal framework specifically created by the Scottish Parliament for this purpose, any interference with property rights is considered lawful, proportionate and in pursuit of legitimate public policy objectives. No significant adverse impacts on other Convention rights have been identified.

Equalities, poverty and human rights screening assessment

What impact do you think there will be to equalities, poverty and human rights? Positive and negative impact

Is a Full Impact Assessment required? No

Children's rights and wellbeing

What likely impact will the proposal have on children and young people? The proposal does not introduce any direct impacts. While indirect positive impacts for children and young people could occur through supporting the availability of homes for permanent residents, contribute to sustaining local communities, supporting the retention of families within communities, and helping to maintain demand for local schools, childcare facilities and other community services, these impacts are limited, indirect and would depend on the planning decisions taken with respect to individual applications, rather than being achieved through the designation itself.

Which of the below children's rights will be affected by the proposal? No children's rights will be affected.

Explain how the children's rights selected above will be affected:

Children's rights and wellbeing screening assessment

What impact do you think there will be to children's rights and wellbeing? No impact

Is a Full Impact Assessment required? No

Data protection

Will your proposal involve processing personal data? No

Is any of this data already processed by the Highland Council? No

Data protection screening assessment

What change will there be to the way personal data is processed? No significant change to current processing.

Is a Full Impact Assessment required? No

Island and mainland rural communities

Does your proposal impact island and mainland rural communities? No

Island and mainland rural communities screening assessment

What impact do you think there will be to island and mainland rural communities? No difference

Is a Full Impact Assessment required? No

Climate change

Does the proposal involve activities that could impact on greenhouse gas emissions (CO₂e)? No

Does the proposal have the potential to affect the environment, wildlife or biodiversity? No

Does the proposal have the potential to influence resilience to extreme weather or changing climate? No

Provide information regarding your selection above: No impact on climate change arising.

Climate change screening assessment

Have you identified potential impact for any of the areas above or marked any as not known? No

Is a Full Impact Assessment required? No

Integrated Impact Assessment Screening

About proposal

What does this proposal relate to? Policy

Proposal name: Highland Rural Short Term Let Control Area

High level summary of the proposal: To progress Rural Inverness-shire (Ward 12 Aird and Loch Ness and the majority of Ward 19 Inverness South) within the proposed Highland Rural Short Term Let Control Area, where any decision to submit a proposal for designation of the Short Term Let Control Area to Scottish Ministers for formal approval will be taken by the Economy and Infrastructure Committee

Who may be affected by the proposal? Highland Council residents, Short Term Let Operators, and prospective Short Term Let operators seeking potential use of residential property for secondary letting.

Start date of proposal:

End date of proposal:

Does this proposal result in a change or impact to one or more Council service? Yes

Which Council services will be impacted by this proposal? Corporate, Place

Does this relate to an existing proposal? Yes

Provide details of the existing proposal: At the meeting of The Highland Council on 18 September 2025, Members agreed a new internal process to consider designation of further Short Term Let Control Areas (STLCA) beyond Ward 20: Badenoch and Strathspey.

Author details

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Service: Place

Responsible officer details

Name: Tim Stott

Job title: Development Plans Manager

Email address: Tim.Stott@highland.gov.uk

Equalities, poverty, and human rights

Protected characteristics

Select what impact the proposal will have on the following protected characteristics:

Sex: No impact

Age: No impact

Disability: No impact

Religion or belief: No impact

Race: No impact

Sexual orientation: No impact

Gender reassignment: No impact

Pregnancy and maternity: No impact

Marriage and civil partnership: No impact

Protected characteristics impact details: Any Short Term Let Control Area would apply consistently across the designated area and would regulate the change of use of properties to short-term lets through the planning system, regardless of the personal characteristics of property owners, operators, residents or visitors. Instead, it introduces a planning framework through which applications for new short-term lets can be assessed on their individual merits. While individuals with protected characteristics may be represented among both residents and short-term let operators, any effects arising from the proposal would relate to a person's role as a resident, property owner or business operator rather than to a protected characteristic itself. As such, no disproportionate impact on any protected group has been identified.

Poverty and socio-economic

What impact is the proposal likely to have on the following?

Prospects and opportunities: No impact

Places: Positive

Financial: No impact

Poverty and socio-economic impact details: The proposal does not restrict individuals' ability to access education, employment, training, childcare or support services, nor does it alter the provision of these services.

The Control Area would introduce a planning requirement for the future change of use of residential properties to short-term lets, but it would not prevent the operation of short-term lets where planning permission is granted. As such, the proposal is not expected to directly affect employment opportunities within the tourism sector or other industries.

The proposal is not expected to have a significant adverse impact on vulnerable areas or communities, including those identified through the Scottish Index of Multiple Deprivation (SIMD), fragile rural communities, or areas experiencing housing and transport challenges.

The purpose of the Short Term Let Control Area is to provide greater oversight of the conversion of residential properties to short-term let use through the planning system. It does not prevent short-term lets from operating but allows the Council to assess proposals on a case-by-case basis, taking account of local circumstances and potential impacts on communities. In rural and fragile communities, the proposal may help to support the sustainability of settlements by providing a mechanism to manage the loss of residential housing stock where concentrations of short-term lets could affect the availability of homes for local residents and workers. This could have positive implications for maintaining population levels, supporting local services and sustaining community cohesion.

There may be some indirect positive impacts over the longer term if the proposal contributes to retaining housing stock for permanent residential use in rural communities. Improved availability of housing could support recruitment and retention of workers in key sectors such as health, education, social care, hospitality and public services, thereby helping people access employment opportunities closer to where they live. Increased housing availability may also assist younger people, families and lower-income households to remain within their communities, supporting access to local schools, training opportunities and employment.

A potential economic impact relates to businesses by requiring planning permission or securing confirmation of lawful planning status with a Certificate of Lawfulness meaning additional costs. However this would bring Short-Term Letting into line with other accommodation businesses that already require planning permission for their siting or change of use. Overall, any impacts on prospects and opportunities are likely to be indirect, limited and would depend on future planning decisions relating to individual short-term let proposals.

Human rights

Which of the below human rights will be affected by this proposal?

Article 1 Protocol 1.

What impact do you consider this proposal to have on the human rights of people? No impact

Human rights impact details: The proposal has the potential to engage Protocol 1, Article 1: Right to peaceful enjoyment of property because it introduces additional planning controls relating to the use of private property as a short-term let. Property owners may be required to obtain planning permission before changing the use of a dwellinghouse to a short-term let within the Control Area.

The principle of requiring planning permission for changes of use to short-term lets has already been considered by the Scottish Government as part of the legislation introducing Short Term Let Control Areas. The Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 provide a lawful mechanism for local authorities to designate control areas where justified by local circumstances.

The Council has considered the view of the Scottish Government on this matter. Cabinet Secretary for Housing Màiri McAllan MSP accepted in February that the regulation of short-term lets via planning and licensing regimes represents a control of the use of a host's property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were "satisfied that the creation of powers for a local authority to designate a short-term let control area is a proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity."

The proposal does not remove property rights or prevent ownership of property. Any interference with property rights would be lawful, proportionate and in pursuit of a legitimate public interest, namely the management of housing supply, community sustainability and the balanced development of the area through the planning system.

As the Control Area operates within an established legal framework specifically created by the Scottish Parliament for this purpose, any interference with property rights is considered lawful, proportionate and in pursuit of legitimate public policy objectives. No significant adverse impacts on other Convention rights have been identified.

Equalities, poverty and human rights screening assessment

What impact do you think there will be to equalities, poverty and human rights? Positive and negative impact

Is a Full Impact Assessment required? No

Children's rights and wellbeing

What likely impact will the proposal have on children and young people? The proposal does not introduce any direct impacts. While indirect positive impacts for children and young people could occur though supporting the availability of homes for permanent residents, contribute to sustaining local populations, supporting the retention of families within communities, and helping to maintain demand for local schools, childcare facilities and other community services, these impacts are limited, indirect and would depend on the planning decisions taken with respect to individual applications, rather than being achieved through the designation itself.

Which of the below children's rights will be affected by the proposal? No children's rights will be affected.

Explain how the children's rights selected above will be affected:

Children's rights and wellbeing screening assessment

What impact do you think there will be to children's rights and wellbeing? No impact

Is a Full Impact Assessment required? No

Data protection

Will your proposal involve processing personal data? No

Is any of this data already processed by the Highland Council? No

Data protection screening assessment

What change will there be to the way personal data is processed? No significant change to current processing.

Is a Full Impact Assessment required? No

Island and mainland rural communities

Does your proposal impact island and mainland rural communities? Yes

Could people in island and mainland rural communities be affected differently? Yes

Have any negative impacts been identified? No

Island and mainland rural communities screening assessment

What impact do you think there will be to island and mainland rural communities? Minor Differences

How could the impact differ? The Highland Rural Short Term Let Control Area is, by its design and nature, intended to apply to rural areas across Highland, including both island and mainland rural communities. The proposal could affect island and mainland rural communities in different ways, reflecting their differing housing markets, population characteristics and levels of reliance on tourism. However, the purpose of the Short Term Let Control Area is to provide a consistent planning mechanism that allows local circumstances to be taken into account when considering individual proposals.

In some island and rural communities, short-term lets can form an important part of the local economy, supporting tourism-related employment and income for self-employed individuals, seasonal workers and small businesses. The introduction of a Control Area may therefore be perceived as having a greater impact in locations where the visitor economy is particularly significant.

Conversely, many island and rural communities experience acute housing pressures, including limited housing supply, higher construction costs, outward migration of young people, difficulties attracting workers and challenges sustaining local services. In these areas, the Control Area may have positive impacts by helping to manage the loss of residential properties to short-term let use and supporting the availability of housing for permanent residents and local workers.

As the Control Area does not prohibit short-term lets but instead requires planning permission for changes of use, it provides a mechanism through which the specific circumstances of individual island and mainland rural communities can be considered as part of the planning process.

Overall, the proposal is assessed as having a mixed but generally neutral to positive impact, recognising that effects may vary between communities depending on the balance between housing pressures and the economic benefits associated with short-term letting. No disproportionate adverse impacts on island communities compared with mainland rural communities have been identified.

Scottish government in the Consultation report on proposals for a licensing scheme and planning control areas for short-term lets in Scotland page 84 stated :

We believe that our licensing scheme and powers to introduce control areas provide the right combination of national consistency and local flexibility that will allow local authorities to strike the right balance between tourism and economic benefits and community needs and concerns in their areas. Some local authorities may want to designate control areas in all or part of their area and might consider that some islands would benefit from such designation. Similar considerations apply in other urban and rural areas on the mainland.

and page 85:

We consider that the legislation is appropriate for the whole of Scotland, including island communities, and offers considerable flexibility to local authorities on how it is implemented. We intend to work with local authorities, not least in the preparation of guidance, as they work towards implementation so that we can facilitate the sharing of ideas and best practice. We hope this will be of particular value to island local authorities and local authorities with island communities.

By introducing planning control for future changes if use it is accepted that this introduces costs applying for planning permission or Certificates of Lawfulness where relevant, that do not apply at present, within rural and island areas that fall within this proposal.

Is a Full Impact Assessment required? No

Climate change

Does the proposal involve activities that could impact on greenhouse gas emissions (CO₂e)? No

Does the proposal have the potential to affect the environment, wildlife or biodiversity? No

Does the proposal have the potential to influence resilience to extreme weather or changing climate? No

Provide information regarding your selection above: No impact on climate change arising.

Climate change screening assessment

Have you identified potential impact for any of the areas above or marked any as not known? No

Is a Full Impact Assessment required? No

Appendix 3

This appendix presents a summary of responses to the **Inverness City STLCA survey**.

Note: Questions 1 – 3, 7 – 11 and 29, which capture personal information, are not reported however they have informed the definition of the geography and cohorts of respondents, outlined below.

Geographic Area

Responses to Questions 6 (area of STL operation), 7 (residential address), 8 (postcode) and 9 (area of residence) are used to identify which responses are from residents, businesses, community councils or current or prospective STL operators living within the affected area or, operators who live outwith the affected area but operate or intend to operate an STL within the area, which are important to highlight to the Area Committee members. We recognise however that the full sample of the consultation includes individuals neither residing in or operating in any of the Committee Areas within the proposed Control Area, or in Highland. These are reported within the “*Total Sample*.”

Cohorts

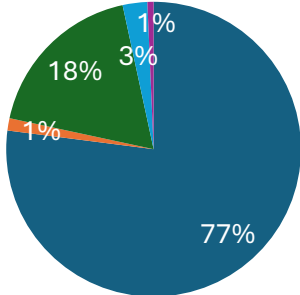
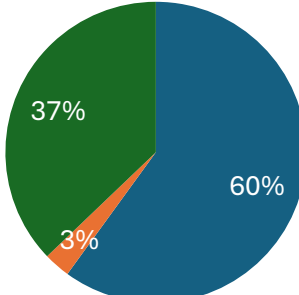
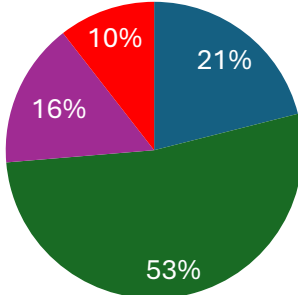
Three cohorts of respondents have been classified as shown in **Table A3.1**. Using cohorts supports the presentation of this analysis by grouping respondents with similar characteristics.

Table A3.1: Summary of cohorts for survey analysis

Residents in Area	Not Resident in Area	Groups
• Residents (not STL operators) • Business (not STL operators) • Current STL Operators (Resident in Area) • Prospective STL Operators (Resident in Area)	• Current STL Operators (Non-resident) • Prospective/Future STL Operators (Non-resident) • Other Non-resident (Visitors, former residents, former operators etc.)	• Community Councils, Groups and Organisations

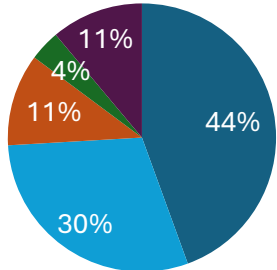
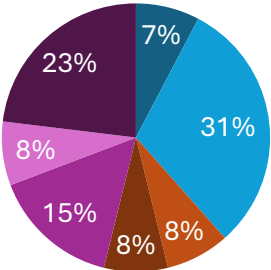
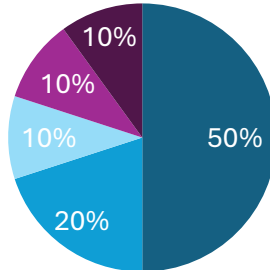
Question 4. Are you responding as:

Where relevant, 'Other' responses which relate to a listed category have been added to that category.

Respondent type	Resides in Inverness City STLCA	Resides elsewhere in Highland Council	Resides Outwith Highland Council Area																																										
Total Residing in Area	147	35	16																																										
Resident (Not a short term let operator)	114	21	4																																										
Business (Not a short term let operator)	2	1	-																																										
Short term let operator	27	13	10																																										
Prospective short term let operator	4	-	-																																										
Community Council, Group, Organisation	1	-	3																																										
Other: Visitor	-	-	2																																										
TOTAL Responses	148	35	19																																										
Resident Business Short Term Let operator Prospective Short Term Let operator Community council, group or organisation Other: Visitor	 <table><caption>Respondent Type Distribution - Inverness City STLCA</caption><thead><tr><th>Respondent Type</th><th>Count</th><th>Percentage</th></tr></thead><tbody><tr><td>Resident</td><td>114</td><td>77%</td></tr><tr><td>Short Term Let operator</td><td>27</td><td>18%</td></tr><tr><td>Prospective Short Term Let operator</td><td>4</td><td>3%</td></tr><tr><td>Business</td><td>2</td><td>1%</td></tr></tbody></table>	Respondent Type	Count	Percentage	Resident	114	77%	Short Term Let operator	27	18%	Prospective Short Term Let operator	4	3%	Business	2	1%	 <table><caption>Respondent Type Distribution - Elsewhere in Highland Council</caption><thead><tr><th>Respondent Type</th><th>Count</th><th>Percentage</th></tr></thead><tbody><tr><td>Resident</td><td>21</td><td>60%</td></tr><tr><td>Short Term Let operator</td><td>13</td><td>37%</td></tr><tr><td>Business</td><td>1</td><td>3%</td></tr></tbody></table>	Respondent Type	Count	Percentage	Resident	21	60%	Short Term Let operator	13	37%	Business	1	3%	 <table><caption>Respondent Type Distribution - Outwith Highland Council Area</caption><thead><tr><th>Respondent Type</th><th>Count</th><th>Percentage</th></tr></thead><tbody><tr><td>Short Term Let operator</td><td>10</td><td>53%</td></tr><tr><td>Resident</td><td>4</td><td>21%</td></tr><tr><td>Community council, group or organisation</td><td>3</td><td>16%</td></tr><tr><td>Other: Visitor</td><td>2</td><td>10%</td></tr></tbody></table>	Respondent Type	Count	Percentage	Short Term Let operator	10	53%	Resident	4	21%	Community council, group or organisation	3	16%	Other: Visitor	2	10%
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Over three quarters of respondents residing in the proposed Inverness City STLCA are residents, while 60% of those living elsewhere in Highland are also residents. The distribution of respondent categories for respondents outwith the Highland Council Area differs however, with a larger share comprising operators. This sample of non-resident operators is much smaller however, meaning that just over half of operators who responded to the Inverness City STLCA consultation live and operate within the affected area.

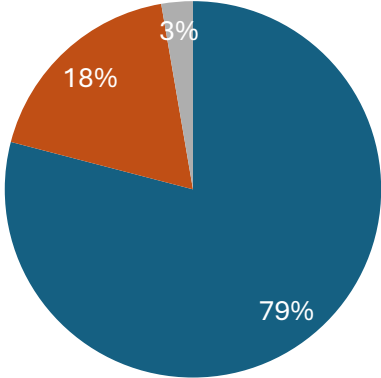
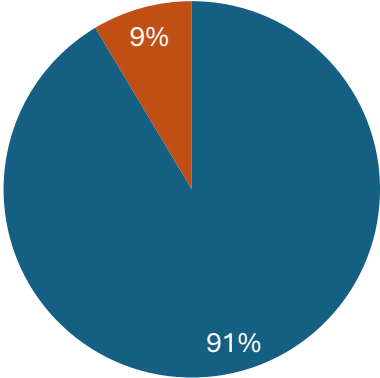
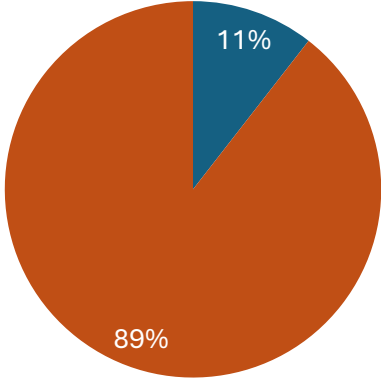
Question 5. What kind(s) of Short Term Lets do you currently operate? (Only asked to Short Term Let Operators)
Where relevant, 'Other' responses which relate to an already listed category have been added to that category for accuracy.

Short Term Let Type	Resident Operators Inverness City	Operators Resident Elsewhere in Highland	Non-Resident Operators outwith Highland
Converted from previous house terraced, semi-detached detached	12	1	5
Converted from previous self-contained flats/apartments	8	4	2
Purpose-built holiday home	-	-	1
Guesthouse/B&B	3	1	-
Homesharing/room letting	-	1	-
Lodges/chalets	-	-	-
Glamping pods/yurts	1	-	-
Other - Conversion from non-residential building category	-	2	1
Other - Annex	-	1	-
Other - Data not provided	-	-	-
Combination of different kinds	3	3	1
TOTAL Operator Responses	27	13	10
			

There are no significant differences in the profile of STLs operated by resident and non-resident respondents with conversion of previous houses/flats being dominant across all groups, although non-resident operators who responded are less likely to operate Guesthouse/B&B.

Question 12. Do you currently work in Highland? (optional question)

Breakdown of responses by area of residence

Do you Currently Work in Highland	Resides in Inverness City STLCA	Resides elsewhere in Highland Council	Resides Outwith Highland Council Area
Yes	117	32	17
No	27	3	2
(No answer)	4	-	-
TOTAL	148	35	19
Yes No (No answer)			

Question 13. Are you on the Council's Housing Register? (optional question)

This means you have submitted an application for social rented housing to The Highland Council and its partner housing associations.

Breakdown of responses by area of residence

Are you on the Council's Housing Register?	Resides in Inverness City STLCA	Resides elsewhere in Highland Council	Resides Outwith Highland Council Area
Yes	12	2	-
No	136	33	19
(No answer)	-	-	-
TOTAL	148	35	19
Yes No (No answer)	A pie chart showing the distribution of responses for residents in Inverness City STLCA. The chart is divided into two segments: a small blue segment representing 'Yes' at 8% and a large orange segment representing 'No' at 92%.	A pie chart showing the distribution of responses for residents elsewhere in Highland Council. The chart is divided into two segments: a small blue segment representing 'Yes' at 6% and a large orange segment representing 'No' at 94%.	A pie chart showing the distribution of responses for residents outwith Highland Council Area. The chart is a single orange circle representing 'No' at 100%.

Question 14. Have you had difficulty buying or renting a house for full-time occupancy within the proposed control area?
(optional question)

Breakdown of responses by area of residence

Have you had difficulty buying or renting a house for full-time occupancy within the proposed control area?	Resides in Inverness City STLCA	Resides elsewhere in Highland Council	Resides Outwith Highland Council Area
No difficulty	78	18	16
Slight difficulty	14	2	-
Moderate difficulty	18	5	-
Severe difficulty	36	8	-
(No answer)	2	2	3
TOTAL	148	35	19
No difficulty Slight difficulty Moderate difficulty Severe difficulty (No answer)			

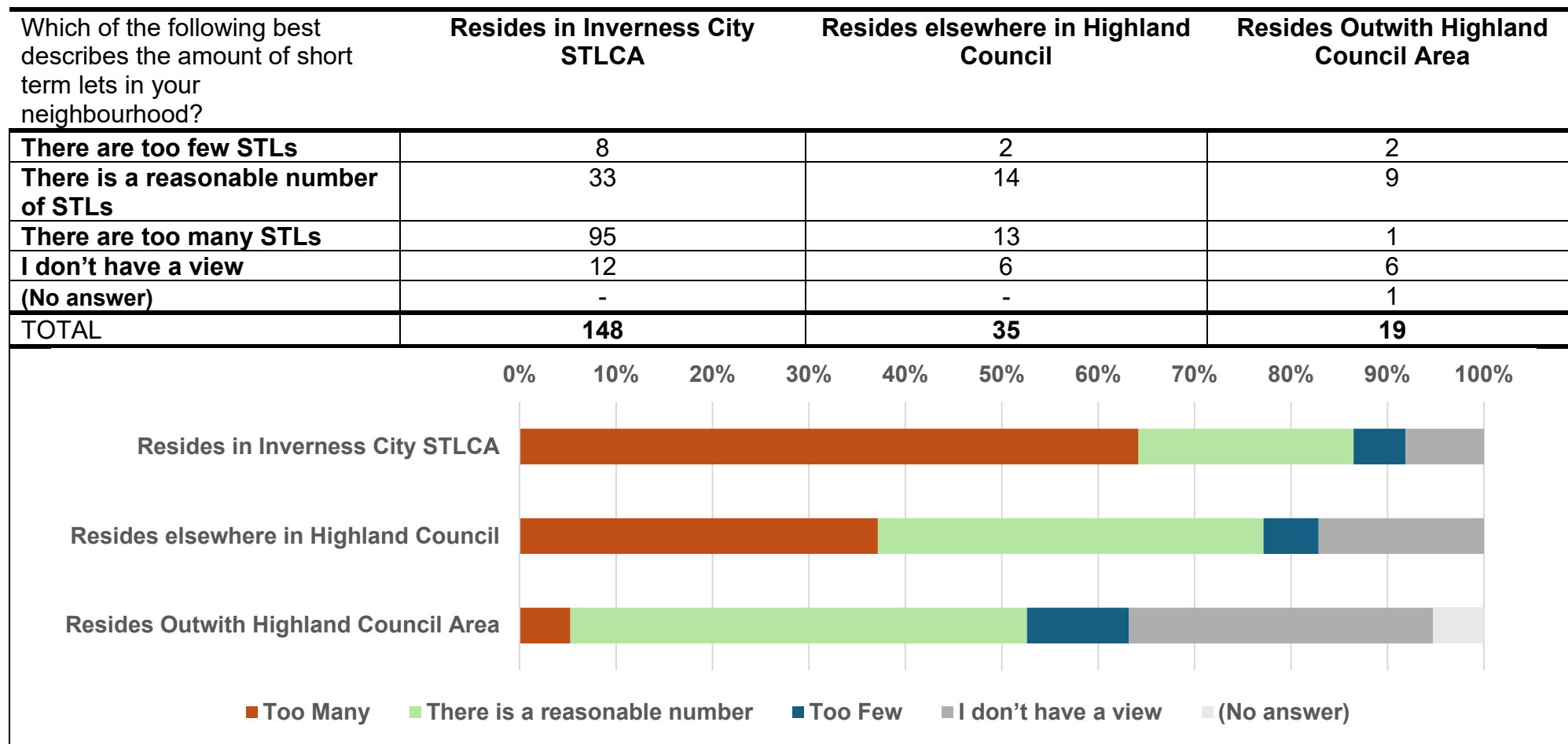
46% of respondents residing within the proposed Inverness City STLCA indicated that they had experienced some level of difficulty (slight, moderate or severe) buying or renting a house for full-time occupancy within the area, while 53% had experienced no difficulty.

Question 15. If you experienced any difficulty in buying or renting a house within the proposed control area, please provide more information: (optional question)

Respondent Reference	Points raised
IC-192-1, IC-187-1, IC-186-1, IC-184-1, IC-170-1, IC-166-1, IC-164-1, IC-153-1, IC-152-1, IC-147-1, IC-146-1, IC-145-1, IC-135-1, IC-127-1, IC-121-1, IC-90-1, IC-72-1, IC-70-1, IC-57-1, IC-55-1, IC-35-1, IC-33-1, IC-24-1, IC-19-1, IC-17-1, IC-16-1, IC-12-1, IC-11-1	Lack of affordable housing
IC-197-1, IC-144-1, IC-139-1, IC-136-1, IC-127-1, IC-120-1, IC-116-1, IC-114-1, IC-110-1, IC-109-1, IC-108-1, IC-106-1, IC-104-1, IC-102-1, IC-98-1, IC-94-1, IC-92-1, IC-89-1, IC-84-1, IC-70-1, IC-60-1, IC-58-1, IC-57-1, IC-56-1, IC-54-1, IC-53-1, IC-52-1, IC-45-1, IC-43-1, IC-37-1, IC-36-1, IC-20-1, IC-17-1, IC-16-1, IC-11-1, IC-8-1, IC-7-1, IC-6-1, IC-1-1	Limited housing availability
IC-201-1, IC-186-1, IC-181-1, IC-176-1, IC-145-1, IC-138-1, IC-135-1, IC-122-1, IC-115-1, IC-112-1, IC-110-1, IC-98-1, IC-94-1, IC-56-1, IC-52-1, IC-45-1, IC-37-1, IC-36-1, IC-16-1, IC-13-1, IC-11-1, IC-8-1, IC-4-1	Competition and overbidding in the housing market
IC-184-1, IC-181-1, IC-180-1, IC-166-1, IC-152-1, IC-147-1, IC-146-1, IC-128-1, IC-127-1, IC-116-1, IC-115-1, IC-108-1, IC-105-1, IC-94-1, IC-90-1, IC-72-1, IC-55-1, IC-45-1, IC-43-1, IC-37-1, IC-33-1, IC-17-1, IC-16-1, IC-11-1, IC-4-1, IC-1-1	Impact of STLs on housing supply
IC-197-1, IC-180-1, IC-176-1, IC-163-1, IC-116-1, IC-104-1	Housing Insecurity and Displacement
IC-180-1, IC-176-1, IC-142-1, IC-136-1, IC-116-1, IC-113-1, IC-108-1, IC-104-1, IC-56-1, IC-11-1	Reliance on family and friends
Council Response: A range of experiences of difficulty in buying/renting a house within the proposed control area are therefore noted.	

Question 16. Which of the following best describes the amount of short term lets in your neighbourhood? (optional question)

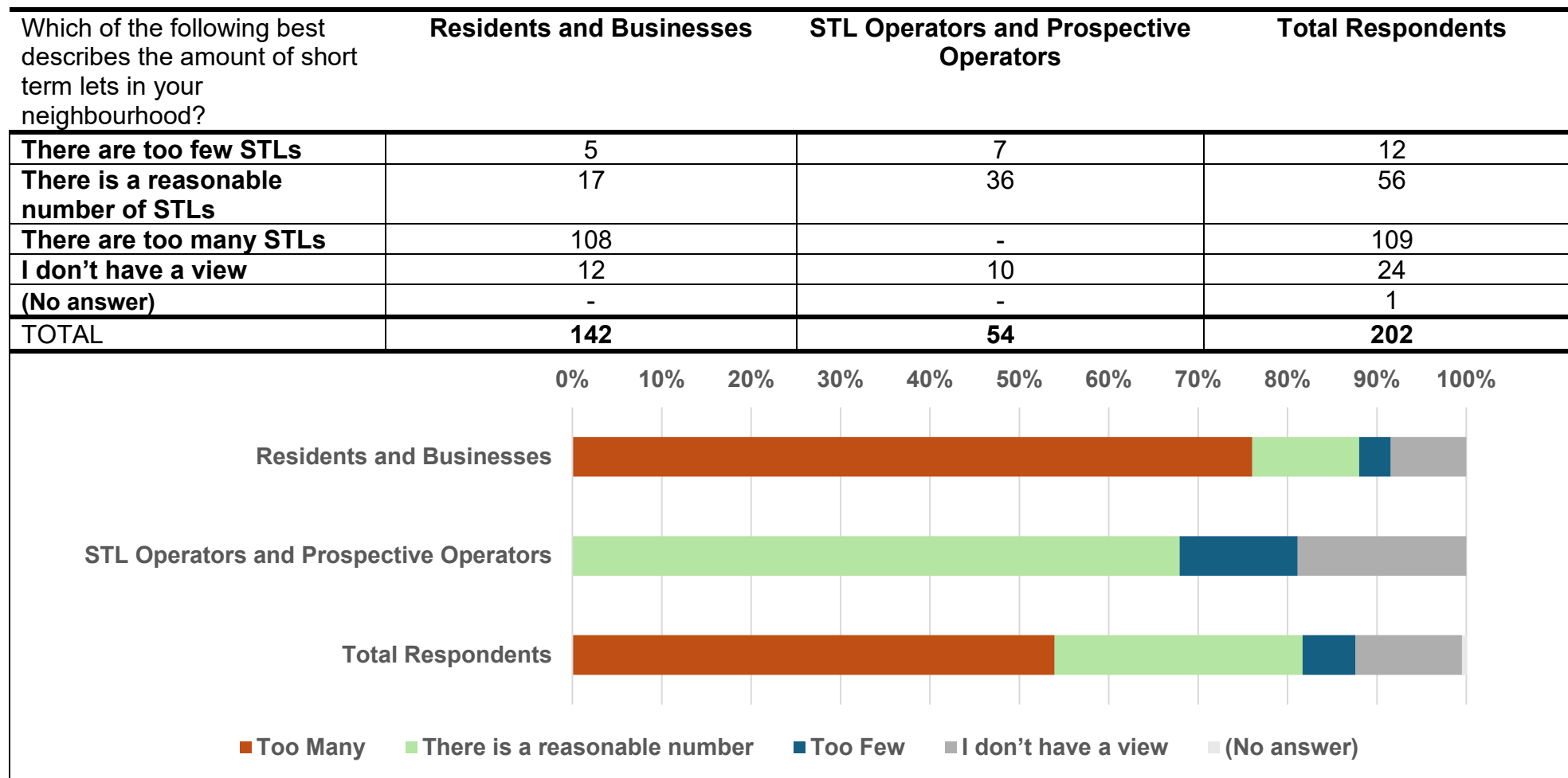
Breakdown of responses by area of residence



Views regarding the overall number of STLs differ in that those residing in the area are more likely to consider there to be too many, while those residing outwith the Highlands are more likely to consider there to be a reasonable number of STLs.

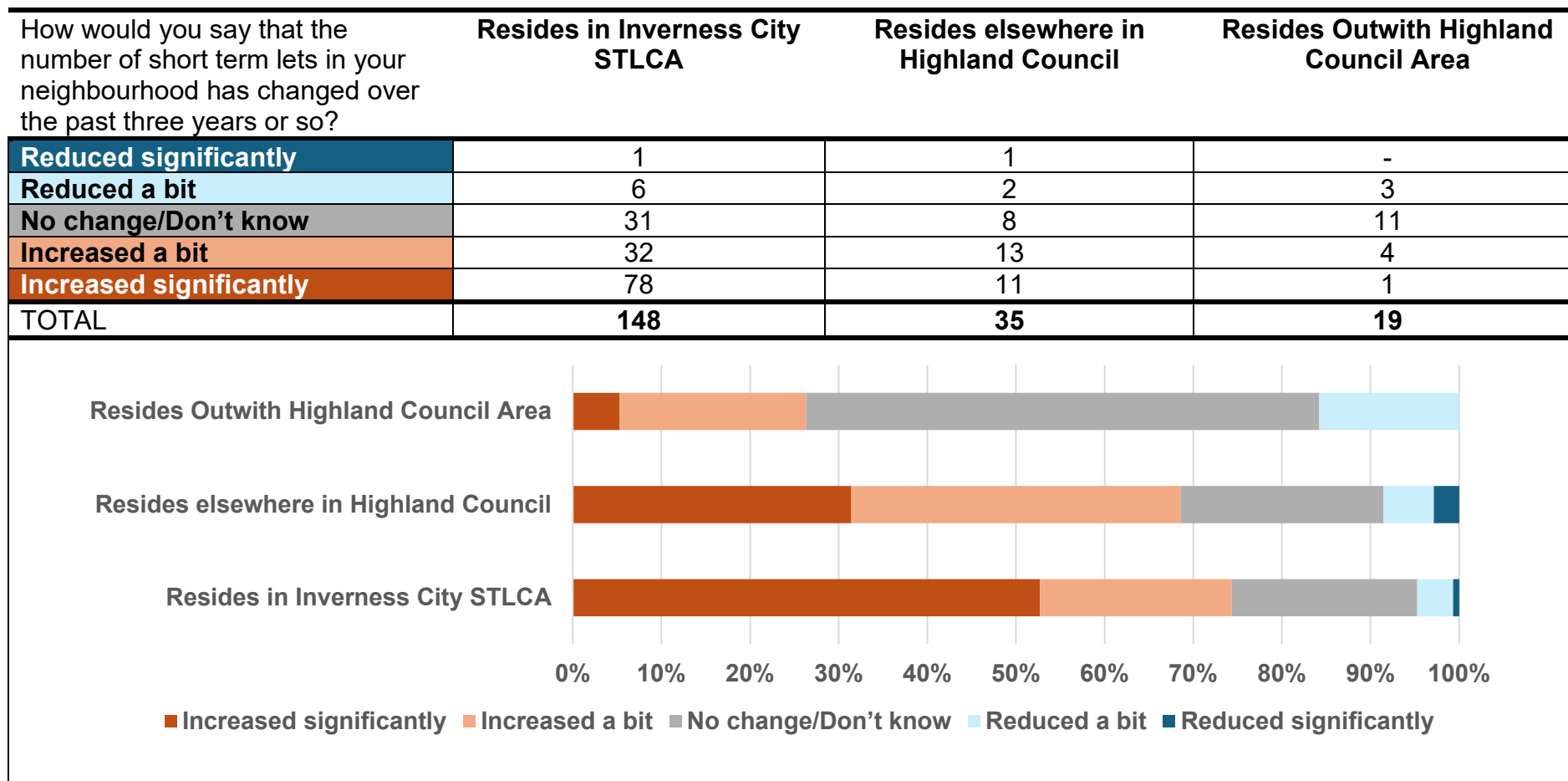
Question 16. Which of the following best describes the amount of short term lets in your neighbourhood? (optional question)

Breakdown of responses by respondent category



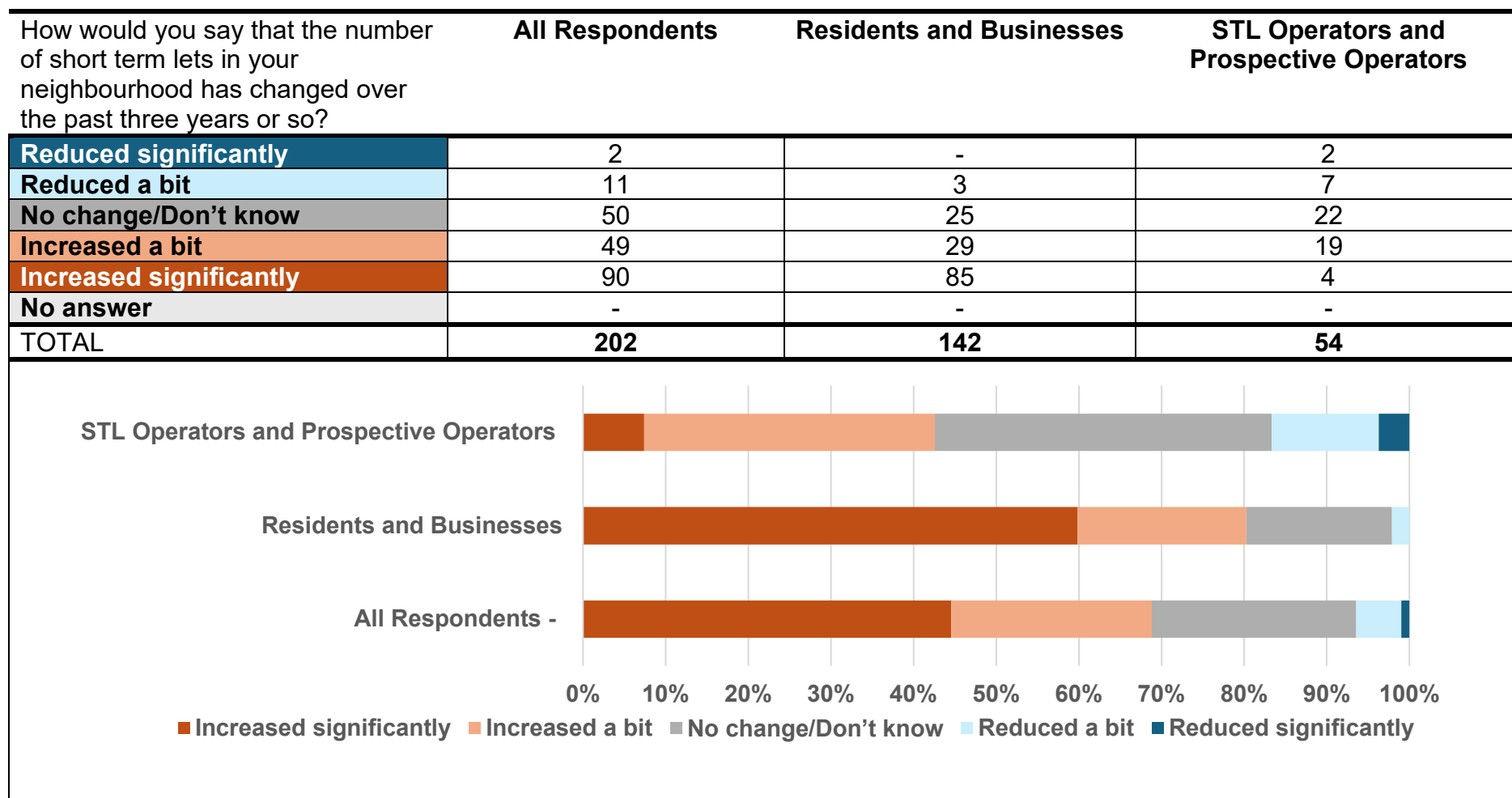
Respondent category is a dominant predictor of views, with operators and prospective operators more likely to consider there to be a reasonable number of STLs, whereas residents and other businesses are more likely to consider there to be too many.

Question 17. How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so? (Breakdown by area of residence)



Respondents residing within the proposed Inverness City STLCA are more likely to consider the number of STLs in the area to have increased significantly, than those living elsewhere.

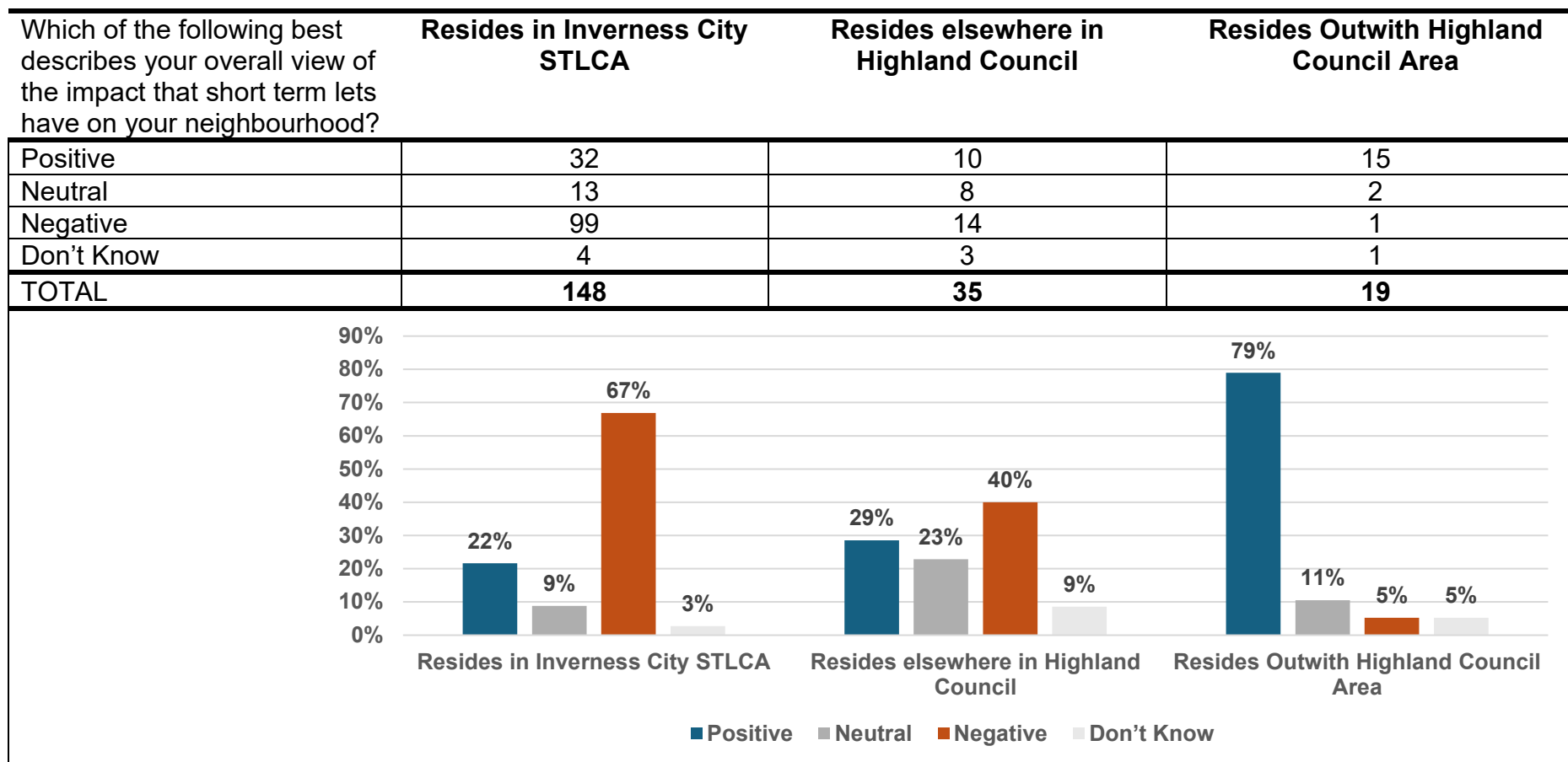
Q17. How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so?
(Breakdown by respondent category)



Category of respondent also is attributed to the divergence in views regarding the rate of change in the number of STLs over the past three years, with residents and businesses being more likely to consider the number to have increased significantly, than operators.

Question 18. Which of the following best describes your overall view of the impact that short term lets have on your neighbourhood? (optional question)

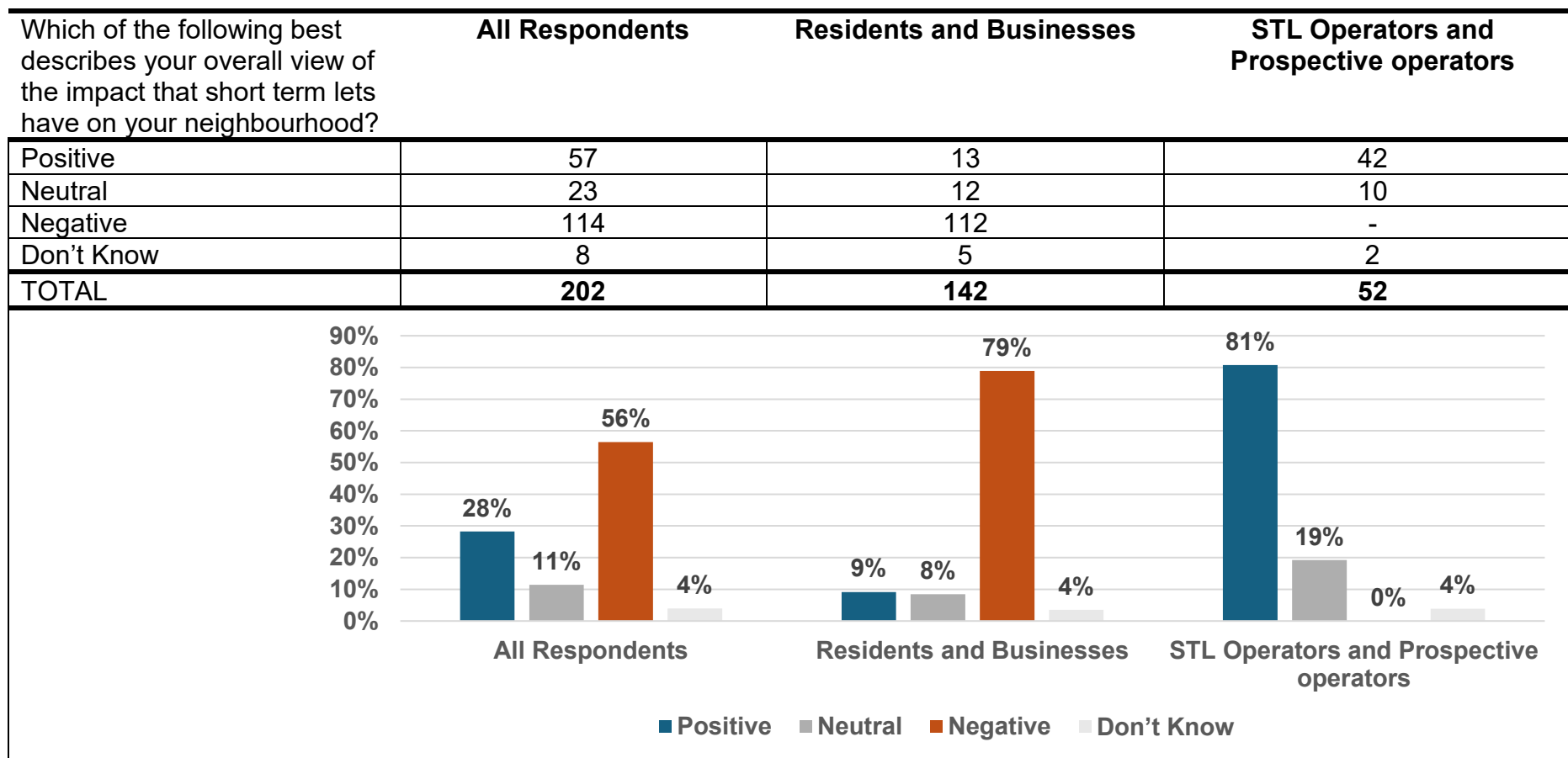
Breakdown by area of residence



A greater share (67%) of Inverness City residents reported that their overall view of the impact of STLs on the neighbourhood was negative, while a large share (79%) of respondents outwith the Highlands reported their overall view to be positive.

Question 18. Which of the following best describes your overall view of the impact that short term lets have on your neighbourhood? (optional question)

Breakdown by respondent category



The overall view of the impact of STLs also differed by respondent category, with the majority of operators holding an overall positive view (albeit a minority held a neutral view) while the majority of residents and businesses held an overall negative view.

Question 19. Could you give brief reasons for your answer to this? (optional question)

Respondent Reference	Points raised
Neutral impact views	
IC-138-1, IC-76-1, IC-73-1, IC-2-1	Impact depends on location and type of STL
Negative impact views	
IC-197-1, IC-194-1, IC-191-1, IC-187-1, IC-176-1, IC-169-1, IC-165-1, IC-163-1, IC-160-1, IC-155-1, IC-154-1, IC-153-1, IC-150-1, IC-146-1, IC-144-1, IC-139-1, IC-137-1, IC-131-1, IC-128-1, IC-127-1, IC-126-1, IC-124-1, IC-123-1, IC-122-1, IC-121-1, IC-120-1, IC-119-1, IC-116-1, IC-115-1, IC-114-1, IC-109-1, IC-104-1, IC-101-1, IC-100-1, IC-96-1, IC-95-1, IC-89-1, IC-86-1, IC-85-1, IC-84-1, IC-80-1, IC-78-1, IC-75-1, IC-64-1, IC-59-1, IC-58-1, IC-57-1, IC-56-1, IC-40-1, IC-37-1, IC-36-1, IC-30-1, IC-17-1, IC-16-1, IC-12-1, IC-11-1, IC-10-1, IC-7-1, IC-6-1, IC-4-1	Reduces housing availability
IC-182-1, IC-179-1, IC-150-1, IC-146-1, IC-143-1, IC-142-1, IC-139-1, IC-137-1, IC-124-1, IC-118-1, IC-105-1, IC-100-1, IC-90-1, IC-60-1, IC-56-1, IC-35-1, IC-30-1, IC-22-1, IC-12-1, IC-11-1, IC-10-1, IC-4-1, IC-2-1	Drives housing prices up/ rent prices
IC-182-1, IC-147-1, IC-143-1, IC-137-1, IC-121-1, IC-109-1, IC-105-1, IC-75-1, IC-55-1, IC-40-1	Amenity and service decline and closure
IC-198-1, IC-194-1, IC-187-1, IC-182-1, IC-181-1, IC-180-1, IC-176-1, IC-171-1, IC-169-1, IC-166-1, IC-155-1, IC-154-1, IC-152-1, IC-147-1, IC-146-1, IC-143-1, IC-142-1, IC-136-1, IC-135-1, IC-125-1, IC-124-1, IC-121-1, IC-118-1, IC-113-1, IC-108-1, IC-101-1, IC-97-1, IC-96-1, IC-94-1, IC-89-1, IC-87-1, IC-86-1, IC-84-1, IC-80-1, IC-78-1, IC-72-1, IC-69-1, IC-60-1, IC-55-1, IC-54-1, IC-53-1, IC-40-1, IC-36-1, IC-35-1, IC-29-1, IC-26-1, IC-20-1, IC-19-1, IC-17-1, IC-13-1, IC-4-1, IC-1-1	Sense of community lost

IC-72-1, IC-56-1, IC-20-1, IC-19-1	Safety concern
IC-198-1, IC-135-1, IC-94-1, IC-72-1, IC-69-1, IC-55-1, IC-45-1, IC-36-1, IC-19-1	STL owners are absent and properties are poorly managed
IC-201-1, IC-198-1, IC-197-1, IC-194-1, IC-187-1, IC-182-1, IC-181-1, IC-176-1, IC-171-1, IC-170-1, IC-169-1, IC-167-1, IC-164-1, IC-155-1, IC-154-1, IC-153-1, IC-152-1, IC-146-1, IC-139-1, IC-129-1, IC-128-1, IC-125-1, IC-124-1, IC-119-1, IC-118-1, IC-117-1, IC-113-1, IC-110-1, IC-108-1, IC-104-1, IC-101-1, IC-98-1, IC-97-1, IC-95-1, IC-92-1, IC-90-1, IC-87-1, IC-84-1, IC-72-1, IC-69-1, IC-60-1, IC-59-1, IC-56-1, IC-55-1, IC-54-1, IC-53-1, IC-52-1, IC-45-1, IC-43-1, IC-35-1, IC-34-1, IC-33-1, IC-31-1, IC-29-1, IC-22-1, IC-17-1, IC-13-1, IC-10-1, IC-8-1, IC-5-1, IC-1-1	Creates nuisance for local people (e.g. anti-social behaviour, increased traffic, increased noise and parking and refuge issues)
IC-163-1, IC-116-1, IC-114-1, IC-86-1, IC-75-1, IC-17-1	Impacts workforce
IC-197-1, IC-184-1, IC-172-1, IC-145-1, IC-82-1, IC-49-1	Balance is needed
Positive impact views	
IC-200-1, IC-199-1, IC-190-1, IC-185-1, IC-178-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-157-1, IC-148-1, IC-141-1, IC-134-1, IC-133-1, IC-132-1, IC-111-1, IC-107-1, IC-74-1, IC-71-1, IC-67-1, IC-51-1, IC-50-1, IC-48-1, IC-46-1, IC-44-1, IC-42-1, IC-41-1, IC-39-1, IC-38-1, IC-32-1, IC-9-1, IC-3-1	Supports and sustains tourism
IC-200-1, IC-199-1, IC-195-1, IC-190-1, IC-188-1, IC-185-1, IC-178-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-162-1, IC-161-1, IC-159-1, IC-157-1, IC-156-1, IC-151-1, IC-149-1, IC-141-1, IC-140-1, IC-134-1, IC-133-1, IC-132-1, IC-130-1, IC-111-1, IC-110-1, IC-107-1, IC-106-1, IC-74-1, IC-71-1, IC-68-1, IC-65-1, IC-61-1, IC-50-1, IC-49-1, IC-48-1, IC-47-1, IC-46-1, IC-44-1, IC-42-1, IC-41-1, IC-39-1, IC-38-1, IC-32-1, IC-28-1, IC-18-1, IC-15-1, IC-9-1	Supports the local economy and businesses
IC-199-1, IC-190-1, IC-188-1, IC-175-1, IC-168-1, IC-159-1, IC-157-1, IC-151-1, IC-140-1, IC-134-1, IC-99-1, IC-74-1, IC-51-1, IC-48-1,	"Provides direct and indirect employment opportunities

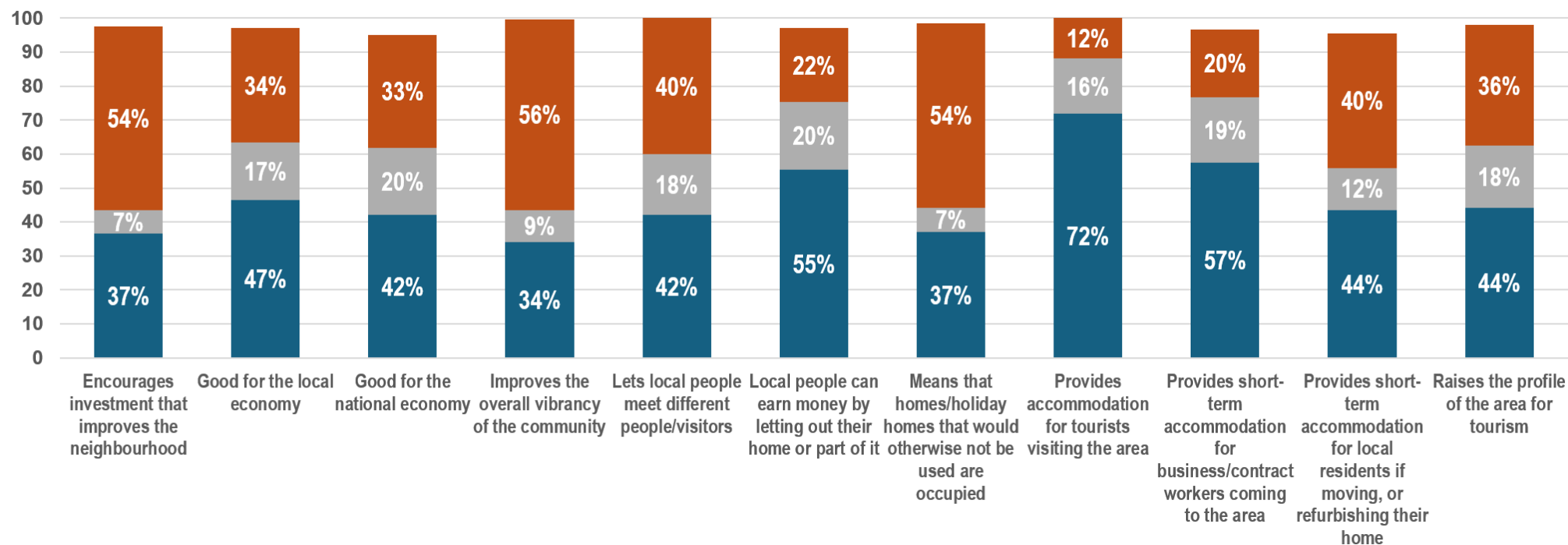
IC-47-1, IC-46-1, IC-44-1, IC-39-1, IC-38-1, IC-32-1, IC-18-1, IC-14-1	
IC-200-1, IC-168-1, IC-162-1, IC-111-1, IC-107-1, IC-77-1, IC-67-1, IC-65-1, IC-51-1, IC-46-1, IC-42-1, IC-39-1, IC-9-1	Offers flexible visitor accommodation
IC-188-1, IC-173-1, IC-168-1, IC-149-1, IC-102-1, IC-66-1	Alternative to empty or underused properties
IC-189-1, IC-188-1, IC-168-1, IC-162-1, IC-161-1, IC-158-1, IC-149-1, IC-132-1, IC-103-1, IC-81-1, IC-62-1, IC-46-1	STLs improves the quality and appearance of the environment
IC-168-1, IC-149-1, IC-134-1, IC-82-1, IC-71-1, IC-28-1, IC-23-1, IC-18-1	Not enough evidence to suggest STLs directly impact housing provision and/or that a reduction in them will increase housing provision
IC-25-1	Property owners should be able to use and develop their property as they see fit
Council Response: A range of reasons for views on the impacts of short term lets are therefore noted.	

Question 20. To what extent do you agree or disagree that the following are positive impacts of having short term lets in your neighbourhood?

Responses for all respondent categories (n=202)

The balance of 100% is "Don't know" in each case.

■ Agree ■ Neutral ■ Disagree



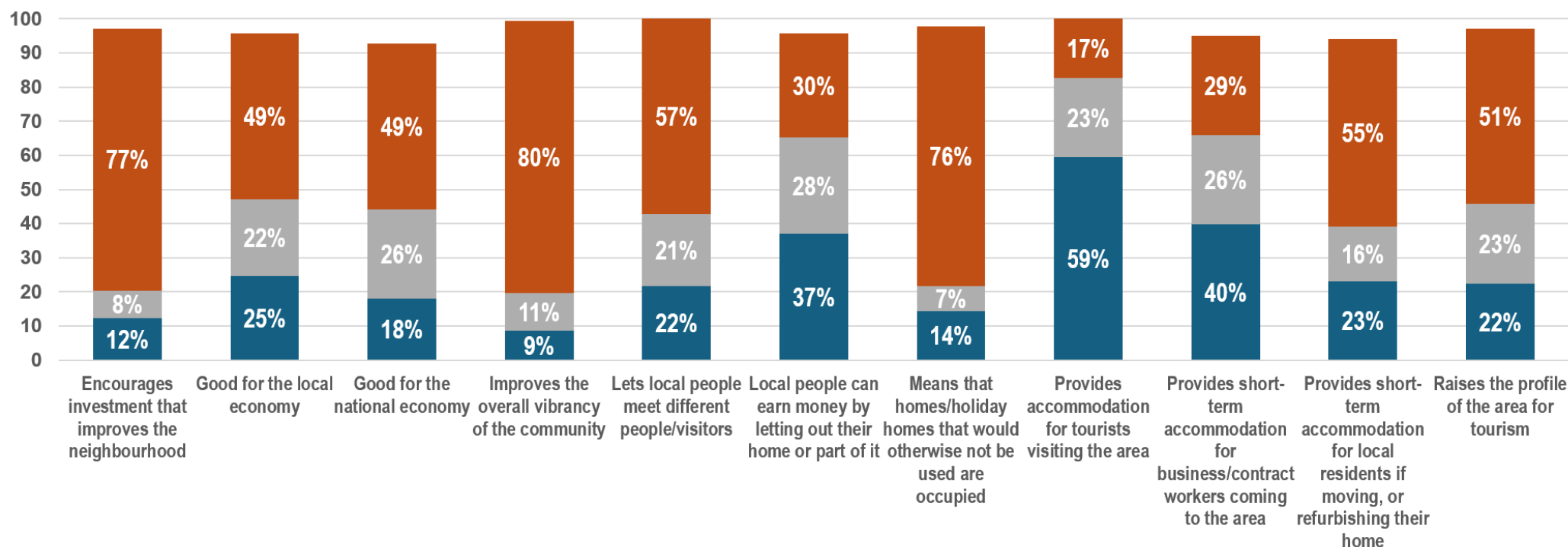
When presented with a list of suggested positive impacts attributed to Short Term Lets, there are varying levels of agreement from respondents, with the highest agreement recorded towards "Provides accommodation for tourists visiting the area" while a slightly larger share disagree with "Improves the overall vibrancy of the community." "Means that homes that would otherwise not be used are occupied" and "Encourages investment that improves the neighbourhood." The category of respondent is the dominant predictor of variation to these responses, with residents and businesses differing sharply in their agreement, relative to STL operators and prospective operators.

Question 20. To what extent do you agree or disagree that the following are positive impacts of having short term lets in your neighbourhood?

Responses for Residents and Businesses (n=138)

The balance of 100% is “Don’t know” in each case.

■ Agree ■ Neutral ■ Disagree

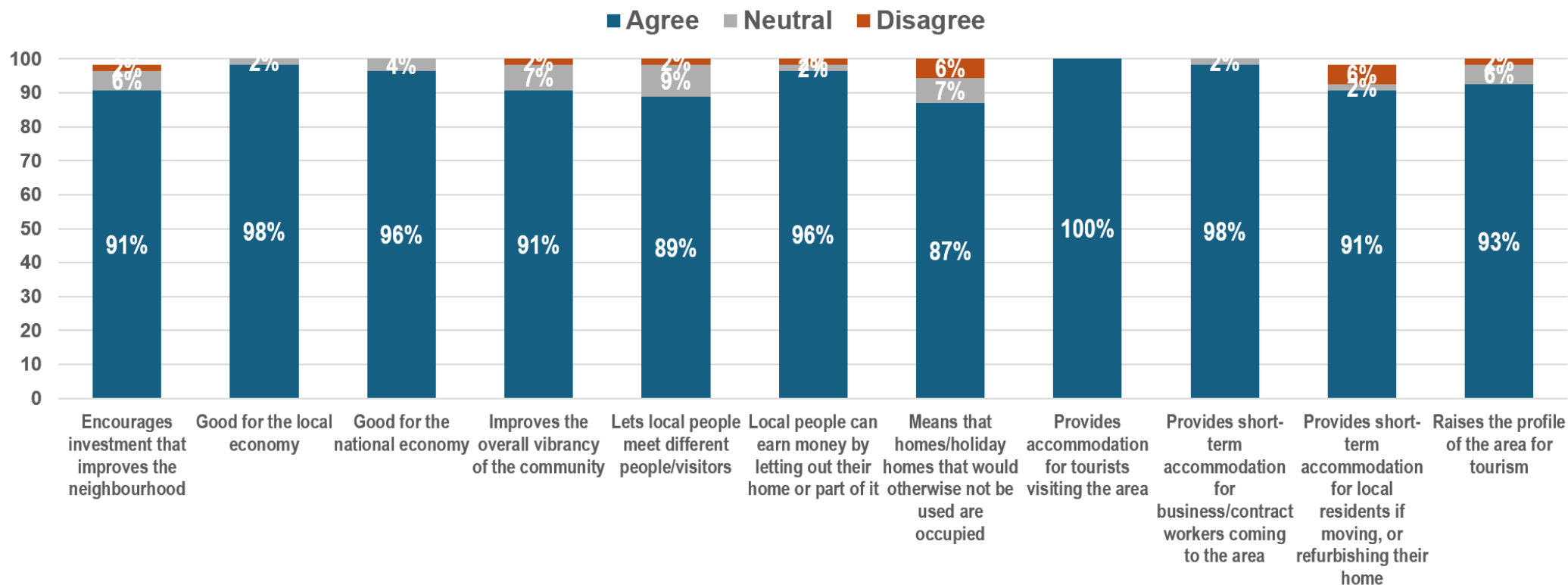


Examining responses from residents and businesses specifically, it is evident that levels of agreement with many of these statements is lower among this cohort. While “Provides accommodation for tourists visiting the area” has a higher level of agreement, a clear majority disagree that STLs “encourage investment that improves the neighbourhood,” “Improves the vibrancy of the neighbourhood,” and “Means that homes that would otherwise not be used are occupied.”

Question 20. To what extent do you agree or disagree that the following are positive impacts of having short term lets in your neighbourhood?

Responses for STL Operators and Prospective Operators (n=54)

The balance of 100% is “Don’t know” in each case.



Turning to STL Operators and prospective Operators, there is a broad consensus and near unanimous agreement that the statements provided are indeed positive impacts of STLs. The highest levels of agreement are attributed to “Provides accommodation for tourists visiting the area,” “Good for the local/national economy” and “Provides short term accommodation for business/contract workers coming to the area.” It is clear that operators in the Area indicated that there was overall a positive impact of having STLs in the neighbourhood.

Question 21. Are there any other positive impacts of having short term lets in your neighbourhood? (optional question)

Responses from all respondents.

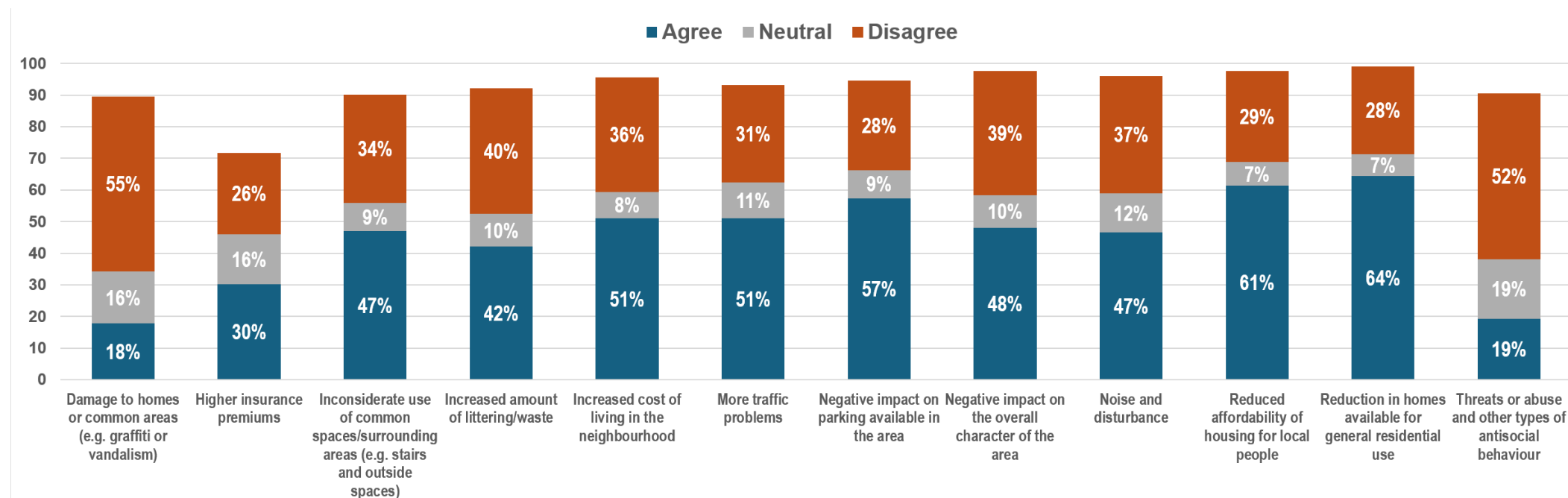
Respondent Reference	Points raised and responses.
IC-200-1, IC-188-1, IC-183-1, IC-159-1, IC-157-1, IC-151-1, IC-149-1, IC-140-1, IC-111-1, IC-102-1, IC-82-1, IC-81-1, IC-65-1, IC-63-1, IC-49-1, IC-48-1, IC-46-1, IC-38-1, IC-32-1, IC-11-1	Creates jobs and flexible work and income opportunities, especially for retired people or young people returning
IC-189-1, IC-183-1, IC-175-1, IC-157-1, IC-151-1, IC-149-1, IC-137-1, IC-130-1, IC-111-1, IC-107-1, IC-82-1, IC-81-1, IC-63-1, IC-48-1, IC-47-1, IC-46-1, IC-38-1, IC-35-1, IC-32-1, IC-27-1, IC-23-1, IC-18-1, IC-9-1, IC-3-1	Visitor spending and spending by operators on property supports local businesses and economy, and profits are retained within the local economy.
IC-180-1, IC-143-1, IC-124-1, IC-118-1, IC-92-1, IC-88-1, IC-52-1, IC-45-1, IC-36-1	Any positive impact are not outweighed by the negative community impacts of STLs including transience, nuisance issues and anti-social behaviour.
IC-165-1, IC-107-1, IC-51-1, IC-46-1, IC-45-1	Provides accommodation suitable for families, groups, those with pets, those with accessibility or other specialist needs
IC-201-1, IC-187-1, IC-65-1, IC-36-1, IC-35-1, IC-30-1, IC-17-1	Support for home-sharing, pods or cabins but opposed to conversion of whole residential property to STL
IC-175-1, IC-174-1, IC-172-1, IC-132-1, IC-111-1, IC-82-1, IC-60-1, IC-51-1, IC-49-1, IC-46-1, IC-32-1	Provides flexible and sometimes more affordable temporary accommodation for tourists, workers, students, patients and residents, not provided by traditional accommodation
IC-137-1, IC-124-1, IC-112-1, IC-52-1, IC-26-1, IC-17-1, IC-16-1, IC-12-1, IC-11-1	Negative impacts on local housing availability and affordability, and recruitment (via ability to secure housing), not outweighed by any positive impacts of short term lets.
IC-202-1, IC-194-1, IC-180-1, IC-155-1, IC-153-1, IC-147-1	Unequal distribution of profits from letting accumulate to second home owners and investors, while local communities bear the negative impacts and costs.
IC-202-1, IC-198-1, IC-194-1, IC-184-1, IC-180-1, IC-179-1, IC-170-1, IC-143-1, IC-137-1, IC-127-1, IC-124-1, IC-	Disputes suggested positive impacts

117-1, IC-98-1, IC-96-1, IC-94-1, IC-92-1, IC-86-1, IC-78-1, IC-69-1, IC-64-1, IC-36-1, IC-28-1, IC-19-1, IC-16-1, IC-13-1	
IC-146-1, IC-143-1, IC-124-1, IC-117-1, IC-109-1, IC-52-1	Too many STLs in certain areas of Inverness, where residents feel outnumbered by visitors and are being priced out
IC-190-1, IC-185-1, IC-175-1, IC-124-1, IC-81-1, IC-67-1, IC-62-1, IC-60-1, IC-46-1, IC-32-1, IC-18-1, IC-14-1, IC-9-1, IC-3-1	Operators invest in property maintenance and improvements which enhance the appearance of neighbourhoods
IC-198-1, IC-194-1, IC-143-1, IC-124-1, IC-118-1, IC-88-1, IC-75-1, IC-52-1, IC-45-1, IC-36-1	Negative impact on neighbourly relationships and sense of belonging and cohesion.
IC-197-1, IC-194-1, IC-138-1, IC-65-1	Impacts are variable, as it depends on type of STL or who the STL visitors are and how they behave
IC-157-1, IC-111-1, IC-107-1, IC-106-1, IC-46-1	Boosts the reputation of Inverness as a visitor destination, distinct from larger city destinations
IC-96-1, IC-94-1, IC-75-1, IC-36-1	View that hotels provide many of the same benefits, with less negative impacts.
IC-67-1	Creates less traffic problems than camper vans and caravans (alternative accommodation option)
IC-175-1, IC-174-1, IC-107-1, IC-98-1, IC-82-1, IC-49-1, IC-48-1, IC-46-1	Supplements traditional tourism accommodation capacity, and meets demand in peak-periods
IC-184-1	Brings together communities in opposition to the harm that STL do, hopefully radicalising and raising the class consciousness of people who without them would be happy enough to get on with their lives.
Council Response: A range of additional suggested positive impacts are therefore noted.	

Question 22. To what extent do you agree or disagree that the following are negative impacts of having short term lets in your neighbourhood?

Responses for all respondent categories (n=202)

The balance of 100% is “Don’t know” in each case.

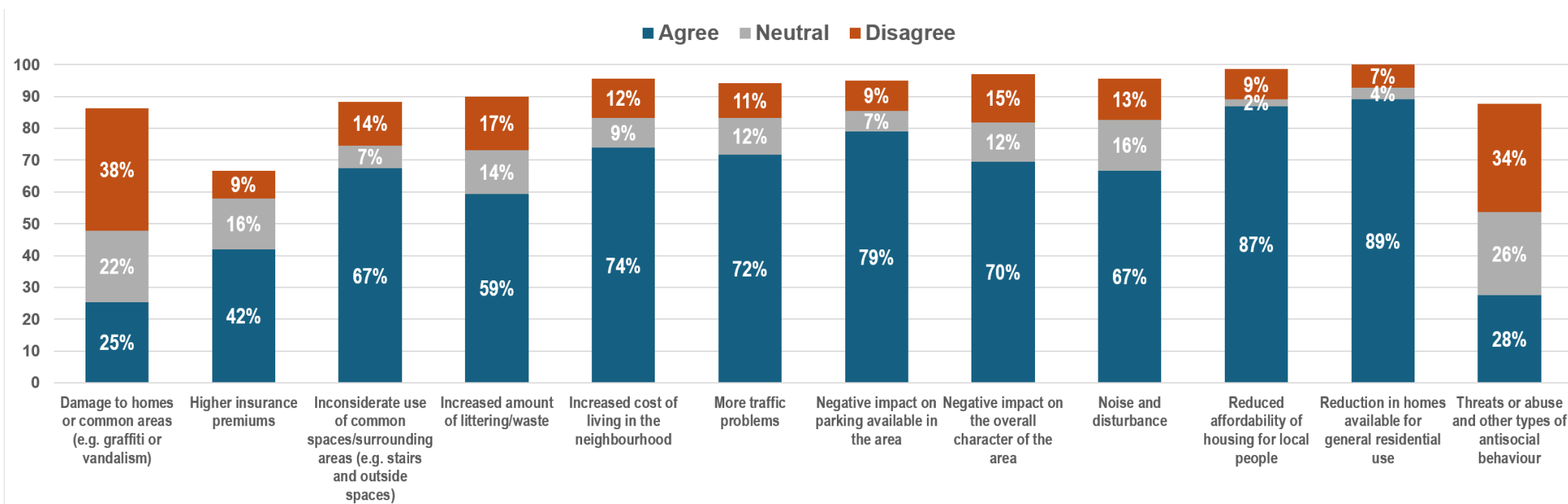


When presented with a list of suggested negative impacts attributed to Short Term Lets, respondents are, again, fairly divided as to their levels of agreement or disagreement with these. It is noted that as with the positive impacts, the category of respondent is the dominant predictor of variation to these responses, with residents and businesses differing sharply in their agreement, relative to STL operators and prospective operators. The highest levels of overall agreements were for “Reduced affordability of housing for local people” and “Reduction in homes available for general use,” while there was large disagreement with “Damage to homes or common areas,” and “Threats or abuse and other types of anti-social behaviour,” suggesting that these are not widely considered to be applicable in the area.

Question 22. To what extent do you agree or disagree that the following are negative impacts of having short term lets in your neighbourhood?

Responses for Residents and Businesses (n=138)

The balance of 100% is “Don’t know” in each case.

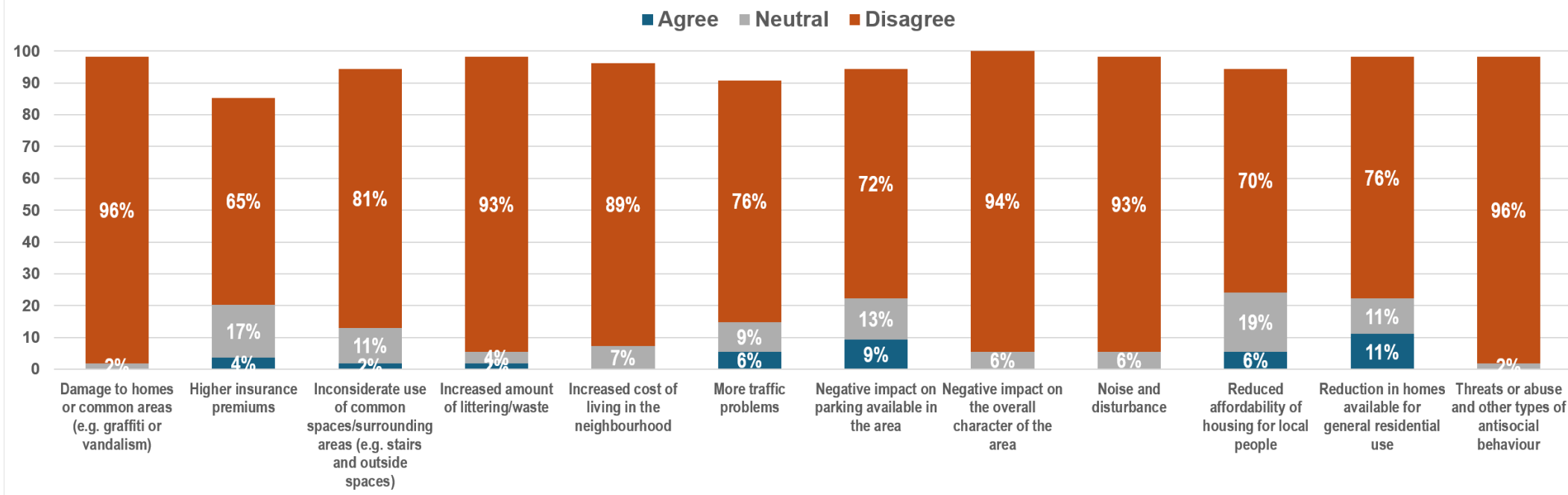


Among residents and businesses, there were greater levels of agreement with the suggested negative impacts of Short Term Lets. The highest levels of overall agreements were for “Reduced affordability of housing for local people” and “Reduction in homes available for general use,” “Increased cost of living in the neighbourhood,” “Increased cost of living,” “More traffic problems,” “Negative impact on parking” and “Negative impact on the overall character of the area.”

Question 22. To what extent do you agree or disagree that the following are negative impacts of having short term lets in your neighbourhood?

Responses for STL Operators and Prospective Operators (n=54)

The balance of 100% is “Don’t know” in each case.



Among operators, a more consistent and homogenous disagreement with the suggested negative impacts of STLs is apparent, with several options receiving no agreement at all among this cohort, albeit there is some agreement among STL operators and prospective operators regarding the negative impacts of STLs on “Reduction in homes available for general residential use.”

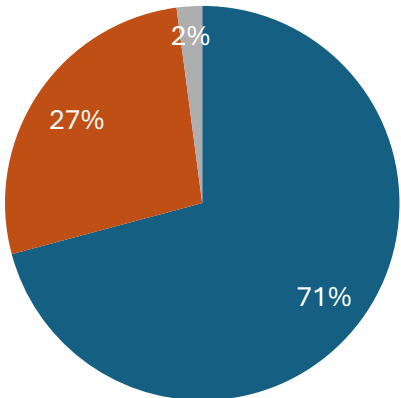
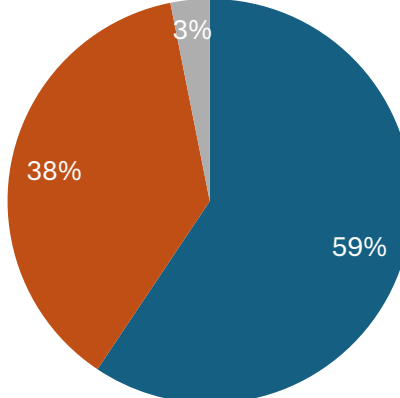
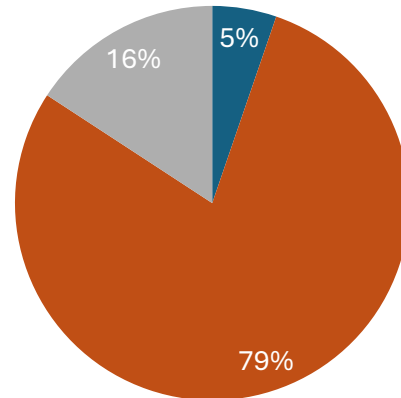
Question 23. Are there any other negative impacts of having short term lets in your neighbourhood? (optional question)

Respondent Reference	Points raised and responses
IC-200-1, IC-192-1, IC-172-1, IC-159-1, IC-157-1, IC-151-1, IC-149-1, IC-140-1, IC-130-1, IC-82-1, IC-71-1, IC-63-1, IC-46-1, IC-44-1, IC-32-1, IC-28-1, IC-27-1, IC-23-1, IC-3-1	Dispute any negative impacts
IC-194-1, IC-187-1, IC-182-1, IC-181-1, IC-176-1, IC-171-1, IC-165-1, IC-146-1, IC-127-1, IC-118-1, IC-113-1, IC-111-1, IC-101-1, IC-100-1, IC-98-1, IC-97-1, IC-92-1, IC-87-1, IC-84-1, IC-78-1, IC-53-1, IC-52-1, IC-36-1, IC-35-1, IC-29-1, IC-17-1, IC-13-1	Loss of community cohesion, belonging and neighbourhood identity
IC-187-1, IC-175-1, IC-160-1, IC-155-1, IC-153-1, IC-146-1, IC-127-1, IC-124-1, IC-118-1, IC-113-1, IC-111-1, IC-101-1, IC-100-1, IC-96-1, IC-94-1, IC-92-1, IC-87-1, IC-80-1, IC-78-1, IC-72-1, IC-70-1, IC-53-1, IC-52-1, IC-29-1, IC-19-1, IC-17-1, IC-2-1	High visitor turnover and transience creates lack of familiarity with neighbours and weakens informal support networks
IC-187-1, IC-182-1, IC-165-1, IC-146-1, IC-142-1, IC-137-1, IC-127-1, IC-125-1, IC-124-1, IC-121-1, IC-120-1, IC-116-1, IC-113-1, IC-109-1, IC-101-1, IC-100-1, IC-87-1, IC-35-1, IC-21-1, IC-7-1	Impact on community sustainability including local services, schools and recruitment for local workforce
IC-194-1, IC-179-1, IC-176-1, IC-175-1, IC-170-1, IC-138-1, IC-101-1, IC-94-1, IC-26-1, IC-13-1	Neighbours faced with impacts of poor / absentee management of STL
IC-194-1, IC-187-1, IC-176-1, IC-171-1, IC-153-1, IC-147-1, IC-146-1, IC-112-1, IC-101-1, IC-100-1, IC-95-1, IC-88-1, IC-80-1, IC-72-1, IC-69-1, IC-56-1, IC-36-1, IC-35-1, IC-20-1, IC-19-1, IC-17-1, IC-2-1	Reduced safety and trust in community, loss of privacy, being 'observed' which creates mental wellbeing impacts
IC-182-1, IC-171-1, IC-155-1, IC-147-1, IC-127-1, IC-124-1, IC-118-1, IC-113-1, IC-108-1, IC-101-1, IC-100-1, IC-98-1, IC-94-1, IC-92-1, IC-87-1, IC-86-1, IC-78-1, IC-58-1, IC-56-1, IC-53-1, IC-52-1, IC-45-1, IC-29-1, IC-17-1	Homes functioning as businesses cumulatively impact the character of neighbourhoods toward investor-owned and tourism driven places, 'hollowed' out communities
IC-200-1, IC-182-1, IC-162-1, IC-153-1, IC-101-1, IC-100-1	View that detached properties with dedicated access and no shared areas have no negative neighbourhood impacts (or the impacts are worse among STLs in semi-detached or terraced properties with common areas).

IC-153-1, IC-147-1, IC-146-1, IC-111-1, IC-101-1, IC-72-1, IC-43-1	Negative impact of visitors not taking adequate civic responsibility for the local area, including bins and parking (e.g. incorrectly using disabled parking spaces)
IC-194-1, IC-72-1	Secondary nuisance from seagulls and vermin due to poor visitor waste management (e.g. divebombing, nesting, droppings)
IC-193-1, IC-192-1, IC-172-1, IC-77-1, IC-65-1, IC-62-1, IC-46-1, IC-42-1, IC-27-1, IC-23-1, IC-18-1	View that anti-social issues raised from residents not visitors, or both residents and visitors
IC-193-1, IC-102-1, IC-23-1	View that neighbourhood amenity issues on streets (e.g. waste, weeds, blocked drains and potholes) are due to poor Council maintenance, not visitors.
IC-175-1, IC-77-1, IC-62-1, IC-46-1, IC-32-1, IC-28-1	View that negative impacts are due to a small minority of poorly managed STLs, or poorly behaved visitors
IC-175-1, IC-172-1, IC-82-1, IC-71-1, IC-65-1, IC-46-1, IC-9-1	Dispute that short term lets are the cause of all of these impacts (e.g. housing affordability, availability), reflect broader social or economic issues.
IC-125-1, IC-124-1, IC-113-1	View that STL visitors spend in chain supermarkets rather than local businesses.
IC-182-1, IC-165-1, IC-146-1, IC-142-1, IC-127-1, IC-124-1, IC-113-1, IC-109-1, IC-104-1, IC-101-1, IC-100-1, IC-87-1, IC-57-1, IC-53-1, IC-21-1, IC-7-1	Housing shortages, depopulation of younger people and families as they can't afford or find accommodation in Inverness, outbid by STL investors.
IC-124-1, IC-100-1, IC-58-1, IC-34-1	Local businesses re-orienting towards visitor needs rather than local needs
IC-82-1	View that tourism and housing should not be framed as competing interests.
IC-125-1, IC-59-1, IC-45-1, IC-10-1	Negative impact on hotels and B&Bs
Council Response: A range of additional suggested negative impacts are therefore noted.	

Question 24. Do you agree with the proposal to establish the Inverness City Short Term Let Control Area? (optional question)

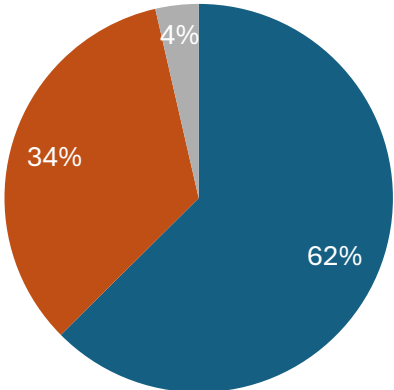
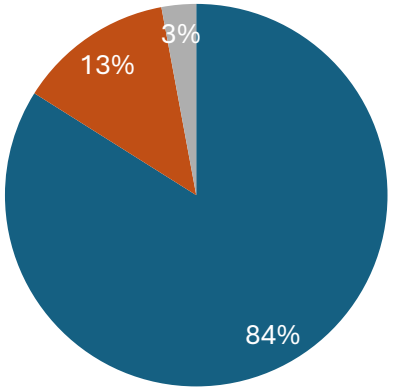
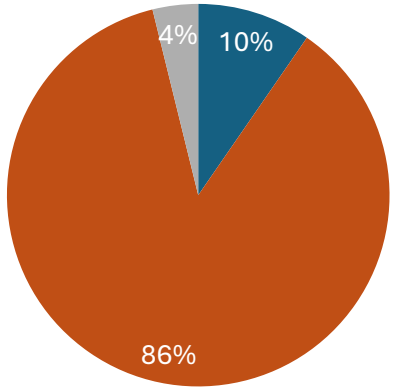
Breakdown by area of residence

Do you agree with the proposal to establish the Inverness City Short Term Let Control Area?	Resides in Inverness City STLCA	Resides elsewhere in Highland Council	Resides Outwith Highland Council Area
Yes	102	19	1
No	39	12	15
Undecided	3	1	3
(No answer)	4	3	-
TOTAL (that responded)	144	32	19
			

A majority of respondents residing within the proposed Inverness City STLCA indicated that they support the proposal, while a smaller majority supported the proposal among respondents living elsewhere in Highland, while a majority of respondents living outwith Highland opposed the proposal.

Question 24. Do you agree with the proposal to establish the Inverness City Short Term Let Control Area? (optional question)

Breakdown by respondent category

Do you agree with the proposal to establish the Inverness City Short Term Let Control Area?	All Respondents	All Residents and Businesses	STL Operators and Prospective Operators
Yes	122	115	5
No	66	18	45
Undecided	7	4	2
(No answer)	7	5	2
TOTAL (that responded)	195	137	52
			

A majority of respondents indicated that they support the proposed STLCA but support is markedly stronger among residents and businesses in contract with STL operators and prospective operators who largely oppose the proposal.

Question 25. Please explain your answer (optional question)

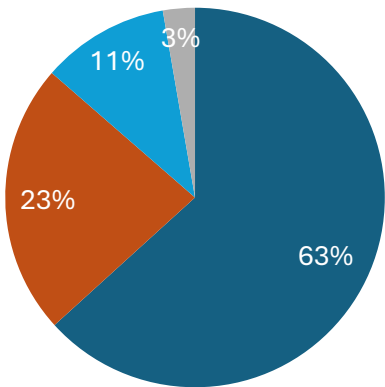
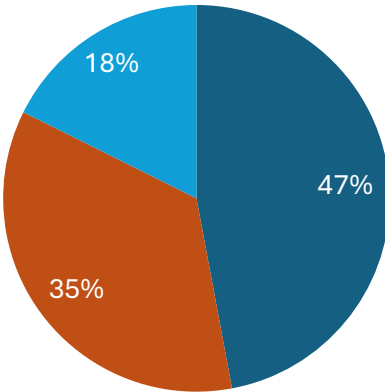
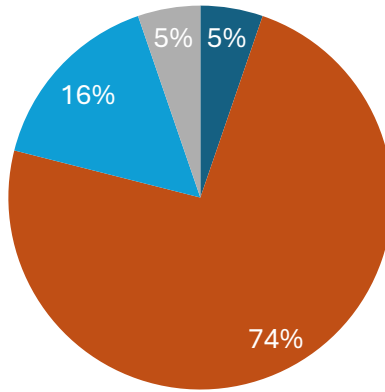
Respondent Reference	Points raised and responses
Explanations in support of proposed control area	
IC-201-1, IC-187-1, IC-182-1, IC-180-1, IC-179-1, IC-166-1, IC-160-1, IC-154-1, IC-153-1, IC-144-1, IC-142-1, IC-127-1, IC-125-1, IC-123-1, IC-122-1, IC-120-1, IC-116-1, IC-114-1, IC-110-1, IC-109-1, IC-104-1, IC-101-1, IC-100-1, IC-98-1, IC-96-1, IC-92-1, IC-90-1, IC-89-1, IC-87-1, IC-86-1, IC-78-1, IC-75-1, IC-72-1, IC-64-1, IC-60-1, IC-56-1, IC-55-1, IC-54-1, IC-53-1, IC-52-1, IC-45-1, IC-40-1, IC-37-1, IC-33-1, IC-31-1, IC-29-1, IC-26-1, IC-16-1, IC-11-1, IC-6-1, IC-5-1, IC-2-1, IC-1-1	Too many residential properties are being converted to STLs decreasing housing supply
IC-186-1, IC-166-1, IC-153-1, IC-122-1, IC-119-1, IC-113-1, IC-104-1, IC-98-1, IC-75-1, IC-72-1, IC-70-1, IC-53-1, IC-16-1, IC-13-1, IC-12-1, IC-11-1, IC-6-1, IC-5-1, IC-2-1	Rising house prices/rent linked to increase in STLs
IC-197-1, IC-194-1, IC-181-1, IC-152-1, IC-139-1, IC-137-1, IC-136-1, IC-124-1, IC-123-1, IC-117-1, IC-112-1, IC-110-1, IC-108-1, IC-101-1, IC-100-1, IC-94-1, IC-90-1, IC-89-1, IC-87-1, IC-86-1, IC-85-1, IC-59-1, IC-52-1, IC-45-1, IC-40-1, IC-35-1, IC-31-1, IC-20-1, IC-18-1, IC-17-1, IC-4-1, IC-2-1, IC-1-1	Requirement for planning controls, regulation and oversight
IC-181-1, IC-173-1, IC-165-1, IC-155-1, IC-153-1, IC-85-1, IC-57-1, IC-33-1, IC-31-1, IC-17-1, IC-1-1	The STLCA does not go far enough and additional measures are required
IC-197-1, IC-194-1, IC-182-1, IC-167-1, IC-160-1, IC-155-1, IC-153-1, IC-143-1, IC-139-1, IC-137-1, IC-136-1, IC-135-1, IC-124-1, IC-118-1, IC-117-1, IC-113-1, IC-105-1, IC-104-1, IC-101-1, IC-98-1, IC-96-1, IC-95-1, IC-94-1, IC-84-1, IC-72-1, IC-69-1, IC-55-1, IC-45-1, IC-40-1, IC-35-1, IC-29-1, IC-26-1, IC-22-1, IC-19-1, IC-13-1, IC-10-1, IC-5-1, IC-4-1, IC-2-1	Concerned about protecting communities and preserving neighbourhood character
IC-202-1, IC-185-1, IC-182-1, IC-181-1, IC-95-1, IC-59-1, IC-53-1, IC-22-1, IC-19-1, IC-17-1	Negative impact of STLs on residential amenity (noise, traffic, parking, antisocial behaviour, waste/bins)

IC-197-1, IC-194-1, IC-170-1, IC-166-1, IC-152-1, IC-147-1, IC-145-1, IC-142-1, IC-127-1, IC-124-1, IC-120-1, IC-113-1, IC-105-1, IC-104-1, IC-101-1, IC-95-1, IC-92-1, IC-55-1, IC-52-1, IC-45-1, IC-40-1, IC-35-1, IC-33-1, IC-26-1, IC-22-1, IC-17-1, IC-7-1, IC-6-1	Prioritise the needs of residents over tourists/visitors.
IC-197-1, IC-189-1, IC-175-1, IC-173-1, IC-146-1, IC-137-1, IC-127-1, IC-124-1, IC-114-1, IC-110-1, IC-101-1, IC-77-1, IC-49-1, IC-45-1, IC-30-1, IC-4-1	Balance the needs of residents, housing supply and communities with the need for visitor accommodation and tourism
IC-191-1, IC-176-1, IC-127-1, IC-116-1, IC-114-1, IC-113-1, IC-100-1, IC-87-1, IC-86-1, IC-66-1, IC-60-1, IC-54-1, IC-43-1, IC-13-1, IC-7-1	STLs have a negative impact on employment, recruitment, workforce availability by reducing accommodation for workers
IC-166-1, IC-129-1, IC-119-1, IC-112-1, IC-105-1, IC-104-1, IC-53-1, IC-45-1, IC-19-1, IC-16-1, IC-12-1	Absentee ownership, external investors and loss of local economic benefit
IC-78-1, IC-55-1, IC-35-1, IC-33-1, IC-29-1	STLs create tourism dependency/over tourism/seasonality/importance of tourism is overstated
Explanations against proposed control area	
IC-199-1, IC-196-1, IC-183-1, IC-177-1, IC-175-1, IC-168-1, IC-159-1, IC-158-1, IC-157-1, IC-141-1, IC-134-1, IC-102-1, IC-81-1, IC-77-1, IC-74-1, IC-65-1, IC-63-1, IC-51-1, IC-50-1, IC-41-1, IC-39-1, IC-32-1, IC-9-1	There is insufficient evidence to suggest STLs cause housing problems/critical of evidence submitted
IC-199-1, IC-177-1, IC-175-1, IC-168-1, IC-158-1, IC-151-1, IC-149-1, IC-134-1, IC-65-1, IC-9-1	STLs do not adversely impact housing prices
IC-189-1, IC-178-1, IC-158-1, IC-151-1, IC-77-1, IC-65-1, IC-48-1, IC-46-1, IC-42-1, IC-15-1, IC-9-1	Build more houses or address housing supply through development
IC-200-1, IC-193-1, IC-189-1, IC-185-1, IC-175-1, IC-174-1, IC-168-1, IC-162-1, IC-158-1, IC-157-1, IC-133-1, IC-130-1, IC-111-1, IC-81-1, IC-74-1, IC-65-1, IC-48-1, IC-46-1, IC-39-1	Opposed to additional planning controls but favours licensing, compliance and enforcement
IC-190-1, IC-189-1, IC-185-1, IC-168-1, IC-162-1, IC-158-1, IC-157-1, IC-151-1, IC-141-1, IC-133-1, IC-132-1, IC-130-1, IC-93-1, IC-81-1, IC-74-1, IC-65-1, IC-48-1, IC-46-1, IC-42-1, IC-32-1, IC-25-1	The STLCA represents overreach/overregulation or is an unnecessary burden on operators

IC-200-1, IC-173-1, IC-158-1, IC-141-1, IC-82-1, IC-74-1, IC-65-1, IC-61-1, IC-47-1, IC-44-1, IC-18-1	The STLCA should not be applied retrospectively: grandfathering or protection of existing operators.
IC-188-1, IC-148-1, IC-132-1	STLs are already sufficiently regulated/no further controls needed
IC-202-1, IC-164-1, IC-35-1	The STLCA should be bigger/cover a wider area
IC-200-1, IC-174-1, IC-149-1, IC-138-1, IC-32-1, IC-27-1	The STLCA is too large/covers inappropriate area
IC-172-1, IC-111-1, IC-81-1	STLs have a positive impact on employment, recruitment, workforce availability by increasing accommodation for workers
IC-189-1, IC-188-1, IC-172-1, IC-156-1, IC-151-1, IC-141-1, IC-130-1, IC-111-1, IC-99-1, IC-91-1, IC-81-1, IC-68-1, IC-65-1, IC-63-1, IC-48-1, IC-46-1	STLs support employment and jobs through economic activity
IC-199-1, IC-197-1, IC-189-1, IC-188-1, IC-175-1, IC-173-1, IC-156-1, IC-151-1, IC-149-1, IC-141-1, IC-137-1, IC-130-1, IC-127-1, IC-111-1, IC-101-1, IC-99-1, IC-81-1, IC-48-1, IC-46-1, IC-45-1, IC-35-1	Importance of tourism to the local economy (not necessarily STL-related)
IC-189-1, IC-173-1, IC-151-1, IC-149-1, IC-141-1, IC-130-1, IC-111-1, IC-99-1, IC-81-1, IC-48-1, IC-46-1	STLS are an essential/important component of the tourism industry
IC-199-1, IC-178-1, IC-162-1, IC-113-1, IC-77-1, IC-74-1, IC-65-1, IC-28-1, IC-23-1, IC-15-1	Distrust of government or suspicious of motives for STLCA

Question 26. Do you agree with the Statement of Reasons for the proposed Control Area? (optional question)

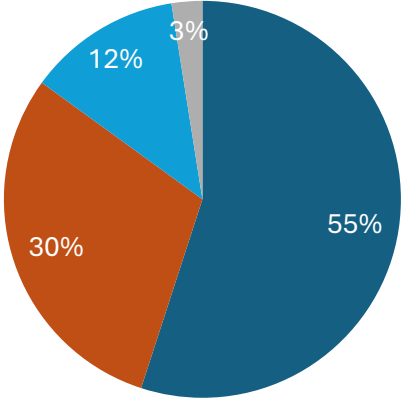
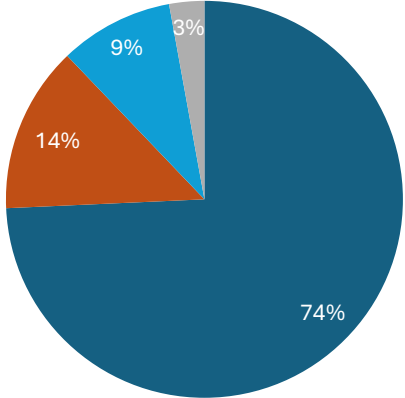
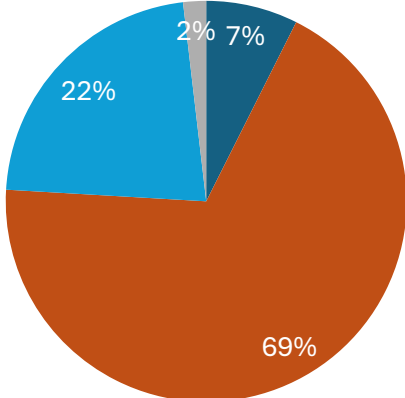
Breakdown by area of residence

Do you agree with the Statement of Reasons for the proposed Control Area?	Resides in Inverness City STLCA	Resides elsewhere in Highland Council	Resides Outwith Highland Council Area
Yes	93	16	1
No	34	12	14
Somewhat	16	6	3
Don't know	4	-	1
(No Answer)	1	1	-
TOTAL (that responded)	147	34	19
			

A greater share of respondents residing within the proposed Inverness City agreed with the Statement of reasons, while a greater share of those residing outwith Highland disagreed.

Question 26. Do you agree with the Statement of Reasons for the proposed Control Area? (optional question)

Breakdown by respondent category

Do you agree with the Statement of Reasons for the proposed Control Area?	All Respondents	All Residents and Businesses	All STL Operators and Prospective Operators
Yes	110	104	4
No	60	19	37
Somewhat	25	13	12
Don't know	5	4	1
(No Answer)	2	2	-
TOTAL (that responded)	200	140	54
			

Of all respondents, a slight majority agreed with the statement of reasons for the proposed Inverness City Control Area, but this support was stronger among residents and businesses, while operators and prospective operatives largely disagreed with the statement of reasons.

Question 27. Please tell us why? (optional question)

Respondent Reference	Points raised and responses
Additional negative views on the Statement of Reasons for the proposed control area	
IC-199-1, IC-196-1, IC-190-1, IC-188-1, IC-178-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-172-1, IC-168-1, IC-158-1, IC-157-1, IC-156-1, IC-148-1, IC-132-1, IC-130-1, IC-111-1, IC-81-1, IC-68-1, IC-67-1, IC-65-1, IC-61-1, IC-50-1, IC-48-1, IC-47-1, IC-46-1, IC-44-1, IC-42-1, IC-32-1, IC-28-1, IC-9-1	There is insufficient evidence to suggest STLs cause housing problems/critical of evidence submitted
IC-199-1, IC-183-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-172-1, IC-168-1, IC-158-1, IC-157-1, IC-156-1, IC-132-1, IC-111-1, IC-81-1, IC-68-1, IC-67-1, IC-65-1, IC-61-1, IC-49-1, IC-47-1, IC-46-1, IC-42-1, IC-32-1, IC-21-1	Report is biased or the data/analysis/conclusions are faulty
IC-200-1, IC-188-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-172-1, IC-168-1, IC-158-1, IC-156-1, IC-130-1, IC-111-1, IC-102-1, IC-81-1, IC-67-1, IC-65-1, IC-61-1, IC-49-1, IC-48-1, IC-47-1, IC-46-1, IC-32-1, IC-28-1, IC-9-1, IC-3-1	STLs do not adversely impact housing prices
IC-188-1, IC-178-1, IC-175-1, IC-172-1, IC-111-1, IC-102-1, IC-81-1, IC-48-1, IC-46-1, IC-28-1, IC-3-1	Build more houses or address housing supply through development
IC-193-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-158-1, IC-130-1, IC-82-1, IC-81-1, IC-65-1, IC-62-1, IC-49-1, IC-48-1, IC-46-1, IC-44-1, IC-18-1	Opposed to additional planning controls but favours licensing, compliance and enforcement
IC-200-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-161-1, IC-158-1, IC-149-1, IC-130-1, IC-111-1, IC-82-1, IC-81-1, IC-65-1, IC-49-1, IC-48-1, IC-46-1, IC-44-1, IC-32-1, IC-27-1, IC-3-1	The STLCA represents overreach/overregulation or is an unnecessary burden on operators
IC-200-1, IC-149-1, IC-82-1, IC-49-1, IC-44-1	The STLCA should not be applied retrospectively: grandfathering or protection of existing operators.
IC-193-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-158-1, IC-130-1, IC-82-1, IC-81-1, IC-49-1, IC-48-1, IC-46-1	STLs are already sufficiently regulated/no further controls needed

IC-155-1, IC-70-1	The STLCA should be bigger/cover a wider area
IC-174-1, IC-173-1, IC-149-1, IC-81-1, IC-65-1, IC-48-1, IC-46-1, IC-27-1	The STLCA is too large/covers inappropriate area
IC-172-1, IC-102-1	STLs have a positive impact on employment, recruitment, workforce availability by increasing accommodation for workers
IC-200-1, IC-185-1, IC-177-1, IC-175-1, IC-168-1, IC-158-1, IC-111-1, IC-106-1, IC-81-1, IC-48-1	STLs support employment and jobs through economic activity
IC-200-1, IC-185-1, IC-177-1, IC-175-1, IC-173-1, IC-168-1, IC-158-1, IC-130-1, IC-111-1, IC-65-1, IC-49-1, IC-48-1, IC-46-1	STLS are an essential/important component of the tourism industry
Additional positive views on the Statement of Reasons for the proposed control area	
IC-194-1, IC-191-1, IC-180-1, IC-176-1, IC-160-1, IC-154-1, IC-152-1, IC-144-1, IC-126-1, IC-125-1, IC-118-1, IC-114-1, IC-113-1, IC-112-1, IC-109-1, IC-104-1, IC-101-1, IC-100-1, IC-98-1, IC-97-1, IC-95-1, IC-92-1, IC-86-1, IC-84-1, IC-75-1, IC-72-1, IC-33-1, IC-22-1, IC-20-1, IC-19-1, IC-17-1, IC-13-1, IC-11-1, IC-5-1, IC-4-1	Too many residential properties are being converted to STLs decreasing housing supply
IC-202-1, IC-201-1, IC-184-1, IC-182-1, IC-165-1, IC-146-1, IC-136-1, IC-135-1, IC-127-1, IC-110-1, IC-88-1, IC-87-1, IC-57-1, IC-55-1, IC-40-1, IC-29-1	Support/agreement with evidence as submitted
IC-191-1, IC-180-1, IC-160-1, IC-126-1, IC-113-1, IC-100-1, IC-95-1, IC-92-1, IC-58-1, IC-19-1, IC-17-1, IC-11-1, IC-5-1, IC-4-1	Rising house prices/rent linked to increase in STLs
IC-197-1, IC-193-1, IC-186-1, IC-181-1, IC-175-1, IC-139-1, IC-124-1, IC-118-1, IC-112-1, IC-101-1, IC-98-1, IC-89-1, IC-84-1, IC-80-1, IC-75-1, IC-70-1, IC-69-1, IC-59-1, IC-45-1, IC-22-1, IC-20-1, IC-17-1, IC-11-1, IC-10-1	Requirement for planning controls, regulation and oversight
IC-189-1, IC-181-1, IC-176-1, IC-155-1, IC-122-1, IC-112-1, IC-101-1, IC-70-1, IC-59-1, IC-17-1, IC-11-1	The STLCA does not go far enough and additional measures are required
IC-194-1, IC-181-1, IC-136-1, IC-125-1, IC-118-1, IC-104-1, IC-101-1, IC-97-1, IC-95-1, IC-72-1, IC-69-1, IC-53-1, IC-45-1, IC-43-1, IC-37-1, IC-35-1, IC-22-1, IC-20-1, IC-13-1, IC-10-1, IC-6-1, IC-5-1	Concerned about protecting communities and preserving neighbourhood character

IC-118-1, IC-108-1, IC-104-1, IC-101-1, IC-72-1, IC-62-1, IC-53-1, IC-37-1, IC-27-1, IC-20-1, IC-13-1, IC-5-1	Negative impact of STLs on residential amenity (noise, traffic, parking, antisocial behaviour, waste/bins)
IC-194-1, IC-180-1, IC-160-1, IC-144-1, IC-129-1, IC-126-1, IC-118-1, IC-114-1, IC-113-1, IC-112-1, IC-104-1, IC-100-1, IC-98-1, IC-97-1, IC-95-1, IC-72-1, IC-43-1, IC-22-1, IC-20-1, IC-19-1, IC-17-1, IC-13-1, IC-5-1, IC-4-1	Prioritise the needs of residents over tourists/visitors.
IC-200-1, IC-175-1, IC-174-1, IC-111-1, IC-81-1, IC-65-1, IC-62-1, IC-49-1, IC-48-1, IC-46-1, IC-18-1	Balance the needs of residents, housing supply and communities with the need for visitor accommodation and tourism
IC-194-1, IC-160-1, IC-114-1, IC-113-1, IC-104-1, IC-100-1, IC-72-1, IC-17-1	STLs have a negative impact on employment, recruitment, workforce availability by reducing accommodation for workers
IC-194-1, IC-189-1, IC-180-1, IC-154-1, IC-149-1, IC-112-1, IC-69-1, IC-43-1, IC-5-1	Absentee ownership, external investors and loss of local economic/community benefit
IC-140-1, IC-126-1, IC-14-1	STLs create tourism dependency/over tourism/seasonality/importance of tourism is overstated

Question 28. Supporting Documents (optional question)

Summary of Respondent issues raised	Officer Response
IC-198-1 Photo supplied of numerous vehicles and equipment/plant of contractors staying in short term lets using residential parking areas.	Noted.
IC-197-1 Screenshot of a map supplied, with supporting comment that not all short term lets in the respondent's area (Wellingtonia Court) have been identified and seems the map is inaccurate.	Noted.
IC-194-1 Photo supplied of poor waste management / incorrect bin use outside a property, in support of comment about impact of STLs on residential amenity.	Noted.
IC-174-1 This submission supports the principle that Inverness has a genuine, evidence-based STL concentration problem warranting planning intervention. Presents an independent analysis of all 1,378 STL properties on the Public Register (13 April 2026). Council findings in the Statement of Reasons which hold up in this independent analysis: • Inverness Central has very high STL concentration • STLs exceed 20% of dwellings in at least two areas (central postcodes) • Growth in STLs concentrated in central areas	Noted. Submission presents an alternative methodology for assessing the concentration of STLs in Inverness, by neighbourhood. Council chose an analysis methodology using data zones which is the primary geography for accurate small area statistical analysis in Scotland. Using data zones mean that the analysis is compatible with other small area statistics and also would be comparable and replicable in the future. Hand drawn neighbourhoods are a subjective measure and difficult to define contiguous geography for statistical purposes. Noted.

• Predominantly self-contained flats property type in historic central areas. On these findings, the Council's analytical work is sound. Doesn't contest that the central concentration of STLs is real. A planning intervention to manage further conversions in these specific central neighbourhoods would be proportionate and evidence based. View that the proposed Control Area boundary is, however, wider than the evidence supports. Disagree with the proposal as drawn, while agreeing in part with the Statement of Reasons. The Council's stated justification for city-wide scope is the risk of displacement, but displacement is asserted rather than evidenced. Edinburgh's experience with planning control areas has not produced documented STL migration into adjacent areas at material scale. Reasons that are less well-supported than presented in Statement of Reasons: • Private rental sector (PRS) decline, not attributed to PRS to STL conversion. Though Council notes the influences of changes to private rental tenancy regulation through the years of Covid-19 and the aftermath, including Section 24 mortgage-interest restrictions, the 2022 Cost of Living (Tenant Protection) Act rent controls, EPC minimum-standards uncertainty, and the Renters' (Reform) Bill.	Noted. Council maintains that displacement risks are still relevant to consider, and that areas showing high rates of change (where STLs as a share of dwellings are growing fastest), indicates that a wider area than the inner-city centre warrants consideration for designation. Areas where the rate of change of STLs are increasing higher than the Highland average are not just in central data zones. Noted. Many parts of Highland do not have a sufficiently functioning private rented sector. While Inverness is one of the few areas where rental properties remain comparatively more available, the market has tightened significantly since the Covid-19 pandemic. The Council does not contend that short term lets (STLs) are the sole cause of this change. However, within an evolving private rented sector, the potential for properties used as STLs to generate higher financial returns than long-term residential lets, particularly in central and tourist-focused locations, can create a market imbalance. This has the potential to encourage the continued conversion of residential properties to STL use within Inverness neighbourhoods, further reducing the supply of homes available for permanent residents.
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• External buyer shares: The 16% average non-Highland buyer share, and 22–50% in the top data zones, is presented as an indicator of STL-driven housing market harm but lacks comparator context. Equivalent figures for central data zones in Edinburgh, Aberdeen, York, Bath, and Manchester routinely sit in the 30–50% range — characteristic of UK regional capitals with universities, healthcare hubs and tourism economies. No causal link to STL activity is established, STL represent 4% of the city’s dwelling stock and could not plausibly drive the price-to-income ratios observed. • Amenity and waste complaints: Environmental health complaints reported in the Statement of Reasons is in a category that already addressed by the existing STL licensing scheme, which has enforcement powers including refusal, revocation and prosecution. A planning control area does not remedy unlicensed operation, over-occupancy, or licensing breaches — the licensing scheme already exists for those purposes.	The Council's concern is not simply the presence of non-Highland buyers, but the extent to which additional investment demand, including demand associated with short-term letting, may compete with local housing needs in neighbourhoods where housing availability is already constrained. Furthermore, the purpose of the analysis is not to demonstrate a direct causal relationship between non-Highland purchases and STL activity. Rather, it provides contextual evidence of market pressures and external demand which, when considered alongside STL concentration data, housing supply indicators and private rented sector trends, helps inform the Council's assessment of the potential cumulative impacts on housing availability. Comparisons with cities such as Edinburgh, Aberdeen, York, Bath or Manchester should also be treated with caution given the significant differences in housing market and rental market scale, development capacity, and population size. The Council's assessment is necessarily focused on the specific circumstances of Inverness and Highland, where relatively modest changes in housing use or ownership patterns can have a proportionately greater effect on local housing availability. The Council's proposal for the Control Area is not founded solely on individual complaints or licensing breaches. Rather, Environmental Health data is one indicator of the cumulative effects that can arise where concentrations of short term lets become established within predominantly residential neighbourhoods. Even where operators are fully licensed and compliant, changes in the character of an area, reductions in the availability of permanent housing, and the intensification of transient occupation are matters that licensing is not designed to address.
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Recommended alternative: A more proportional boundary confined to the affected central neighbourhoods would address the demonstrated planning concern (85% of registered STLs) without imposing regulatory burden across areas where no evidence of STL-driven harm has been presented. The amended boundary should be confined to: • All of postcode sector IV1 1 (City Centre core including the Longman/Innes Street corridor); • All of IV3 5 (West End, Dalneigh, Ballifeary); • All of IV2 3 (Crown, Hilton, Drumossie, Old Edinburgh Road, Millburn); • The riverside portion of IV2 4 covering Ness Bank, Haugh Road, Island Bank Road, the Gordonville and Rosebery streets. This alternative is consistent with the legislative requirement at section 26B of the Town & Country Planning (Scotland) Act 1997 (as amended) that a Control Area boundary be drawn to reflect where the planning concern is materially present, rather than as an administrative convenience. Highland Council has done genuine analytical work in identifying that Inverness has an STL concentration problem in specific central neighbourhoods. That part of the case is sound. The proposed remedy — a Control Area covering the whole urban area plus the northern portion of Ward 19 — is, on the Council's own evidence, considerably wider than the problem. Planning control areas restrict the property rights of homeowners across the area they designate. The threshold for that restriction should be evidence that the planning concern is materially present, not administrative convenience or unevidenced concerns about hypothetical displacement. A boundary drawn around the demonstrated concentration would be a proportionate and defensible response,	The Council notes this suggestion and agrees that these suggested areas fall within the highest levels of concentration in Inverness but considers that the proposed Inverness-wide boundary provides a clear, easily understood and administratively workable framework for residents, operators, investors and decision-makers. While administrative convenience is not, in itself, a justification for designation, clarity and certainty are legitimate planning considerations that assist in the consistent operation of the regulatory framework. Given the mobility of investment demand and the attractiveness of Inverness as a tourism destination, there is a reasonable prospect that operators seeking to avoid future planning requirements within a more limited Control Area would look to nearby areas with similar accessibility and visitor appeal. A boundary drawn tightly around only the areas of highest existing concentration within what is a relatively compact city, risks creating a displacement effect, whereby proposals are redirected to adjoining residential neighbourhoods that experience similar housing market and amenity pressures but fall outside the Control Area. This would hinder timely intervention in those areas, reduce the effectiveness of the designation as a strategic planning tool and could necessitate further boundary reviews in the future. The Council therefore proposes to take a precautionary and forward-looking approach that seeks to manage not only existing clusters but also the potential redistribution of STL activity across the wider urban area. A wider boundary reduces the risk of such displacement and provides a more effective mechanism for managing cumulative impacts on housing availability and residential amenity across Inverness as a whole.
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and I would encourage the Council to consider that alternative before progressing to formal designation.	
IC-45-1 Photo supplied of numerous large vehicles (4-5 for one property) parked in the street from when groups of workmen stay in short term lets in the neighbourhood.	Noted.
IC-82-1 Scottish Tourism Alliance The STA recognises the significant housing pressures facing many communities across Highland and supports the need for balanced, evidence-led and sustainable policymaking. Concerns regarding the proposed expansion of Short Term Let Control Areas in the absence of robust evidence demonstrating that the existing Badenoch and Strathspey Control Area has materially achieved its intended policy outcomes. Key points: • Tourism and hospitality are fundamental to Scotland's economy, employment and communities, and self-catering accommodation are a critical component of this industry. Many parts of Highland rely heavily upon flexible visitor accommodation infrastructure in areas where traditional hotel provision is limited or economically unviable.	Noted. Council recognises that housing challenges in the Highland, including in rural and fragile communities are complex. The Statement of Reasons for Inverness City does not seek to or make a causal link between short term lets and all housing challenges: the evidence is presented in support of the proposal to designate a STLCA. Council recognises and is using a range of policy mechanisms for managing housing pressures in Highland. See full response to ASSC views below (IC-71-1) for response to this matter. Noted. Council has also received responses from hoteliers and serviced accommodation providers expressing the opposite view and support the proposal to help maintain a balanced accommodation market and reduces the risk of visitor demand being diverted away from traditional hotels to an expanding short-term let sector.

• Concern that the current consultation narrative frames tourism and housing as competing interests, which is an oversimplification and seems to causally link short term lets to wider issues such as depopulation, school and community decline, without sufficient evidence. • View that the STL statistics are not appropriately distinguishing between different accommodation types: hospitality-led self-catering accommodation; home sharing; ancillary accommodation; glamping and unconventional accommodation; and conventional residential properties capable of contributing to mainstream housing supply.	It is acknowledged that tourism and housing are both important to Highland's economy and communities. The Control Area is intended to manage changes of use specifically from housing to secondary letting short term lets and the Council's justification therefore must focus on evidence specific to these forms of short term let. The Council does not claim that all short term lets are a previous form of housing supply. The Council's analysis of STLs as a share of total dwellings contained within the Statement of Reasons and provided to Councillors prior to the commencement of the consultation, excluded unconventional accommodation STL properties as denoted within the STL public register. These estimates at data zone level therefore do not include unconventional properties which are highly unlikely to have been part of the former housing supply. Consultation information outlined that a STLCA only changes the planning requirements for Short Term Lets converted from dwellinghouses and flats. An STLCA will not change the current planning requirements for bed and breakfasts, renting out individual rooms/annexes if the owner/occupier resides in the dwellinghouse, second homes where no secondary letting is done, conversions of garden buildings, or accommodation built specifically for holiday purposes, such as pods, annexes and holiday chalets. The consultation survey sought responses from a range of short term let operators, which have different use classes, and many of which already require planning permission. Respondent operators were notified within the survey whether or not the proposed Control Area would relate to the type of short-term let they operate.
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• The current proposal risks undermining the objectives of Scotland Outlook 2030 and the STA's 2026 election priorities. This includes calls to nurture tourism and hospitality sector, avoid unnecessary regulatory burdens, strengthen investment confidence, support sustainable tourism and position tourism sector for major future growth. • Concern about the cumulative interaction between Short Term Let Control Areas, licensing requirements and Mandatory Condition 13 and evolving planning interpretation, and implications for long-standing operators. Concern about legal certainty, investment confidence, procedural fairness and retrospective regulatory burden. Existing lawful operators require clarity, consistency and proportionate treatment. Notes these concerns raised by Association of Scotland's Self-Caterers. • Calls for clear protection and certainty for existing lawful operators, particularly those operating prior to the introduction of the 2022 STL licensing framework. • Support consideration of a formal Use Class Order for short term lets. • Call for a pause on STLCA expansion until existing control areas have been properly evaluated and evidence collected,	For inclusion of terms such as hospitality-led self-catering accommodation, see full response to ASSC views below (IC-71-1) for response to this matter of definitional clarity. The proposed Control Area is not intended to restrict tourism accommodation or place unnecessary burdens on existing operators. Rather, it introduces a planning framework for changes of use from residential housing to secondary letting short-term lets, enabling the impacts on local housing and communities to be considered where appropriate. The Council considers that supporting a sustainable visitor economy and addressing housing pressures are complementary objectives, and that providing greater oversight of such changes can contribute to the long-term sustainability of both. See full response to ASSC views below (IC-71-1) for response to this same matter. See full response to ASSC views below (IC-71-1) for response to this same matter. Consideration of a formal Use Class Order is noted but is out of scope for this local consultation and is in the remit of Scottish Government. See full response to ASSC views below (IC-71-1) for response to this same matter. Council has collated a wide range of evidence
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including economic and regulatory impact assessment. Need to ensure future interventions are developed in collaboration with the tourism sector to develop long-term sustainable solutions.	on this issue presented within the Statement of Reasons, in tandem with the ongoing Housing Need and Demand Assessment. An economic impact assessment is not a statutory requirement for proposing to designate a STLCA, nor is there any requirement to delay designations in pursuit of evaluation of any existing control areas. On concerns about retrospectivity, the Control Area only changes the planning requirements for short term lets converted from residential properties and only applies to changes of use that occur <i>after</i> the designation comes into effect. If an existing short term let already required planning permission in any event because it was a material change of use, this position is unaltered by the designation of the Control Area. Operators who are uncertain can contact the planning service by submitting a free short term let development enquiry, where they will receive a view from the planning service as to whether their short term let is a material change of use. They will be advised whether they ought to apply for planning permission or a Certificate of Lawful Use.
IC-71-1 Association of Scotland's Self-Caterers The Association of Scotland's Self-Caterers does not agree with the proposal to designate a Highland Rural and Inverness City Short Term Let Control Areas (STLCAs). Considers that the proposals are not supported by sufficient evidence and could have significant economic, legal and practical consequences for the tourism sector. The association, which represents over 1,700 self-catering operators in Scotland, accepts that housing pressures exist but that any intervention must be evidence-led, proportionate and legally robust.	Noted. It is unclear how many self-caters in the proposed Highland Rural Short Term Let Control Area the Association represents.

Key points raised:

- Need for definitional clarity and distinguishing between different forms of short term let and visitor accommodation, and how they contribute to residential housing loss. View that the “short-term let” term encompasses a wide range of operating types and models, by contrast “self-catering accommodation” is hospitality-led and is a long-standing recognised tourism infrastructure. Concern about a single narrative which collapses distinct short term let categories into one and centres the discourse around housing loss.
- Failure to distinguish between different types of accommodation in the consultation documents, which consider overall STL concentrations and adjusted STL prevalence whereas the proposal relates specifically to loss of formal residential dwellings to short-term letting. Relates to definitional clarity point, on the range of different types of short term lets and tourist accommodation.
- Concern about the evidential basis for the proposed expansion of Control Area, that Highland Council is proposing a new designation without robust evidence that the existing STLCA in Badenoch and Strathspey has materially achieved its intended policy objectives (with reference to the [Post 2 Year Review of the Ward 20 Badenoch and Strathspey Short Term Let Control Area](#)). Council has not demonstrated increased affordable housing supply, reduced rents, improved affordability, reduced depopulation or measurable housing market stabilisation.

The terminology in question is not optional or interpretive but is established in legislation. Under Scotland’s short-term let licensing framework, a “short-term let” and its sub-category, a “secondary let”, are legally defined classifications that underpin regulation, licensing and enforcement. Self-catering accommodation does not exist outside this regulatory framework. Many self-catering properties fall within these definitions, particularly where they are let on a secondary basis, and their classification is determined by how they are used rather than how they are marketed or the perceived character of their business model. As such, planning and housing policy must focus on the land-use and housing impacts of secondary letting rather than branding or sectoral identity. The fact that such accommodation may be hospitality-led does not negate its classification under the law, nor its potential interaction with housing supply. Introducing alternative terminology would risk confusion and undermine the consistent application of the statutory framework.

The proposed Highland Rural STL Control Area is not intended to replicate any real or perceived success of the Badenoch and Strathspey Control Area. While the Council’s [Post 2-year review of the Badenoch and Strathspey Control Area](#) indicates that changes of use to short-term lets are now being managed, the current proposal is based on its own evidence of housing pressures and short-term let prevalence. Even where the Badenoch and Strathspey Control Area found to have coincided with suggested indicators such as subsequent declining house prices and rental prices, those trends alone would not justify the current proposal which to be consistent with planning practice, must be grounded in its own evidence base demonstrating an

• Wider concerns regarding the evidence base for the proposed Control Area.	issue and that the Council through designating a Control Area proposes to take a proportionate response to that issue. There is no legislative or policy requirement to delay consideration of further control areas until the long-term effects of existing designations are known. Local authorities are required to assess the need for control areas based on the evidence available at the time, and requiring definitive proof of impacts on housing affordability, population retention or community sustainability (which may take many years to emerge) would create an unreasonable barrier to timely and proportionate intervention where current evidence demonstrates a need for action. It is important to recognise that there is no prescribed methodology in legislation, or the Planning circular 1/2023: short-term lets and planning requiring a particular form or level of technical analysis for control area designation. The relevant test is whether sufficient and appropriate information has been gathered to inform a reasoned planning judgment. The research undertaken was proportionate to the purpose of informing a planning designation under section 26B of the Town and Country Planning (Scotland) Act 1997 and drew on a range of relevant and available data sources. Importantly, this evidence also forms part of the Council's Housing Need and Demand Assessment (HNDA), which is a well-established evidential framework used to inform housing policy and decision-making. The HNDA is subject to established methodologies and scrutiny and provides a credible, consistent basis for understanding housing pressures across Highland. The Council is satisfied that the evidence available, including that derived from the HNDA, provides a reasonable basis for consultation on the proposed control areas. The suggestion that it is inappropriate to rely on this evidence is therefore not accepted.
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• Consultation should contextualise short term lets within wider housing landscape, including empty homes and second homes. View that in recognition of housing pressures any material efforts to increase housing supply should address long-term empty homes, infrastructure constraints, stalled developments and wider housing delivery barriers. • The economic contribution of the self-catering sector should be taken into account with more weight. Sustainable communities require both housing and viable local economies. The self-catering sector supports jobs, employment and community sustainability. Highland Council has not produced a meaningful economic impact assessment for this proposal, quantifying impacts of an STLCA on visitor capacity, business viability, tourism displacement, investment attractiveness or supply chain.	The Council recognises short term lets are not the sole cause of housing pressures in Highland, but they are one of several contributing factors leading to the loss of residential homes in some areas. Second Homes and Long-Term Empty homes are Council Tax categories, whereas there is no Short Term Let Council Tax category. Second Homes and STLs are not therefore exclusive, as some secondary letting STLs are also Second Homes. The Council is currently using other policy mechanisms to address these which includes second home Council Tax premiums and a grant and loan scheme to encourage owners of empty properties to bring them back onto the local housing market. There are no planning mechanisms applicable to manage Second Homes or Long-Term Empty properties. In many rural wards in Highland, the potential dwellings converted to Short Term Lets and therefore removed from the housing supply, is greater than those recorded as Long Term Empty properties and/or Second Homes. The Council is not required to undertake a separate economic impact assessment before designating a Short Term Let Control Area (or other planning designations such as Conservation Areas, Article 4 Directions, housing land designations, Special Landscape Areas, etc.). The statutory process requires the preparation of a statement of reasons, consultation, and consideration of the available evidence and representations received. A control area designation does not introduce policy restrictions in itself, prohibit short term lets, or predetermine planning decisions; it simply requires planning permission for relevant changes of use so that individual and cumulative impacts can be assessed through the planning system. As such, it would not be possible to meaningfully assess the economic effects of a
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• Concern about the cumulative interaction between planning and licensing requirements, and the confusion, uncertainty and procedural burden they create for operators. • Reference to <i>Muirhead</i> decision, and that Scottish Parliament did not intend that section 26B should have retrospective effect. Seeks further clarification on how materiality assessments are undertaken, evidential thresholds, procedural burdens for operators and extent to which operators are expected to obtain CLEUD to avoid licensing difficulty. • Concern about different operational approach to planning scrutiny within and outwith Control Areas, and the implications for fairness, legal certainty, legitimate expectation, proportionality and consistency of treatment.	control area designation in isolation from the planning policy framework and future planning decisions that would apply within it. The potential economic implications of specific proposals are therefore considered at the planning application stage rather than through the designation itself. In addition, the wider regulatory and business impacts of the Short Term Let Control Area Regulations were already assessed by the Scottish Government through its Business and Regulatory Impact Assessment (BRIA) when introducing the national legislative framework. It is therefore not necessary for individual planning authorities to repeat that exercise when considering whether local circumstances justify designation of a control area. Noted. The insertion of Section 26B into the Planning Act does not retrospectively alter the planning requirements that applied to a property. Where clarity and certainty regarding planning status are required, that status must be demonstrated through evidence rather than presumed. This principle is not unique to Short Term Lets; it is a fundamental aspect of planning law that applies across all forms of development and land use. The Council must apply the law as it stands and cannot depart from the established legal framework or create an alternative process. It is not within the Council's gift to disregard statutory requirements or adopt a different approach from that prescribed by legislation. The Council does not consider that the different planning consequences that apply within and outwith a Control Area raise concerns regarding fairness, legal certainty or consistency of treatment. The distinction is a deliberate feature of the statutory framework, introduced to enable planning authorities to respond to evidenced local circumstances where concentrations of short-term lets create particular planning issues. Consistency of
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• Concern regarding compatibility with established broader principles of administrative fairness and proportionality, Article 1 Protocol 1 (A1P1) rights, and the Provision of Services Regulations 2009.	treatment is achieved through the application of the same statutory framework to all properties within a designated Control Area and the same planning principles to developments elsewhere. The fact that different regulatory consequences apply in different locations reflects the established operation of the planning system, which regularly applies different policy approaches to different areas in order to address distinct local planning circumstances and considerations. Consequently, the planning authority considers that the Control Area framework strikes an appropriate balance between regulatory certainty, local flexibility and the legitimate public interest objectives it was designed to address. This matter has already been raised directly by the ASSC to Scottish Government and a response was provided by the then Cabinet Secretary for Housing Màiri McAllan MSP in February 2026. The suggestion that planning controls relating to short term lets are incompatible with Convention rights is not supported by the Scottish Government's own assessment of the legislation. In its 2025 review of the Data Protection Impact Assessment for the short-term let licensing and control area framework, the Scottish Government concluded that any such impact would arise only where it was the policy intention of the local authority and only where the restriction was necessary to protect the rights and freedoms of others or the wider economic well-being of the local community. While Article 1 of Protocol 1 protects peaceful enjoyment of possessions, Cabinet Secretary Màiri McAllan MSP accepted that the regulation of short term lets via planning and licensing regimes represents a control of the use of a host's property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were "satisfied that the creation of powers for a local authority to designate a short-term let control area is a
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• The ASSC’s position remains that: ○ existing operators who commenced trading lawfully prior to the introduction of the 2022 licensing frameworks should be expressly protected through appropriate grandfathering provisions; ○ operators who have subsequently complied with the statutory licensing regime should not face disproportionate retrospective procedural or regulatory burden arising from evolving interpretation of planning policy and practice; ○ and that long-term clarity should instead be pursued through development of a formal Use Class Order capable of delivering national consistency, legal certainty and a more proportionate planning framework.	proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity.” The Council concurs that requiring planning consideration of short term lets therefore represents a proportionate exercise of planning control rather than an unlawful interference with property rights. Similarly, the Provision of Services Regulations 2009 do not preclude planning controls which pursue legitimate public policy objectives and are applied in a non-discriminatory and proportionate manner. Planning regulation of land use is a recognised and established function of the planning system and does not prevent the operation of short term let businesses where planning considerations support such use. Such a framework would be a matter for the Scottish Government to introduce. Requiring operators to demonstrate compliance with planning legislation does not constitute a disproportionate retrospective burden. Operators remain able to rely upon existing lawful use rights where these can be evidenced. Many operators already hold confirmation of their planning status as they operate a form of short term let which would have required planning permission in any event. The creation of a new use class or amendment of the planning use classes framework is a matter for the Scottish Government through legislation. In the meantime, the Council is required to apply the planning system as it currently exists and does not have the power to establish an alternative regulatory framework at a local level. Timely intervention to address an existing issue
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Specific comments on the Inverness City STLCA • ASSC recognise that urban housing pressures in Inverness differ materially from those within rural Highland. • Evidence also does not demonstrate that STL growth is the primary driver of affordability pressures, that PCA designation materially improves housing outcomes or that the proposed intervention is proportionate relative to the scale of demonstrated impact.	should not be deferred in anticipation of a hypothetical alternative framework that may or may not be introduced. Noted. The Council does not contend that short-term lets are the sole, or even necessarily the primary, driver of housing affordability and availability pressures in Inverness. However, that does not mean that their contribution can be disregarded. In a housing market where supply is already constrained and affordability is a significant concern; the Council must consider all factors that have the potential to reduce the stock of homes available for permanent occupation. The relevant question is not whether STLs are solely responsible for current pressures, but whether continued conversion of residential properties to STL use could exacerbate existing challenges. Significant public and private investment is currently directed towards increasing housing delivery, with housebuilding expected to accelerate in the coming years. The purpose of that investment is to increase the supply of homes for Highland communities, support population retention and growth, address housing need and help sustain communities and local services. While tourism remains a vital part of the Highland economy, it would be difficult to justify a situation where a consistent share of new housing stock, supported directly or indirectly through substantial public expenditure on infrastructure, site servicing, affordable housing
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• The ASSC also notes that Inverness functions as a major tourism and business hub, visitor accommodation flexibility is strategically important; and tourism demand supports significant economic activity throughout the region. ASSC calls for a pause on further STLCA expansion pending a full review of existing control areas, comprehensive economic and regulatory impact assessment, establishment of transparent and measurable success criteria. Express statutory protection for existing lawful operators is sought. Existing lawful self-catering businesses should not become a proxy target for broader structural housing failures absent robust evidence. ASSC would like Highland Council to work collaboratively with the sector towards development of a formal Short Term Let Use Class Order capable of delivering long-term legal certainty, national consistency and a more proportionate planning framework.	interventions and wider enabling investment, continues to be diverted into commercial visitor accommodation without any planning scrutiny. It would similarly be difficult to justify allowing a further source of pressure on housing supply to develop unchecked simply because other factors are also contributing to the problem, particularly when some of these factors fall outwith the scope of the planning system to manage (Long term empty homes, second homes etc). Noted. Points previously addressed in above responses. Points previously addressed in above responses.
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Summary of Responses from Community Councils, Groups or Organisations

Respondent issues raised	Officer Response
IC-202-1 Lochardil and Drummond Community Council Agree with the proposal to establish the City of Inverness Short Term Let Control Area. Short term lets have the potential to be highly disruptive to neighbours. They in turn may complain to the police or council services. Better to at least attempt to avoid this situation before it happens. Support the Statement of Reasons and view that there is plenty of evidence that the [Reasons] are correct. Have not heard of anyone saying that it is a positive thing to have short term lets in a residential area. Disputes the suggested positive impacts of short term lets in the neighbourhood. For example, the fact that an individual makes money from a let cannot be construed as positive for the neighbourhood.	Noted.
Organisations	
IC-82-1 Scottish Tourism Alliance See summary above, for Question 28.	See response above, for Question 28.
IC-71-1 Association of Scotland's Self-Caterers See summary above, for Question 28.	See response above, for Question 28.
IC-100-1 Living Rent Agree with the proposal to establish the City of Inverness Short Term Let Control Area. One in five properties in Inverness are Short Term Lets (STLs) and in some parts of the city it is rising higher than the rest of the Highlands. The introduction of controls will slow down the growth of STLs, leaving more homes to rent or buy for those that want to live and work in Inverness, and providing real benefits to communities, businesses and the local economy. Controls will also deter prospective owners from buying properties to convert into STLs, making more homes available for long-term residents.	Noted. It is not accurate to state that one in five properties are STLs in Inverness, as these rates are typically found within more central areas in central Inverness City, however it is correct that some parts of the city it is rising higher than the

Agree with the Statement of Reasons. As evidenced in the Statement of Reasons, Inverness is facing a significant housing crisis. In all parts of Inverness, the concentration of STLs is more than 15% of all dwellings, and in two parts of Inverness it is over 20%. This rise in short term lets has coincided with a rise in house prices across the city, resulting in 62% of Inverness residents finding they can't afford the average house price in Inverness (which is over £200,000) and only 41% can afford an entry level house in Inverness, the average price of which is £141,000. There has also been a simultaneous rise in the price of properties on the private rental market, with average monthly rental prices increasing, jumping from £550 in 2014 to over £800 in 2024. This tallies with evidence from the Scottish Government that shows that private rents have increased in Inverness by 51% on average, since 2010. 88% of the 1,714 Short Term Lets across the Inverness Area, are potential homes. That's over 1,500 homes we could have in the middle of a housing crisis. Meanwhile, the waiting list for social housing in Inverness grows and lengthens, especially as Inverness makes up 40% of first-choice allocation for social housing across the Highland Council, given the proximity to available work. This inevitably results in a rise in homelessness across the city and wider Highland Council region. There are too many short-term lets in the neighbourhood, which have increased significantly. There were over 900,000 overnight stays at short-term lets (STLs) in the Highlands between April and June 2025, which is one of the highest in the UK (only Cornwall and Westminster were higher). Our members who are first time buyers have told us how they have repeatedly been outbid by absentee STL owners. For instance, in one case, one of our members was outbid by over £40K. In addition, all of our members who rent have both struggled to find properties that remain available for rent, and when in properties they have struggled with the rent levels which have been increasing steadily. Properties are usually let by the time a call is made to arrange a viewing. Some members have been forced to move back home with their parents, with one ending up living in a caravan in their parents' garden for two years. Many are forced to live outside of Inverness and commute in for work from a long distance. Average rents have increased by 4% in 1-bedroom across the Highlands, with an average of	rest of the Highlands, as set out in the Statement of Reasons. Noted. While the consultation is not intended to be a representative sample, the responses are consistent with the evidence cited by Living Rent, and outlined in the Statement of Reasons: 14 consultation respondents are on the Highland Council Housing Register (14 out of 202), and 67 total respondents cited severe or moderate difficulty in buying or renting a house for full-time occupancy within the proposed control area (67 out of 202), of these 10 are on the Housing Register. Noted.
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£722. This represents a third of the average disposable income in the region, at £23,625, hitting the poorest the hardest. Our members who are on minimum wage, which is very prevalent in the service industry jobs across the Highlands, often spend 40 to 50% of their income on rent. The rise in STL's has had, and continues to have, a negative effect on local populations. One of the most prominent of those being the shortage of affordable housing and increase in rental prices. With long term private landlords choosing to outsource services, selling or converting properties into short term let accommodation, this results in higher rental prices for the few properties left on the market. It also pushes up prices for homes and excludes first time buyers. The social impacts of STL's must also not be ignored – we are already seeing the effects of the lack of housing in small communities, with schools facing closure due to a lack of families being able to live in the area and hospitals not being able to recruit for key frontline jobs. This has a knock-on effect on services, shops and facilities, without a local permanent population many businesses and facilities are often reoriented towards the tourists' preferences rather than those of residents – alienating them in their own area. It is also essential to recognise the negative emotional effects on residents that high concentrations of STL's can cause, such as leaving streets and neighbourhoods feeling 'hollowed' out, with few community members left who are able to support each other (e.g. picking up post, checking on pets and each other, etc). There is also the issue of new "neighbours" every few days, a lack of knowledge or safety of who might be sharing the stairwell or garden or issues such as parking, "party houses" and disruptive behaviour by tourists. Neighbourhoods with a high concentration of short term lets can often become "museum-ized," leading to locals feeling alienated and observed in their own neighbourhood. The commercialisation of local neighbourhood can lead to a loss of families and overall sense of identity – something the Highlands knows all too well.	Noted.
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Appendix 4

This appendix presents a summary of **Rural Inverness-shire** responses to the **Highland Rural STLCA survey**. Rural Inverness-shire responses are those residing in Ward 12 Aird and Loch Ness and the majority of Ward 19 Inverness South.

Note: Questions 1 – 3, 7 – 11 and 29, which capture personal information, are not reported however they have informed the definition of the geography and cohorts of respondents, outlined below.

Geographic Area

Responses are reported by Committee Area to support local decision making on whether to progress. Responses to Questions 6 (area of STL operation), 7 (residential address), 8 (postcode) and 9 (area of residence) are used to identify which responses are from residents, businesses, community councils or current or prospective STL operators living within the Committee Area or, operators who live outwith the Committee Area but operate or intend to operate an STL within the area, which are important to highlight to the Area Committee members. We recognise however that the full sample of the consultation includes individuals neither residing in or operating in any of the Committee Areas within the proposed Control Area, or in Highland. These are reported within the “*Highland Rural Total*.”

Cohorts

Three cohorts of respondents have been classified as shown in **Table A4.1**. Using cohorts supports the presentation of this analysis by grouping respondents with similar characteristics.

Table A4.1: Summary of cohorts for survey analysis

Residents in Area	Not Resident in Area	Groups
- Residents (not STL operators) - Business (not STL operators) - Current STL Operators (Resident in Area) - Prospective STL Operators (Resident in Area)	- Current STL Operators (Non-resident) - Prospective/Future STL Operators (Non-resident) - Other Non-resident (Visitors, former residents, former operators etc.)	Community Councils, Groups and Organisations

‘Other’ respondents who are not living or operating STLs in a Committee Area are reported in the Highland Rural total sample response only.

Question 4. Are you responding as:

Where relevant, 'Other' responses which relate to a listed category have been added to that category.

Respondent type	Resides in Rural Inverness-shire	Resides in the Highland Rural STLCA	Resides in the Highland Council Area	Resides Outwith Highland Council Area
Total Residing in Area	57	407	466	121
Resident (Not a short term let operator)	35	268	308	23
Business (Not a short term let operator)	1	12	13	1
Short term let operator	21	121	138	86
Prospective short term let operator	-	6	7	10
Community Council, Group, Organisation	-	6	7	4
Other: Visitor	-	-	-	10
TOTAL Responses	57	413	473	135
Resident Business Short Term Let operator Prospective Short Term Let operator Community council, group or ornaisation Other: Visitor				

The distribution of respondent categories among respondents residing in Rural Inverness-shire has a slightly higher share of STL operators than the wider Highland Rural resident sample and the wider Highland Council Area. The distribution of respondent categories for respondents outwith the Highland Council Area differs however, with a larger share comprising operators.

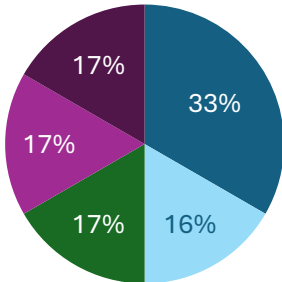
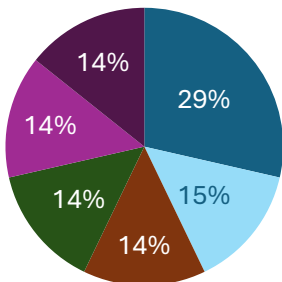
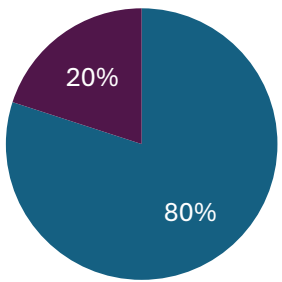
Question 5. What kind(s) of Short Term Lets do you currently operate? (Only asked to Short Term Let Operators)
Where relevant, 'Other' responses which relate to an already listed category have been added to that category for accuracy.

Short Term Let Type	Resident Operators Rural Inverness-shire	Non-Resident Operators Rural Inverness-shire	Resident Operators within the Highland Rural STLCA	Non-Resident Operators within the Highland Rural STLCA
Converted from previous house terraced, semi-detached detached	6	4	34	68
Converted from previous self-contained flats/apartments	2	2	5	6
Purpose-built holiday home	3	-	10	14
Guesthouse/B&B	2	-	10	1
Homesharing/room letting	1	-	4	1
Lodges/chalets	1	-	6	3
Glamping pods/yurts	-	-	5	-
Other - Conversion from non-residential building category	2	-	8	3
Other - Annex	1	-	7	-
Other - Data not provided	1	-	8	1
Combination of different kinds	2	-	22	5
TOTAL Operator Responses	21	6	119	102

Question 6. What kind(s) of Short Term Lets do you intend to operate? (Only asked to Prospective Short Term Let Operators)

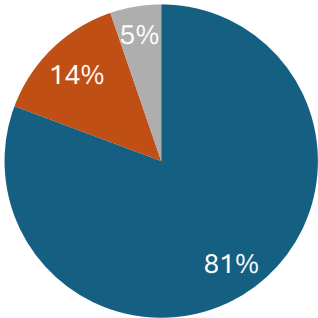
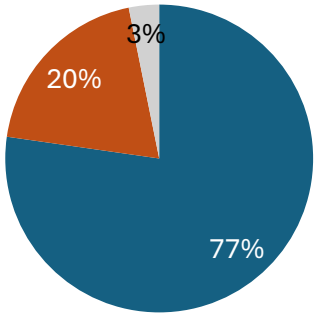
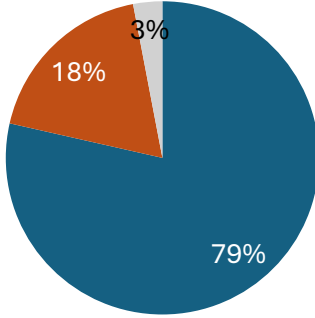
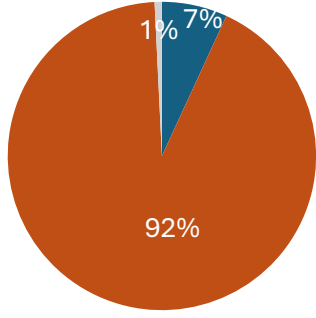
Where relevant, 'Other' responses which relate to an already listed category have been added to that category for accuracy.

*Note small sample and **no** respondents residing within Rural Inverness-shire identified as prospective STL Operators

Short Term Let Type	Resident in Rural Inverness-shire	Resident within the Highland Rural STLCA	Resident in Highland Council Area	Non-Resident in the Highland Council Area
Converted from previous house terraced, semi-detached detached	-	2	2	8
Converted from previous self-contained flats/apartments	-	-	-	-
Purpose-built holiday home	-	1	1	-
Guesthouse/B&B	-	-	-	-
Homesharing/room letting	-	-	1	-
Lodges/chalets	-	-	-	-
Glamping pods/yurts	-	1	1	-
Other - Conversion from non-residential building category	-	1	1	-
Other - Annex	-	-	-	-
Other - Data not provided	-	-	-	-
Combination of different kinds	-	1	1	2
TOTAL Prospective Operator Responses	-	6	7	10
	-			

Question 12. Do you currently work in Highland? (optional question)

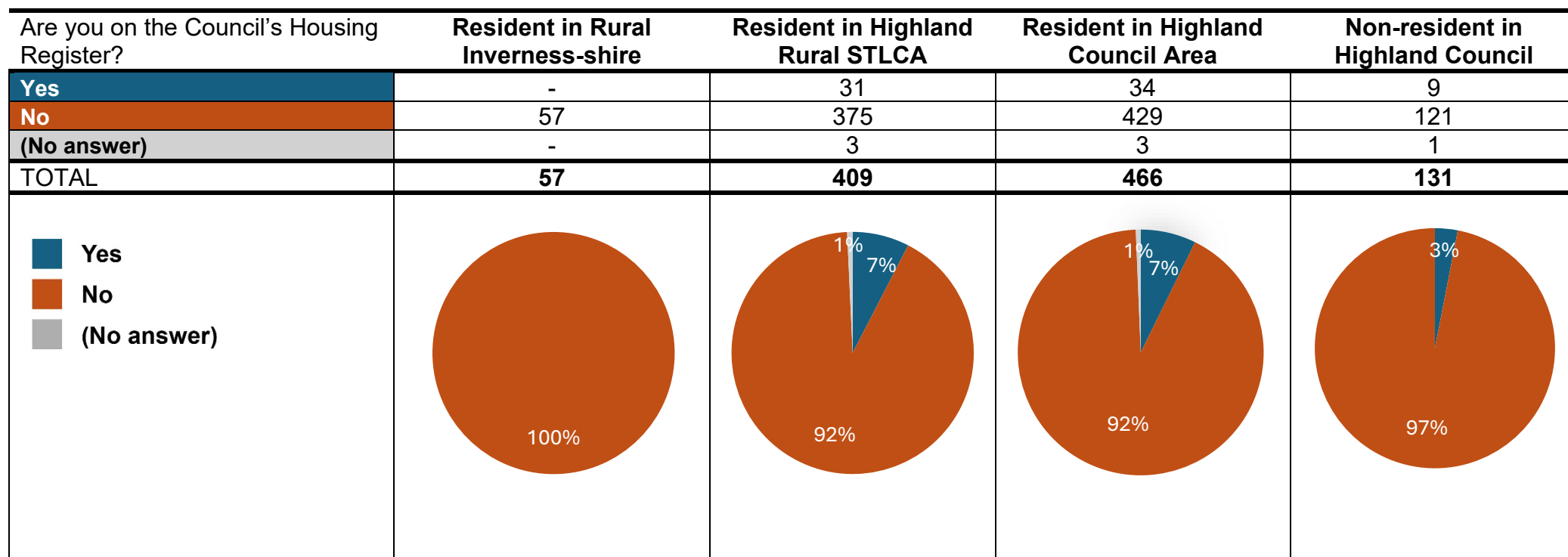
Breakdown of responses by area of residence

Do you Currently Work in Highland	Resident in Rural Inverness-shire	Resident in Highland Rural STLCA	Resident in Highland Council Area	Non-resident in Highland Council
Yes	46	316	366	9
No	8	80	86	121
(No answer)	3	13	14	1
TOTAL	57	409	466	131
Yes No (No answer)				

Question 13. Are you on the Council's Housing Register? (optional question)

This means you have submitted an application for social rented housing to The Highland Council and its partner housing associations.

Breakdown of responses by area of residence



No Rural Inverness-shire respondents indicated that they were on the Highland Housing register, which is lower than other area sub-samples.

Question 14. Have you had difficulty buying or renting a house for full-time occupancy within the proposed control area?
(optional question)

Breakdown of responses by area of residence

Have you had difficulty buying or renting a house for full-time occupancy within the proposed control area?	Resident in Rural Inverness-shire	Resident in Highland Rural STLCA	Resident in Highland Council Area	Non-resident in Highland Council
No difficulty	42	251	284	101
Slight difficulty	4	23	28	1
Moderate difficulty	5	50	53	2
Severe difficulty	4	65	77	6
(No answer)	2	20	24	21
TOTAL	57	409	466	131
No difficulty Slight difficulty Moderate difficulty Severe difficulty (No answer)				

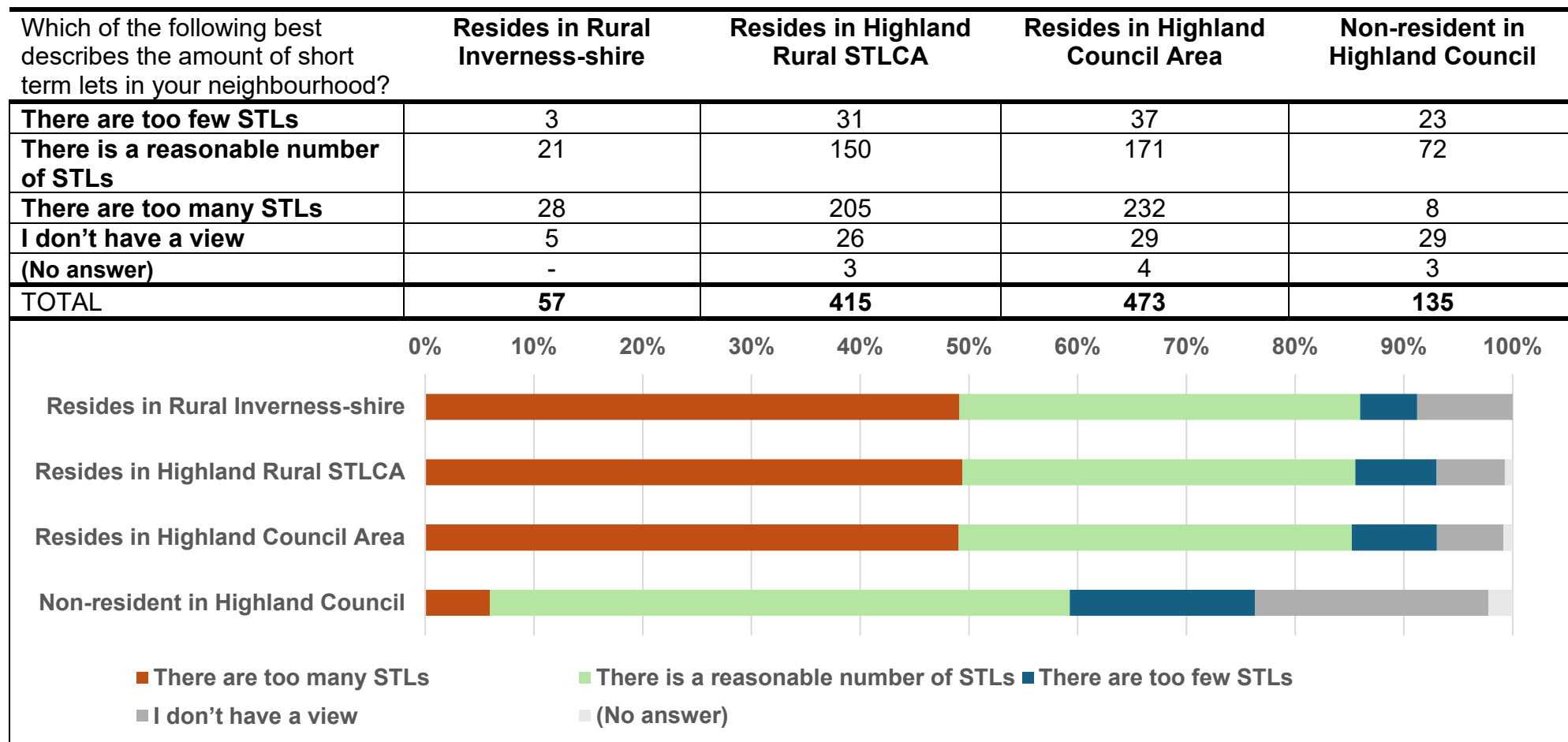
A slightly lower share (25%) of Rural Inverness-shire respondents indicated that they had experienced some level of difficulty (slight, moderate or severe) buying or renting a house for full-time occupancy within the area, than in other area sub-samples.

Question 15. If you experienced any difficulty in buying or renting a house within the proposed control area, please provide more information: (optional question)

Respondent Reference	Points raised
HR-573-1, HR-455-1, HR-372-1, HR-321-1, HR-10-1	Limited choice and supply of housing and land
HR-553-1, HR-400-1	High house prices and affordability challenges
HR-400-1, HR-372-1, HR-371-1, HR-321-1	Competitive purchasing/rental market
HR-589-1, HR-455-1, HR-372-1, HR-371-1	Short-term lets impacting housing availability
HR-23-1	Competition from second-home owners, investors and external buyers
HR-553-1, HR-399-1, HR-372-1, HR-371-1	Reliance on family and friends support and informal housing arrangements
HR-589-1, HR-400-1, HR-399-1, HR-372-1, HR-371-1	Housing insecurity and displacement
HR-573-1, HR-455-1, HR-372-1, HR-321-1, HR-10-1	Reliance on inheritance
HR-553-1, HR-400-1	Limited choice and supply of housing and land
Council Response: A range of experiences of difficulty in buying/renting a house within the proposed control area are therefore noted.	

Question 16. Which of the following best describes the amount of short term lets in your neighbourhood? (optional question)

Breakdown of responses by area of residence

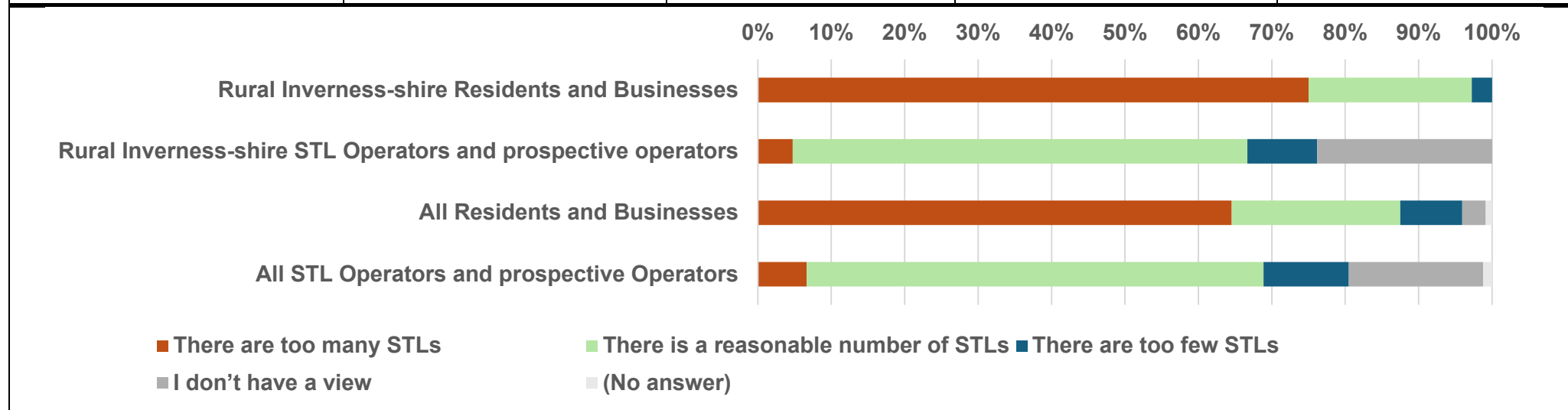


Views regarding the overall number of STLs do not differ greatly by area of residence within Highland. Non-residents are more likely to consider there to be a reasonable number of STLs, whereas those residing in the area are more likely to consider there to be too many.

Question 16. Which of the following best describes the amount of short term lets in your neighbourhood? (optional question)

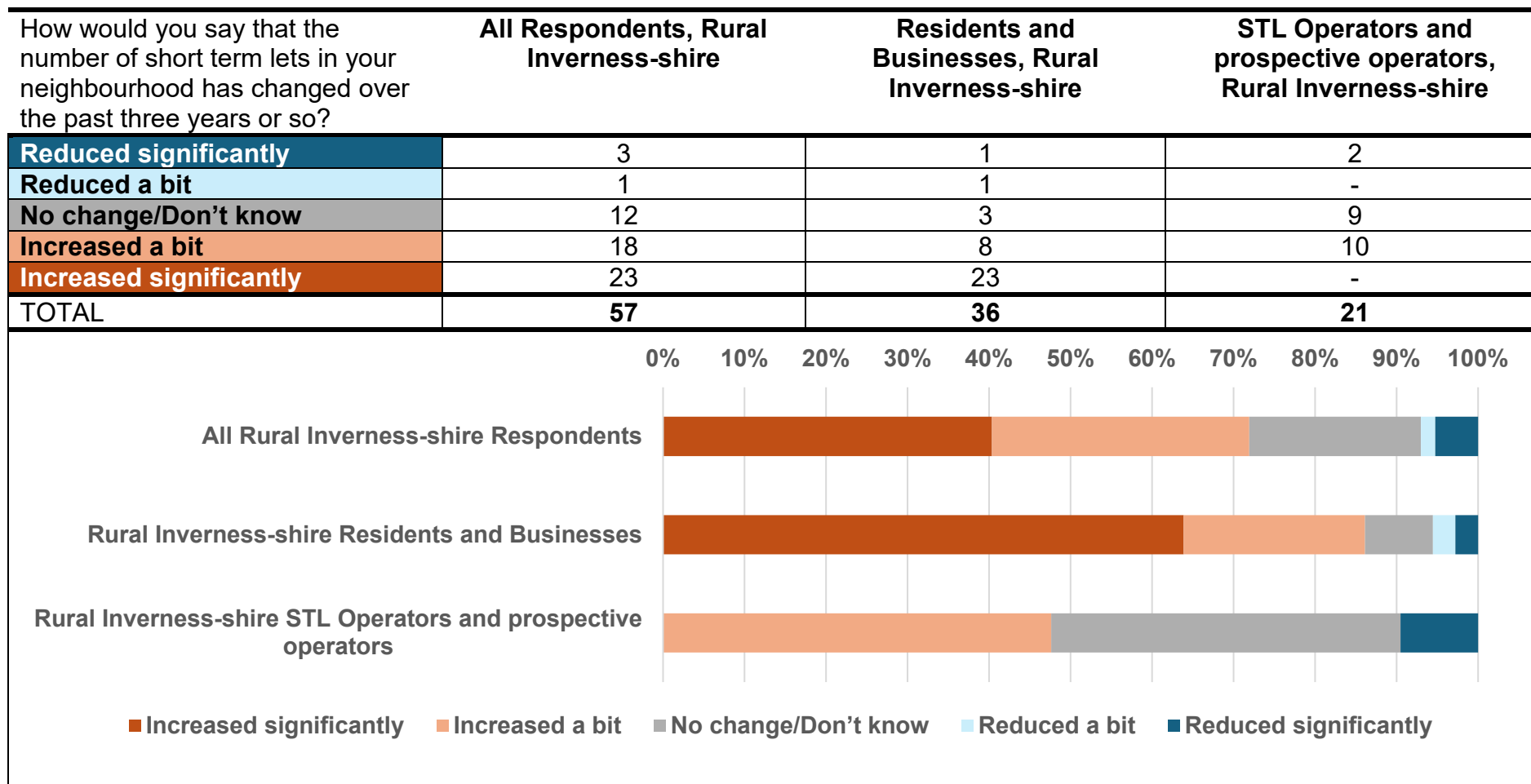
Breakdown of responses by category of respondent

Which best describes the amount of short term lets in your neighbourhood?	Rural Inverness-shire sub-sample		Total Sample	
	Residents and Businesses	STL Operators and prospective operators	Residents and Businesses	STL Operators and prospective Operators
There are too few STLs	1	2	29	28
There is a reasonable number of STLs	8	13	79	150
There are too many STLs	27	1	222	16
I don't have a view	-	5	11	44
(No answer)	-	-	3	3
TOTAL	36	21	344	241



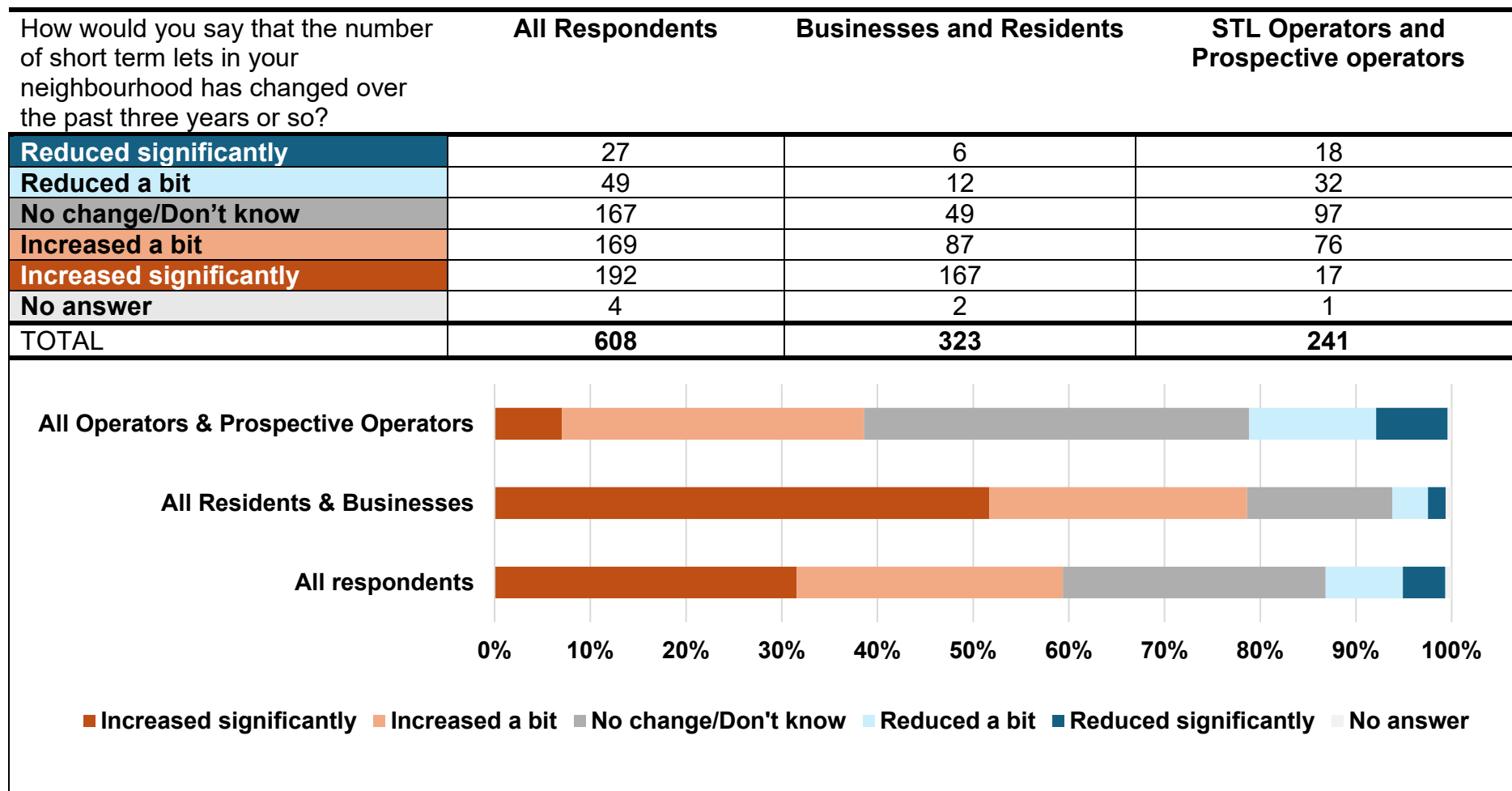
Greater divergence in views regarding the overall number of STLs is attributed to the category of respondent, with residents and businesses more likely to consider there to be too many STLs, with operators more likely to consider there to be a reasonable number.

Question 17. How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so? (*Breakdown for Rural Inverness-shire subsample*)



Category of respondent also is attributed to the divergence in views regarding the rate of change in the number of STLs over the past three years, with residents and businesses being more likely to consider the number to have increased significantly, than operators.

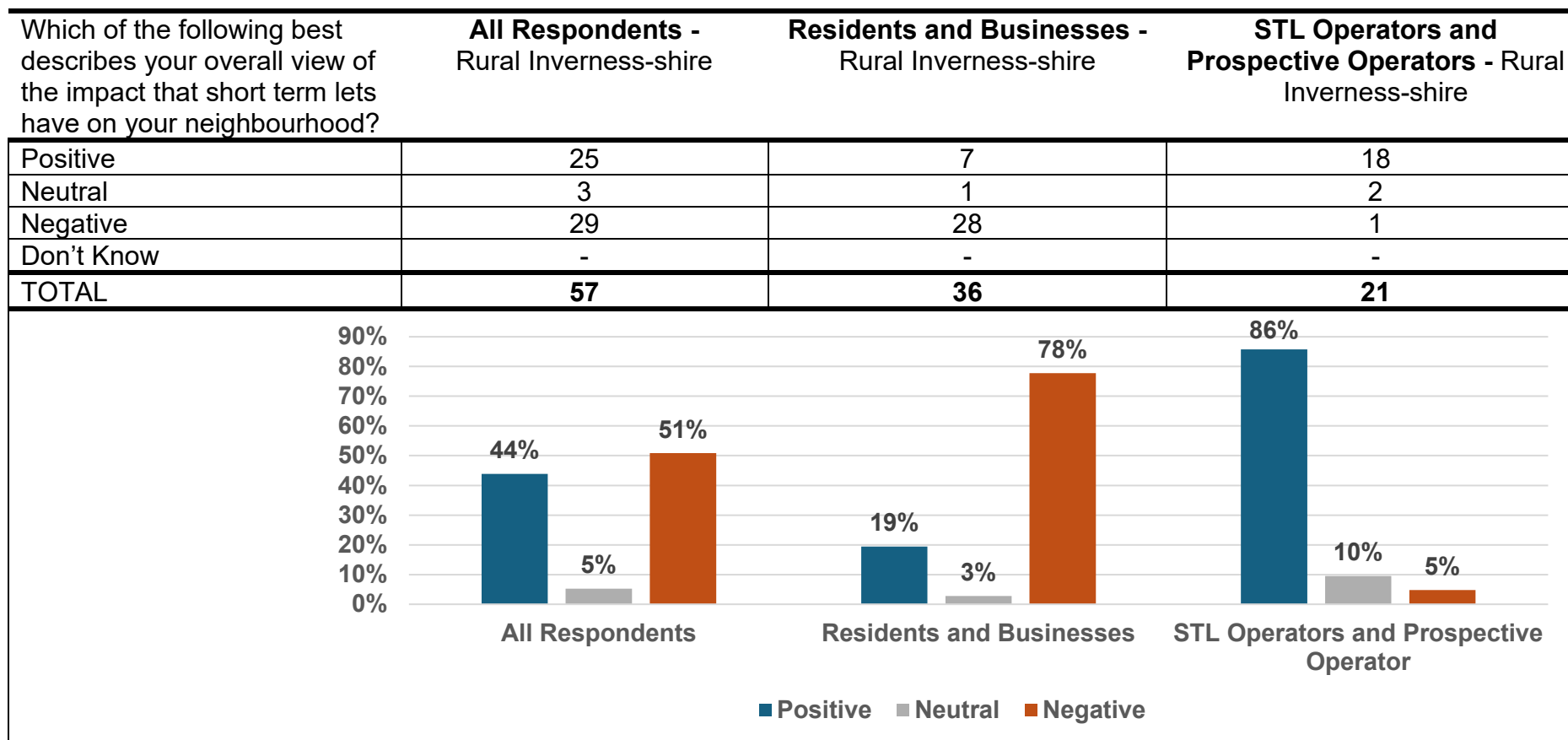
Q17. How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so?
(Breakdown for Full Sample)



This divergence in views by respondent category was not isolated to the Rural Inverness-shire subsample, with similar polarised views observed among the total sample of respondents.

Question 18. Which of the following best describes your overall view of the impact that short term lets have on your neighbourhood? (optional question)

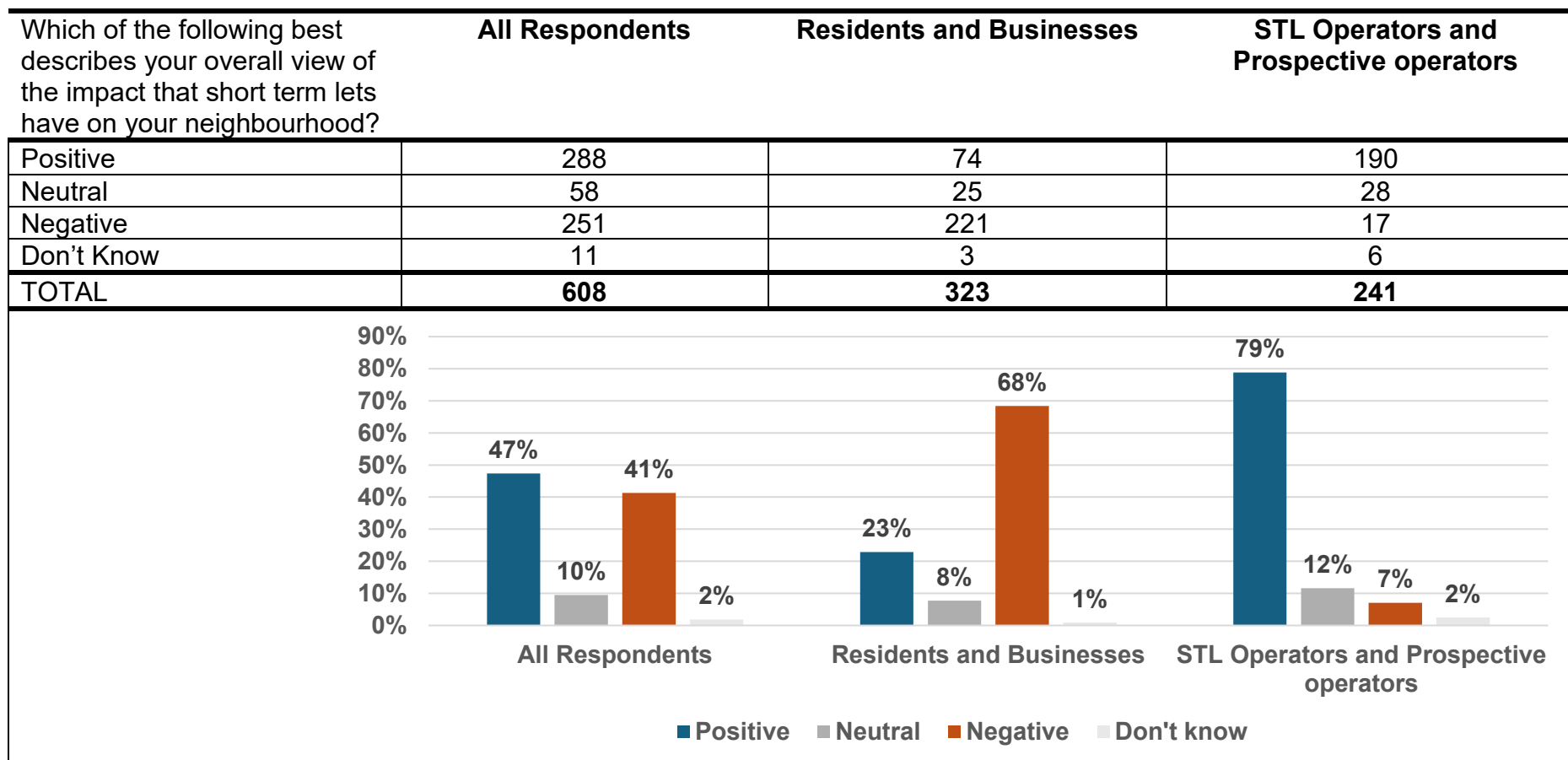
Breakdown for Rural Inverness-shire subsample



A greater share (78%) of Rural Inverness-shire residents reported that their overall view of the impact of STLs on the neighbourhood was negative, while a large share (86%) of resident operators reported their overall view to be positive.

Question 18. Which of the following best describes your overall view of the impact that short term lets have on your neighbourhood? (optional question)

Breakdown for Total Sample



The divergence in views on the overall view of the impact of STLs also differed by respondent category across the total sample to a similar degree as observed in Rural Inverness-shire.

Question 19. Could you give brief reasons for your answer to this? (optional question)

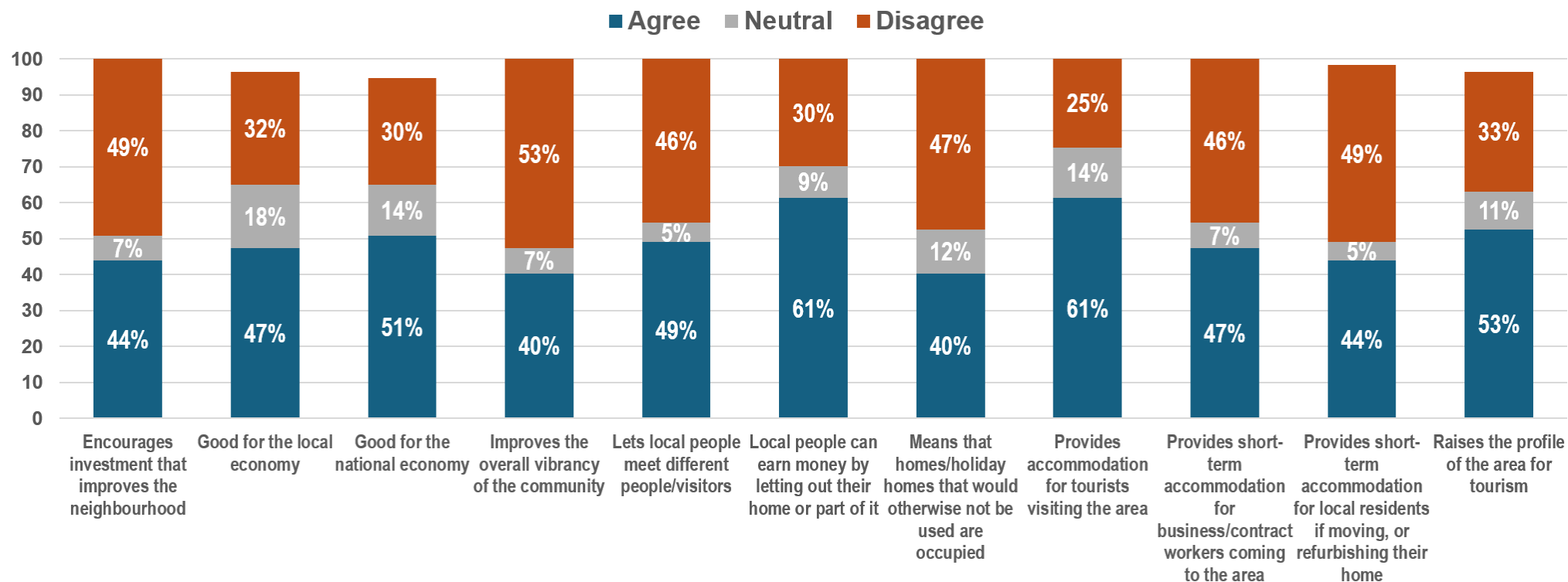
Respondent Reference	Points raised
Neutral impact views	
HR-594-1	Need to balance STLs with housing stock
HR-415-1	Impacts depend on the type and location of STL
Negative impact views	
HR-341-1, HR-234-1	Properties used as STLs are unaffordable or unsuitable for permanent housing
HR-594-1, HR-592-1, HR-589-1, HR-436-1, HR-419-1, HR-416-1, HR-372-1, HR-322-1, HR-321-1, HR-41-1, HR-23-1	Loss of housing for local people
HR-554-1, HR-419-1, HR-416-1, HR-322-1, HR-321-1, HR-73-1	Increases in house prices
HR-602-1, HR-436-1, HR-416-1	Impacts on the local workforce
HR-573-1, HR-428-1, HR-416-1, HR-401-1, HR-400-1, HR-399-1	Loss of community cohesion
HR-573-1, HR-416-1, HR-23-1	Demographic changes
HR-502-1, HR-416-1	Properties remaining vacant for much of the year
HR-416-1, HR-322-1, HR-29-1	Nuisance impacts on local residents (e.g. antisocial behaviour, traffic, noise, parking, and waste issues)
HR-502-1	Contributions to local service closures (e.g. schools)
HR-416-1	Pressure on community infrastructure
HR-592-1, HR-456-1, HR-415-1, HR-400-1, HR-399-1	Incompatible land uses within residential areas
Positive impact views	

HR-559-1, HR-552-1, HR-550-1, HR-543-1, HR-542-1, HR-510-1, HR-490-1, HR-458-1, HR-451-1, HR-283-1, HR-10-1	Supports tourism
HR-559-1, HR-552-1, HR-550-1, HR-543-1, HR-542-1, HR-534-1, HR-510-1, HR-490-1, HR-423-1, HR-349-1, HR-342-1, HR-315-1, HR-283-1, HR-261-1, HR-234-1, HR-181-1, HR-178-1, HR-166-1, HR-163-1, HR-21-1, HR-4-1	Supports the local economy and businesses
HR-552-1, HR-542-1, HR-490-1, HR-451-1, HR-423-1, HR-261-1, HR-234-1, HR-178-1, HR-166-1, HR-163-1, HR-157-1, HR-148-1, HR-33-1, HR-21-1, HR-4-1	Provides direct and indirect employment opportunities
HR-559-1, HR-543-1	Income generator for residents
HR-163-1	Supports population retention and local services (e.g. schools)
HR-543-1, HR-452-1	Provides essential accommodation
HR-559-1	Offers alternative accommodation when hotels are unavailable or full
HR-341-1, HR-261-1, HR-234-1	Bring derelict or unused buildings back into use
HR-552-1, HR-550-1, HR-458-1	Contributes to a multicultural and socially vibrant community
HR-490-1	Reduces reliance on self-sufficient tourism (e.g. caravanning and camping)
HR-143-1	Empty homes and second homes as the primary cause of housing issues
Council Response: A range of reasons for views on the impacts of short term lets are therefore noted.	

Question 20. To what extent do you agree or disagree that the following are positive impacts of having short term lets in your neighbourhood?

Responses for total Rural Inverness-shire sub-sample – all respondent categories (n=57)

The balance of 100% is “Don’t know” in each case.

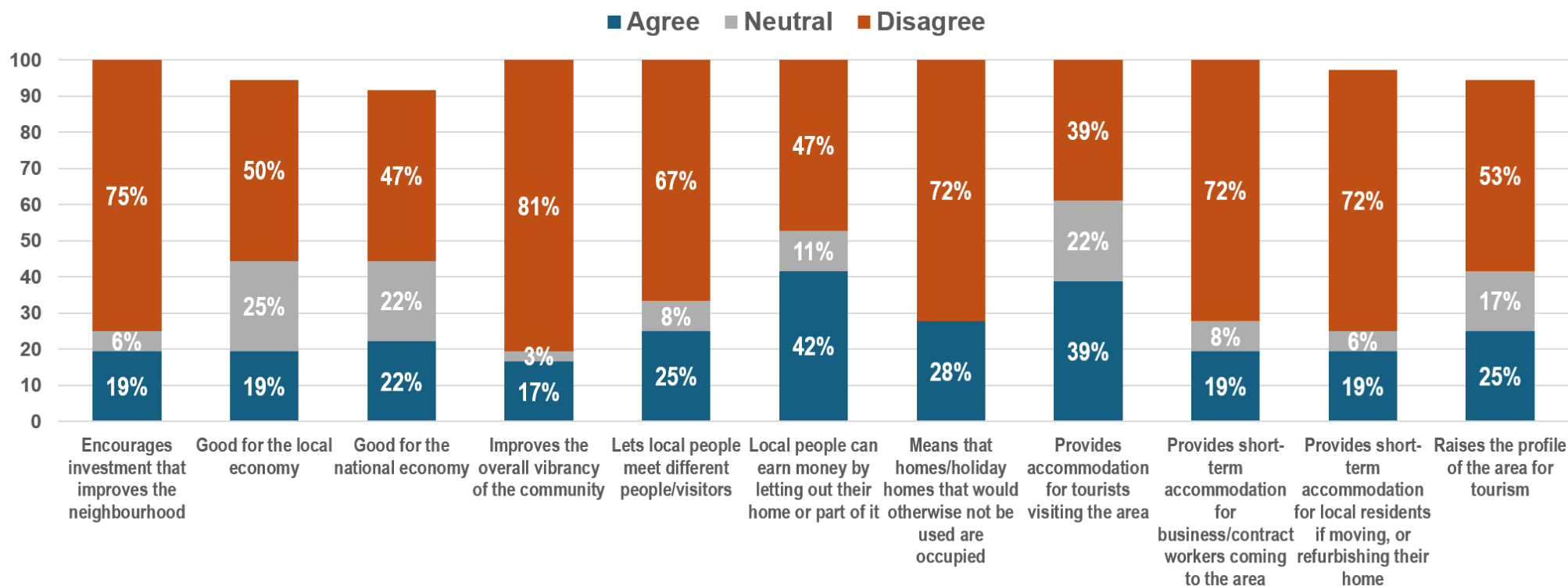


When presented with a list of suggested positive impacts attributed to Short Term Lets, there are varying levels of agreement from respondents residing in Rural Inverness-shire, with the highest agreement recorded towards “Provides accommodation for tourists visiting the area” while a slightly larger share disagree with “Improves the overall vibrancy of the community.” The statement with the highest level of neutral responses was “Good for the local economy.” There is little difference between the Rural Inverness-shire area and the overall sample, but the category of respondent is the dominant predictor of variation to these responses, with residents and businesses differing sharply in their agreement, relative to STL operators and prospective operators.

Question 20. To what extent do you agree or disagree that the following are positive impacts of having short term lets in your neighbourhood?

Responses for Rural Inverness-shire Residents and Businesses (n=36)

The balance of 100% is “Don’t know” in each case.

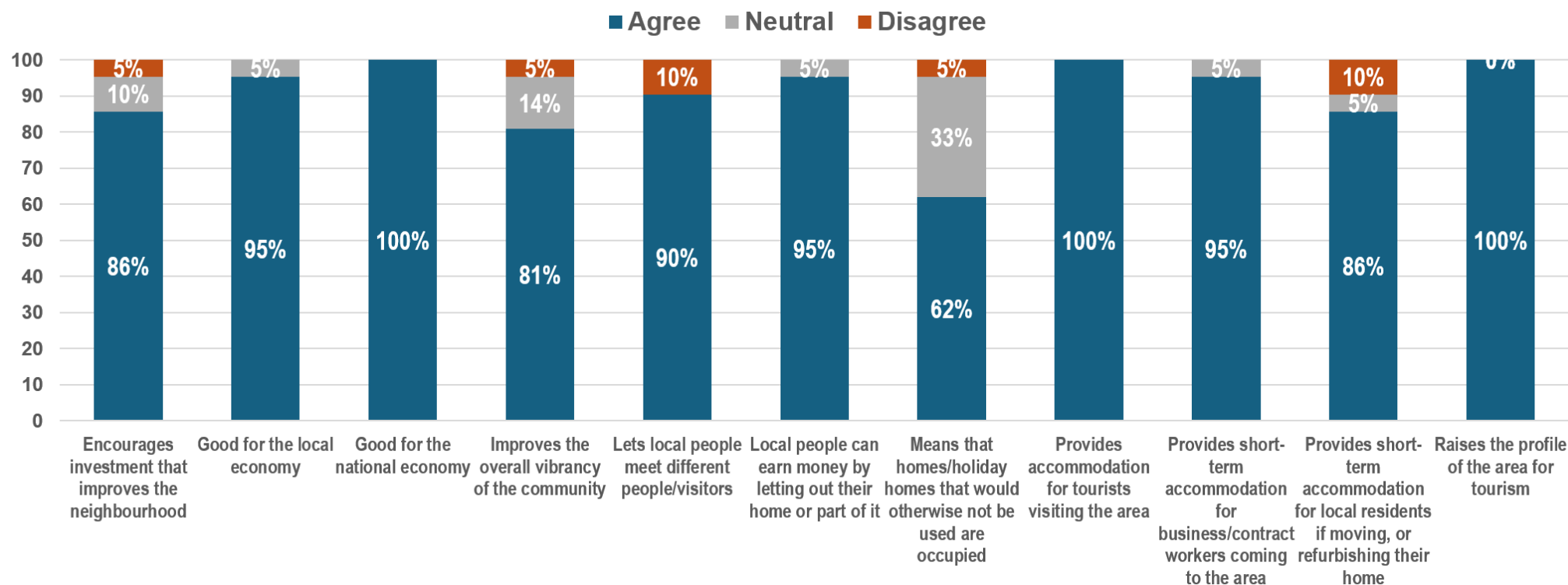


Examining responses from residents and businesses specifically residing in Rural Inverness-shire, it is evident that levels of agreement with many of these statements is lower among this cohort. While “Local people can earn money by letting out their home or part of it” has a higher level of agreement, a clear majority disagree that STLs “encourage investment that improves the neighbourhood,” “Means that homes that would otherwise not be used are occupied.”

Question 20. To what extent do you agree or disagree that the following are positive impacts of having short term lets in your neighbourhood?

Responses for Rural Inverness-shire STL Operators and Prospective Operators (n=21)

The balance of 100% is “Don’t know” in each case.



Turning to STL Operators and prospective Operators in Rural Inverness-shire, there is a broad consensus and near unanimous agreement that the statements provided are indeed positive impacts of STLs. The highest levels of agreement are attributed to “Provides accommodation for tourists visiting the area,” “Good for the national economy” and “Raises the profile of the area for tourism.” A slightly higher rate of neutral responses was received for “Means that homes/holiday homes that would otherwise not be used are occupied,” but it is clear that operators in the Area indicated that there was overall a positive impact of having STLs in the neighbourhood.

Question 21. Are there any other positive impacts of having short term lets in your neighbourhood? (optional question)

Responses from respondents residing in Rural Inverness-shire, alongside non-resident operators in the area.

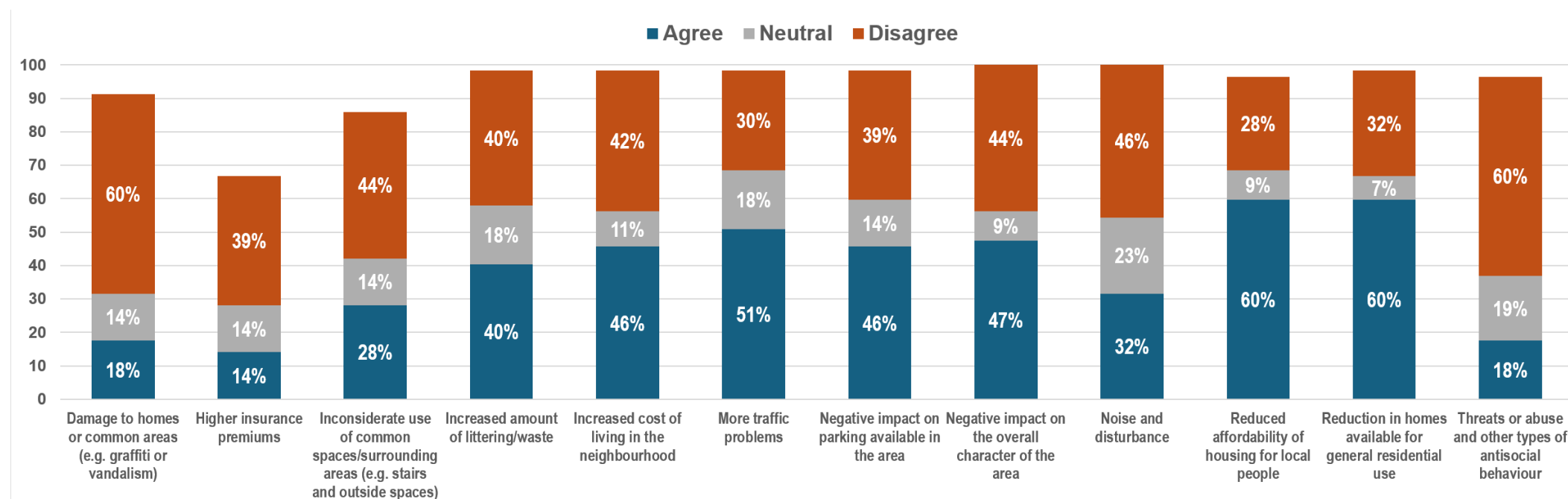
Respondent Reference	Points raised and responses.
HR-542-1, HR-534-1, HR-490-1	Offers additional income and flexible work opportunities compatible with caring responsibilities
HR-490-1, HR-458-1, HR-451-1, HR-315-1, HR-313-1, HR-166-1, HR-163-1, HR-143-1, HR-101-1, HR-33-1, HR-21-1	Demand and spend from visitors helps sustain local businesses and services, including shops, pubs, public transport and trades
HR-178-1	Retains population and reduces depopulation in fragile rural areas, especially through providing employment and maintaining a balanced demographic
HR-178-1	Supports local schools through employment and population retention
HR-342-1	Support local cultural heritage and Gaelic-speaking communities
HR-559-1, HR-452-1	Brings derelict or neglected buildings back into productive use, and reduces homes being left empty
HR-349-1	Helps modernise and maintain older, historic, traditional or inherited family properties, by generating funds for upkeep.
HR-342-1	Supports farm and croft diversification, by providing alternative income sources
HR-458-1, HR-452-1	Provides accommodation suitable for families, groups, those with pets, those with accessibility or other specialist needs
HR-143-1	Reduced reliance on campervans and informal camping, which have negative local impacts (such as parking, environmental impact)
HR-552-1, HR-550-1, HR-458-1, HR-451-1	Encourages slow tourism which helps tourists feel invested and connected to the area, adds vibrancy to community
HR-33-1	Provides temporary worker accommodation (e.g. renewables projects)

HR-592-1, HR-455-1, HR-452-1	Negative impacts on local housing availability and affordability not outweighed by any positive impacts of short term lets.
HR-592-1, HR-589-1, HR-455-1, HR-436-1, HR-416-1, HR-400-1, HR-399-1, HR-371-1, HR-322-1, HR-240-1	Disputes suggested positive impacts
HR-143-1	Provides accommodation options and supports tourism in communities without hotels and B&Bs, or areas with high demand
HR-163-1	Seasonal and diversified income for locals, income stays local
HR-542-1, HR-534-1, HR-490-1	View that small-scale local resident operators - especially for homesharing, pods or B&Bs - have more positive impacts on local economy than absentee operators living outwith Highland.
Council Response: A range of additional suggested positive impacts are therefore noted.	

Question 22. To what extent do you agree or disagree that the following are negative impacts of having short term lets in your neighbourhood?

Responses for total Rural Inverness-shire sub-sample – all respondent categories (n=57)

The balance of 100% is “Don’t know” in each case.

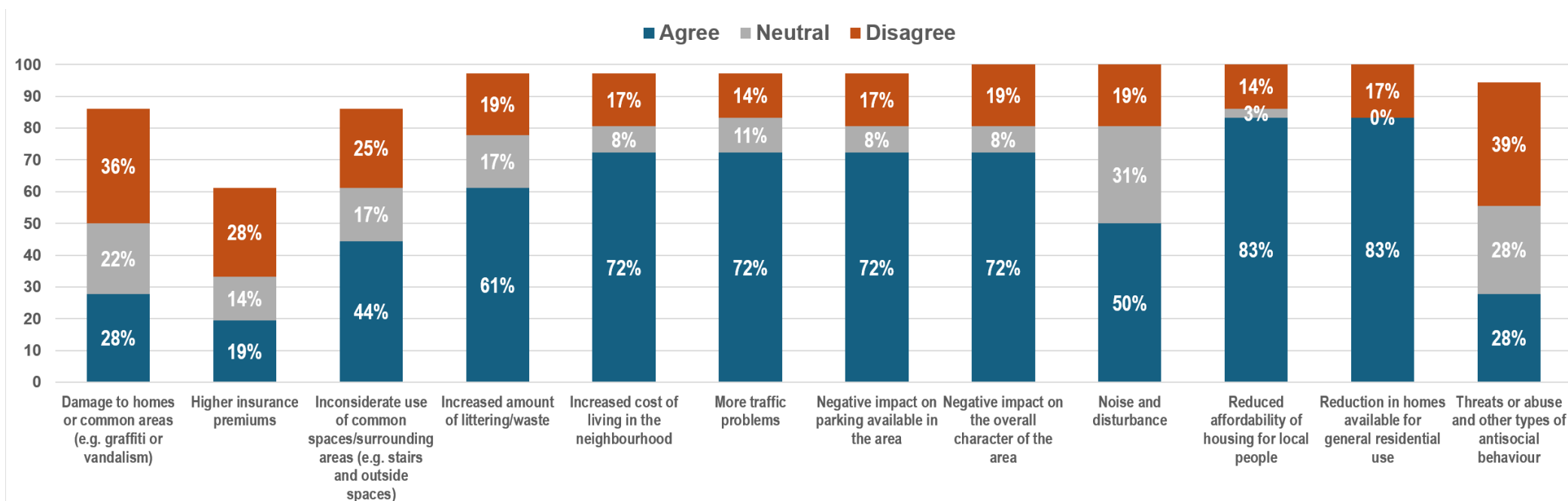


When presented with a list of suggested negative impacts attributed to Short Term Lets, respondents residing in Rural Inverness-shire are, again, fairly divided as to their levels of agreement or disagreement with these. It is noted that as with the positive impacts, there is little difference between the Rural Inverness-shire area and the overall sample, but the category of respondent is the dominant predictor of variation to these responses, with residents and businesses differing sharply in their agreement, relative to STL operators and prospective operators. The highest levels of overall agreements were for “Reduced affordability of housing for local people” and “Reduction in homes available for general use,” while there was large disagreement with “Damage to homes or common areas,” and “Threats or abuse and other types of anti-social behaviour,” suggesting that these are not widely considered to be applicable in the area.

Question 22. To what extent do you agree or disagree that the following are negative impacts of having short term lets in your neighbourhood?

Responses for Rural Inverness-shire Residents and Businesses (n=36)

The balance of 100% is “Don’t know” in each case.

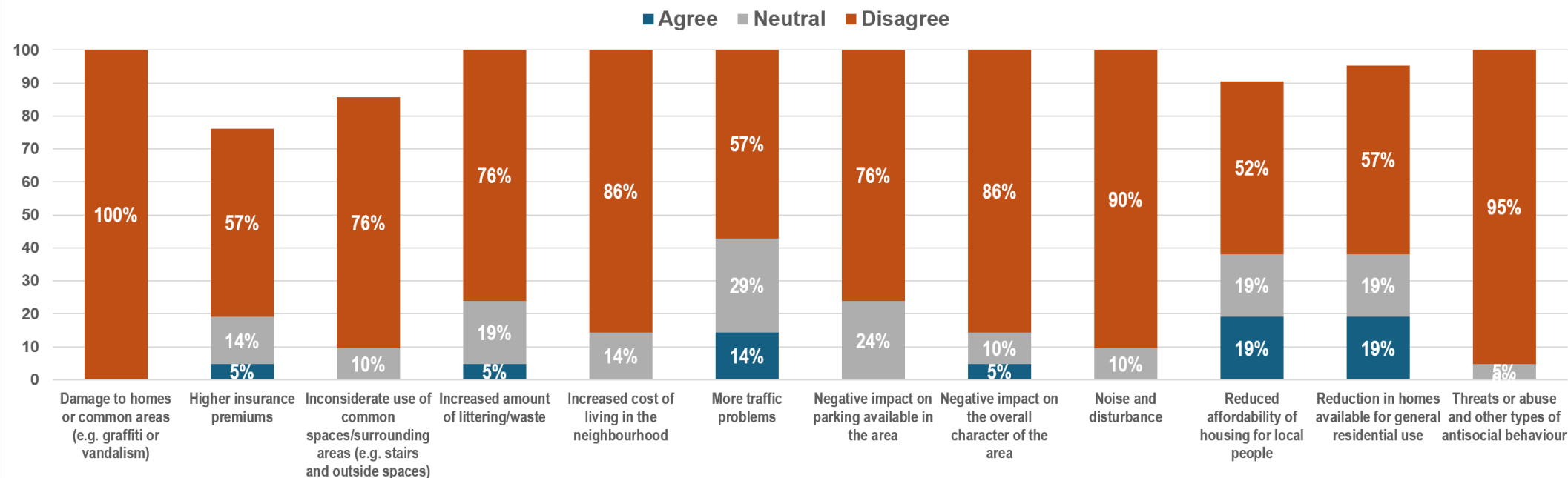


Among residents and businesses in Rural Inverness-shire, there were greater levels of agreement with the suggested negative impacts of Short Term Lets. The highest levels of overall agreements were for “Reduced affordability of housing for local people” and “Reduction in homes available for general use,” “Increased cost of living in the neighbourhood,” “Increased cost of living,” “More traffic problems,” “Negative impact on parking” and “Negative impact on the overall character of the area.”

Question 22. To what extent do you agree or disagree that the following are negative impacts of having short term lets in your neighbourhood?

Responses for Rural Inverness-shire STL Operators and Prospective Operators (n=21)

The balance of 100% is “Don’t know” in each case.



Among operators, a more consistent and homogenous disagreement with the suggested negative impacts of STLs is apparent, with several options receiving no agreement at all among this cohort, albeit there is some agreement among STL operators and prospective operators regarding the negative impacts of STLs on “More traffic problems,” “Reduced affordability of housing for local people,” and “Reduction in homes available for general residential use.”

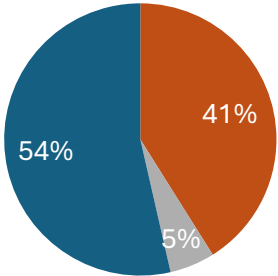
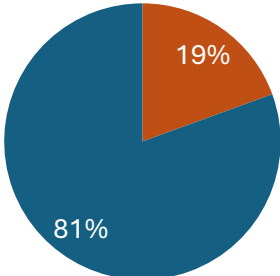
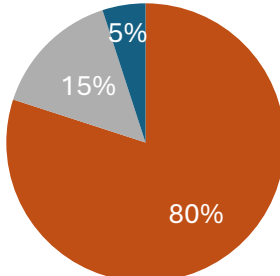
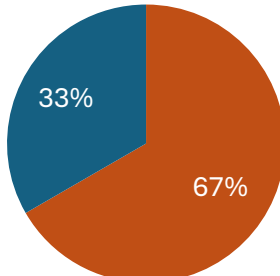
Question 23. Are there any other negative impacts of having short term lets in your neighbourhood? (optional question)

Respondent Reference	Points raised and responses
HR-573-1, HR-534-1, HR-455-1, HR-426-1, HR-416-1, HR-400-1, HR-399-1, HR-371-1, HR-322-1	Loss of community cohesion, neighbourliness, community spirit and sense of belonging
HR-416-1, HR-400-1	Increasing community transience due to constant turnover of visitors
HR-554-1	Rural depopulation, decline of resident base especially young people and families
HR-573-1	Impact on viability of local public services, including GP services, post offices, transport and community facilities
HR-602-1, HR-573-1, HR-401-1, HR-372-1, HR-371-1	Local businesses increasingly targeted to visitor needs (e.g. souvenirs) rather than resident needs
HR-436-1, HR-416-1	Difficult recruiting and retaining key workers due to difficulty securing housing for key workers
HR-502-1, HR-372-1, HR-315-1	Additional pressure on local infrastructure and services (including roads, healthcare) due to wider tourism, NC500 and campervans, not just short term lets
HR-321-1	Harm to nature, wildlife and conflict with crofting activities from tourism related activities
HR-436-1, HR-372-1	Economic leakage from non-local owners extracting profit from communities.
HR-543-1, HR-502-1, HR-341-1, HR-315-1, HR-234-1, HR-178-1, HR-166-1, HR-163-1, HR-157-1, HR-10-1	Dispute with negative impacts of short term lets
HR-559-1, HR-554-1, HR-33-1	Loss or lack of housing for local people, impacts staffing for local businesses and independence for young people
HR-552-1	The problem isn't short term lets, its total available properties: Highland needs to build more homes to address the shortage including affordable and social housing

HR-552-1, HR-436-1, HR-371-1, HR-341-1, HR-33-1	Investment property purchases for letting, often from higher income outsiders, driving up prices to be unaffordable for local permanent residents with lower incomes
HR-552-1, HR-21-1	Low long-term rental housing availability impacts reflect preference or incentive toward short term lets due to increased private sector tenancy requirements and higher potential revenue from short term lets.
Council Response: A range of additional suggested negative impacts are therefore noted.	

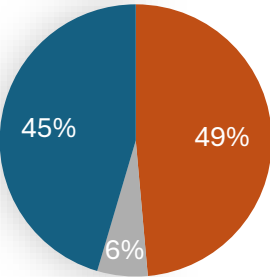
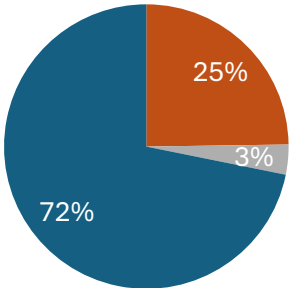
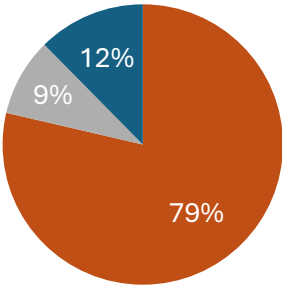
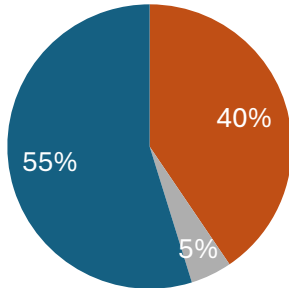
Question 24. Do you agree with the proposal to establish the Highland Rural Short Term Let Control Area? (optional question)

Breakdown for Rural Inverness-shire subsample, alongside non-resident STL Operators in the Area

	Residing in Rural Inverness-shire			Non-resident
Do you agree with the proposal to establish the Highland Rural Short Term Let Control Area?	All Respondents – Rural Inverness-shire	Residents and Businesses	STL Operators and Prospective Operators	STL Operators and prospective Operators
Yes	30	29	1	2
No	23	7	16	4
Undecided	3	-	3	-
(No answer)	1	-	1	-
TOTAL (that responded)	56	36	20	6
				
A narrow majority of respondents residing in Rural Inverness-shire agree with the proposal to establish the Highland Rural Short Term Let Control Area. There is stronger support for the proposal among residents and businesses, while the majority of operators and prospective operators residing in the area do not support the proposal. Other Non-resident STL Operators operating Short Term Lets in Rural Inverness-shire also do not support the proposal, albeit a small number evidently do.				

Question 24. Do you agree with the proposal to establish the Highland Rural Short Term Let Control Area? (optional question)

Breakdown for total sample, including non-resident STL Operators in the Area

Do you agree with the proposal to establish the Highland Rural Short Term Let Control Area?	All Respondents	All Residents and Businesses	STL Operators and Prospective Operators	All Respondents who reside in the Highland Council Area
Yes	273	232	29	257
No	292	80	184	190
Undecided	36	11	21	22
(No answer)	7	-	7	4
TOTAL (that responded)	601	323	234	473
				

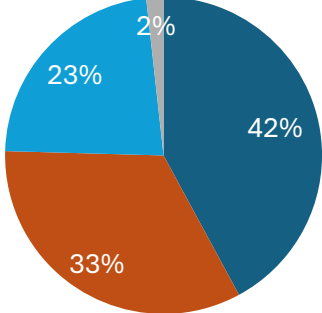
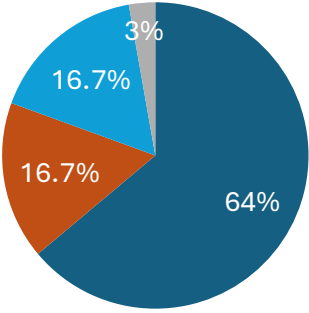
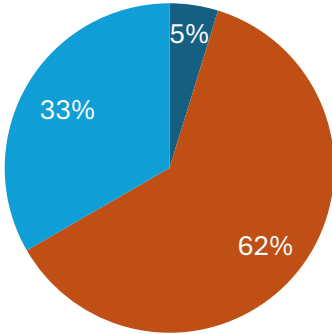
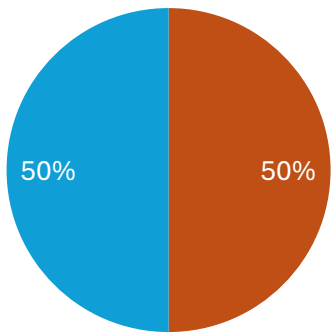
Question 25. Please explain your answer (optional question)

Respondent Reference	Points raised and responses
Explanations in support of proposed control area	
HR-594-1, HR-592-1, HR-589-1, HR-554-1, HR-428-1, HR-426-1, HR-419-1, HR-416-1, HR-415-1, HR-400-1, HR-372-1, HR-321-1, HR-29-1	Need/desire for control of and managing short term lets
HR-594-1, HR-553-1, HR-502-1, HR-455-1, HR-428-1, HR-416-1, HR-372-1, HR-322-1, HR-255-1, HR-240-1	Need for a balance with STL, between housing and tourism
HR-602-1, HR-592-1, HR-573-1, HR-426-1, HR-400-1, HR-371-1	View that the proposal is an obvious and necessary response
HR-608-1, HR-587-1, HR-586-1, HR-561-1, HR-557-1, HR-546-1, HR-520-1, HR-459-1, HR-457-1, HR-449-1, HR-420-1, HR-395-1, HR-386-1, HR-382-1, HR-377-1, HR-369-1, HR-353-1, HR-335-1, HR-276-1, HR-241-1, HR-194-1, HR-89-1, HR-87-1	Need to protect housing availability
HR-416-1	View that it could help cost/affordability of housing
HR-594-1, HR-455-1	Tourists should be staying in tourist accommodation/supporting serviced providers
HR-553-1, HR-436-1, HR-428-1, HR-416-1, HR-401-1, HR-399-1, HR-33-1	View that STLs harm community cohesion/sustainability
HR-602-1, HR-455-1, HR-416-1	View that lack of housing is harming recruitment and retention of key workers and essential services
HR-322-1	Negative impacts on roads and traffic need to be considered
HR-455-1, HR-428-1	Negative impacts on other infrastructure
HR-415-1, HR-372-1	Negative amenity/anti-social impacts
Explanations against proposed control area	

HR-559-1, HR-552-1, HR-543-1, HR-542-1, HR-519-1, HR-490-1, HR-458-1, HR-423-1, HR-315-1, HR-261-1, HR-178-1, HR-166-1, HR-157-1, HR-143-1, HR-21-1, HR-4-1	Concern about impact on the tourism industry
HR-542-1, HR-519-1, HR-294-1, HR-178-1, HR-21-1, HR-4-1	Loss of jobs from tourist sector will fuel depopulation
HR-559-1, HR-543-1, HR-519-1, HR-510-1, HR-349-1, HR-341-1, HR-315-1, HR-294-1, HR-283-1, HR-163-1, HR-148-1, HR-143-1, HR-10-1, HR-4-1	Over-regulation/bureaucracy
HR-349-1, HR-283-1, HR-10-1	Licensing process is sufficient
HR-534-1, HR-519-1, HR-315-1	Property rights/fairness
HR-510-1, HR-4-1	Second/empty homes are the main issue
HR-315-1	Campervans are the main issue, not STLs
HR-552-1, HR-519-1, HR-163-1, HR-143-1	There are other causes of pressure not STLs
HR-542-1, HR-452-1, HR-342-1, HR-157-1, HR-143-1, HR-33-1, HR-4-1	Proposed Control Area is too large and broad-brush.
HR-163-1, HR-4-1	No evidence that a Control Area will work or that it has worked in Badenoch and Strathspey.
HR-519-1, HR-313-1, HR-4-1	View that STL operators have invested heavily in their properties and maintain them to a higher standard than residential property owners.
HR-163-1, HR-4-1	No economic impact assessment.
HR-556-1, HR-448-1, HR-437-1, HR-344-1, HR-281-1, HR-199-1, HR-125-1, HR-97-1	Council should be building more homes, including affordable homes.

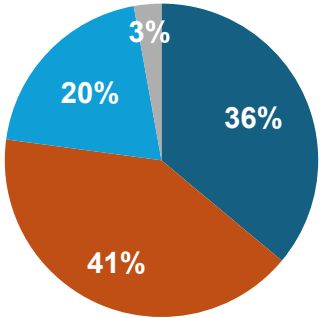
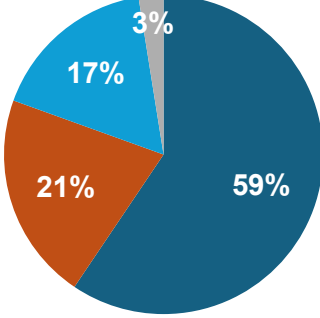
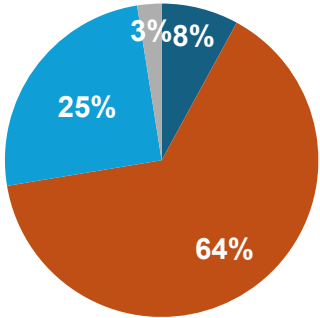
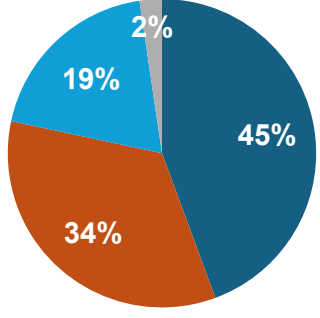
Question 26. Do you agree with the Statement of Reasons for the proposed Control Area? (optional question)

Breakdown for Rural Inverness-shire subsample, alongside non-resident STL Operators in the Area

	Residing in Rural Inverness-shire			Non-resident
Do you agree with the Statement of Reasons for the proposed Control Area?	All Respondents – Rural Inverness-shire	Residents and Businesses	STL Operators and Prospective Operators	STL Operators and prospective Operators
Yes	24	23	1	-
No	19	6	13	3
Somewhat	13	6	7	3
Don't know	1	1	-	-
(No Answer)	-	-	-	-
TOTAL (that responded)	57	36	21	6
				

Question 26. Do you agree with the Statement of Reasons for the proposed Control Area? (optional question)

Breakdown for total sample, including non-resident STL Operators in the Area

Do you agree with the Statement of Reasons for the proposed Control Area?	All Respondents	All Residents and Businesses	All STL Operators and Prospective Operators	All Respondents who reside in the Highland Council Area
Yes	216	189	19	209
No	246	67	154	160
Somewhat	120	54	60	91
Don't know	17	8	6	11
(No Answer)	9	5	2	8
TOTAL (that responded)	599	318	239	471
				

Question 27. Please tell us why? (optional question)

Respondent Reference	Points raised and responses
Additional negative views on the Statement of Reasons for the proposed control area	
HR-542-1, HR-341-1, HR-181-1, HR-101-1	Housing pressures should be addressed through targeted measures rather than broad restrictions
HR-602-1, HR-552-1, HR-550-1, HR-490-1, HR-349-1, HR-342-1, HR-283-1, HR-261-1, HR-143-1, HR-21-1, HR-4-1	No evidence that Control Areas increase affordable housing, reduce rents or solve housing crisis
HR-178-1	Tourism is vital (employment) to the Highland economy and Control Areas could affect that
HR-519-1	Criticism of the Consultation and/or the evidence presented. Evidence doesn't talk about wider housing market pressures
HR-371-1	Criticism of the Consultation and/or the evidence presented. Evidence doesn't mention the detrimental impacts to other tourism businesses such as hotels
HR-255-1	Policy does not distinguish between locals with family connections to the area and non-residents
HR-534-1, HR-234-1, HR-10-1	Regulation not Required
HR-451-1, HR-157-1	Proposal area too wide (disagree)
HR-559-1, HR-543-1, HR-458-1, HR-452-1, HR-423-1, HR-315-1, HR-294-1, HR-166-1, HR-148-1	Other negative impacts, including no further details or referencing other responses
Additional positive views on the Statement of Reasons for the proposed control area	
HR-436-1, HR-400-1, HR-387-1, HR-322-1, HR-29-1	General support for the policy and controls
HR-502-1	Addresses housing affordability & availability
HR-510-1	Support but controls should be applied to other areas/whole of Highland

Question 28. Supporting Documents (optional question)

Summary of Respondent issues raised	Officer Response
Rural Inverness-shire	
No responses received on Q28	
Highland Rural	
HR-284-1 Scottish Tourism Alliance The STA recognises the significant housing pressures facing many communities across Highland and supports the need for balanced, evidence-led and sustainable policymaking. Concerns regarding the proposed expansion of Short Term Let Control Areas in the absence of robust evidence demonstrating that the existing Badenoch and Strathspey Control Area has materially achieved its intended policy outcomes. Key points: • Tourism and hospitality are fundamental to Scotland's economy, employment and communities, and self-catering accommodation are a critical component of this industry. Many parts of Highland rely heavily upon flexible visitor	Noted. Council recognises that housing challenges in the Highland, including in rural and fragile communities are complex. The Statement of Reasons does not seek to or make a causal link between short term lets and all housing challenges: the evidence is presented in support of the proposal to designate a STLCA. Council recognises and is using a range of policy mechanisms for managing housing pressures in Highland. See full response to ASSC views below (HR-260-1) for response to this matter. Noted. Council has also received responses from hoteliers and serviced accommodation providers expressing the opposite view and support the proposal to help maintain a balanced accommodation market and reduces the risk of visitor demand

accommodation infrastructure in areas where traditional hotel provision is limited or economically unviable. • Concern that the current consultation narrative frames tourism and housing as competing interests, which is an oversimplification and seems to causally link short term lets to wider issues such as depopulation, school and community decline, without sufficient evidence. • View that the STL statistics are not appropriately distinguishing between different accommodation types: hospitality-led self-catering accommodation; home sharing; ancillary accommodation; glamping and unconventional accommodation; and conventional residential properties capable of contributing to mainstream housing supply.	being diverted away from traditional hotels to an expanding short-term let sector. It is acknowledged that tourism and housing are both important to Highland's economy and communities. The Control Area is intended to manage changes of use specifically from housing to secondary letting short term lets and the Council's justification therefore must focus on evidence specific to these forms of short term let. The Council does not claim that all short term lets are a previous form of housing supply. The Council's analysis of STLs as a share of total dwellings contained within the Statement of Reasons and provided to Councillors prior to the commencement of the consultation, excluded unconventional accommodation STL properties as denoted within the STL public register. These estimates at data zone level therefore do not include unconventional properties which are highly unlikely to have been part of the former housing supply. Consultation information outlined that a STLCA only changes the planning requirements for Short Term Lets converted from dwellinghouses and flats. An STLCA will not change the current planning requirements for bed and breakfasts, renting out individual rooms/annexes if the owner/occupier resides in the dwellinghouse, second homes where no secondary letting is done, conversions of garden buildings, or accommodation built specifically for holiday purposes, such as pods, annexes and holiday chalets. The consultation survey sought responses from a range of short term let operators, which have different use classes, and many of which already require planning permission. Respondent operators were notified within the survey whether or not the
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• The current proposal risks undermining the objectives of Scotland Outlook 2030 and the STA's 2026 election priorities. This includes calls to nurture tourism and hospitality sector, avoid unnecessary regulatory burdens, strengthen investment confidence, support sustainable tourism and position tourism sector for major future growth. • Concern about the cumulative interaction between Short Term Let Control Areas, licensing requirements and Mandatory Condition 13 and evolving planning interpretation, and implications for long-standing operators. Concern about legal certainty, investment confidence, procedural fairness and retrospective regulatory burden. Existing lawful operators require clarity, consistency and proportionate treatment. Notes these concerns raised by Association of Scotland's Self-Caterers.	proposed Control Area would relate to the type of short-term let they operate. For inclusion of terms such as hospitality-led self-catering accommodation, see full response to ASSC views below (HR-260-1) for response to this matter of definitional clarity. The proposed Control Area is not intended to restrict tourism accommodation or place unnecessary burdens on existing operators. Rather, it introduces a planning framework for changes of use from residential housing to secondary letting short-term lets, enabling the impacts on local housing and communities to be considered where appropriate. The Council considers that supporting a sustainable visitor economy and addressing housing pressures are complementary objectives, and that providing greater oversight of such changes can contribute to the long-term sustainability of both. See full response to ASSC views below (HR-260-1) for response to this same matter. See full response to ASSC views below (HR-260-1) for response to this same matter. Consideration of a formal Use Class Order is
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• Calls for clear protection and certainty for existing lawful operators, particularly those operating prior to the introduction of the 2022 STL licensing framework. • Support consideration of a formal Use Class Order for short term lets. • Call for a pause on STLCA expansion until existing control areas have been properly evaluated and evidence collected, including economic and regulatory impact assessment. Need to ensure future interventions are developed in collaboration with the tourism sector to develop long-term sustainable solutions.	noted but is out of scope for this local consultation and is in the remit of Scottish Government. See full response to ASSC views below (HR-260-1) for response to this same matter. Council has collated a wide range of evidence on this issue presented within the Statement of Reasons, in tandem with the ongoing Housing Need and Demand Assessment. An economic impact assessment is not a statutory requirement for proposing to designate a STLCA, nor is there any requirement to delay designations in pursuit of evaluation of any existing control areas. On concerns about retrospectivity, the Control Area only changes the planning requirements for short term lets converted from residential properties and only applies to changes of use that occur <i>after</i> the designation comes into effect. If an existing short term let already required planning permission in any event because it was a material change of use, this position is unaltered by the designation of the Control Area. Operators who are uncertain can contact the planning service by submitting a free short term let development enquiry, where they will receive a view from the planning service as to whether their short term let is a material change of use. They will be advised whether they ought to apply for planning permission or a Certificate of Lawful Use.
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HR-260-1 Association of Scotland’s Self-Caterers The Association of Scotland’s Self-Caterers does not agree with the proposal to designate a Highland Rural and Inverness City Short Term Let Control Areas (STLCAs). Considers that the proposals are not supported by sufficient evidence and could have significant economic, legal and practical consequences for the tourism sector. The association, which represents over 1,700 self-catering operators in Scotland, accepts that housing pressures exist but that any intervention must be evidence-led, proportionate and legally robust. Key points raised: • Need for definitional clarity and distinguishing between different forms of short term let and visitor accommodation, and how they contribute to residential housing loss. View that the “short-term let” term encompasses a wide range of operating types and models, by contrast “self-catering accommodation” is hospitality-led and is a long-standing recognised tourism infrastructure. Concern about a single narrative which collapses distinct short term let categories into one and centres the discourse around housing loss. • Failure to distinguish between different types of accommodation in the consultation documents, which consider overall STL concentrations and adjusted STL prevalence whereas the proposal relates specifically to loss of formal residential dwellings to short-term letting. Relates to definitional clarity point, on the range of different types of short term lets and tourist accommodation.	Noted. It is unclear how many self-caters in the proposed Highland Rural Short Term Let Control Area the Association represents. The terminology in question is not optional or interpretive but is established in legislation. Under Scotland’s short-term let licensing framework, a "short-term let" and its sub-category, a "secondary let", are legally defined classifications that underpin regulation, licensing and enforcement. Self-catering accommodation does not exist outside this regulatory framework. Many self-catering properties fall within these definitions, particularly where they are let on a secondary basis, and their classification is determined by how they are used rather than how they are marketed or the perceived character of their business model. As such, planning and housing policy must focus on the land-use and housing impacts of secondary letting rather than branding or sectoral identity. The fact that such accommodation may be hospitality-led does not negate its classification under the law, nor its potential interaction with housing supply. Introducing alternative terminology would risk confusion and undermine the consistent application of the statutory framework.
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- Concern about the evidential basis for the proposed expansion of Control Area, that Highland Council is proposing a new designation without robust evidence that the existing STLCA in Badenoch and Strathspey has materially achieved its intended policy objectives (with reference to the Post 2 Year Review of the Ward 20 Badenoch and Strathspey Short Term Let Control Area). Council has not demonstrated increased affordable housing supply, reduced rents, improved affordability, reduced depopulation or measurable housing market stabilisation. - Wider concerns regarding the evidence base for the proposed Control Area.	The proposed Highland Rural STL Control Area is not intended to replicate any real or perceived success of the Badenoch and Strathspey Control Area. While the Council's Post 2-year review of the Badenoch and Strathspey Control Area indicates that changes of use to short-term lets are now being managed, the current proposal is based on its own evidence of housing pressures and short-term let prevalence. Even where the Badenoch and Strathspey Control Area found to have coincided with suggested indicators such as subsequent declining house prices and rental prices, those trends alone would not justify the current proposal which to be consistent with planning practice, must be grounded in its own evidence base demonstrating an issue and that the Council through designating a Control Area proposes to take a proportionate response to that issue. There is no legislative or policy requirement to delay consideration of further control areas until the long-term effects of existing designations are known. Local authorities are required to assess the need for control areas based on the evidence available at the time, and requiring definitive proof of impacts on housing affordability, population retention or community sustainability (which may take many years to emerge) would create an unreasonable barrier to timely and proportionate intervention where current evidence demonstrates a need for action. It is important to recognise that there is no prescribed methodology in legislation, or the Planning circular 1/2023: short-term lets and planning requiring a particular form or level of technical analysis for control area designation. The relevant test is whether sufficient and appropriate information has been gathered to inform a reasoned planning judgment. The research undertaken was proportionate to the purpose of informing a planning designation under section 26B of the Town and Country
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• Consultation should contextualise short term lets within wider housing landscape, including empty homes and second homes. View that in recognition of housing pressures any material efforts to increase housing supply should address long-term empty homes, infrastructure constraints, stalled developments and wider housing delivery barriers. • The economic contribution of the self-catering sector should be taken into account with more weight. Sustainable	Planning (Scotland) Act 1997 and drew on a range of relevant and available data sources. Importantly, this evidence also forms part of the Council's Housing Need and Demand Assessment (HNDA), which is a well-established evidential framework used to inform housing policy and decision-making. The HNDA is subject to established methodologies and scrutiny and provides a credible, consistent basis for understanding housing pressures across Highland. The Council is satisfied that the evidence available, including that derived from the HNDA, provides a reasonable basis for consultation on the proposed control areas. The suggestion that it is inappropriate to rely on this evidence is therefore not accepted. The Council recognises short term lets are not the sole cause of housing pressures in Highland, but they are one of several contributing factors leading to the loss of residential homes in some areas. Second Homes and Long-Term Empty homes are Council Tax categories, whereas there is no Short Term Let Council Tax category. Second Homes and STLs are not therefore exclusive, as some secondary letting STLs are also Second Homes. The Council is currently using other policy mechanisms to address these which includes second home Council Tax premiums and a grant and loan scheme to encourage owners of empty properties to bring them back onto the local housing market. There are no planning mechanisms applicable to manage Second Homes or Long-Term Empty properties. In many rural wards in Highland, the potential dwellings converted to Short Term Lets and therefore removed from the housing supply, is greater than those recorded as Long Term Empty properties and/or Second Homes.
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communities require both housing and viable local economies. The self-catering sector supports jobs, employment and community sustainability. Highland Council has not produced a meaningful economic impact assessment for this proposal, quantifying impacts of an STLCA on visitor capacity, business viability, tourism displacement, investment attractiveness or supply chain. • Concern about the cumulative interaction between planning and licensing requirements, and the confusion, uncertainty and procedural burden they create for operators. • Reference to <i>Muirhead</i> decision, and that Scottish Parliament did not intend that section 26B should have retrospective effect. Seeks further clarification on how materiality assessments are undertaken, evidential thresholds, procedural burdens for operators and extent to which	The Council is not required to undertake a separate economic impact assessment before designating a Short Term Let Control Area (or other planning designations such as Conservation Areas, Article 4 Directions, housing land designations, Special Landscape Areas, etc.). The statutory process requires the preparation of a statement of reasons, consultation, and consideration of the available evidence and representations received. A control area designation does not introduce policy restrictions in itself, prohibit short term lets, or predetermine planning decisions; it simply requires planning permission for relevant changes of use so that individual and cumulative impacts can be assessed through the planning system. As such, it would not be possible to meaningfully assess the economic effects of a control area designation in isolation from the planning policy framework and future planning decisions that would apply within it. The potential economic implications of specific proposals are therefore considered at the planning application stage rather than through the designation itself. In addition, the wider regulatory and business impacts of the Short Term Let Control Area Regulations were already assessed by the Scottish Government through its Business and Regulatory Impact Assessment (BRIA) when introducing the national legislative framework. It is therefore not necessary for individual planning authorities to repeat that exercise when considering whether local circumstances justify designation of a control area. Noted. The insertion of Section 26B into the Planning Act does not retrospectively alter the planning requirements that applied to a property. Where clarity and certainty regarding planning status are required, that status must be demonstrated through evidence rather than presumed. This principle is not unique to Short Term Lets; it is a fundamental aspect of planning law that applies
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operators are expected to obtain CLEUD to avoid licensing difficulty. • Concern about different operational approach to planning scrutiny within and outwith Control Areas, and the implications for fairness, legal certainty, legitimate expectation, proportionality and consistency of treatment. • Concern regarding compatibility with established broader principles of administrative fairness and proportionality, Article 1 Protocol 1 (A1P1) rights, and the Provision of Services Regulations 2009.	across all forms of development and land use. The Council must apply the law as it stands and cannot depart from the established legal framework or create an alternative process. It is not within the Council's gift to disregard statutory requirements or adopt a different approach from that prescribed by legislation. The Council does not consider that the different planning consequences that apply within and outwith a Control Area raise concerns regarding fairness, legal certainty or consistency of treatment. The distinction is a deliberate feature of the statutory framework, introduced to enable planning authorities to respond to evidenced local circumstances where concentrations of short-term lets create particular planning issues. Consistency of treatment is achieved through the application of the same statutory framework to all properties within a designated Control Area and the same planning principles to developments elsewhere. The fact that different regulatory consequences apply in different locations reflects the established operation of the planning system, which regularly applies different policy approaches to different areas in order to address distinct local planning circumstances and considerations. Consequently, the planning authority considers that the Control Area framework strikes an appropriate balance between regulatory certainty, local flexibility and the legitimate public interest objectives it was designed to address. This matter has already been raised directly by the ASSC to Scottish Government and a response was provided by the then Cabinet Secretary for Housing Màiri McAllan MSP in February 2026. The suggestion that planning controls relating to short term lets are incompatible with Convention rights is not supported by the Scottish Government's own assessment of the legislation. In
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• The ASSC’s position remains that: ○ existing operators who commenced trading lawfully prior to the introduction of the 2022 licensing frameworks should be expressly protected through appropriate grandfathering provisions;	its 2025 review of the Data Protection Impact Assessment for the short-term let licensing and control area framework, the Scottish Government concluded that any such impact would arise only where it was the policy intention of the local authority and only where the restriction was necessary to protect the rights and freedoms of others or the wider economic well-being of the local community. While Article 1 of Protocol 1 protects peaceful enjoyment of possessions, Cabinet Secretary Màiri McAllan MSP accepted that the regulation of short term lets via planning and licensing regimes represents a control of the use of a host’s property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were “satisfied that the creation of powers for a local authority to designate a short-term let control area is a proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity.” The Council concurs that requiring planning consideration of short term lets therefore represents a proportionate exercise of planning control rather than an unlawful interference with property rights. Similarly, the Provision of Services Regulations 2009 do not preclude planning controls which pursue legitimate public policy objectives and are applied in a non-discriminatory and proportionate manner. Planning regulation of land use is a recognised and established function of the planning system and does not prevent the operation of short term let businesses where planning considerations support such use. Such a framework would be a matter for the Scottish Government to introduce. Requiring operators to demonstrate compliance with planning legislation does not constitute a disproportionate
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○ operators who have subsequently complied with the statutory licensing regime should not face disproportionate retrospective procedural or regulatory burden arising from evolving interpretation of planning policy and practice; ○ and that long-term clarity should instead be pursued through development of a formal Use Class Order capable of delivering national consistency, legal certainty and a more proportionate planning framework. • Specific comments on the Highland Rural STLCA, ASSC is concerned that broad geographic designation risks overreach; localised evidence is being extrapolated too widely; and substantial differences between communities are insufficiently recognised. • Evidence also does not demonstrate direct causation of STL prevalence on housing pressures, school closures, Gaelic decline, depopulation and fragile community sustainability. Scottish Government research recognises that these challenges are long-term, structurally complex and driven by	retrospective burden. Operators remain able to rely upon existing lawful use rights where these can be evidenced. Many operators already hold confirmation of their planning status as they operate a form of short term let which would have required planning permission in any event. The creation of a new use class or amendment of the planning use classes framework is a matter for the Scottish Government through legislation. In the meantime, the Council is required to apply the planning system as it currently exists and does not have the power to establish an alternative regulatory framework at a local level. Timely intervention to address an existing issue should not be deferred in anticipation of a hypothetical alternative framework that may or may not be introduced. Despite covering a large geographic area, short term let prevalence has been analysed at data zone level, the smallest geographic area for which official statistics on households and dwellings are routinely published. This approach enables a highly localised assessment of the distribution and concentration of short term lets, rather than relying on broad Highland-wide averages. The designation therefore reflects the aggregation of multiple localised areas where the evidence supports intervention, rather than the application of a blanket approach across a heterogeneous rural area. Council does not claim that STLs are a sole contributor to these aspects but considers that housing supply must be safeguarded to prevent further constriction of housing supply in areas with no market housebuilder presence to increase supply at scale, which
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multiple inter-connected factors, and that sustainable local economies are important to support fragile and remote communities. Concern that the consultation risks attributing exceptionally complex demographic and cultural trends to STL prevalence without sufficiently robust longitudinal or causal evidence. ASSC calls for a pause on further STLCA expansion pending a full review of existing control areas, comprehensive economic and regulatory impact assessment, establishment of transparent and measurable success criteria. Express statutory protection for existing lawful operators is sought. Existing lawful self-catering businesses should not become a proxy target for broader structural housing failures absent robust evidence. ASSC would like Highland Council to work collaboratively with the sector towards development of a formal Short Term Let Use Class Order capable of delivering long-term legal certainty, national consistency and a more proportionate planning framework.	adds to housing market pressure that exacerbates housing availability and affordability in the proposed Control Area. No contrary evidence has been presented demonstrating that the growth in STLs as a share of total dwellings within the proposed Control Area has supported population growth, supported the Gaelic language, or stabilised/reversed declining school rolls. Points previously addressed in above responses. Points previously addressed in above responses.
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Summary of Responses from Community Councils, Groups or Organisations

Respondent issues raised	Officer Response
No Rural Inverness-shire responses from Community Councils, Groups or Organisations	
Highland Rural Organisations	
HR-284-1 Scottish Tourism Alliance See summary above, for Question 28.	See response above, for Question 28.
HR-260-1 Association of Scotland's Self-Caterers See summary above, for Question 28.	See response above, for Question 28.
HR-604-1 Scottish Land and Estates Scottish Land and Estates are undecided on the proposal to establish the Highland Rural short term let control area. The existing 'one size fits all' modelling of the STLCA proposals across the Highland region does not appear to have been adequately considered as part of these existing proposals. It does not represent the diversity and property availability within town, village or remote communities, and how existing infrastructure would be impacted by any changes in the number of short term lets. Evidence from Badenoch and Strathspey, an area with distinctly different characteristics and more concentrated pressures, cannot necessarily be applied across a much more diverse rural geography.	Noted. Despite covering a large geographic area, short term let prevalence has been analysed at data zone level, the smallest geographic area for which official statistics on households and dwellings are routinely published. This approach enables a highly localised assessment of the distribution and concentration of short term lets, rather than relying on broad Highland-wide averages. The designation therefore reflects the aggregation of multiple localised areas where the evidence supports intervention, rather than the application of a blanket approach across a heterogeneous rural area. Evidence of the concentration of short term lets from Badenoch and Strathspey has not been

Designation of an STLCA would potentially remove case-by-case assessments, automatically requiring planning permission for secondary letting. While the Council argues this will help balance tourism growth with housing need by managing concentrations of short-term lets, it is vitally important to recognise that housing pressures are not uniform across Highland. Achieving the right balance between supporting housing supply and maintaining economic viability is critical. Since that STLCA was introduced in Badenoch & Strathspey, there have been 330 short-term let planning applications, with only 13% of those being refused. Furthermore, a recent review by Highland Council concluded that the outcome of the STLCA in that area is that the number of short term lets is declining or remaining constant across the area. Of concern is if these properties are being sold to local families or as second homes. The Badenoch and Strathspey STLCA, where a high number of applications resulted in relatively few refusals, suggests that the system can introduce significant cost, delay and administrative burden without materially changing outcomes in most cases. Applied more widely, this approach risks extending bureaucracy into areas where there is little evidence of harm, potentially undermining tourism-dependent economies that are vital to community sustainability. Achieving the right balance between supporting housing supply and maintaining economic viability is critical and needs to be individually considered across each area of the Highlands. One size modelling should not be used throughout this process. While the aim of protecting existing housing stock is understood, a blanket [control area] risks unintended consequences in rural areas; for example, in some locations the flexibility to use properties for self-catering can help bring empty or underused buildings back into use, and additional planning barriers may discourage such investment. We appreciate, and support, the aim of preventing existing housing stock from being lost to short term lets. However, the proposed approach risks having the opposite effect in some rural areas by potentially making it more challenging to bring empty or unused buildings back into	used to inform the proposed Highland Rural STLCA designation. Noted. Noted. Points previously addressed in above responses.
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productive use. It also sits in conflict with the policy objectives of the empty homes premium, which is intended to incentivise owners to bring properties back into productive use. By increasing the regulatory risk attached to viable end uses such as self-catering, the proposal may deliver negative outcomes to that objective.	Noted. The current non-statutory Short Term Let Control Area policy affords support in instances where the change of use sought involves a previously long-term empty property being brought into productive use. While the Council does not want to conflate the designation with the policy tests within it, this instance of empty homes is noted and a matter the Council has previously accounted for when determining the policy framework that applies within its existing Control Area.
HR-546-1 Scottish Crofting Federation The Scottish Crofting Federation supports the designation of a Highland Rural Short Term Let Control Area. However, the Federation believes more is needed to prevent croft houses from becoming holiday lets and croft land being misused to extract value by actors with no real understanding of or interest in crofting. Crofters are required, by law, to be ordinarily resident on or within 32 kilometres of their croft but this is rarely enforced. Many crofts' houses across the Highlands have been turned into short term lets, and crofts are misused as development sites for second homes, with the supposed crofters in breach of their legal residency and cultivation duties. The proliferation of short term lets, and second homes has dramatically changed the Highlands and Islands: • School roll numbers continue to drop, communal life in townships is declining. • Property prices continue to surge, putting housing stock out of reach for young local people and into the hands of those able to capitalise on the short term let market. • Tourism is an important source of income for many crofters, and crofters in tourist destinations traditionally have run bed and breakfasts. Nowadays, some crofters opt	Noted. Noted. Noted.

to diversify by erecting glamping pods or shepherds' huts, and some may even choose to let their house during the tourist season whilst living on the croft in a static caravan or in another accommodation nearby. Views differ among crofters on what level of short-term letting activity on crofts, by crofters themselves, is desirable. Crofters compliant with their crofting duties of residency and cultivation are part of the permanent resident community, they work their crofts and value generated from short term lets is kept local. The introduction of short term let control areas is a step in the right direction, but in and of itself insufficient to prevent crofts from being misused as short term lets whilst the legal occupiers remain absent. There are a number of factors at play, namely the lack of enforcement of crofting duties and the lack of effective procedures ensuring proper communication between different public bodies, namely the Crofting Commission and local planning authorities. The Crofting Commission is a statutory consultee for planning applications on croft land. However, the Commission is only consulted if applicants explicitly state that the development is on croft land or if this fact is, coincidentally, known by the Council. The Commission currently refrains from commenting on individual planning applications apart from a standard letter. Moreover, even if it would pursue a more proactive approach, the Commission is not a statutory consultee for developments of decrofted house sites. We strongly urge Highland Council and the Crofting Commission to establish a joint, coordinated procedure that prevents any application for change of use – or any planning application at all, for that matter – being approved where crofters are in breach of their duties. Generally, there should be a strong presumption for rejecting any change of use applications for any houses within crofting townships, regardless of decrofting, unless it can be established that this is for the good of the local crofting community – for example by allowing a resident crofter to generate additional income by converting part of their house into short term let accommodation, enabling them to stay and to keep on crofting. The slow enforcement of crofting duties combined with a planning regime that does not, by default, take into account applicants' compliance with crofting law, has led to a situation where croft houses continue to be surrendered to a speculative market, whilst crofting continues its decline, as the people willing to work and cultivate crofts cannot find an affordable place	Noted. Noted. Noted. While this consultation does not wish to conflate the principle of the designation with the policy tests within it, we shall take account of this when considering the policy framework within a Control Area, should this be progressed by the Council.
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nearby to live. Combined, duties enforcement and planning process – including the proposed procedures for approving short term lets – can be a powerful tool to tackle the interconnected problems of rural housing crisis, land abandonment and rural depopulation.	
HR-184-1 Nairn BID Do not agree with the proposal to establish the Highland Rural STLCA. Nairn BID don't think the causal link between having a control area and increasing the availability of housing has been made. I think operators of short term lets need protection for their valuable businesses and the part they play in the prosperity of the Highlands. Investing in a property to let out may be providing a local family with the income to send their children to a local school. We need to have a range of holiday accommodation to maintain our tourism industry. The Highland Council should be working with everyone they can in order to enable the conversion and sale of empty homes and the development of social housing for local people.	Noted. The Council does not consider that increasing social or affordable housing supply and managing the loss of existing housing stock are mutually exclusive approaches. While increasing the delivery of housing is important, this is not a simple or immediate solution in Highland, where housing delivery is constrained by factors including infrastructure capacity, development viability, land ownership, peat and ground conditions, workforce availability and limited market interest across large parts of the region. New housing can take many years to bring forward. Highland Council has recently established an Empty Homes Challenge Fund to support, encourage and target bringing empty homes back into use, enabled in part by Council Tax initiatives.

Nairn BID consider short term lets to be self-catering holiday accommodation which brings many families to the Highlands where they spend their money locally and bring an enormous boost to our economies. Short term lets also provide local employment which allows local people and families to live locally and raise children. Believe that there is a reasonable number of short term lets in the neighbourhood (Nairn) and that it has positive impacts. They give an enormous boost to our economies.	There are no planning mechanisms applicable to manage these kinds of property. In many rural wards in Highland, the potential dwellings converted to Short Term Lets and therefore removed from the housing supply, is greater than those recorded as Long Term Empty properties and/or Second Homes. Noted.
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