

Agenda Item	10
Report No	SCC/25/26

The Highland Council

Committee: Sutherland County

Date: 31 August 2026

Report Title: Short Term Let Control Area – 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 process for the establishment of a Highland Rural Short Term Let Control Area which was agreed to be undertaken by the Economy & Infrastructure Committee (E&I) at its meeting on 12 February 2026. It specifically provides details of responses from Sutherland residents, businesses and operators, alongside those living elsewhere but operating short term lets within Ward 1 and Ward 4.
- 1.2 The report also invites Members to determine, in light of the consultation responses, if they wish to progress the consideration of Sutherland within the Highland Rural Short Term Let Control Area. If so, any decisions to submit the proposal to designate the Short Term Let Control Area to Scottish Ministers for formal approval would be taken by the Economy & Infrastructure Committee.

2 Recommendations

- 2.1 Members are asked to:-
 - i. **Consider** the consultation feedback and the potential implications that a STL Control Area will have on communities within Sutherland as set out in **Appendix 2** and summarised in **Sections 8, 9 and 10**; and
 - ii. **Agree to recommend to** Economy and Infrastructure Committee that Sutherland 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 Highland Rural STL Control Area 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 this area within the Highland Rural STLCA 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 specific Gaelic-speaking communities.

4 Impacts

- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 **Integrated Impact Assessment - Summary**
- 4.3.1 An Integrated Impact Assessment screening has been undertaken on 5 August 2026. The conclusions have been subject to the relevant Manager Review and Approval.
- 4.3.2 The Screening process 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 – summarised as both the direct and indirect benefits of retaining homes within the local housing supply with the operator costs for preparing and submitting planning applications or certificates of lawfulness where required.
Human Rights	No – impact. The Council has considered the Scottish Government view on this matter in relation to Article 1 Protocol 1.
Children's Rights and Well-being	No impact
Island and Mainland Rural	Minor differences – The Control Area (if implemented) would take effect in a rural area. 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 proposed Highland Rural Short Term Let Control Area

- 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 this decision, information on the prevalence of short term lets in Sutherland, relative to Highland as a whole, was presented on [1 December 2025](#) and this committee agreed to progress with the process of considering the introduction of a STLCA within all or part of Sutherland by undertaking a statutory consultation.
- 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 Short Term Let Control Areas: [Inverness City](#), and [Highland Rural](#), which includes Sutherland.
- 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 short-term let control area (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 of the dwellinghouse. 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, Short Term Let. 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 Highland Rural STLCA Consultation Steps

- 6.1 The consultation for the Highland Rural Short Term Let Control Area 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 Control Area was circulated in the Press and Journal which appeared on the 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 submissions or representations on the survey within the [Highland Rural STLCA](#) consultation portal. All Community Councils within the proposed area were provided with notice of the proposal directly by email. As some Community Councils span ward and area committee boundaries, there are a number that are therefore partially within the proposed area. These community councils were notified in the same manner as those that were wholly within the proposed Control Area.
- 6.2 The map of the proposed Control Area and the [Statement of Reasons](#) were also available for inspection during normal opening hours within Service Points and Access Points within the proposed Control Area during the consultation period.
- 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 summary and outputs from the Q&A were disseminated afterwards to all the community councils within the Highland Rural area.
- 6.4 Informal in-person drop in events were held in the following locations:-
- 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)
 - 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 referred to on the Council webpages to provide current STL operators with a view as to whether their own STL at present would have likely required planning permission in any case (regardless of the Control Area) owing to it being operational development (physical building works) or a material change of use. This was and remains freely available for operators to consult with no application fee. In total, 89 STL Development Enquiries were received during the consultation period but this remains open on an ongoing basis for operators to continue to engage with the Planning Service and clarify the planning status of their STL use. The view received from the STL Development Enquiry can inform the operators next steps; either to apply for planning permission in the event that their STL already would require planning permission, or the option of applying for a certificate of lawfulness.

- 6.6 The Council's Corporate Communications team led 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 geography of the area, 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 portal including a map of the proposed STLCA and short term lets in Highland, Frequently Asked Questions, all recent Council and Area Committee reports on the STLCA, 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 Survey

- 7.1 During the six-weeks consultation period for the Highland Rural STLCA, a total of **608** responses were received, of which **409** were from individual respondents who reside within the proposed Highland Rural STLCA. The consultation survey gathered a range of descriptive characteristics of respondents, including residents, businesses, current or prospective short term let operators, their awareness and experience of short term lets, and their views on the proposed Control Area. It directly used several survey 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.
- 7.2 Adapting many of the same survey questions for a short term let control area consultation has several key benefits. Firstly, it ensures consistency in the responses collected, allowing comparison of views across different groups such as residents, businesses and operators. This makes it easier to identify clear patterns in perceived issues like housing pressure or community impacts. 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.
- 7.3 The survey also required existing or prospective short term let operators to provide more detail on the kinds of short term let(s) that they operate and/or intend to operate, recognising that as a diverse sector, there could reasonably be a range of views among operators.

8 Sutherland Respondents

- 8.1 The total number of responses to the Highland Rural STLCA consultation attributed to individual respondents residing in Sutherland is 80 as shown in **Table 1**. This 80 comprises those responding as residents, resident operators, other businesses and resident prospective operators. In addition, 1 community council based within the area also responded.

Table 1: Number of Resident Consultation Survey Respondents by Area

Respondent type	Sutherland	Highland Rural Total (Resident)
Total Residing in Area	80	409
Resident (Not a short term let operator)	53	270
Business (Not a short term let operator)	5	12
Short term let operator	21	121
Prospective short term let operator	1	6
Community Council, Group, Organisation	1	6
TOTAL Resident responses	81	415

- 8.2 In addition to resident responses, a further 20 respondents were non-resident in Sutherland but indicated that they were operators within the area, while a smaller number (2) of 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 area.

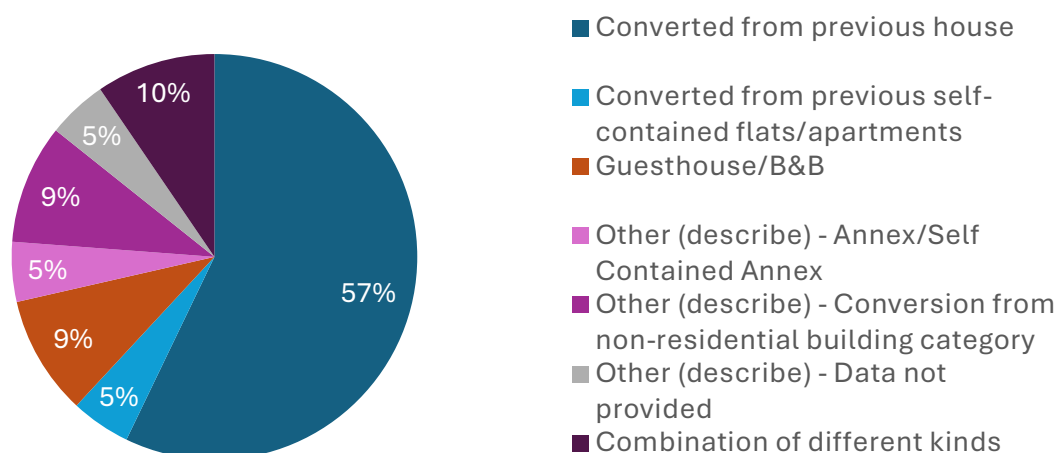
Table 2: Number of Non-Resident Consultation Survey Respondents by Area

Respondent type	Sutherland	Highland Rural Total
Total Non-Residing in Area	22	188
Short term let operator	20	103
Prospective short term let operator	2	11
Business (Not a short term let operator)	0	2
Other Highland resident (outwith proposed STLCA)	-	39
Other (Visitor, former resident, and other non-resident)	0	33
Community Council, Group, Organisation	-	5
TOTAL Non-Resident Responses	22	193

- 8.3 The existing operators who responded to the consultation survey operate a variety of different Short Term Lets. Within the survey, respondents were informed if the type of short term let they operate (or intend to) already requires planning permission and/or is out of scope of the proposed Control Area including purpose-built holiday homes, Guesthouse and B&B, Lodges and Chalets and, glamping pots and yurts. There are also two distinct cohorts of current STL operator respondents, with 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.

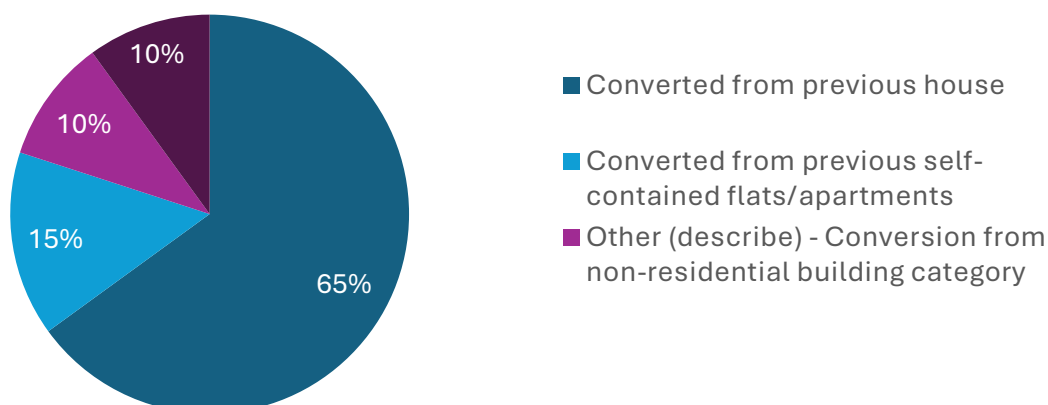
- 8.4 It is noted that there are differences in the profile of Short Term Lets currently operated by these cohorts, where current resident operator respondents operate a broader range of STLs, several of which are a form of Short Term let that likely requires planning permission in any event such as the siting of annexes, and glamping pods. The largest cohort operate a combination of different kinds. This is shown in **Figure 1a**.

Figure 1a: Resident Operator Respondents' Type of Short Term Lets - Sutherland (n=21)



- 8.5 Current non-resident operator respondents within Sutherland by contrast indicated that they operate a different profile of Short Term Lets as shown in **Figure 1b**, with 80% being conversions from previous houses, while a smaller minority operate lodges/chalets or a combination of different kinds.

Figure 1b: Non-Resident Operator Respondents' Type of Short Term Lets - Sutherland (n=20)



- 8.6 In Sutherland there was 1 response from Community Councils, groups and organisations specific to the area:-
- Lairg Community Council

8.7 Groups or 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
- 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 2**.

9 Summary of consultation responses

9.1 A full summary of responses to the Highland Rural STLCA consultation survey for Sutherland and all respondents to the Highland Rural Short Term Let Control Area consultation is presented in **Appendix 2**.

The key findings from respondents in the Sutherland Area are summarised as:-

- A slight majority (53%, 42 of 80 respondents residing in the Area) support the proposal to establish the Highland Rural Short Term Let Control Area, while 36 respondents (45%) oppose it (**Figure 2a**).
- Support is notably stronger among residents and businesses, with 38 of 58 respondents (65%) in favour (**Figure 2b**).
- In contrast, most short term let operators and prospective operators living in the area oppose the proposal, with 16 of 21 respondents (76%) indicating they do not support it (**Figure 2c**).
- Non-resident operators operating within Sutherland also oppose the proposal as shown in **Appendix 2**.
- Rates of support and opposition to the proposal are recognised as showing a largely inverse pattern driven by the respective respondent categories.
- Similarly, non-resident short term let operators operating within Sutherland are predominantly opposed to the proposal to establish the Highland Rural Short Term Let Control Area, with 15 of 21 respondents (71%) answering 'No'.
- Overall, the results indicate a clear divergence of opinion between local residents and businesses - who generally support the proposal – and, short term let operators (both resident and non-resident) - who are largely opposed.
- Lairg Community Council oppose the proposal to designate the Highland Rural Short Term Let Control Area.
- Sutherland responses show a similar level of support than responses from respondents living elsewhere within the proposed Highland Rural Short Term Let Control Area, or within the Highland Council in general.
- The divergence of opinion between local residents and businesses in contrast with short term let operators, extends beyond the stance on 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, signalling that different groups and stakeholders perceive the prevalence and the impacts of Short Term Lets very differently.

Figure 2a: All responses to 'Do you agree with the proposal to establish the Highland Rural STLCA?', residing in Sutherland (n=80)

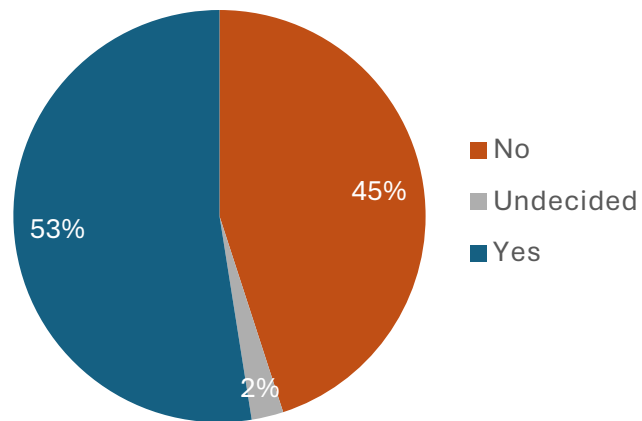


Figure 2b: Resident and business responses to 'Do you agree with the proposal to establish the Highland Rural STLCA?', residing in Sutherland (n=58)

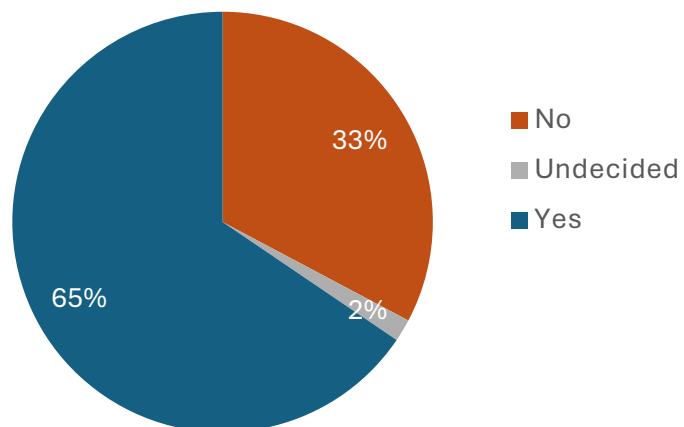
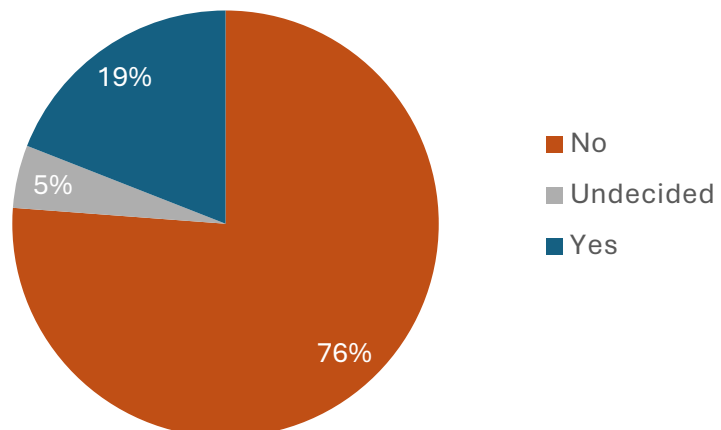


Figure 2c: Operator responses to 'Do you agree with the proposal to establish the Highland Rural STLCA?', residing in Sutherland (n=21)



9.2 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/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 other infrastructure
- Negative amenity/antisocial impacts

9.3 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
- 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 The consultation attracted responses from a range of stakeholders, including local residents, community organisations, businesses and short term let operators. It is notable that a large proportion of objections were submitted by respondents who were not resident within the proposed Control Area 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 the 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 consultation 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 and business needs.
- 10.2 While the majority of short term let operators oppose the proposal, representations from hotel owners and serviced accommodation providers demonstrate that there is not a consistent sector wide position 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 therefore highlighted 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 designation 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 a 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 bring them back into 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. 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 proposal overwhelmingly disputed the Council's evidence base, notwithstanding analysis demonstrating that a significant proportion of newly built homes and properties sold within the area have subsequently been converted to short-term lets.

- 10.7 The proposed Control Area sits between these positions. It neither prevents short-term letting nor leaves future changes of use entirely unmanaged. Similarly, it is focussed on changes of use that occur after the designation comes into effect and therefore does not alter the planning requirements of current operators within the area. Rather, it provides a mechanism through which future conversions can be assessed consistently on their individual merits through the planning system, allowing decision-makers to balance the benefits and impacts of proposals on a case by case basis. Given that it does not retrospectively alter planning requirements for existing operators, the Council does not agree that it 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. The proposal is concerned with future changes of use, not existing provision. The Council therefore considers claims that the designation would substantially damage tourism or lead to the loss of the sector to be unconvincing. The proposal does not prohibit short term lets; it simply ensures that future conversions of residential properties are subject to planning scrutiny. It is 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 indicated that 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. While increasing the delivery of affordable 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 levels of market interest across large parts of the region, including Sutherland. New housing can take many years to bring forward. Even with new housing provided, 8.7% of new houses built within Sutherland 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 addressing the area's identified housing needs on a long-term basis.
- 10.10 The proposed Control Area does not prevent short term let uses where they are appropriate; but instead ensures that the merits of proposals to convert homes intended to contribute to the area's housing supply are properly assessed against the adopted development plan, material considerations, the public interest and the circumstances of the locality before that housing resource is removed from residential use within the subsequent development management process. On balance, it is therefore proposed to progress Sutherland within the proposed Highland Rural Short Term Let Control Area and recommend to E&I to proceed.

11 Next Steps

- 11.1 As demonstrated in the **Section 9** and **Appendix 2**, the consultation responses demonstrated, on balance, support for the proposed Highland Rural STLCA among respondents residing within Sutherland. 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 Sutherland within the Highland Rural Short Term Let Control Area.
- 11.2 The purpose of the consultation 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, 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](#).
- 11.3 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 Control Area. Following all Area Committee decisions, Officers will prepare a report to Economy and Infrastructure Committee outlining the resultant proposed area to designate for the Highland Rural STLCA. The Economy and Infrastructure 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.
- 11.4 The proposed Short Term Let STL Control Area would enable Council planning 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.

- 11.5 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 the 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 the Control Area.
- 11.6 The designation of a Control Area 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 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:	10 Aug 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 Sutherland County Committee 1 December 2025 Short Term Let Control Area Report to EIC 12 February 2026 Highland Rural STLCA Statement of Reasons
Appendices:	Appendix 1 – Integrated Impact Assessment Appendix 2 – Summarised Consultation Responses

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 the Sutherland Committee Area (Ward 1 and Ward 4) 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.

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Service: Place

Responsible officer details

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Job title: Development Plans Manager

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Sign off date: 2026-07-20

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 through 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 2

This appendix presents a summary of responses to the Highland Rural 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 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 A2.1**. Using cohorts supports the presentation of this analysis by grouping respondents with similar characteristics.

Table A2.1: 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 Sutherland	Resides in the Highland Rural STLCA	Resides in the Highland Council Area	Resides Outwith Highland Council Area
Total Residing in Area	80	409	466	121
Resident (Not a short term let operator)	53	270	308	23
Business (Not a short term let operator)	5	12	13	1
Short term let operator	21	121	138	86
Prospective short term let operator	1	6	7	10
Community Council, Group, Organisation	1	6	7	4
Other: Visitor	-	-	-	10
TOTAL Responses	81	415	473	135
- Resident - Business - Short Term Let operator - Prospective Short Term Let operator - Community council, group or organisation - Other: Visitor				

The distribution of respondent categories is broadly similar among respondents residing in Sutherland, the wider proposed Highland Rural Short Term Let Control Area, and the wider Highland Council Area, albeit Sutherland has a slightly higher share of Businesses and a slightly smaller share of operators. The distribution of respondent categories for respondents outwith the Highland Council Area differs however, with a larger share comprising operators.

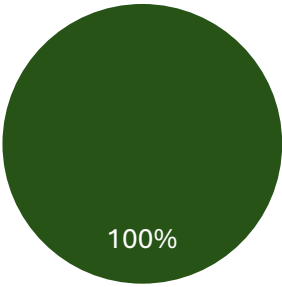
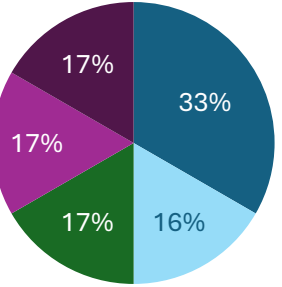
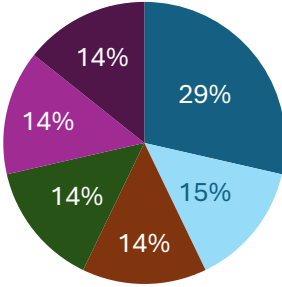
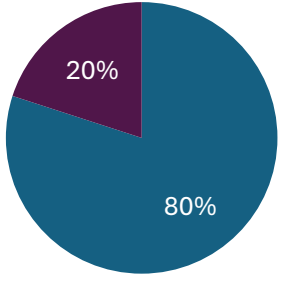
Question 5. What kind(s) of Short Term Lets do you currently operate? (Only asked to Short Term Let Operators)
Where relevant, 'Other' responses which relate to an already listed category have been added to that category for accuracy.

Short Term Let Type	Resident Operators Sutherland	Non-Resident Operators Sutherland	Resident Operators within the Highland Rural STLCA	Non-Resident Operators within the Highland Rural STLCA
Converted from previous house terraced, semi-detached detached	12	13	34	68
Converted from previous self- contained flats/apartments	1	3	5	6
Purpose-built holiday home	-	-	10	14
Guesthouse/B&B	2	-	10	1
Homesharing/room letting	-	-	4	1
Lodges/chalets	-	-	6	3
Glamping pods/yurts	-	-	5	-
Other - Conversion from non- residential building category	1	2	8	3
Other - Annex	2	-	7	-
Other - Data not provided	1	-	8	1
Combination of different kinds	2	2	22	5
TOTAL Operator Responses	21	20	119	102

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

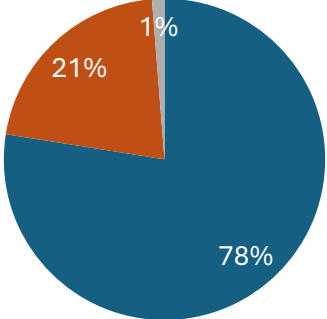
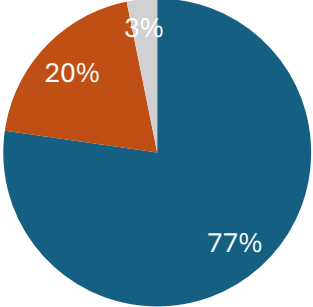
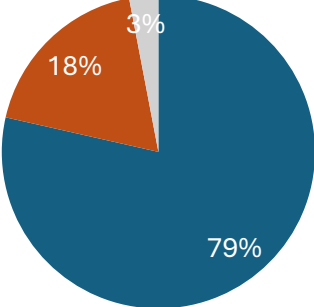
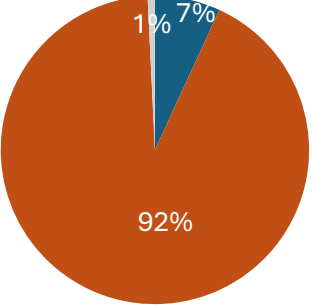
Where relevant, 'Other' responses which relate to an already listed category have been added to that category for accuracy.

*Note v.small sample

Short Term Let Type	Resident in Sutherland	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	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	1	6	7	10
				

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

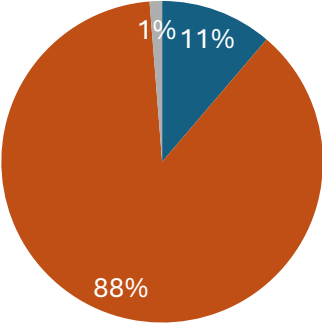
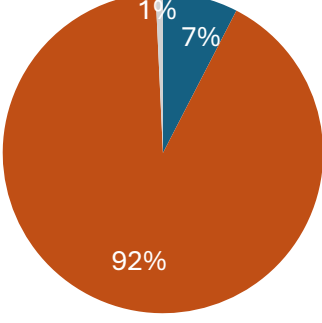
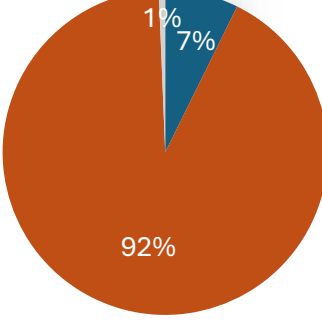
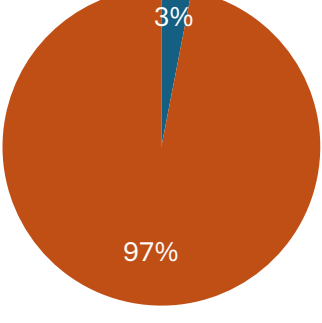
Breakdown of responses by area of residence

Do you Currently Work in Highland	Resident in Sutherland	Resident in Highland Rural STLCA	Resident in Highland Council Area	Non-resident in Highland Council
Yes	62	316	366	9
No	17	80	86	121
(No answer)	1	13	14	1
TOTAL	80	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

Are you on the Council’s Housing Register?	Resident in Sutherland	Resident in Highland Rural STLCA	Resident in Highland Council Area	Non-resident in Highland Council
Yes	9	31	34	9
No	70	375	429	121
(No answer)	1	3	3	1
TOTAL	80	409	466	131
Yes No (No answer)				

A slightly higher share (11%) of Sutherland respondents indicated that they were on the Highland Housing register as in 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 Sutherland	Resident in Highland Rural STLCA	Resident in Highland Council Area	Non-resident in Highland Council
No difficulty	50	251	284	101
Slight difficulty	4	23	28	1
Moderate difficulty	12	50	53	2
Severe difficulty	11	65	77	6
(No answer)	3	20	24	21
TOTAL	80	409	466	131
No difficulty Slight difficulty Moderate difficulty Severe difficulty (No answer)				

A similar share (34%) of Sutherland 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.

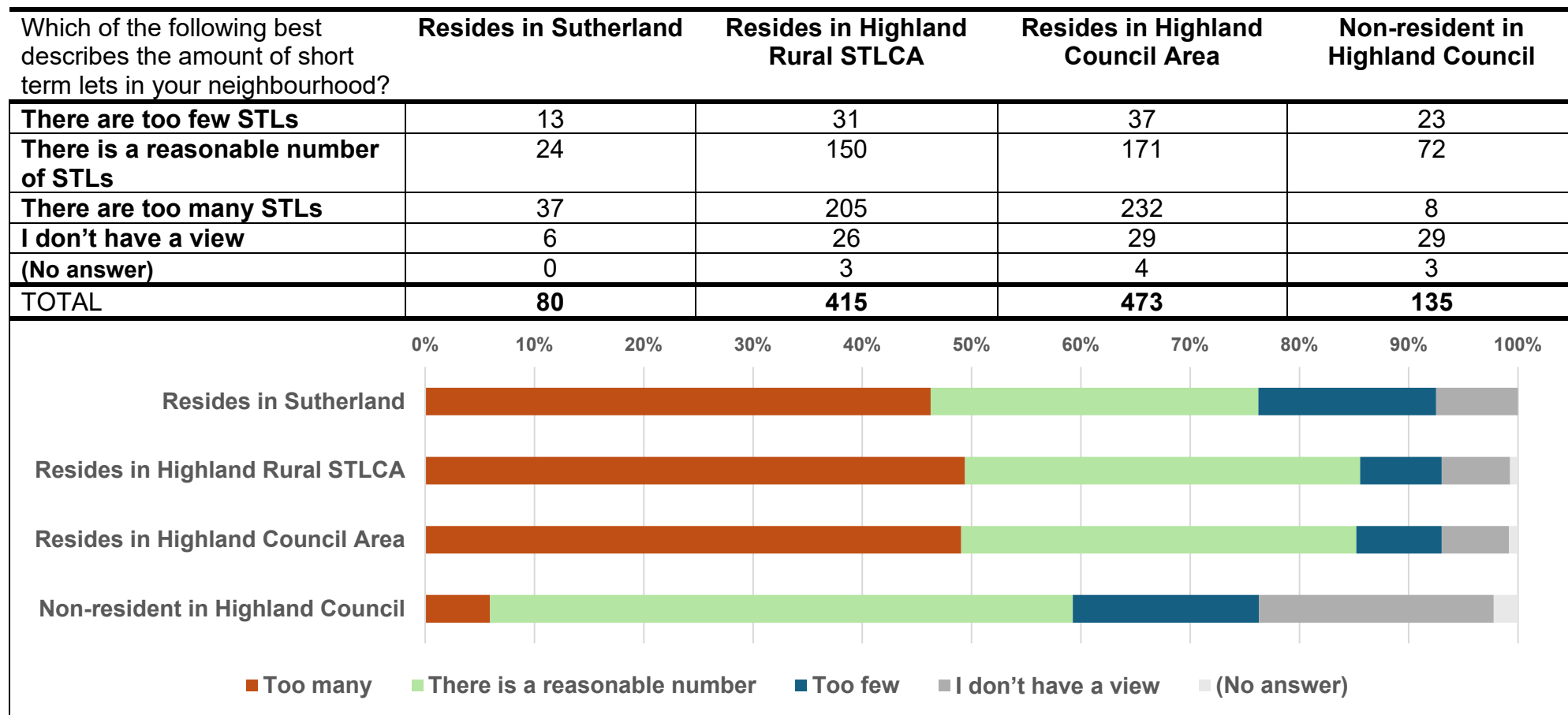
Question 15. If you experienced any difficulty in buying or renting a house within the proposed control area please provide more information: (optional question)

Respondent Reference	Points raised
HR-582-1, HR-547-1, HR-439-1, HR-417-1, HR-413-1, HR-352-1, HR-159-1, HR-144-1, HR-107-1, HR-78-1, HR-43-1	Limited choice and supply of housing and land • Housing rarely comes onto the market • No rental listings in much of the area • Feeling pressured to buy sub-optimal homes due to lack of choice • No bungalows/accessible housing for all stages of life
HR-439-1, HR-407-1, HR-159-1, HR-107-1, HR-94-1, HR-37-1	High house prices and affordability challenges • Houses that come on the market are not affordable • House prices have little relationship with local incomes
HR-409-1	Competitive purchasing/rental market • House prices often sell for higher than listing • Outbid by purchasers outwith the area • Rental market under pressure as landlords are leaving the sector when fixed tenancy agreements came to an end • Difficulties getting mortgages in the area
HR-373-1, HR-49-1	Short Term Lets affecting availability of housing
HR-409-1, HR-407-1, HR-62-1, HR-37-1	Competition from second-home owners, investors and external buyers
HR-582-1, HR-439-1, HR-417-1, HR-413-1, HR-375-1	Reliance on family and friends support and informal housing arrangements • Living in caravans • Extended family reliance • Delayed milestones and life events
HR-285-1	Reliance on council housing/ government schemes
HR-285-1	Council housing stock is too limited
HR-429-1, HR-373-1	Reliance on inheritance

HR-413-1, HR-375-1, HR-373-1, HR-144-1	Housing insecurity and displacement, such as eviction from the private rental sector
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)

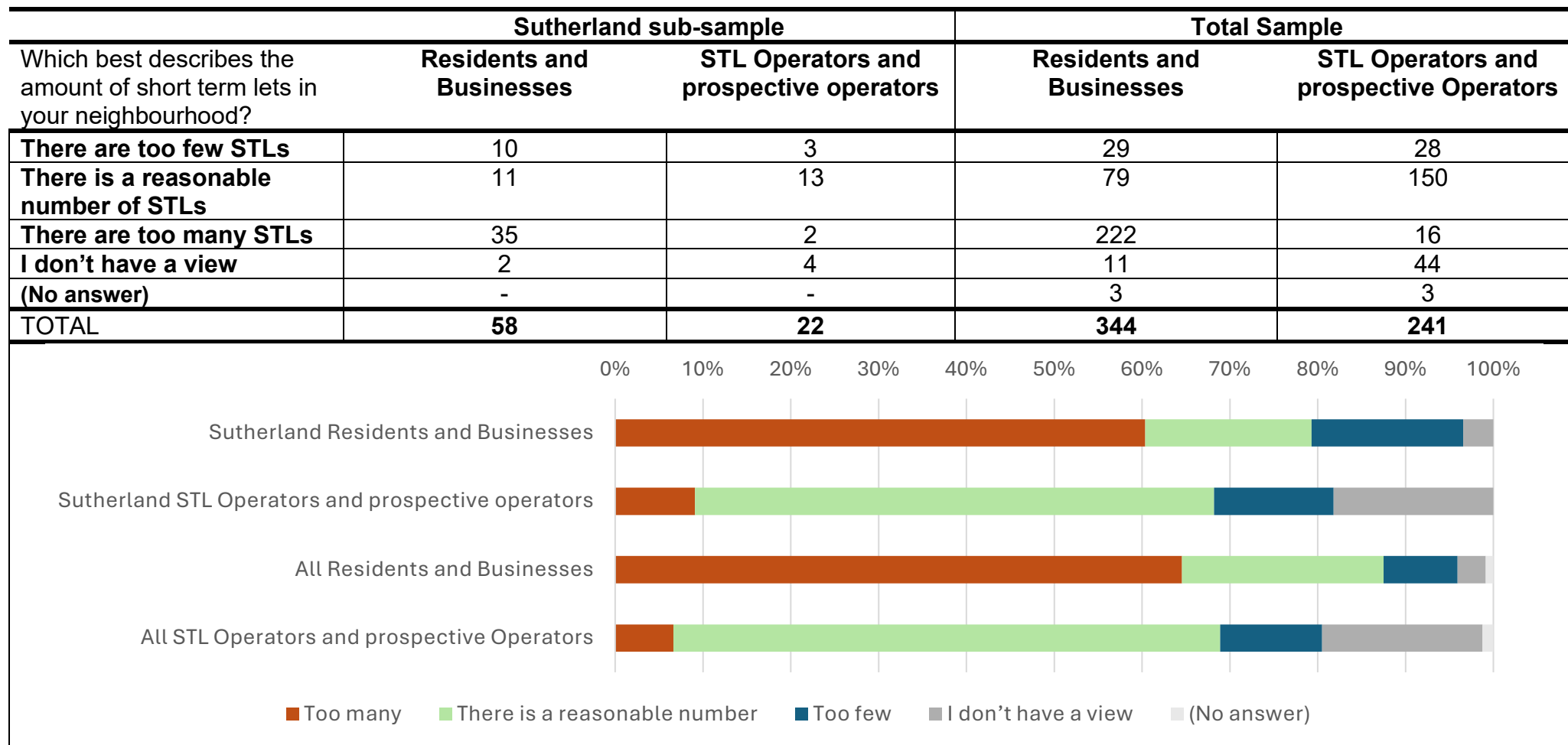
Breakdown of responses by area of residence



Views regarding the overall number of STLs generally do not differ greatly by area of residence within Highland, although Sutherland residents' views differ slightly from other area sub-samples, with a slightly lower share considering there to be too many, and a larger share considering there to be too few. While. Non-residents are more likely to consider there to be a reasonable number of STLs or too few or do not have a view.

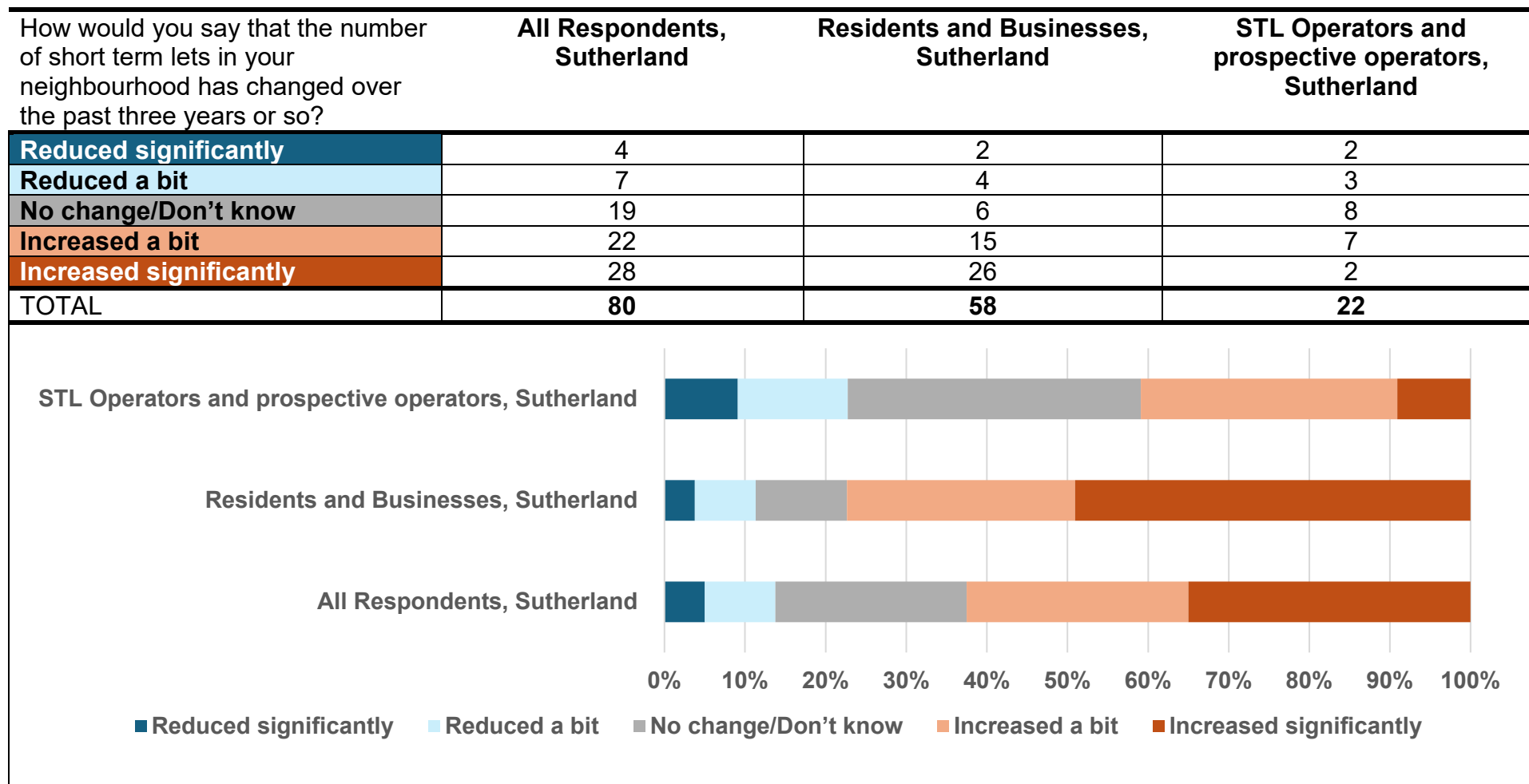
Question 16. Which of the following best describes the amount of short term lets in your neighbourhood? (optional question)

Breakdown of responses by category of respondent



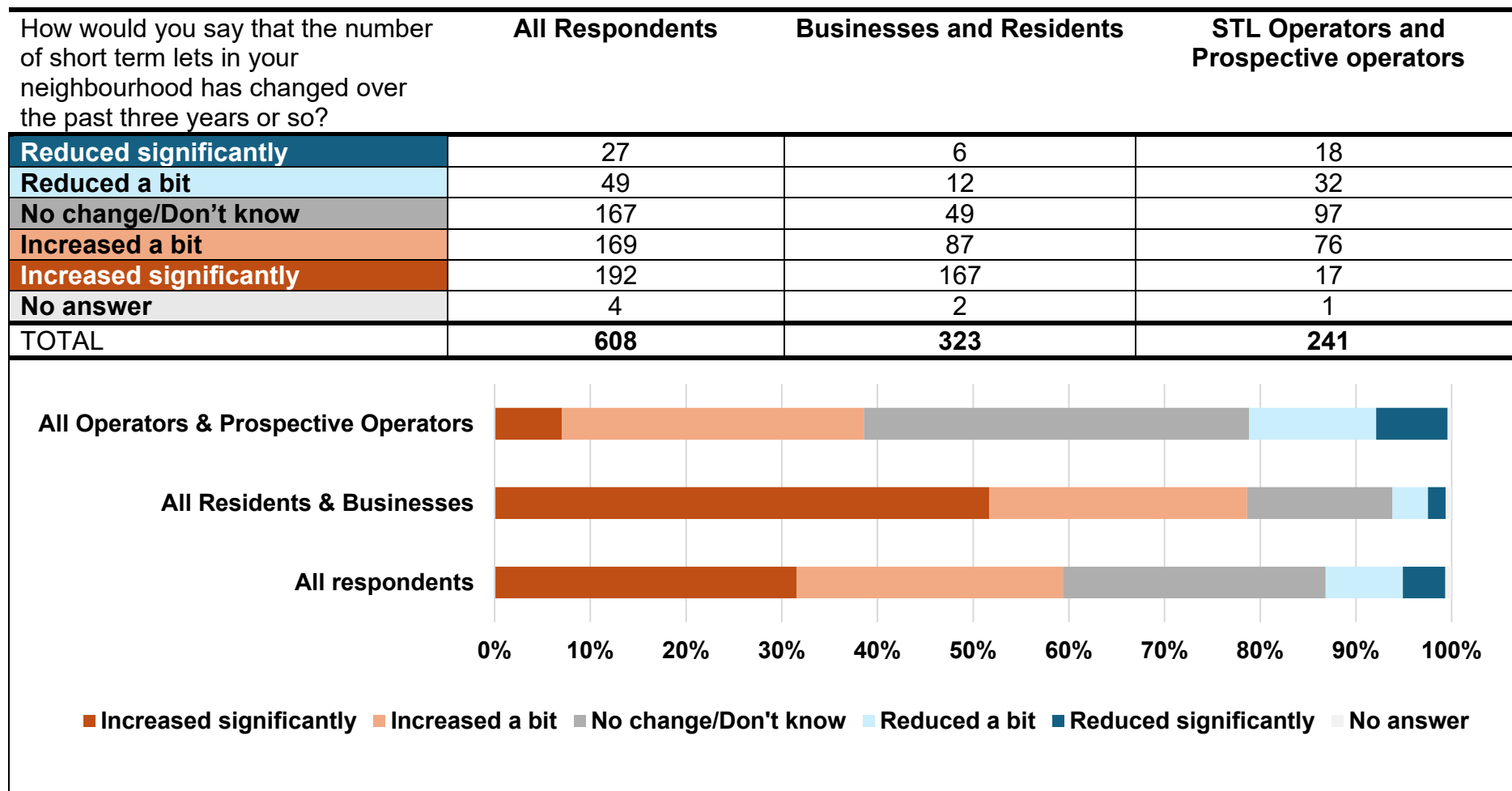
Greater divergence in views regarding the overall number of STLs is attributed to the category of respondent, with residents and businesses more likely to consider there to be too many STLs, with operators more likely to consider there to be a reasonable number.

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 Sutherland 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.

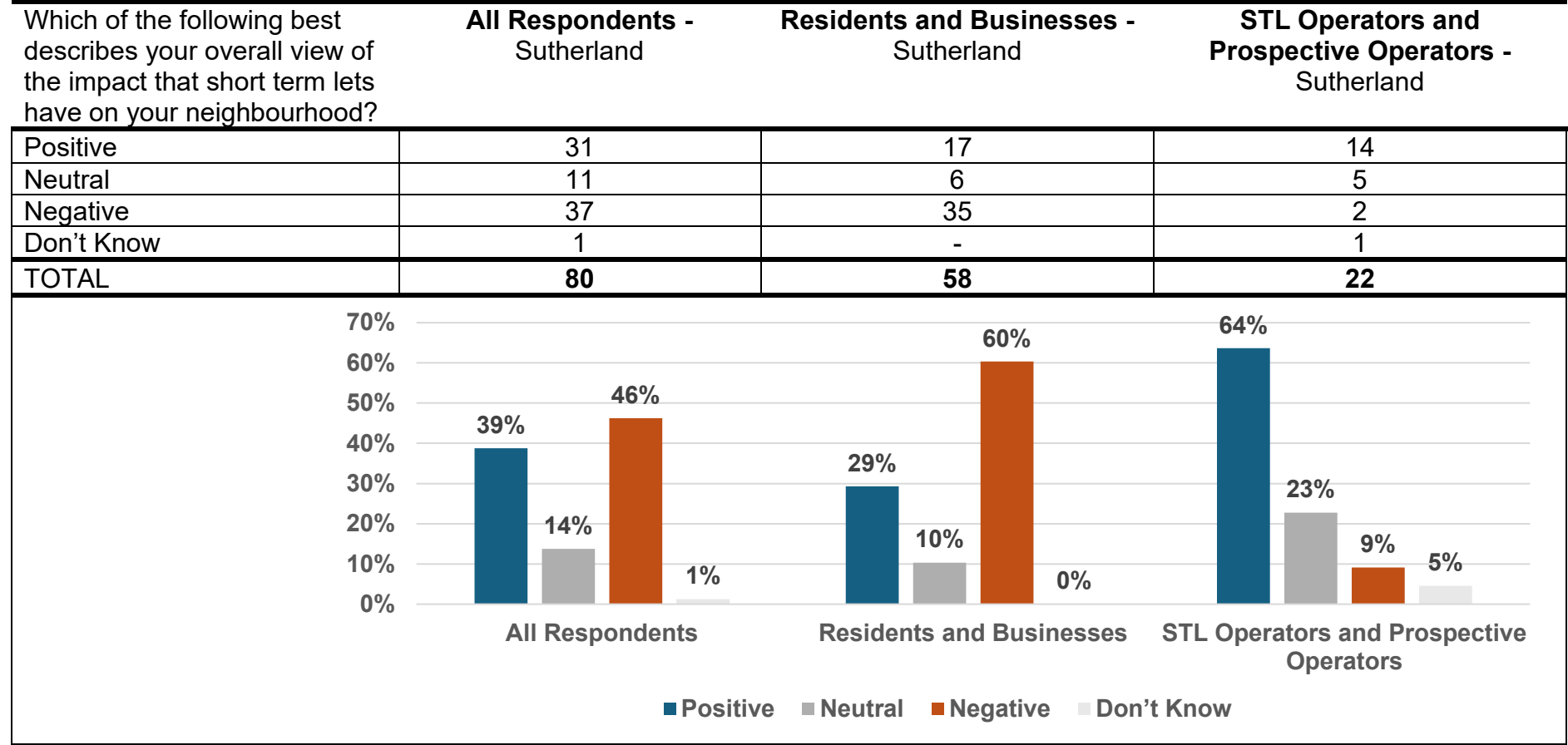
Q17. How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so?
(Breakdown for Full Sample)



This divergence in views by respondent category was not isolated to the Sutherland 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)

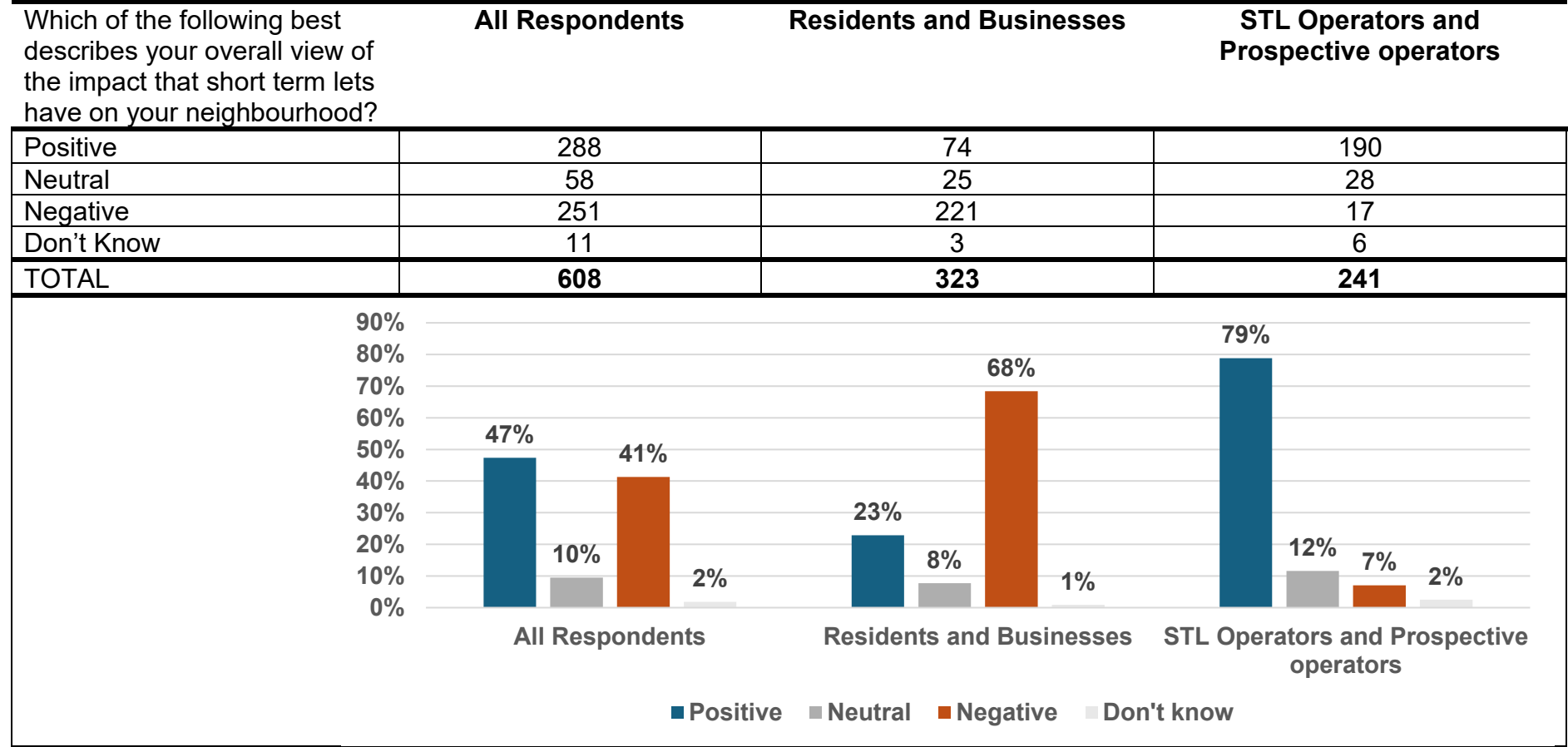
Breakdown for Sutherland subsample



A greater share (60%) of Sutherland residents and businesses reported that their overall view of the impact of STLs on the neighbourhood was negative, while a large share (64%) 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 Sutherland.

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

Respondent Reference	Points raised
Neutral impact views	
HR-285-1	Need to balance STLs with housing stock
HR-603-1, HR-593-1, HR-582-1, HR-447-1, HR-303-1, HR-162-1, HR-144-1	Impacts depend on the type and location of STL
Negative impact views	
HR-427-1, HR-417-1, HR-375-1, HR-285-1, HR-282-1, HR-262-1, HR-126-1, HR-107-1, HR-94-1, HR-78-1, HR-54-1, HR-43-1, HR-37-1, HR-22-1	Properties used as STLs are unaffordable or unsuitable for permanent housing
HR-363-1, HR-159-1, HR-107-1, HR-43-1	Loss of housing for local people
HR-582-1, HR-417-1	Increases in house prices
HR-479-1, HR-439-1, HR-405-1, HR-352-1, HR-262-1, HR-159-1, HR-94-1, HR-37-1, HR-8-1	Impacts on the local workforce
HR-439-1, HR-285-1, HR-262-1, HR-159-1, HR-60-1	Loss of community cohesion
HR-547-1, HR-479-1, HR-405-1, HR-373-1, HR-159-1	Demographic changes
HR-427-1, HR-376-1, HR-363-1, HR-262-1, HR-49-1	Properties remaining vacant for much of the year
HR-427-1, HR-417-1, HR-375-1, HR-285-1, HR-282-1, HR-262-1, HR-126-1, HR-107-1, HR-94-1, HR-78-1, HR-54-1, HR-43-1, HR-37-1, HR-22-1	Nuisance impacts on local residents (e.g. anti-social behaviour, traffic, noise, parking, and waste issues)
HR-460-1, HR-429-1, HR-409-1	Competition with hotels and B&Bs, reducing occupancy rates and increasing closures
HR-285-1, HR-282-1, HR-262-1, HR-22-1	Contributions to local service closures (e.g. schools)

HR-285-1	Loss of local culture and heritage (e.g. Gaelic and crofting traditions)
HR-427-1, HR-376-1, HR-363-1, HR-49-1	Pressure on community infrastructure
HR-607-1, HR-407-1	Incompatible land uses within residential areas
Positive impact views	
HR-609-1, HR-593-1, HR-581-1, HR-576-1, HR-571-1, HR-537-1, HR-532-1, HR-422-1, HR-412-1, HR-408-1, HR-396-1, HR-393-1, HR-392-1, HR-379-1, HR-367-1, HR-348-1, HR-345-1, HR-325-1, HR-310-1, HR-301-1, HR-297-1, HR-291-1, HR-278-1, HR-268-1, HR-244-1, HR-243-1, HR-238-1, HR-224-1, HR-153-1, HR-20-1, HR-5-1	Supports tourism
HR-609-1, HR-593-1, HR-581-1, HR-571-1, HR-537-1, HR-532-1, HR-422-1, HR-408-1, HR-396-1, HR-393-1, HR-383-1, HR-379-1, HR-370-1, HR-367-1, HR-365-1, HR-348-1, HR-345-1, HR-343-1, HR-325-1, HR-310-1, HR-297-1, HR-269-1, HR-247-1, HR-244-1, HR-243-1, HR-224-1, HR-200-1, HR-189-1, HR-162-1, HR-153-1, HR-62-1, HR-5-1	Supports the local economy and businesses
HR-609-1, HR-593-1, HR-581-1, HR-537-1, HR-532-1, HR-497-1, HR-447-1, HR-408-1, HR-393-1, HR-392-1, HR-383-1, HR-367-1, HR-365-1, HR-348-1, HR-345-1, HR-326-1, HR-310-1, HR-291-1, HR-278-1, HR-270-1, HR-269-1, HR-268-1, HR-243-1, HR-238-1, HR-189-1, HR-162-1, HR-153-1, HR-131-1, HR-26-1	Provides direct and indirect employment opportunities
HR-609-1, HR-576-1, HR-532-1, HR-413-1, HR-392-1, HR-326-1, HR-325-1, HR-238-1, HR-189-1, HR-162-1, HR-100-1, HR-91-1, HR-62-1	Income generator for residents
HR-367-1, HR-345-1, HR-26-1	Supports population retention and local services (e.g. schools)
HR-383-1, HR-340-1, HR-268-1, HR-244-1, HR-200-1, HR-5-1	Provides essential accommodation

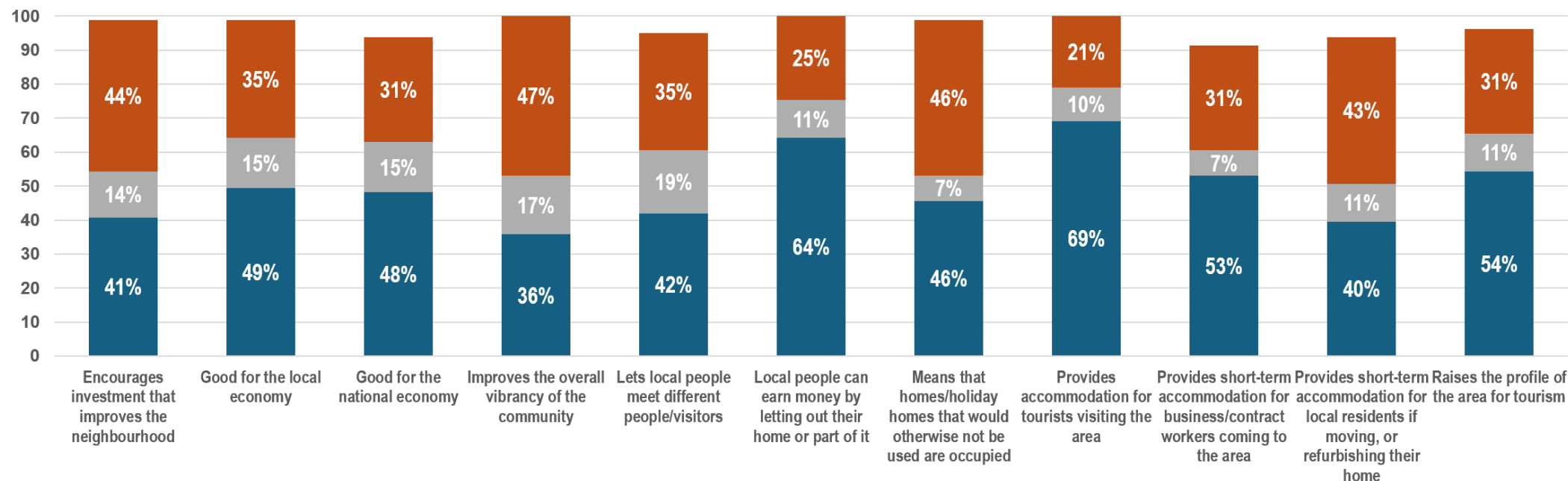
HR-340-1, HR-291-1, HR-162-1, HR-91-1	Offers alternative accommodation when hotels are unavailable or full
HR-497-1, HR-354-1, HR-200-1, HR-162-1, HR-153-1, HR-115-1	Bringing derelict or unused buildings back into use
HR-497-1, HR-291-1, HR-200-1, HR-162-1, HR-153-1, HR-62-1	Reduces reliance on self-sufficient tourism (e.g. caravanning and camping)
HR-593-1	No impact on the provision of affordable housing
HR-576-1	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 Sutherland sub-sample – all respondent categories (n=81)

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

■ Agree ■ Neutral ■ Disagree



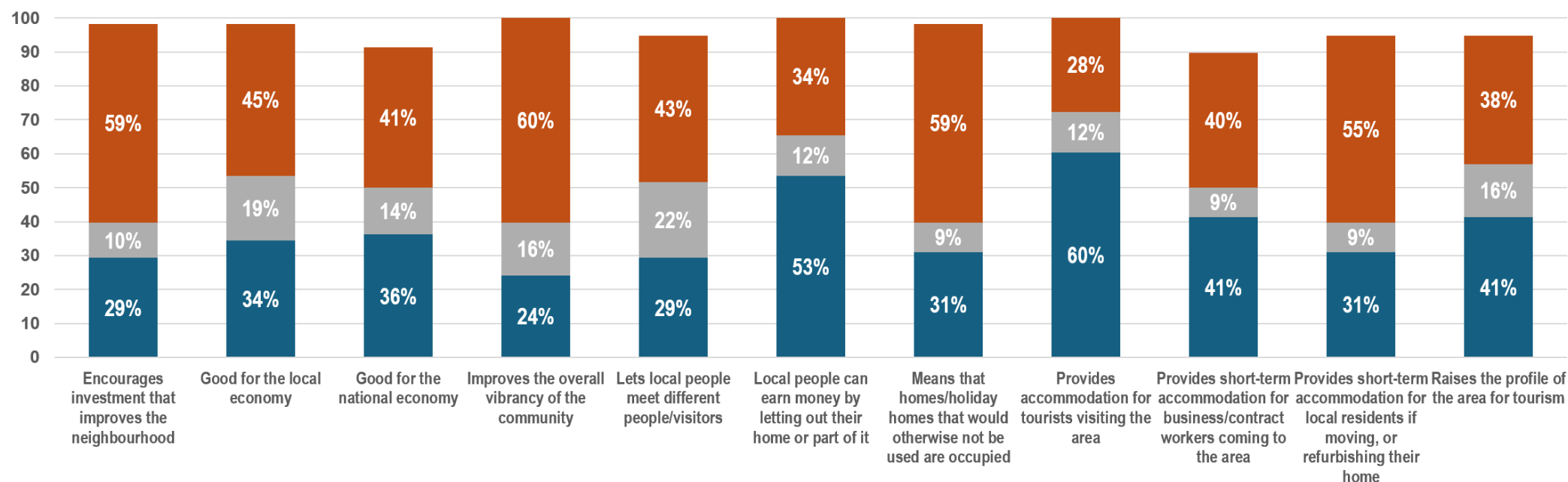
When presented with a list of suggested positive impacts attributed to Short Term Lets, there are varying levels of agreement from respondents residing in Sutherland, with the highest agreement recorded towards “Provides accommodation for tourists visiting the area” while a slightly larger share disagree with “Improves the overall vibrancy of the community”. The statement with the highest level of neutral responses was “Lets local people meet different people/visitors”. There is little difference between the Sutherland 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 from STL operators and prospective operators in their level of agreement.

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 Sutherland Residents and Businesses (n=58)

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

■ Agree ■ Neutral ■ Disagree



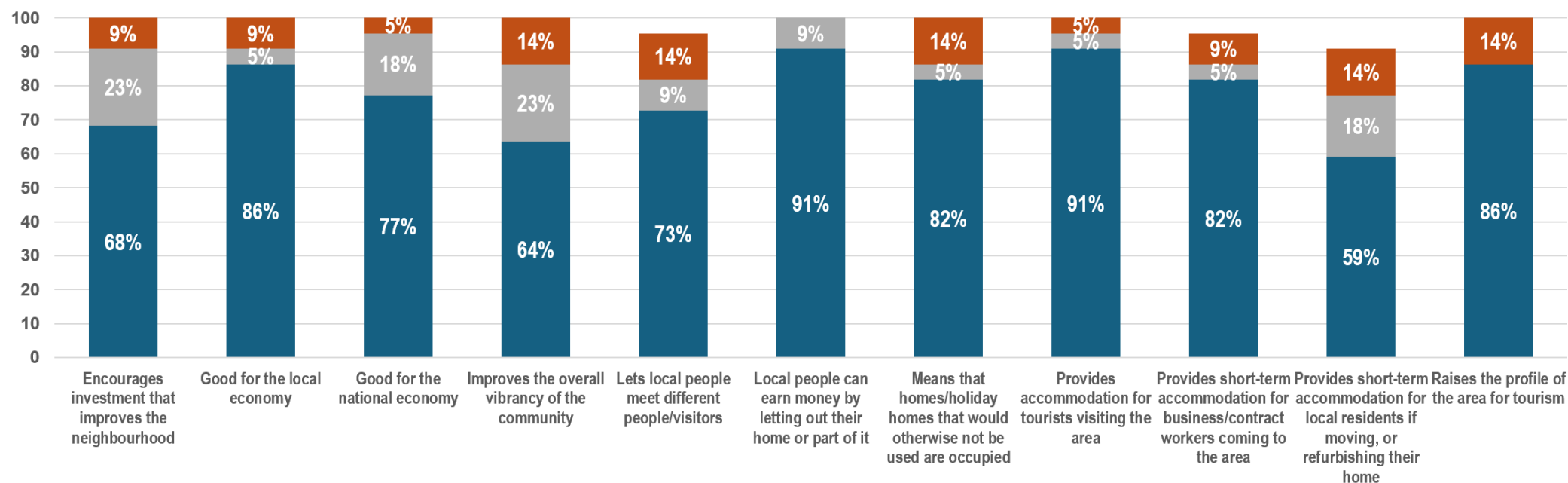
Examining responses from residents and businesses specifically residing in Sutherland, it is evident that levels of agreement with many of these statements is lower among this cohort. While a majority agree that STLs provide accommodation for tourists visiting the area, responses are split on STLs being “Good for the local and national economies”, and a greater share disagree that STLs mean that homes/holiday homes that would otherwise not be used are occupied, improves the vibrancy of the community or encourage investment that improves the neighbourhood.

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 Sutherland STL Operators and Prospective Operators (n=22)

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

■ Agree ■ Neutral ■ Disagree



Turning to STL Operators and prospective Operators in Sutherland, there is a broad consensus and 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”, “Local people can earn money by letting out their home or part of it”, and “Good for the local economy”. A slightly higher rate of neutral responses was received for “Improves the vibrancy of the community” and “Encourages investment that improves the neighbourhood”, 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 Sutherland, alongside non-resident operators in the area.

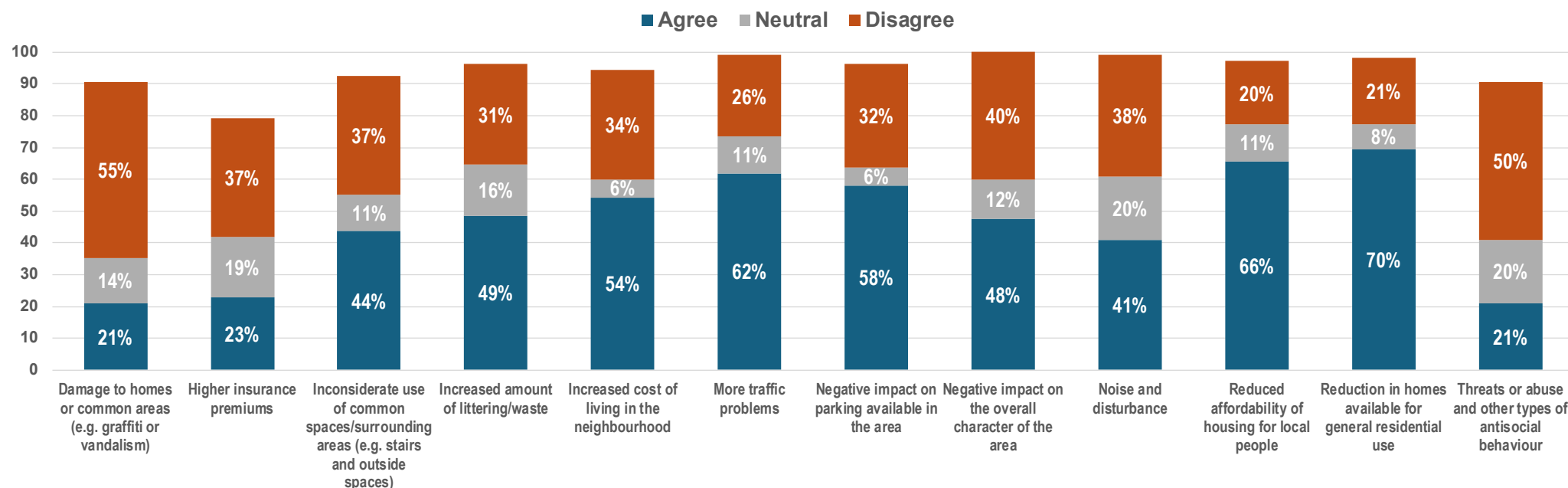
Respondent Reference	Points raised and responses.
HR-547-1, HR-238-1, HR-60-1	Offers additional income and flexible work opportunities compatible with caring responsibilities
HR-514-1, HR-497-1, HR-422-1, HR-374-1, HR-370-1, HR-354-1, HR-348-1, HR-340-1, HR-326-1, HR-247-1, HR-224-1, HR-200-1, HR-91-1	Demand and spend from visitors helps sustain local businesses and services, including shops, pubs, public transport and trades
HR-374-1, HR-365-1, HR-326-1, HR-325-1, HR-270-1, HR-243-1, HR-238-1, HR-60-1	Retains population and reduces depopulation in fragile rural areas, especially through providing employment and maintaining a balanced demographic
HR-544-1, HR-540-1, HR-536-1, HR-471-1, HR-246-1, HR-242-1, HR-180-1	Brings derelict or neglected buildings back into productive use, and reduces homes being left empty
HR-412-1, HR-270-1, HR-5-1	Helps modernise and maintain older, historic, traditional or inherited family properties, by generating funds for upkeep.
HR-412-1	Supports farm and croft diversification, by providing alternative income sources
HR-238-1, HR-37-1, HR-20-1	Provides accommodation suitable for families, groups, those with pets, those with accessibility or other specialist needs
HR-578-1	Reduced reliance on campervans and informal camping, which have negative local impacts (such as parking, environmental impact)
HR-609-1, HR-396-1, HR-269-1	Encourages slow tourism which helps tourists feel invested and connected to the area, adds vibrancy to community
HR-268-1, HR-5-1	Provides emergency or transitional accommodation for residents
HR-5-1	Provides temporary worker accommodation (e.g. renewables projects)

HR-576-1, HR-429-1, HR-22-1	Negative impacts on local housing availability and affordability not outweighed by any positive impacts of short term lets.
HR-609-1, HR-584-1, HR-576-1, HR-479-1, HR-429-1, HR-413-1, HR-406-1, HR-405-1, HR-282-1, HR-270-1, HR-265-1, HR-159-1, HR-126-1, HR-60-1, HR-54-1, HR-22-1	Disputes suggested positive impacts: include instances of outright disagreement, conditional agreement where the impacts are positive when hosts reside within the relevant community as opposed to elsewhere, or that these positive impacts are minimal and outweighed by significant negative impacts.
HR-367-1, HR-303-1, HR-291-1	Provides accommodation options and supports tourism in communities without hotels and B&Bs, or areas with high demand
HR-340-1, HR-270-1, HR-244-1, HR-91-1, HR-60-1	Seasonal and diversified income for locals, income stays local
HR-576-1	View that small-scale local resident operators - especially for home sharing, 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 Sutherland sub-sample – all respondent categories (n=81)

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

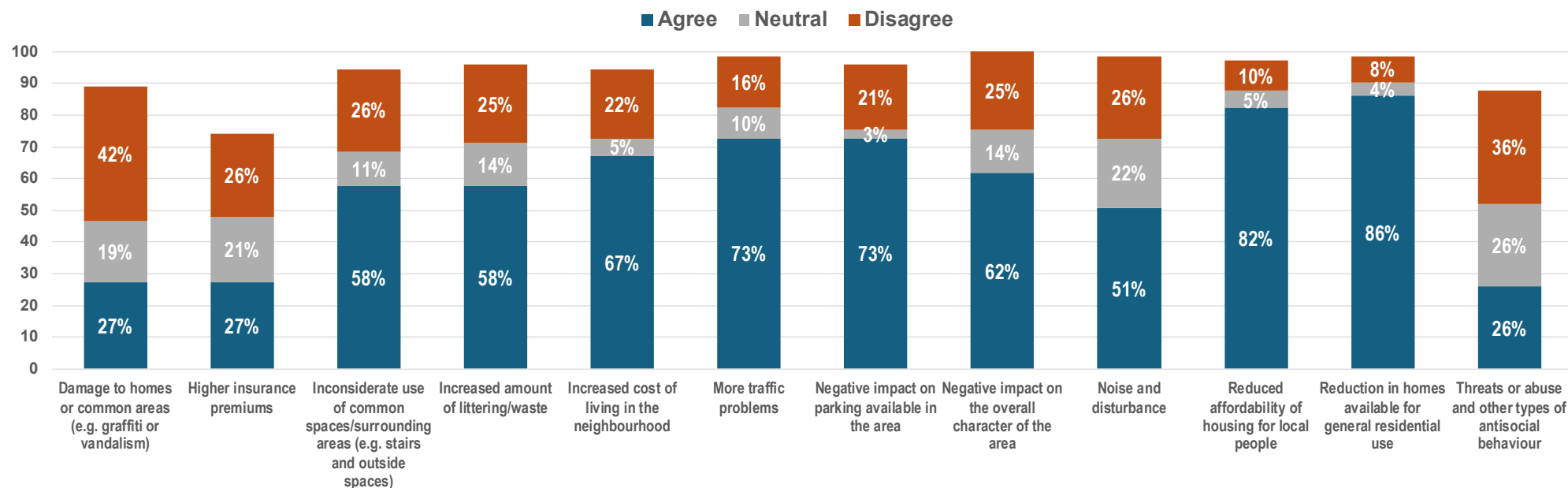


When presented with a list of suggested negative impacts attributed to Short Term Lets, respondents residing in Sutherland are, again, fairly divided as to their levels of agreement or disagreement with these. It is noted that as with the positive impacts, there is little difference between the Sutherland 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 Sutherland Residents and Businesses (n=58)

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

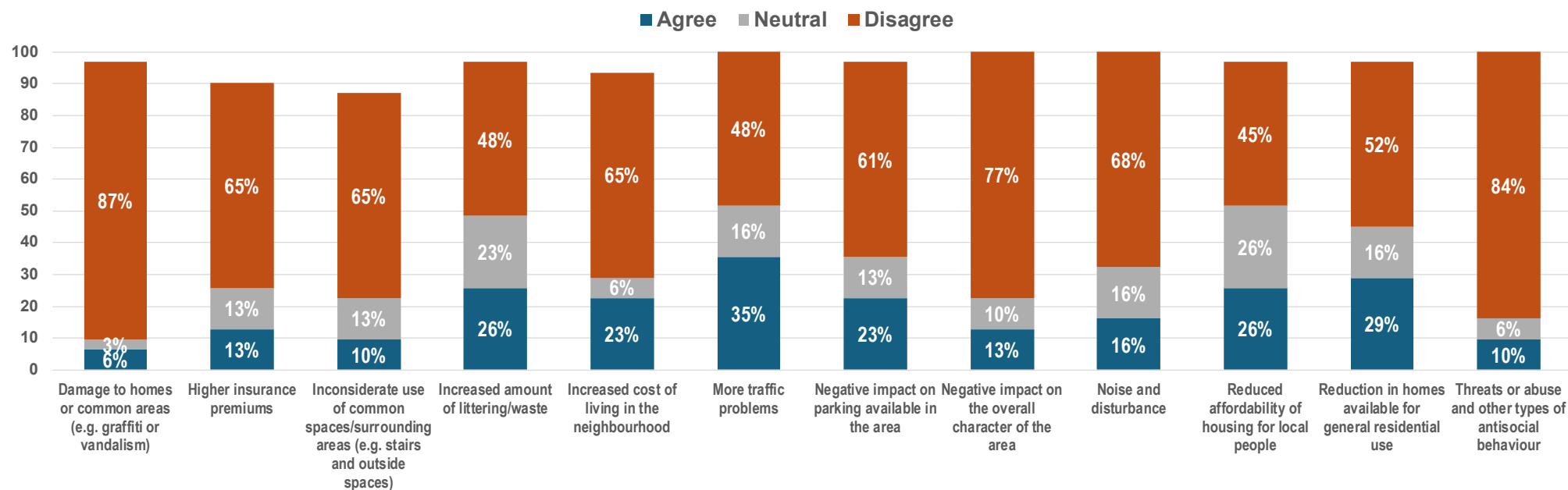


Among residents and businesses in Sutherland, there were greater levels of agreement with the suggested negative impacts of Short Term Lets. The highest levels of overall agreements were for “Reduced affordability of housing for local people” and “Reduction in homes available for general use”, “Negative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

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 Sutherland STL Operators and Prospective Operators (n=22)

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



Among operators, a more consistent disagreement with the suggested negative impacts of STLs is apparent, 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”, “Negative impact on parking available in the area”, and “Reduction in homes available for general residential use”.

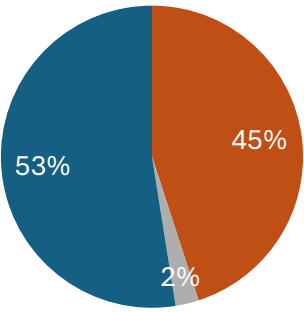
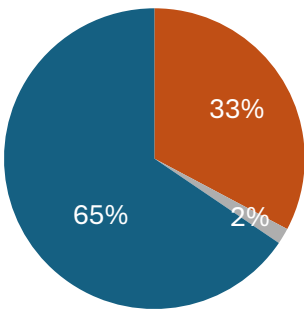
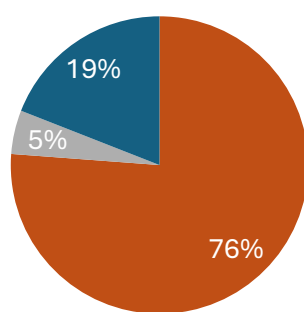
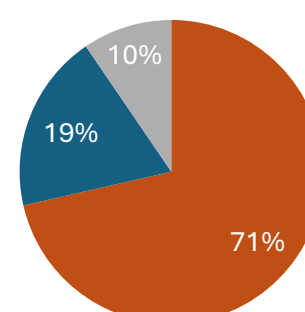
Question 23. Are there any other negative impacts of having short term lets in your neighbourhood? (optional question)

Respondent Reference	Points raised and responses
HR-603-1, HR-439-1, HR-417-1, HR-413-1, HR-407-1, HR-406-1, HR-352-1, HR-285-1, HR-262-1, HR-112-1, HR-107-1, HR-60-1	Loss of community cohesion, neighbourliness, community spirit and sense of belonging
HR-417-1, HR-406-1, HR-370-1, HR-352-1, HR-262-1, HR-60-1	Increasing community transience due to constant turnover of visitors
HR-285-1	Rural depopulation, decline of resident base especially young people and families
HR-375-1	Declining school rolls threatening or causing school closure
HR-439-1, HR-405-1, HR-285-1, HR-22-1	Impact on viability of local public services, including GP services, post offices, transport and community facilities
HR-22-1	Local businesses increasingly targeted to visitor needs (e.g. souvenirs) rather than resident needs
HR-405-1, HR-285-1, HR-268-1	Difficult recruiting and retaining key workers due to difficulty securing housing for key workers
HR-547-1, HR-285-1, HR-22-1	Communities becoming seasonal, "ghost towns" in winter season, with unoccupied short term lets.
HR-112-1, HR-60-1	Loss of local cultural heritage, traditions, place-based knowledge and identity
HR-370-1	View that negative impacts, like litter, noise and vandalism, relate more to urban areas with a higher concentration of lets, not experienced in rural Highland
HR-429-1, HR-406-1, HR-393-1, HR-282-1, HR-270-1, HR-91-1, HR-37-1, HR-5-1	Additional pressure on local infrastructure and services (including roads, healthcare) due to wider tourism, NC500 and campervans, not just short term lets
HR-547-1, HR-159-1	Harm to nature, wildlife and conflict with crofting activities from tourism related activities

HR460-1	Impact on traditional accommodation providers including hotels and B&Bs
HR-609-1, HR-396-1, HR-278-1, HR-244-1, HR-243-1, HR-200-1, HR-153-1, HR-100-1, HR-22-1	Dispute with negative impacts of short term lets: include instances of outright disagreement, or that negative impacts are minimal and outweighed by significant positive impacts, or where the stated impacts are attributable to tourism in general rather than STLs specifically, to more urban in nature than applicable in a Highland context.
HR-576-1, HR-413-1, HR-409-1, HR-285-1, HR-200-1	Loss or lack of housing for local people, impacts staffing for local businesses and independence for young people
HR-578-1, HR-269-1, HR-268-1	The problem is not short term lets, its total available properties: Highland needs to build more homes to address the shortage including affordable and social housing
HR-578-1, HR-479-1, HR-352-1, HR-200-1, HR-94-1, HR-91-1, HR-62-1	Investment property purchases for letting, often from higher income outsiders, driving up prices to be unaffordable for local permanent residents with lower incomes
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 Sutherland subsample, alongside non-resident STL Operators in the Area

	Residing in Sutherland			Non-resident
Do you agree with the proposal to establish the Highland Rural Short Term Let Control Area?	All Respondents – Sutherland	Residents and Businesses	STL Operators and Prospective Operators	STL Operators and prospective Operators
Yes	42	38	4	2
No	36	19	16	15
Undecided	2	1	1	4
(No answer)	1	-	1	1
TOTAL (that responded)	80	58	21	21
				
A slight majority of respondents residing in Sutherland 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 Sutherland also do not support the proposal.				

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-607-1, HR-603-1, HR-547-1, HR-460-1, HR-427-1, HR-409-1, HR-405-1, HR-375-1, HR-373-1, HR-352-1, HR-296-1, HR-285-1, HR-282-1, HR-159-1, HR-43-1, HR-5-1	Need/desire for control of and managing short term lets
HR-584-1, HR-460-1, HR-429-1, HR-427-1, HR-417-1, HR-409-1, HR-407-1, HR-406-1, HR-405-1, HR-373-1, HR-365-1, HR-352-1, HR-296-1, HR-282-1, HR-78-1, HR-60-1, HR-5-1	Need for a balance with STL, between housing and tourism
HR-609-1, HR-607-1, HR-439-1, HR-417-1, HR-352-1, HR-296-1	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-406-1, HR-365-1, HR-265-1, HR-262-1	View that it could help cost/affordability of housing
HR-460-1, HR-409-1, HR-296-1, HR-94-1	Tourists should be staying in tourist accommodation/supporting serviced providers
HR-603-1, HR-373-1, HR-262-1, HR-22-1	Concern about homes being bought for investment purposes by people outside of Highland and converted to STL
HR-460-1, HR-429-1, HR-406-1, HR-296-1, HR-282-1, HR-144-1, HR-60-1, HR-54-1, HR-43-1, HR-37-1, HR-22-1	View that STLs harm community cohesion/sustainability
HR-584-1, HR-460-1, HR-409-1, HR-282-1, HR-159-1, HR-144-1, HR-60-1	View that lack of housing is harming recruitment and retention of key workers and essential services
HR-94-1	Impacts on parking need to be considered
HR-584-1, HR-406-1	Negative impacts on other infrastructure

HR-514-1, HR-429-1, HR-409-1, HR-406-1, HR-60-1, HR-54-1	Negative amenity/anti-social impacts
Explanations against proposed control area	
HR-593-1, HR-532-1, HR-412-1, HR-408-1, HR-396-1, HR-393-1, HR-383-1, HR-367-1, HR-365-1, HR-345-1, HR-325-1, HR-310-1, HR-301-1, HR-297-1, HR-278-1, HR-268-1, HR-244-1, HR-243-1, HR-189-1, HR-162-1, HR-153-1	Concern about impact on the tourism industry
HR-593-1, HR-412-1, HR-383-1, HR-367-1, HR-354-1, HR-310-1, HR-301-1, HR-278-1, HR-270-1, HR-268-1, HR-238-1, HR-200-1	Loss of jobs from tourist sector will fuel depopulation
HR-593-1, HR-497-1, HR-383-1, HR-370-1, HR-365-1, HR-354-1, HR-348-1, HR-345-1, HR-301-1, HR-291-1, HR-268-1, HR-244-1, HR-243-1, HR-238-1, HR-153-1, HR-82-1, HR-62-1	Over-regulation/bureaucracy
HR-581-1, HR-412-1	Licensing process is sufficient
HR-609-1, HR-512-1, HR-365-1, HR-297-1, HR-238-1, HR-200-1, HR-100-1, HR-62-1	Property rights/fairness
HR-370-1, HR-354-1, HR-326-1, HR-115-1	Second/empty homes are the main issue
HR-412-1, HR-278-1, HR-270-1	Campervans are the main issue, not STLs
HR-537-1, HR-392-1, HR-383-1, HR-269-1, HR-200-1, HR-91-1, HR-62-1	There are other causes of pressure not STLs
HR-383-1, HR-370-1, HR-363-1, HR-326-1, HR-301-1, HR-291-1, HR-243-1	Proposed Control Area is too large and broad-brush.
HR-162-1	No evidence that a Control Area will work or that it has worked in Badenoch and Strathspey.
HR-383-1, HR-297-1, HR-243-1	View that STL operators have invested heavily in their properties and maintain them to a higher standard than residential property owners.
HR-593-1, HR-365-1, HR-310-1	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/affordable homes.
HR-383-1, HR-310-1	STLs support fragile economies with little other economic industry present.

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

Breakdown for Sutherland subsample, alongside non-resident STL Operators in the Area

	Residing in Sutherland			Non-resident
Do you agree with the Statement of Reasons for the proposed Control Area?	All Respondents – Sutherland	Residents and Businesses	STL Operators and Prospective Operators	STL Operators and prospective Operators
Yes	33	30	3	-
No	25	15	9	13
Somewhat	20	12	8	7
Don't know	2	1	1	2
(No Answer)	1	-	1	-
TOTAL (that responded)	80	58	21	22

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
	Pie chart for All Respondents: Yes 36%, No 41%, Somewhat 20%, Don't know 3%, No Answer 0%.	Pie chart for All Residents and Businesses: Yes 59%, No 21%, Somewhat 17%, Don't know 3%, No Answer 0%.	Pie chart for All STL Operators and Prospective Operators: Yes 8%, No 64%, Somewhat 25%, Don't know 3%, No Answer 0%.	Pie chart for All Respondents who reside in the Highland Council Area: Yes 45%, No 34%, Somewhat 19%, Don't know 2%, No Answer 0%.

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-189-1	Housing pressures should be addressed through targeted measures rather than broad restrictions
HR-609-1, HR-374-1, HR-345-1, HR-310-1, HR-224-1, HR-20-1	No evidence that Control Areas increase affordable housing, reduce rents or solve housing crisis
HR-412-1, HR-409-1, HR-379-1, HR-303-1, HR-297-1, HR-291-1, HR-278-1, HR-153-1, HR-5-1	Tourism is vital (employment) to the Highland economy and Control Areas could affect that
HR-460-1	Criticism of the Consultation and/or the evidence presented. The evidence does not mention the positives brought by tourism.
HR-537-1, HR-162-1	Criticism of the Consultation and/or the evidence presented. Evidence does not talk about wider housing market pressures
HR-354-1, HR-348-1, HR-268-1, HR-265-1, HR-126-1	Policy does not distinguish between locals with family connections to the area and non-residents
HR-571-1, HR-497-1, HR-325-1, HR-20-1	Regulation not Required
HR-370-1	Does not go far enough
HR-447-1, HR-396-1, HR-383-1	Proposal area too wide
HR-26-1	Controls should be applied across the whole of Highland
HR-581-1, HR-532-1, HR-408-1, HR-393-1, HR-392-1, HR-367-1, HR-365-1, HR-362-1, HR-340-1, HR-326-1, HR-301-1, HR-282-1, HR-270-1, HR-269-1, HR-260-1, HR-244-1, HR-243-1, HR-238-1, HR-200-1, HR-131-1, HR-115-1, HR-100-1, HR-62-1	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-576-1, HR-514-1, HR-429-1, HR-417-1, HR-406-1, HR-405-1, HR-296-1, HR-285-1, HR-262-1, HR-107-1, HR-91-1, HR-78-1, HR-37-1	General support for the policy and controls
HR-352-1, HR-94-1	Addresses housing affordability & availability
HR-144-1, HR-112-1	Balances tourism with community needs
HR-363-1, HR-159-1	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
Sutherland	
HR-379-1 Helmsdale Station CIC For Helmsdale Station CIC, the Short Term Let Licensing scheme has had a negative impact. This business has rescued and restored the listed station building at Helmsdale converting the old station master's accommodation into holiday accommodation. This is in a station building which is not appropriate for a permanent residence and so the development has had no adverse impact on the available local housing stock available for local residents. Indeed we offer a reduction to those arriving by transport other than a private car – such people (having no car) being more likely to stay local and patronise local businesses. The business operates as a community interest company, operated in large part by volunteers, and donating all its trading surplus to supporting local charities and community causes. The STL fees we have to pay to the Highland Council has meant that this sum has been lost to local charities in urgent need. In addition, we paid a further £500 for formal certification of measures that were already in place (£950 in total). In summary for us the scheme has had a detrimental effect on our commitment to support the local community through donations. As our local councillor has said ‘this is most unfortunate and unintended consequence’. So my challenge to you is to find a way to overcome this damage to the local community which the scheme causes us.	Noted. The consultation does not propose any changes to the Short Term Let Licensing regulations. These apply nationally across Scotland. The conversion from a former station building to short term letting use is not a form of short term let that sees its planning requirements altered as a result of a proposed Short Term Let Control Area. A Short Term Let Control Area is concerned with changes of use from residential housing to short term lets. 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, with benefit to local communities as a result.

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 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.

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 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

- 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.

- 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

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.

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

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, 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.	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 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, not is there any
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	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.
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:	Noted. It is unclear how many self-caters in the proposed Highland Rural Short Term Let Control Area the Association represents.

- 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 issue and that the Council through designating a Control Area proposes to take a proportionate response to that issue. There is

- Wider concerns regarding the evidence base for the proposed Control Area.

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.

- 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 control area designation in isolation from the planning policy

- Concern about the cumulative interaction between planning and licensing requirements, and the confusion, uncertainty and procedural burden they create for operators.
- Reference to *Muirhead* 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.

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 treatment is achieved through the application of the same

- 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.

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 respond 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 proportionate measure to allow them to consider and manage the

- 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.

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

• 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 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	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 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.
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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.	Points previously addressed in above responses.

Summary of Responses from Community Councils, Groups or Organisations

Respondent issues raised	Officer Response
Sutherland	
North Highland Chamber of Commerce North Highland Chamber of Commerce urges Highland Council not to proceed with the proposed Short-Term Let Control Area in Sutherland in its current form. While we recognise the extent of the housing shortage particularly in rural areas, we do not believe that the proposed introduction of STLC in Sutherland is a proportionate or effective response to those challenges. Our members are concerned that the proposal risks causing significant harm to our tourism economy without addressing the core issue of housing availability or affordability. While we fully acknowledge the seriousness of housing pressures across the North Highlands, we remain unconvinced that the proposed designation will deliver meaningful housing benefits. By contrast, it carries significant risks for business confidence, investment, visitor capacity, employment and the wider rural economy. Main concerns are: • Detrimental impact on the visitor economy in North Highland: ○ Tourism is one of the most important growth sectors in the North Highland economy and is disproportionately important in rural communities such as northwest Sutherland. Particularly in areas where there is limited hotel	Noted. Noted. Noted. Council recognises the importance of tourism in Sutherland and rural Highland, and the range of

capacity, self-catering accommodation provides more opportunities for visitors to stay, spend and explore throughout the North Highlands. The benefits extend far beyond individual operators, supporting restaurants, cafés, shops, visitor attractions, transport providers, outdoor activity businesses, tradespeople, cleaners, laundry services and numerous other local enterprises.

- Many self-catering businesses are owner-operated microbusinesses that provide important supplementary income for local families, support rural diversification and help sustain economic activity in fragile communities.
- The Chamber supports the Association of Scotland's Self-Caterers in its call for a comprehensive economic impact assessment of the proposed Control Area. Given the importance of tourism and hospitality to the North Highland economy, it is essential that the potential effects on businesses, employment, investment and community sustainability are fully understood before any decision is taken.

economic benefits that tourism brings to communities.

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. 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 *after* 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

- **Regulatory burden and business uncertainty:**

- A further concern is the cumulative impact of planning and licensing requirements on existing operators. Many businesses established and operated lawfully long before the introduction of the current licensing regime. They have invested substantial sums in properties, complied with licensing requirements, paid local taxes and contributed openly to the local economy.
- The practical interaction between Planning Control Area designation, Mandatory Condition 13 of the licensing regime and current planning policy creates significant uncertainty for many operators. Existing businesses may find themselves required to obtain planning advice, pursue Certificates of Lawfulness, submit planning applications or incur substantial professional costs simply to continue operating.

- The Chamber is particularly concerned that longstanding lawful businesses could face increasing regulatory burdens despite no clear evidence that such measures will deliver meaningful housing benefits. For many small businesses, these costs and uncertainties are disproportionate and risk discouraging future investment.

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. This can inform whether they apply for planning permission or a Certificate of Lawful Use. 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.

- **Blanket approach does not account for rural diversity**

- The Chamber notes that Highland Council is proposing one of the most significant expansions of STLC in Scotland despite there being no clear

Noted. The proposed Highland Rural STL Control Area is not intended to replicate any real or perceived success

evidence that the existing Badenoch and Strathspey designation has delivered measurable housing benefits. Before extending the proposed designation, it would be reasonable to undertake a full and transparent assessment of the existing STLC areas in operation.

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

○ It should be noted that Sutherland is an exceptionally large and economically diverse rural area. Housing pressures vary considerably between communities, as do tourism patterns, accommodation needs and local economic circumstances. A blanket designation across such a wide geographical area risks applying the same regulatory response to communities facing very different challenges. We are not persuaded that the evidence currently presented justifies an intervention of this scale or that it would deliver tangible benefits to the regional housing shortage. • Housing challenges should be addressed through capital investment ○ There is no question that access to housing is one of the most significant challenges facing communities across Sutherland and the wider North Highlands. The shortage of available and affordable homes affects families, businesses, public services and community sustainability. However, there is no compelling evidence to suggest that restrictions to short-term lets would address the underlying structural housing challenges facing the area. As already stated, the beneficial effects for Badenoch and Strathspey have yet to be presented. ○ The fundamental causes of housing shortages in rural Highland are well understood. They include insufficient new housing delivery, infrastructure	timely and proportionate intervention where current evidence demonstrates a need for action. 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. Noted. The proposed STLCA is not being applied nor is considered an out-right solution to local housing challenges, but it is the sole regulatory tool available to Council for managing future conversions of flats or dwellinghouses to secondary let short term lets. Council is progressing a range of initiatives to address the Highland Housing Challenge, and preparation of the new Highland Local
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constraints, construction costs, limited development opportunities, demographic change and long-standing challenges in rural housing provision. ○ Addressing these issues requires investment in housing development, infrastructure and planning solutions that increase supply. Restricting visitor accommodation risks reducing economic activity without creating a meaningful increase in available homes.	Development Plan will consider allocation of sites for housing and policies to support settlements in Highland.
HR-303-1 Lairg Community Council Lairg Community Council do not agree with the proposal to establish the Highland Rural Short Term Let Control Area. The short-term holiday homes are needed within our area, we strongly believe Highland Council needs to stop targeting them. As a community council, we are in favour of and supportive of holiday home owners and understand they are running a business. We do believe there is no housing crisis in our area; however, in some parts of the Highlands there is. This proposed licensing does not affect everyone. We need our holiday homes within our area and targeting them is not the way forward. Lairg Community Council wishes to express its concerns regarding the proposed introduction of Short-Term Let Control Zones within Ward 1, Sutherland. Many holiday let owners within our communities are small business operators who work extremely hard to provide high-quality accommodation for visitors to our area. These businesses contribute significantly to the local economy by supporting tourism, sustaining local services, and helping attract visitors to rural communities that rely heavily on tourism-related income. We are concerned that the proposals appear to place undue focus on short term holiday lets rather than addressing the wider issue of long-term empty homes across the area. Lairg Community Council would urge the Council to prioritise measures that bring vacant and unused properties back into residential use, as this would have a more meaningful impact on local housing availability without negatively affecting established small businesses.	Noted. The proposed Short Term Let Control Area is not a licensing proposal, but rather a planning proposal. Noted. The proposal does not prohibit this form of activity. It would require future changes of use from housing to short-term letting to obtain planning permission in advance. 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. The Council is currently using other policy mechanisms to address long-term empty homes and second homes 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. 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. 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.
We also wish to express our disappointment regarding statements contained within documents produced by Kyle of Sutherland Development Trust as part of their Place Plans in relation to holiday lets. While we recognise the importance of community consultation and discussion, we believe it is important that community organisations represent and consider the interests of all sections of the community, including local business owners involved in tourism and hospitality, rather than promoting only one particular viewpoint.	Noted.
Lairg Community Council supports balanced and evidence-based approaches to housing challenges and believes that any future policy decisions should fully consider the economic importance of tourism accommodation within rural Highland communities.	Noted.
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. 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	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 used to inform the proposed Highland Rural STLCA designation. Noted.

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 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. Points previously addressed in above responses. 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
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	Council has previously accounted for when determining the policy framework that applies within its existing Control Area.
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 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	Noted. Noted. Noted. Noted.

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 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.	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.
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	Noted. The Council does not consider that increasing social or affordable housing

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.	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.
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.	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. 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.
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	Noted.

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.	
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