The Highland Council

Agenda Item	**3**
Report No	**ECI/36/26**

Committee: **Economy and Infrastructure**

Date: **28 September 2026**

Report Title: **Short Term Let Control Area – Post Consultation Report**

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

1 Purpose/Executive Summary

1.1 This report informs Members of the outcome of the statutory consultation processes for the establishment of an Inverness City Short Term Let Control Area and a Highland Rural Short Term Let Control Area which was agreed to be undertaken by the Economy and Infrastructure Committee (E&I) at its meeting on 12 February 2026 and asks Members to agree to submit the proposed designations to Ministers.

1.2 The statutory consultations were undertaken between 12 May-23 June 2026. Consultation responses highlight a spectrum of opinion largely divided into two directly opposing views about how best to balance competing public interests. Those that wish to support the designations generally viewed it as a necessary planning tool to address concerns regarding housing availability, community sustainability and the cumulative impact of STLs on residential amenity. The majority of STL operators on the other hand oppose the proposals albeit representations from hotel owners and serviced accommodation providers suggests that there is no single tourism-sector view on the proposed control area(s).

1.3 A control area designation is aimed at managing future changes of use, not existing provision. It is therefore not considered that the designations would substantially damage tourism or lead to the loss of the sector. The proposals do not prohibit short term lets; they simply ensure that future conversions of residential properties are subject to planning scrutiny. They are a measure to manage future growth in the sector, not to curtail existing tourism accommodation. They may help to address a loss of much needed housing to an alternative use.

1.4 In light of the consultation responses and the referrals of decisions taken by the respective Local Area Committees who have all considered the consultation feedback, the report therefore invites Members to determine if they wish to progress:-

- the Inverness City Short Term Let Control Area, and
- the Highland Rural Short Term Let Control Area

1.5 Should Members agree, in accordance with Regulation 8 of The Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021, the Council is required to give notice of the proposal to the Scottish Ministers and obtain their approval.

2 Recommendations

2.1 Members are asked to:-

i. **Note** the consultation feedback detailed within Appendix 3 and Appendix 4, and summarised in Section 8, Section 9, and Section 10;
ii. **Note** the recommendation of the City of Inverness Area Committee to (E&I) that the proposed City of Inverness Short Term Let Control Area be progressed, should any decision to submit a proposal for designation to Scottish Ministers be taken;
iii. **Note** the recommendations of the Wester Ross Strathpeffer and Lochalsh, Lochaber, City of Inverness, Skye and Raasay and Sutherland Area Committees to (E&I) that their respective Areas are included in the proposed Highland Rural Short Term Let Control Area, should any decision to submit a proposal for designation to Scottish Ministers be taken;
iv. **Agree** to submit the proposed designations of the Inverness City Short Term Let Control Area and the Highland Rural Short Term Let Control Area to Scottish Ministers, based on the available evidence, consultation feedback and the recommendations of the relevant Local Area Committees, and to delegate authority to Officers to:-
    a. submit the proposed Short Term Let Control Area designations to Scottish Ministers for approval; and
    b. following the decision by Scottish Ministers bring back a further report to the Economy and Infrastructure Committee confirming the outcome and outlining the next steps, including the date of the commencement of the Control Area; and
v. **Note** the resourcing implications outlined in Section 11.

3 Implications

3.1 **Resource** - The work undertaken to progress the Inverness City and Highland Rural Short Term Let Control Areas has been extensive and has involved a significant number of officers across a variety of services prioritising this work. Should designation proceed, there is the potential for a considerable increase in planning caseload and recommend that additional staffing resources are established in advance to manage demand effectively. Whilst this would have resource and budget implications, it must be balanced against the public interest in ensuring that the loss of residential properties to short-term letting is subject to appropriate planning scrutiny, helping to address the Council's declared Housing Challenge and prevent further unmanaged loss of housing stock. Planning fee income may offset some costs over time, but any initial resource requirement would need to be front funded to ensure that this does not negatively impact performance and/or customer experience.

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 The Inverness City STLCA and the Highland Rural STLCA are distinct proposals with their own relevant geographies. Integrated Impact Assessment screening has been undertaken for each of the proposals on 31 August 2026. The conclusions have been subject to the relevant Manager Review and Approval.

4.3.2 The Screening process for the **Inverness City STLCA** has concluded that there are mixed impacts from the proposed Control Area if 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 within **Appendix 1** to support the decision-making process.

4.3.3

Impact Assessment Area	Conclusion of Screening/Full Assessment
Equality	Limited indirect positive impacts for elderly individuals by supporting social cohesion, neighbourhood familiarity/support networks. Limited indirect positive impacts for disabled individuals, should the Control Area support the retention of residential properties suitable for meeting the needs of disabled people. No impact on other characteristics.
Socio-economic	Positive and negative impact – both the direct and indirect benefits of retaining homes within the housing supply with the operator costs for preparing and submitting planning applications or certificates of lawfulness where required.
Human Rights	No impact - Considers Scottish Government's view in relation to ECHR Article 1 Protocol 1.
Children's Rights and Well-being	No impact
Island and Mainland Rural	No impact
Climate Change	No impact
Data Rights	No impact

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

4.3.5

Impact Assessment Area	Conclusion of Screening/Full Assessment
Equality	Limited indirect positive impacts for elderly individuals by supporting social cohesion, neighbourhood familiarity/support networks. Limited indirect positive impacts for disabled individuals, should the Control Area support the retention of residential properties suitable for meeting the needs of disabled people. No impact on other characteristics.
Socio-economic	Positive and negative impact – both the direct and indirect benefits of retaining homes within the housing supply with the operator costs for preparing and submitting planning applications or certificates of lawfulness where required.
Human Rights	No impact - Considers Scottish Government's view in relation to ECHR Article 1 Protocol 1.
Children's Rights and Well-being	No impact
Island and Mainland Rural	Minor differences – Overall, the proposal is assessed as having a mixed but generally neutral to positive impact.
Climate Change	No impact
Data Rights	No impact

5 Background

5.1 The Town and Country Planning (Scotland) Act 1997 section 26B establishes that a planning authority may designate all or part of its area as a STLCA. In a STLCA, the use of a dwellinghouse for the purpose of providing short-term lets is deemed to involve a material change of use 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, STL. However, this only applies to changes of use that occur **after** an STLCA comes into force and cannot be applied retrospectively. An STLCA does not affect the planning requirements for other types of short-term accommodation such as guest houses, B&Bs, annexes and pods. Where an existing short term let is considered to have involved a material change of use prior to the establishment of an STLCA, existing planning requirements would apply. Where certainty is required, STL operators have the option to apply for a Certificate of Lawfulness.

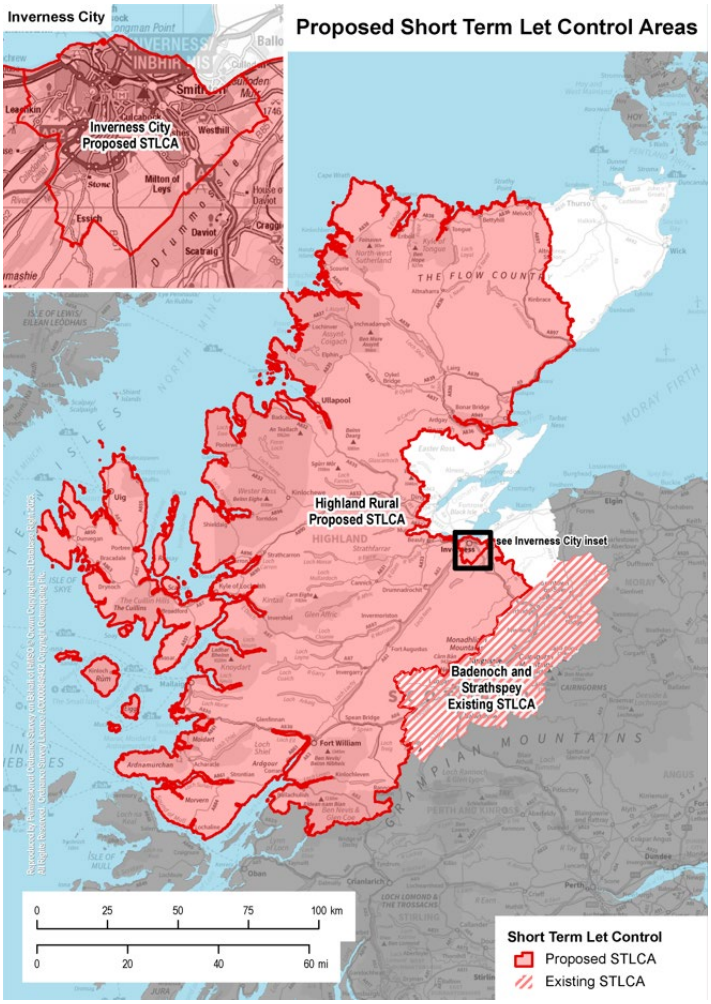
5.2 On 18 September 2025, Highland Council agreed that Area Committees would first decide on whether to progress the introduction of a STLCA in all or part of their area. Subsequent to this process being agreed, Area Committees with the most justifiable evidence agreed to continue the process of further considering designating a Short Term Let Control Area covering all or part of their area, namely:-

- Wester Ross, Strathpeffer and Lochalsh – Agreed on 3 November 2025;
- Lochaber Area Committee – Agreed on 10 November 2025;
- Sutherland Area Committee – Agreed on 1 December 2025;
- Skye and Raasay Area Committee – Agreed on 1 December; and
- City of Inverness Area Committee – Agreed on 7 January 2026

5.3 At its meeting on 12 February 2026 the Economy and Infrastructure Committee took the decision to commence the statutory consultation process for two proposed Short Term Let Control Areas shown in Figure 1:-

- Inverness City, which includes Ward 13, 14, 15, 16 and part of Ward 19 (Slackbuie, Milton of Leys and Westhill); and
- Highland Rural, which includes Ward 12 Aird and Loch Ness, and the remaining majority of Ward 19 Inverness South, in addition to Sutherland, Wester Ross, Strathpeffer and Lochalsh, Lochaber, and Skye and Raasay).

Figure 1 Proposed Inverness City and Highland Rural Short Term Let Control Areas



It also agreed to recommend to Council that the final decision to designate a Short Term Let Control Area would be for the Economy and Infrastructure Committee, following a post-consultation report to the relevant Area Committees, amending the Scheme of Delegation, accordingly, allowing them to comment, and if necessary, amend the Short Term Let Control Area within their area committee boundary.

5.4 Following the statutory consultation, detailed in Section 6, all Local Area Committees within the proposals have now considered the feedback from the consultations. The City of Inverness Area Committee on 17 August 2026 agreed to recommend to the Economy and Infrastructure Committee that the City of Inverness Short Term Let Control Area be progressed, should any decision to submit a proposal for designation to Scottish Ministers be taken. The following Area Committees have also agreed to recommend to the Economy and Infrastructure Committee that their areas 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, namely:-

- Wester Ross, Strathpeffer and Lochalsh – Agreed on 3 August 2026;
- Lochaber – Agreed on 10 August 2026;
- City of Inverness Area – Agreed on 17 August 2026;
- Sutherland County – Agreed on 31 August 2026; and
- Skye and Raasay – Agreed on 31 August 2026

6 Overview of the consultation

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

6.2 During the consultation, the Inverness City STLCA Statement of Reasons and map were available for inspection during normal opening hours at the Inverness Service Point in the Town House. The Highland Rural STLCA Statement of Reasons and map were also available for inspection within all Service Points and Access Points within the proposed Control Area. Additional steps, beyond those required within Regulation 4(1), were taken to increase awareness of and engagement with the proposals. Community Councils were invited to a webinar briefing on the proposals. 14 attended a Highland Rural STLCA webinar and 3 attended an Inverness City STLCA webinar. A summary of and outputs from the Q&A were subsequently disseminated to all the community councils within the proposed areas.

6.3 Informal in-person drop in events with officers were held in the following locations:-

- Inverness (circa 20 in attendance);
- Plockton (circa 25 in attendance);
- Lochinver (circa 20 in attendance);
- Fort Augustus (circa 15 in attendance);
- Portree (circa 20 in attendance);
- Fort William (circa 25 in attendance); and
- Ullapool (circa 15 in attendance)

These events provided an appropriate forum for members of the public to ask officers queries about the proposal and view display boards and printed materials.

6.4 A STL Development Enquiry Form was launched and promoted to provide STL operators with a view as to whether their STL would have likely required planning permission in any case (regardless of the Control Area) owing to it being operational development (building works) or a material change of use. This remains available for operators to consult, currently without fee. In total, 89 STL Development Enquiries were received during the consultation. This service will remain available as an option for operators to engage with the Planning Service and enable them to clarify the planning status of their STL. It is likely that the fee will be revisited. The view received from the STL Development Enquiry can help inform the operator of next steps; either to apply for planning permission where it would already require planning permission, or the option of applying for a certificate of lawfulness.

6.5 The 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.

6.6 The Council held a webinar briefing for operators and the tourism industry, where 25 attended. Further information was available on the consultation portal including a map of the proposed STLCA, Frequently Asked Questions, Council Committee reports, and the Planning Circular 1/2023 on short term lets and planning.

7 Consultation surveys

7.1 For the Inverness City STLCA consultation survey, a total of **202** responses were received, of which **147** were from individual respondents who reside within the Inverness City STLCA. For the Highland Rural STLCA consultation survey, a total of **608** responses were received, of which **409** were from individual respondents who reside within the proposed Highland Rural STLCA.

7.2 The consultation surveys gathered a range of descriptive characteristics of respondents, their awareness and experience of STLs, and their views on the proposed Control Area. It used several questions from Research into the impact of short-term lets on communities across Scotland which was conducted by the Scottish Government and carried out independently by the Indigo Group in 2019. The exact questions adapted from this previous study are contained within *Section 4 Awareness and Experience of Short Term Lets* (p 21) of the Supporting Material to the study.

8 Inverness City STLCA Respondents

8.1 A full summary of responses to the Inverness City STLCA consultation survey, that was considered by the City of Inverness Area Committee, is presented within **Appendix 3**. The total number of responses to the Inverness City STLCA consultation attributed to individual respondents residing in the affected area is 147 as shown in **Table 1**. This 147 comprises those responding as residents, resident operators, other businesses and resident prospective operators. In addition, 1 community council based within the area also responded, alongside a further 54 respondents non-resident in Inverness City, of which 23 were Short Term Let Operators. The total number of responses received is therefore 202.

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

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

8.3 This means that of the 50 STL Operators who responded, these are fairly split between 27 resident operators (who live and work within the proposed Control Area) and 23 non-resident operators. Among operators who responded to the Inverness City STLCA Consultation, the dominant form of STL properties were conversions from previous houses (36%) or self-contained flats (28%). There were no substantive differences between the profile of STL properties operated by resident and non-resident operators in Inverness City.

8.4 The 1 response from Community Councils, groups and organisations specifically within Inverness City included Lochardil and Drummond Community Council. Other organisations that responded were:-

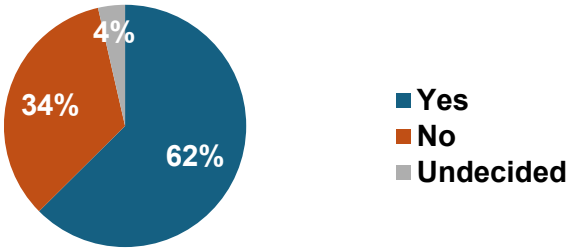
- The Scottish Tourism Alliance;
- Association for Scotland's Self-Caterers; and
- Living Rent

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

8.5 The key findings from respondents are:-

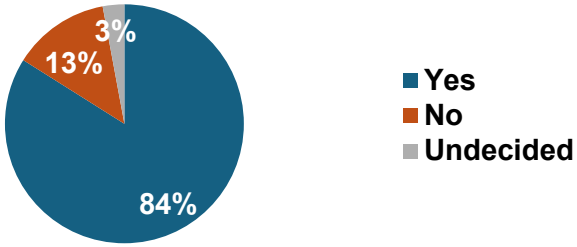
- A majority (62% or 122 of 195 respondents) of respondents support the proposal to establish the Inverness City Short Term Let Control Area, while 66 respondents (34%) oppose it (**Figure 2a**).
- Support is notably stronger among residents and businesses, with 115 of 137 respondents (84%) in favour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

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



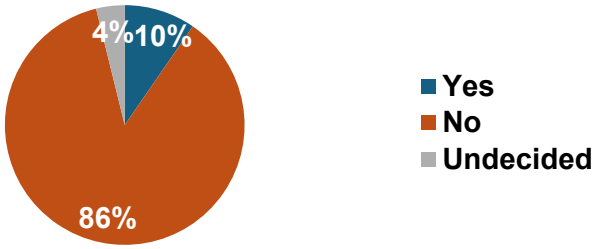
**Note: 7 respondents did not answer this question*

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



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

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



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

9 Highland Rural STLCA Respondents

9.1 A full summary of responses to the Highland Rural Short Term Let Control Area consultation, considered by the Wester Ross, Strathpeffer and Lochalsh, Lochaber, City of Inverness, Skye and Raasay, and Sutherland County Area Committees is presented within **Appendix 4**. The total number of responses to the Highland Rural STLCA consultation attributed to individual respondents residing in the proposed area is **409** as shown in **Table 2**. This 409 comprises those responding as residents, resident operators, and other businesses. In addition, 6 community councils/ groups or organisations based specifically within the area responded.

Table 2: Number of Resident Consultation Survey Respondents by Area

Respondent type	Resides in Highland Rural STLCA	Total Responses
Total Residing in Area	**409**	**597**
Resident (Not a short term let operator)	270	332
Business (Not a short term let operator)	12	14
Short term let operator	121	224
Prospective short term let operator	6	17
Visitor	-	10
Community Council, Group, Organisation	**6**	**11**
TOTAL Resident responses	**415**	**608**

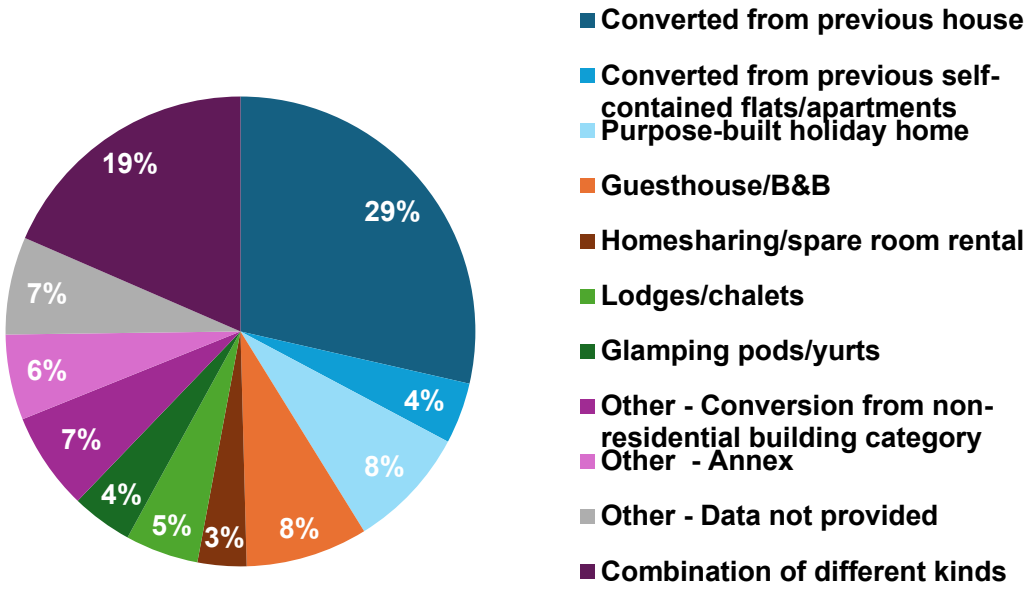
9.2 The consultation received 193 responses from individuals who do not reside within the proposed control area, as shown in **Table 3**; most of whom (135) are not residents of The Highland Council area. While the profile of respondents living elsewhere in Highland is broadly similar to those within the proposed Control Area, the profile of individual respondents residing outwith Highland differs considerably, comprising a higher share of STL operators (66%) than resident respondents, where STL operators comprise 29% of the sample. All responses have been analysed in preparing this report.

Table 3: Number of Non-Resident Consultation Survey Respondents

Respondent type	Resides elsewhere in Highland	Resides outwith Highland
Individual Respondents	**57**	**131**
Resident (outwith proposed STLCA)	38	22
Business (Not a short term let operator)	1	1
Short term let operator	17	86
Prospective short term let operator	1	10
Visitor	0	10
Former Short Term Let Operator	0	2
Community Council, Group, Organisation	**1**	**4**
TOTAL Non-Resident Responses	**58**	**135**

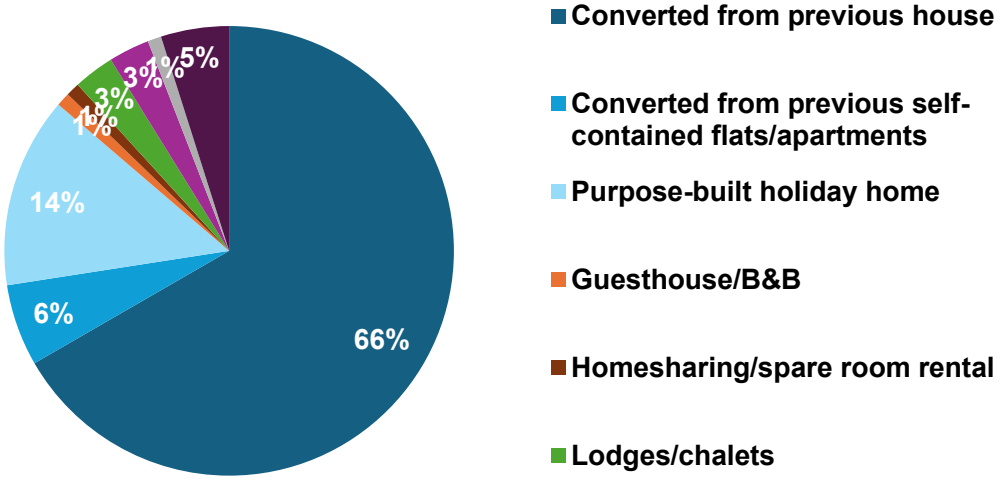
9.3 Among operator responses to the Highland Rural STLCA consultation survey, there are two distinct cohorts; resident operators (who both live and operate STLs within the Area), and non-resident operators, the majority of whom do not reside within The Highland Council area. There are differences in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

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



9.4 Non-resident operator respondents by contrast indicated that they operate a different profile of Short Term Lets within the proposed Highland Rural STLCA as shown in **Figure 3b**, with two thirds (66%) being conversions from previous houses, with a slightly higher share of purpose-built holiday homes also.

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



9.5 Responses from Community Councils, Groups and Organisations included:-

- Lairg Community Council;
- Fort William Inverlochy & Torlundy Community Council;
- Plockton District & Community Trust;
- Wester Loch Ewe Community Council;
- Contin Community Council; and
- Torridon and Kinlochewe Community Council

Organisations that submitted a response relating to all of the Highland Rural proposed STLCA area were:-

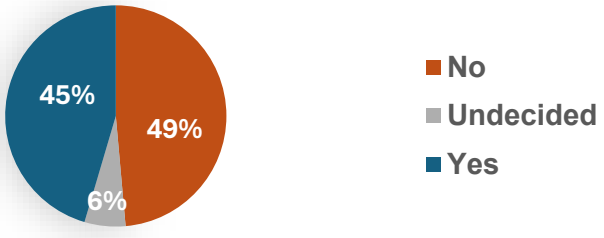
- Scottish Crofting Federation;
- Scottish Land and Estates;
- The Scottish Tourism Alliance;
- Association for Scotland's Self-Caterers; and
- Nairn BID

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

9.6 The key findings from respondents are:-

- For the total sample, 292 (49%) respondents oppose the proposal while 273 (45%) support it, while 36 are undecided (6%).
- Support is notably stronger among residents and businesses, with 232 of 323 respondents (72%) in favour (**Figure 4b**).
- Most operators living within and outwith the area oppose the proposal, with 184 of 234 respondents (79%) indicating they do not support it (**Figure 4c**).
- Of the Community Councils/Groups that responded, 3 (50%) support the proposal, while 3 (50%) oppose the proposal.
- Of the wider organisations that responded, the Nairn BID, the Scottish Tourism Alliance and the Association of Scotland's Self Caterers oppose the proposal, Scottish Land and Estates are undecided, while the Scottish Crofting Federation support the proposal. Their submissions and the responses to the matters raised are detailed within **Appendix 4**.
- Overall, the results indicate a clear divergence of opinion between residents and businesses - who generally support the proposal – and short term let operators (both resident and non-resident) - who are largely opposed.
- The clear divergence of opinion extends beyond the question of whether to support the proposed control area. The category of respondent (Resident, Business, or Operator) is a dominant predictor of responses provided to many other questions within the consultation as shown within **Appendix 4**, signalling that different groups and stakeholders perceive the prevalence and the impact of Short Term Lets very differently.

Figure 4a: All responses to 'Do you agree with the proposal to establish the Highland Rural STLCA?' (n=601)*



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

Figure 4b: Resident and business responses to 'Do you agree with the proposal to establish the Highland Rural STLCA?' (n=323)

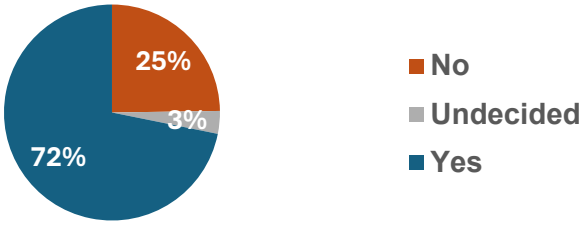
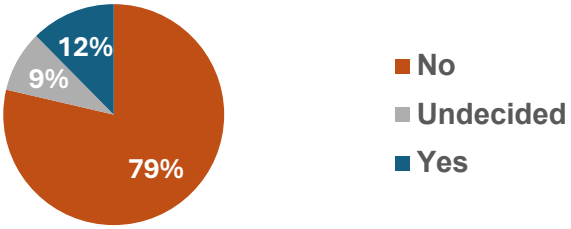


Figure 4c: Operator responses to 'Do you agree with the proposal to establish the Highland Rural STLCA?' (n=234)*



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

9.7 The main themes emerging from open comments given in support of and/or in opposition to the proposal to designate the Highland Rural STLCA have been noted and considered by the respective Area Committees and are detailed within **Appendix 4**.

10 Analysis and Conclusions

10.1 Both STLCA consultations attracted responses from a range of stakeholders, including local residents, community organisations, businesses and short term let operators.

10.2 Given the differences between the urban and rural contexts, there are differences in the profile of STL properties within the proposed Control Areas, and the impacts that they have within their contexts on surrounding communities. The key views and concerns raised within both surveys are therefore different and speak to the respective applicable issues.

10.3 It is notable that for the Highland Rural consultation a large proportion of objections were submitted by respondents who were not resident within the proposed Control Area or the Highlands at large. This does not diminish the legitimacy of any of these views but reflects the differing perspectives of different groups responding to each consultation.

10.4 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.

10.5 In assessing consultation responses, it is important not only to consider the number of representations received, but also the different perspectives and interests they represent. The purpose of the consultations is not to determine which group forms a majority, but to understand the range of views and to inform a balanced judgment on how best to reconcile the competing public interests associated with housing provision, community sustainability, residential amenity and tourism accommodation.

10.6 The majority of STL operators oppose the proposals. However, representations from hotel owners and serviced accommodation providers demonstrate that there is no single tourism-sector view on the proposed control area(s). 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 STL 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.

10.7 The consultation responses each therefore highlight a spectrum of opinion, but one characterised by two legitimate albeit directly opposing views about how best to balance competing public interests. Those supporting the designations generally viewed it as a necessary planning tool to address concerns regarding housing availability, community sustainability and the cumulative impact of STLs on residential amenity which are not grounds for consideration within STL licence applications.

10.8 Some respondents who supported the introduction of either Control Area were concerned that it represents only a partial solution, considering that it did not go far enough and expressed concerned that the designation does not apply retrospectively and therefore does not automatically bring existing STLs within planning control or compel them to return to the housing supply.

10.9 In response, the proposal can be viewed as a means of managing future changes of use rather than addressing the full extent of existing concentrations of short-term letting. Some were concerned that the proposals did not cover wider areas (Culloden, Nairn, Tain or the whole of Highland), and alternatively others suggested smaller areas be considered for designation around the areas of the highest STL concentrations. Those opposed generally regarded it as an unnecessary and disproportionate intervention in an already regulated sector and that property owners should not be inhibited from converting further residential properties to short term let

use in response to market demand to generate further tourism growth and economic benefits in the area.

10.10 Those opposed to the proposals overwhelmingly disputed the Council's evidence base, notwithstanding analysis demonstrating spatial concentrations in both Control Areas, and a significant proportion of new-build homes and properties sold in the Highland Rural area that have subsequently been converted to STLs.

10.11 The proposed Control Areas for Highland Rural and Inverness City sit between these positions. They would neither prohibit short-term letting nor leave future changes of use entirely unmanaged. Similarly, they are focussed on future changes of use that occur after a designation comes into effect and therefore would not alter the planning requirements of current operators within the area. Rather, they provide a mechanism through which future conversions can be assessed on their individual merits through the planning system, allowing decision-makers to balance the benefits and impacts of proposals in the circumstances of each case.

10.12 Given that a STLCA does not apply retrospectively such that this alters planning requirements for existing operators, it cannot be agreed that the proposed STLCAs will have a significant adverse impact on the current short term let sector. The overwhelming majority of existing operators are expected to continue operating as they do at present. Each proposal is concerned with future changes of use, not existing provision. It is therefore not considered that the designations would substantially damage tourism or lead to the loss of the sector. The proposals do not prohibit short term lets; they simply ensure that future conversions of residential properties are subject to planning scrutiny. They are a measure to manage future growth in the sector, not to curtail existing tourism accommodation.

10.13 This balanced approach is particularly important in the Highland context. Many respondents to both consultations indicated that the main measure to address the Highland Housing Challenge is the delivery of new homes. Increasing affordable housing supply and managing the loss of existing housing stock are not mutually exclusive approaches. Increasing the delivery of affordable housing is important but not a simple or immediate solution in Highland. Within the Highland Rural Area, housing delivery is constrained by factors including infrastructure capacity, development viability, land ownership, ground conditions, workforce availability and limited market interest across large parts of the region. New housing can take many years to bring forward.

10.14 Even with new housing provided, over 9.5% of new houses built within the proposed Highland Rural STLCA in the last 5 years have since become STLs. That is double the equivalent rate for Highland (4.7%) as a whole, while rates within particular areas exceed this further. This 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. Viewed through a forward-looking lens, this trend should not be replicated, or made worse, in future housing development, so that new housing stock contributes to the area's identified housing needs on a long-term basis.

10.15 Similar challenges exist in Inverness City, where opportunities for new housing in central historic neighbourhoods are limited. This means that housing demand in Inverness is increasingly met within the expanding suburbs. While several successful housing developments have come forward within more centrally located areas, these

units are vulnerable to future conversion owing to their proximity to the city centre with its many tourist facilities and hospitality sector. It is recognised that existing concentrations of STLs in central areas of Inverness have become increasingly controversial in recent years reflecting growing tensions between the need to sustain established residential communities and the demand for tourist accommodation.

10.16 The respective Local Area Committees have agreed to progress the proposals as set out in paragraph 5.4 by referral to this Committee. On balance, it is therefore proposed to progress both the proposed Inverness City Short Term Let Control Area, and the proposed Highland Rural Short Term Let Control Area, where if agreed, the proposals will be submitted to Scottish Ministers in accordance with Regulation 8.

11 Resource Implications

11.1 This report is concerned with a decision on whether to progress or not with the designation of Highland Rural and Inverness City STLCAs. If the decision is taken to progress, a further report will be presented to this Committee on the outcome of the decision of Scottish Ministers and providing the opportunity to formally designate. Any decision taken in respect of the recommendations contained within this report would not, in itself, bring either Control Area into effect and would not immediately trigger need for additional staffing resource however the implications on resource should be noted.

11.2 While the number of planning applications, Certificates of Lawful Use (CLUs) and related enquiries resulting from the designation of the Short Term Let Control Areas cannot be predicted with certainty, evidence can be drawn from the experience of the Badenoch and Strathspey STLCA to estimate potential caseload that will be created.

11.3 Applying the proportions of planning applications and CLUs recorded in Badenoch and Strathspey to the number of existing secondary-letting short-term lets within the proposed Control Areas suggests that there will be a significant planning caseload over the first four years after designation. This does not reflect the additional work involved in responding to enquiries and consultations from /cross working with Licensing.

11.4 Experience from Badenoch and Strathspey suggests such caseloads are unlikely to be spread evenly over time. Instead, applications and CLUs are likely to be concentrated around key points in a cycle as operators seek to regularise their planning position, particularly to support license applications. This is generally the same with regard to enquiries. It is therefore considered that resource is most required at these points in order to manage customer expectation and maintain existing performance.

11.5 The designation of the Badenoch and Strathspey Control Area resulted in a substantial increase in planning caseload and a corresponding backlog of cases at a time when no dedicated additional resource had been established in advance. Consequently, staffing requirements are likely to be driven by peak demand rather than average annual workloads.

11.6 If the proposed Control Areas are designated, consideration should be given to the establishment of a dedicated Short Term Lets Planning Team in advance of implementation. While fee income is expected to recover a significant proportion of costs over time, staffing resources would need to be available in advance of the

anticipated increase in demand, something that cannot therefore be funded solely through the subsequent receipt of planning fees.

11.7 A detailed assessment of the potential planning resource implications, should Ministers approve either or both Control Areas, is in development and will inform ongoing resourcing discussions.

12 Next Steps

12.1 As demonstrated in **Section 8** and **Appendix 3**, the consultation responses demonstrated, on balance, support for the proposed Inverness City STLCA among respondents residing in the Area. Based on the evidence set out in the Inverness City Statement of Reasons, consultation feedback on the proposal, and the decision taken by the City of Inverness Area Committee, it is proposed to submit the proposed Inverness City STLCA to Scottish Ministers for their approval in accordance with in accordance with Regulation 8.

12.2 As demonstrated in **Section 9** and **Appendix 4**, the consultation responses demonstrated, on balance, support for the proposed Highland Rural STLCA among respondents residing within the affected areas, but also a significant level of opposition from STL operators, many of which do not reside within the affected Area. Based on the evidence set out in the Highland Rural Statement of Reasons, consultation feedback on the proposal, and the decisions taken by the Wester Ross, Strathpeffer and Lochalsh, Lochaber, City of Inverness, Skye and Raasay, and Sutherland County Area Committees, it is also proposed to submit the proposed Highland Rural STLCA to Scottish Ministers for their approval in accordance with in accordance with Regulation 8.

12.3 The designation of the Control Areas does not in itself determine the outcome of planning applications, nor does it ban short term let changes of use or set the policy framework that applies to these applications. Planning applications within the Control Area would require to be determined in accordance with the adopted development plan. Members will therefore 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:	3 September 2026
Author:	Meadhbh Maguire, Principal Planner Meredith Dale, Principal Planner David Mudie, Strategic Lead Planning and Building Standards and Chief Planning Officer
Background Papers:	Short Term Let Control Area Report to Highland Council 18 September 2025 Short Term Let Control Area Report to EIC 12 February 2026 Short Term Let Control Area – Post Consultation Update Report to WRSL 3 August 2026 Short Term Let Control Area – Post Consultation Update Report to Lochaber Area 10 August 2026

Short Term Let Control Area – Post Consultation Update Report to CIAC 17 August 2026
Short Term Let Control Area – Post Consultation Update Report to Skye and Raasay Area 17 August 2026
Short Term Let Control Area – Post Consultation Update Report to Sutherland County 17 August 2026
Inverness City STLCA Statement of Reasons
Highland Rural STLCA Statement of Reasons

Appendices:

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

Appendix 1

Integrated Impact Assessment Screening

About proposal

What does this proposal relate to? Policy

Proposal name: Inverness City Short Term Let Control Area

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

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

Start date of proposal:

End date of proposal:

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

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

Does this relate to an existing proposal? Yes

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

Author details

Name: Meadhbh Maguire

Job title: Principal Planner

Email address: Meadhbh.Maguire1@highland.gov.uk

Service: Place

Responsible officer details

Name: Tim Stott

Job title: Development Plans Manager

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

Sign off date: 2026-08-31

Equalities, poverty, and human rights

Protected characteristics

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

Sex: No impact

Age: Positive

Disability: Positive

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.
By providing greater control over the conversion of dwellinghouses to secondary short-term lets, the Control Area may help retain housing for permanent occupation. This could support community cohesion and social networks, which can be particularly important for older residents who may rely on established local relationships, neighbourhood familiarity, and informal support networks. The measure may also help reduce the perception of increasing community transience associated with high concentrations of visitor accommodation in some areas. Any such impact would be indirect and limited, as outcomes will depend on the proposals brought forward and the decisions made on individual planning applications. The measure is therefore likely to have a modest and variable effect rather than a significant direct impact.
The proposed Short Term Let Control Area may have a positive impact on disabled people by enabling greater scrutiny of proposals involving the change of use of dwellinghouses to secondary short-term lets. In some cases, this may help support the retention of residential properties that are suitable for, or capable of adaptation to meet, the needs of disabled people. Where accessible housing forms part of the local housing stock, the requirement for planning permission provides an opportunity for the potential loss of such accommodation to be considered through the planning process, whereas changes of use that do not require planning permission would not be subject to the same level of scrutiny. Any benefit would be indirect and limited, as outcomes will depend on the nature of individual planning applications and subsequent decisions.

Poverty and socio-economic

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

Prospects and opportunities: No impact

Places: Positive

Financial: No impact

Poverty and socio-economic impact details: The proposal does not restrict individuals' ability to access education, employment, training, childcare or support services, nor does it alter the provision of these services.
The Control Area would introduce a planning requirement for the future change of use of residential properties to short-term lets, but it would not prevent the operation of short-term lets where planning permission is granted. As such, the proposal is not expected to directly affect employment opportunities within the tourism sector or other industries.
The proposal is not expected to have a significant adverse impact on vulnerable areas or communities, including those identified through the Scottish Index of Multiple Deprivation (SIMD), fragile rural communities, or areas experiencing housing and transport challenges.
The purpose of the Short Term Let Control Area is to provide greater oversight of the conversion of residential properties to short-term let use through the planning system. It does not prevent short term lets from operating but allows the Council to assess proposals on a case-by-case basis, taking account of local circumstances and potential impacts on communities. Within Inverness, the Control Area may help to protect the availability of housing for permanent residents by providing a mechanism to manage the concentration and distribution of short-term lets in areas where demand for housing is high. By supporting the retention of residential accommodation for local households and workers, the proposal could contribute positively to sustaining mixed and balanced communities, maintaining access to housing, and supporting the long-term social and economic wellbeing of the city.
There may be some indirect positive impacts over the longer term if the proposal contributes to retaining housing stock for permanent residential use in Inverness City. Improved availability of housing could support recruitment and retention of workers in key sectors such as health, education, social care, hospitality and public services, thereby helping people access employment opportunities closer to where they live. Increased housing availability may also assist younger people, families and lower-income households to remain within their communities, supporting access to local schools, training opportunities and employment.
A potential economic impact relates to businesses by requiring planning permission or securing confirmation of lawful planning status with a Certificate of Lawfulness meaning additional costs. However this would bring Short-Term Letting into line with other accommodation businesses that already require planning permission for their siting or change of use. Overall, any impacts on prospects and opportunities are likely to be indirect, limited and would depend on future planning decisions relating to individual short-term let proposals.

Human rights

Which of the below human rights will be affected by this proposal?
Article 1 Protocol 1.

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

Human rights impact details: The proposal has the potential to engage Protocol 1, Article 1: Right to peaceful enjoyment of property because it introduces additional planning controls relating to the use of private property as a short-term let. Property owners may be required to obtain planning permission before changing the use of a dwellinghouse to a short-term let within the Control Area. The principle of requiring planning permission for changes of use to short-term lets has already been considered by the Scottish Government as part of the legislation introducing Short Term Let Control Areas. The Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 provide a lawful mechanism for local authorities to designate control areas where justified by local circumstances.
The Council has considered the view of the Scottish Government on this matter. Cabinet Secretary for Housing Màiri McAllan MSP accepted in February that the regulation of short-term lets via planning and licensing regimes represents a control of the use of a host's property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were "satisfied that the creation of powers for a local authority to designate a short-term let control area is a proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity".
The proposal does not remove property rights or prevent ownership of property. Any interference with property rights would be lawful, proportionate and in pursuit of a legitimate public interest, namely the management of housing supply, community sustainability and the balanced development of the area through the planning system. As the Control Area operates within an established legal framework specifically created by the Scottish Parliament for this purpose, any interference with property rights is considered lawful, proportionate and in pursuit of legitimate public policy objectives. No significant adverse impacts on other Convention rights have been identified.

Equalities, poverty and human rights screening assessment

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

Is a Full Impact Assessment required? No

Children's rights and wellbeing

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

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

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

Children's rights and wellbeing screening assessment

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

Is a Full Impact Assessment required? No

Data protection

Will your proposal involve processing personal data? No

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

Data protection screening assessment

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

Is a Full Impact Assessment required? No

Island and mainland rural communities

Does your proposal impact island and mainland rural communities? No

Island and mainland rural communities screening assessment

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

Is a Full Impact Assessment required? No

Climate change

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

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

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

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

Climate change screening assessment

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

Is a Full Impact Assessment required? No

Integrated Impact Assessment Screening

About proposal

What does this proposal relate to? Policy

Proposal name: Highland Rural Short Term Let Control Area

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

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

Start date of proposal:

End date of proposal:

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

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

Does this relate to an existing proposal? Yes

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

Author details

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Service: Place

Responsible officer details

Name: Tim Stott

Job title: Development Plans Manager

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

Sign off date: 2026-08-31

Equalities, poverty, and human rights

Protected characteristics

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

Sex: No impact

Age: Positive

Disability: Positive

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.
By providing greater control over the conversion of dwellinghouses to secondary short-term lets, the Control Area may help retain housing for permanent occupation. This could support community cohesion and social networks, which can be particularly important for older residents who may rely on established local relationships, neighbourhood familiarity, and informal support networks. The measure may also help reduce the perception of increasing community transience associated with high concentrations of visitor accommodation in some areas. Any such impact would be indirect and limited, as outcomes will depend on the proposals brought forward and the decisions made on individual planning applications. The measure is therefore likely to have a modest and variable effect rather than a significant direct impact.
The proposed Short Term Let Control Area may have a positive impact on disabled people by enabling greater scrutiny of proposals involving the change of use of dwellinghouses to secondary short-term lets. In some cases, this may help support the retention of residential properties that are suitable for, or capable of adaptation to meet, the needs of disabled people. Where accessible housing forms part of the local housing stock, the requirement for planning permission provides an opportunity for the potential loss of such accommodation to be considered through the planning process, whereas changes of use that do not require planning permission would not be subject to the same level of scrutiny. Any benefit would be indirect and limited, as outcomes will depend on the nature of individual planning applications and subsequent decisions.

Poverty and socio-economic

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

Prospects and opportunities: No impact

Places: Positive

Financial: No impact

Poverty and socio-economic impact details: The proposal does not restrict individuals' ability to access education, employment, training, childcare or support services, nor does it alter the provision of these services.
The Control Area would introduce a planning requirement for the future change of use of residential properties to short-term lets, but it would not prevent the operation of short-term lets where planning permission is granted. As such, the proposal is not expected to directly affect employment opportunities within the tourism sector or other industries.
The proposal is not expected to have a significant adverse impact on vulnerable areas or communities, including those identified through the Scottish Index of Multiple Deprivation (SIMD), fragile rural communities, or areas experiencing housing and transport challenges.
The purpose of the Short Term Let Control Area is to provide greater oversight of the conversion of residential properties to short-term let use through the planning system. It does not prevent short term lets from operating but allows the Council to assess proposals on a case-by-case basis, taking account of local circumstances and potential impacts on communities. In rural and fragile communities, the proposal may help to support the sustainability of settlements by providing a mechanism to manage the loss of residential housing stock where concentrations of short-term lets could affect the availability of homes for local residents and workers. This could have positive implications for maintaining population levels, supporting local services and sustaining community cohesion.
There may be some indirect positive impacts over the longer term if the proposal contributes to retaining housing stock for permanent residential use in rural communities. Improved availability of housing could support recruitment and retention of workers in key sectors such as health, education, social care, hospitality and public services, thereby helping people access employment opportunities closer to where they live. Increased housing availability may also assist younger people, families and lower-income households to remain within their communities, supporting access to local schools, training opportunities and employment.
A potential economic impact relates to businesses by requiring planning permission or securing confirmation of lawful planning status with a Certificate of Lawfulness meaning additional costs. However this would bring Short-Term Letting into line with other accommodation businesses that already require planning permission for their siting or change of use. Overall, any impacts on prospects and opportunities are likely to be indirect, limited and would depend on future planning decisions relating to individual short-term let proposals.

Human rights

Which of the below human rights will be affected by this proposal?
Article 1 Protocol 1.

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

Human rights impact details: The proposal has the potential to engage Protocol 1, Article 1: Right to peaceful enjoyment of property because it introduces additional planning controls relating to the use of private property as a short-term let. Property owners may be required to obtain planning permission before changing the use of a dwellinghouse to a short-term let within the Control Area. The principle of requiring planning permission for changes of use to short-term lets has already been considered by the Scottish Government as part of the legislation introducing Short Term Let Control Areas. The Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 provide a lawful mechanism for local authorities to designate control areas where justified by local circumstances.
The Council has considered the view of the Scottish Government on this matter. Cabinet Secretary for Housing Màiri McAllan MSP accepted in February that the regulation of short-term lets via planning and licensing regimes represents a control of the use of a host's property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were "satisfied that the creation of powers for a local authority to designate a short-term let control area is a proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity".
The proposal does not remove property rights or prevent ownership of property. Any interference with property rights would be lawful, proportionate and in pursuit of a legitimate public interest, namely the management of housing supply, community sustainability and the balanced development of the area through the planning system. As the Control Area operates within an established legal framework specifically created by the Scottish Parliament for this purpose, any interference with property rights is considered lawful, proportionate and in pursuit of legitimate public policy objectives. No significant adverse impacts on other Convention rights have been identified.

Equalities, poverty and human rights screening assessment

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

Is a Full Impact Assessment required? No

Children's rights and wellbeing

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

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

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

Children's rights and wellbeing screening assessment

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

Is a Full Impact Assessment required? No

Data protection

Will your proposal involve processing personal data? No

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

Data protection screening assessment

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

Is a Full Impact Assessment required? No

Island and mainland rural communities

Does your proposal impact island and mainland rural communities? Yes

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

Have any negative impacts been identified? No

Island and mainland rural communities screening assessment

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

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

In some island and rural communities, short-term lets can form an important part of the local economy, supporting tourism-related employment and income for self-employed individuals, seasonal workers and small businesses. The introduction of a Control Area may therefore be perceived as having a greater impact in locations where the visitor economy is particularly significant.
Conversely, many island and rural communities experience acute housing pressures, including limited housing supply, higher construction costs, outward migration of young people, difficulties attracting workers and challenges sustaining local services. In these areas, the Control Area may have positive impacts by helping to manage the loss of residential properties to short-term let use and supporting the availability of housing for permanent residents and local workers.
As the Control Area does not prohibit short-term lets but instead requires planning permission for changes of use, it provides a mechanism through which the specific circumstances of individual island and mainland rural communities can be considered as part of the planning process.
Overall, the proposal is assessed as having a mixed but generally neutral to positive impact, recognising that effects may vary between communities depending on the balance between housing pressures and the economic benefits associated with short-term letting. No disproportionate adverse impacts on island communities compared with mainland rural communities have been identified.

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

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

and page 85:
We consider that the legislation is appropriate for the whole of Scotland, including island communities, and offers considerable flexibility to local authorities on how it is implemented. We intend to work with local authorities, not least in the preparation of guidance, as they work towards implementation so that we can facilitate the sharing of ideas and best practice. We hope this will be of particular value to island local authorities and local authorities with island communities.

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

Is a Full Impact Assessment required? No

Climate change

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

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

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

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

Climate change screening assessment

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

Is a Full Impact Assessment required? No

Appendix 3

This Appendix presents a summary of responses to the **Inverness City STLCA survey**.
Note: Questions 1 – 3, 7 – 11 and 29, which capture personal information, are not reported however they have informed the definition of the geography and cohorts of respondents, outlined below.

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

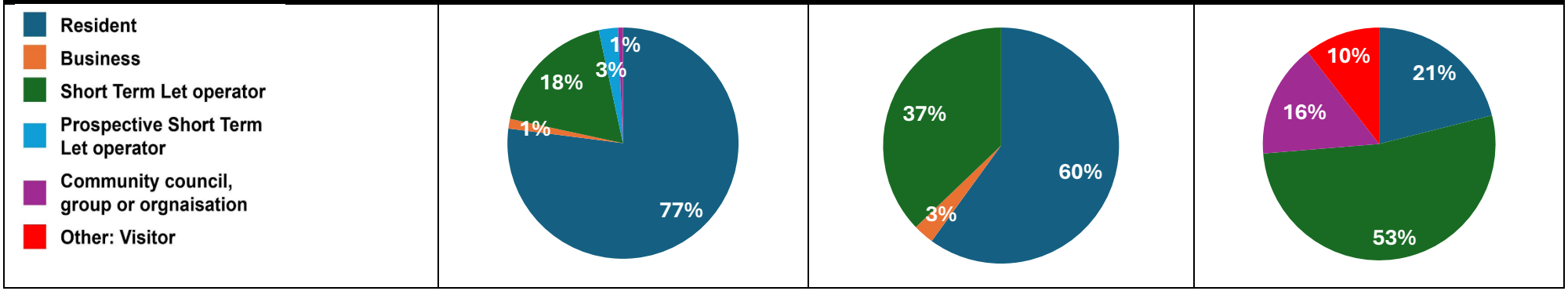
Cohorts
Three cohorts of respondents have been classified as shown in **Table A3.1**. Using cohorts supports the presentation of this analysis by grouping respondents with similar characteristics.

Table A3.1: Summary of cohorts for survey analysis

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

Question 4. Are you responding as:
Where relevant, 'Other' responses which relate to a listed category have been added to that category.

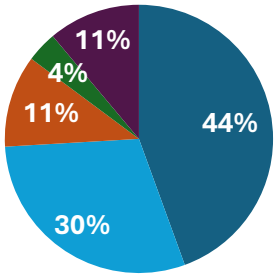
Respondent type	Resides in Inverness City STLCA	Resides elsewhere in Highland Council	Resides Outwith Highland Council Area
Total Residing in Area	**147**	**35**	**16**
Resident (Not a short term let operator)	114	21	4
Business (Not a short term let operator)	2	1	-
Short term let operator	27	13	10
Prospective short term let operator	4	-	-
Community Council, Group, Organisation	**1**	**-**	**3**
Other: Visitor	-		2
TOTAL Responses	**148**	**35**	**19**

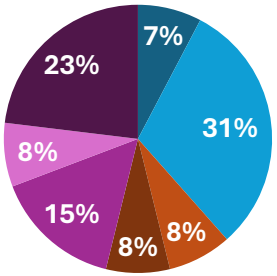


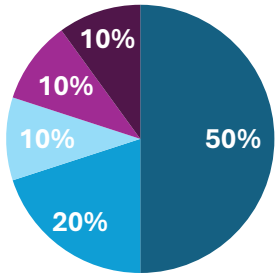
Over three quarters of respondents residing in the proposed Inverness City STLCA are residents, while 60% of those living elsewhere in Highland are also residents. The distribution of respondent categories for respondents outwith the Highland Council Area differs however, with a larger share comprising operators. This sample of non-resident operators is much smaller however, meaning that just over half of operators who responded to the Inverness City STLCA consultation live and operate within the affected area.

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

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





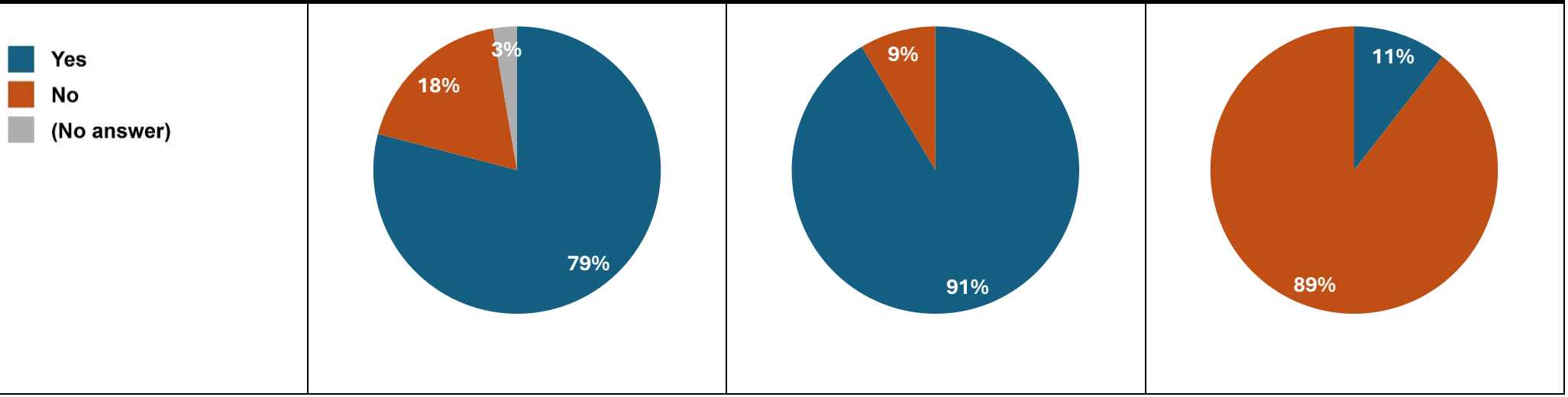


There are no significant differences in the profile of STLs operated by resident and non-resident respondents with conversion of previous houses/flats being dominant across all groups, although non-resident operators who responded are less likely to operate Guesthouse/B&B.

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

Breakdown of responses by area of residence

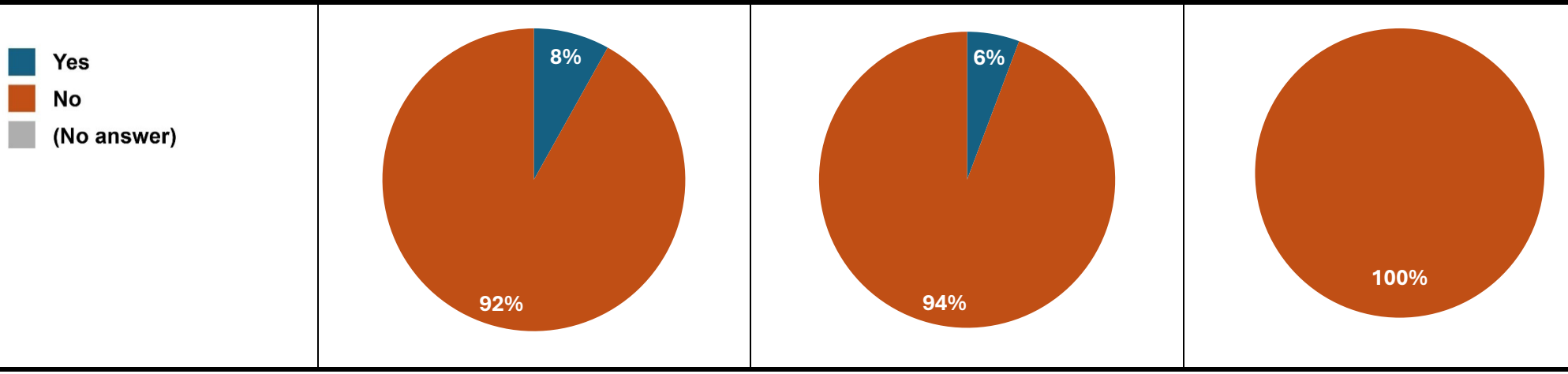
Do you Currently Work in Highland	**Resides in Inverness City STLCA**	**Resides elsewhere in Highland Council**	**Resides Outwith Highland Council Area**
Yes	117	32	17
No	27	3	2
(No answer)	4	-	-
TOTAL	**148**	**35**	**19**



Question 13. Are you on the Council's Housing Register? (optional question)
This means you have submitted an application for social rented housing to The Highland Council and its partner housing associations.

Breakdown of responses by area of residence

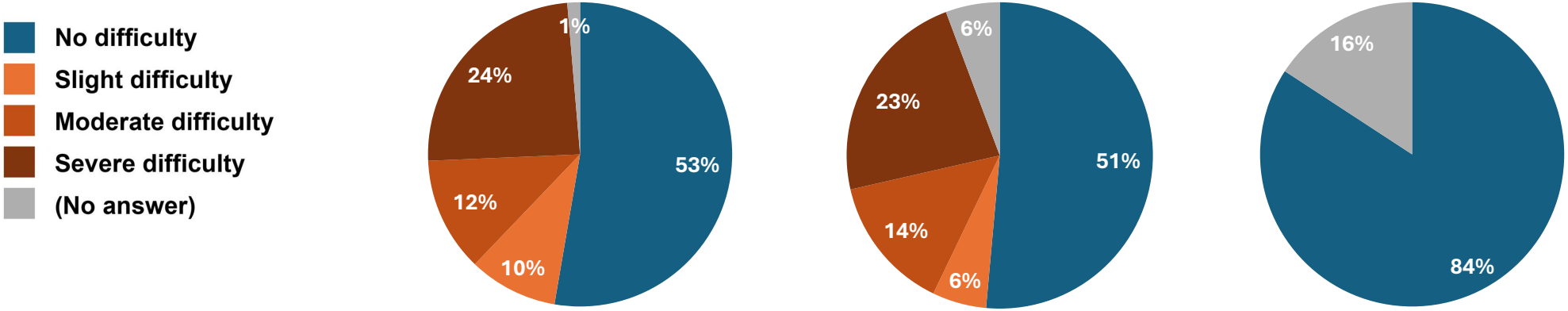
Are you on the Council's Housing Register?	**Resides in Inverness City STLCA**	**Resides elsewhere in Highland Council**	**Resides Outwith Highland Council Area**
Yes	12	2	-
No	136	33	19
(No answer)	-	-	-
TOTAL	**148**	**35**	**19**



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

Breakdown of responses by area of residence

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



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

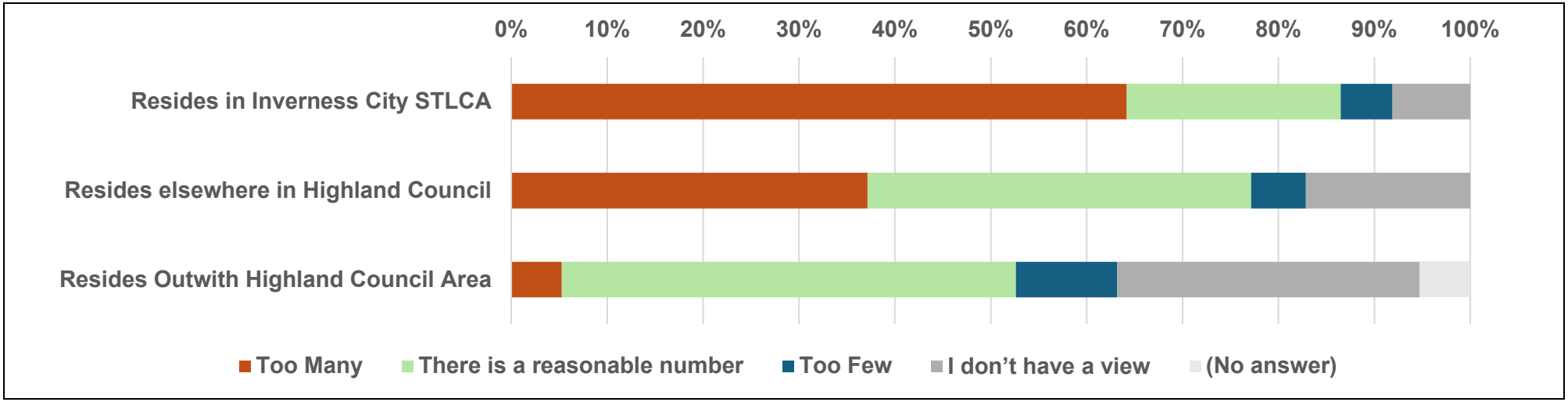
Question 15. If you experienced any difficulty in buying or renting a house within the proposed control area please provide more information: (optional question)

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

Council Response: A range of experiences of difficulty in buying/renting a house within the proposed control area are therefore noted.

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

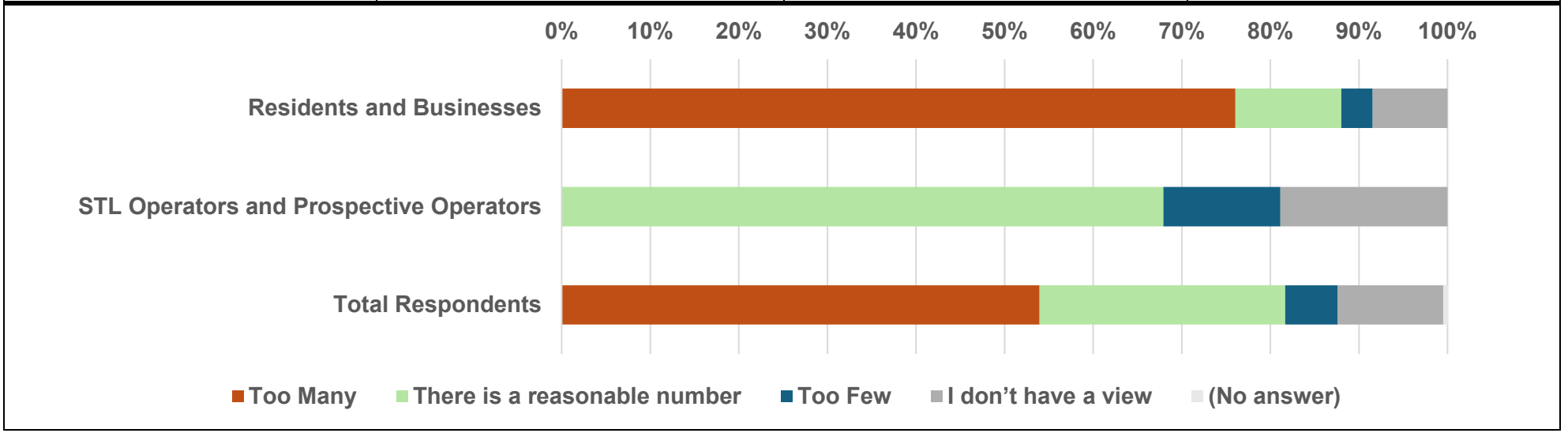
Which of the following best describes the amount of short term lets in your neighbourhood?	**Resides in Inverness City STLCA**	**Resides elsewhere in Highland Council**	**Resides Outwith Highland Council Area**
There are too few STLs	8	2	2
There is a reasonable number of STLs	33	14	9
There are too many STLs	95	13	1
I don't have a view	12	6	6
(No answer)	-	-	1
TOTAL	**148**	**35**	**19**



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

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

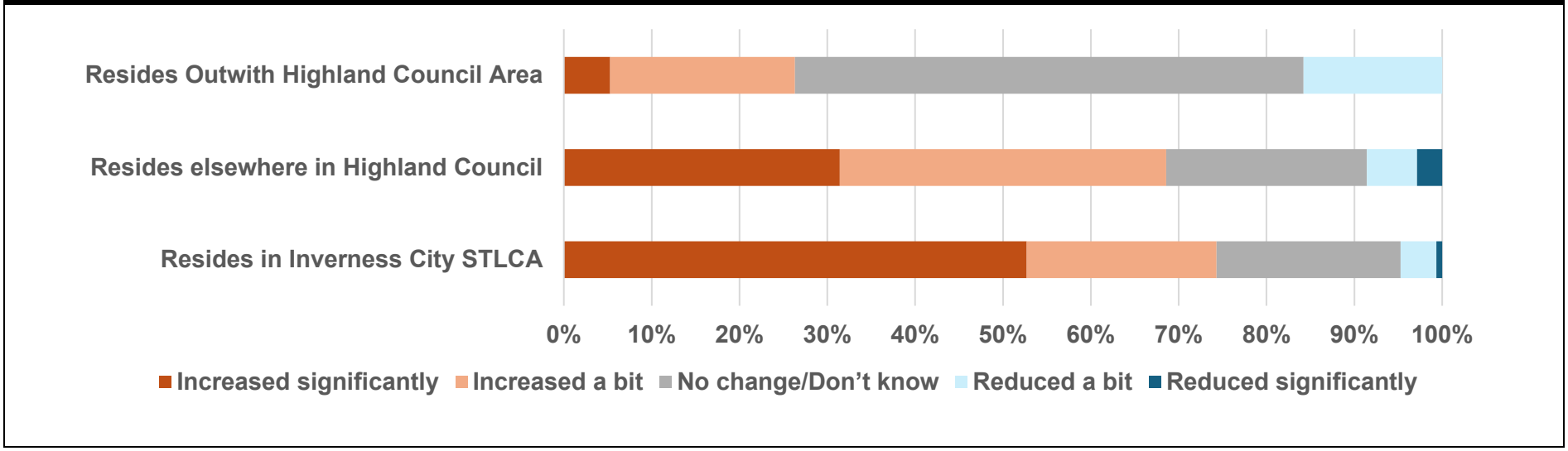
Which of the following best describes the amount of short term lets in your neighbourhood?	**Residents and Businesses**	**STL Operators and Prospective Operators**	**Total Respondents**
There are too few STLs	5	7	12
There is a reasonable number of STLs	17	36	56
There are too many STLs	108	-	109
I don't have a view	12	10	24
(No answer)	-	-	1
TOTAL	**142**	**54**	**202**



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

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

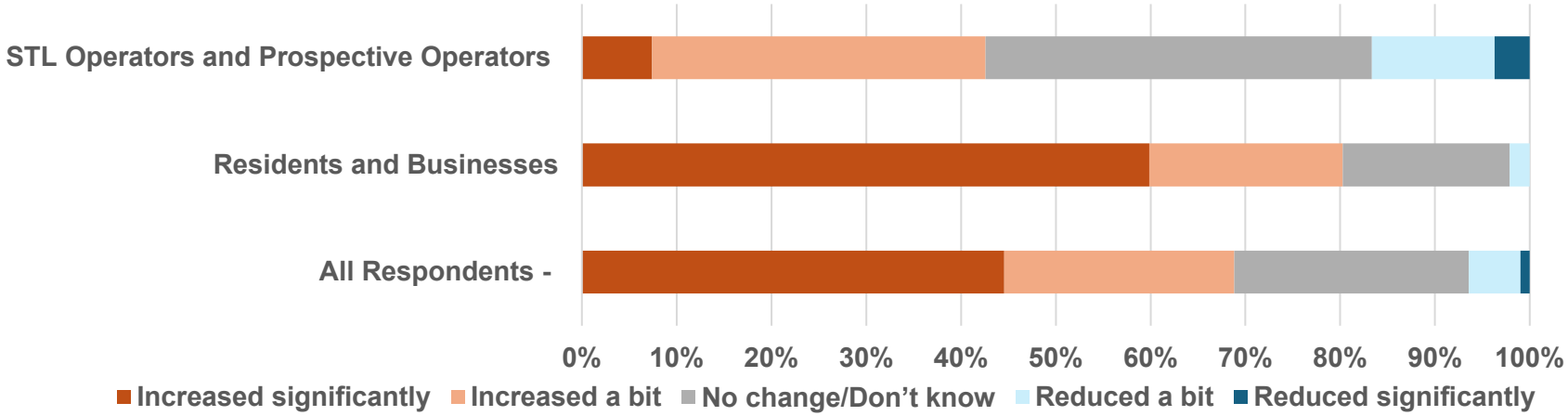
How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so?	**Resides in Inverness City STLCA**	**Resides elsewhere in Highland Council**	**Resides Outwith Highland Council Area**
Reduced significantly	1	1	-
Reduced a bit	6	2	3
No change/Don't know	31	8	11
Increased a bit	32	13	4
Increased significantly	78	11	1
TOTAL	**148**	**35**	**19**



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

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

How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so?	All Respondents	Residents and Businesses	STL Operators and Prospective Operators
Reduced significantly	2	-	2
Reduced a bit	11	3	7
No change/Don't know	50	25	22
Increased a bit	49	29	19
Increased significantly	90	85	4
No answer	-	-	-
TOTAL	**202**	**142**	**54**

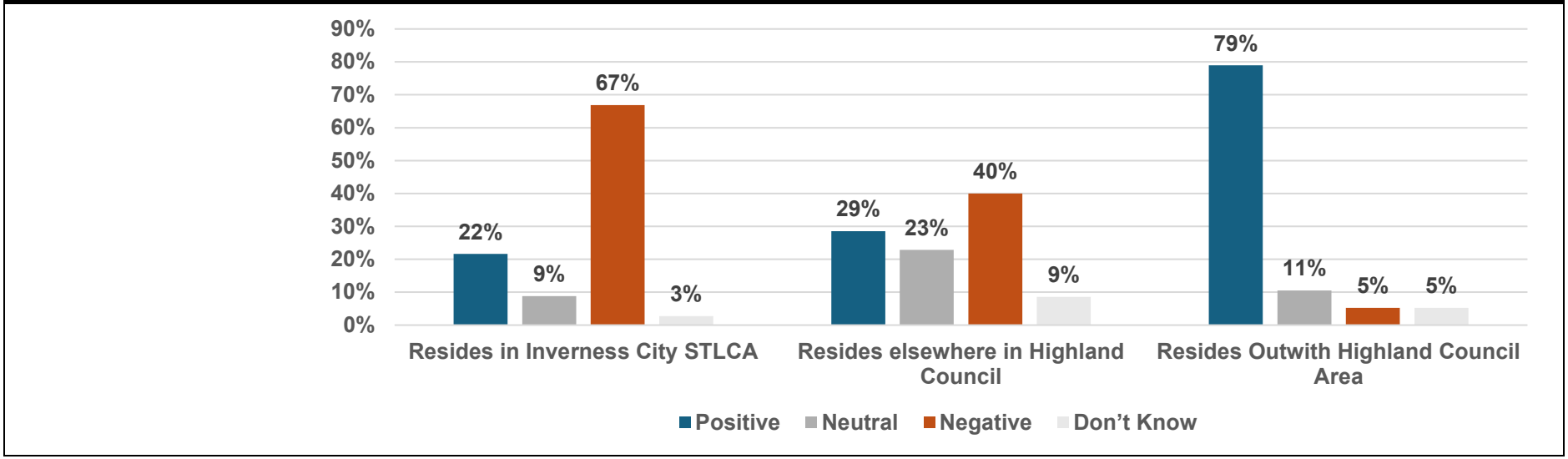


Category of respondent also is attributed to the divergence in views regarding the rate of change in the number of STLs over the past three years, with residents and businesses being more likely to consider the number to have increased significantly, than operators.

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

Breakdown by area of residence

Which of the following best describes your overall view of the impact that short term lets have on your neighbourhood?	**Resides in Inverness City STLCA**	**Resides elsewhere in Highland Council**	**Resides Outwith Highland Council Area**
Positive	32	10	15
Neutral	13	8	2
Negative	99	14	1
Don't Know	4	3	1
TOTAL	**148**	**35**	**19**

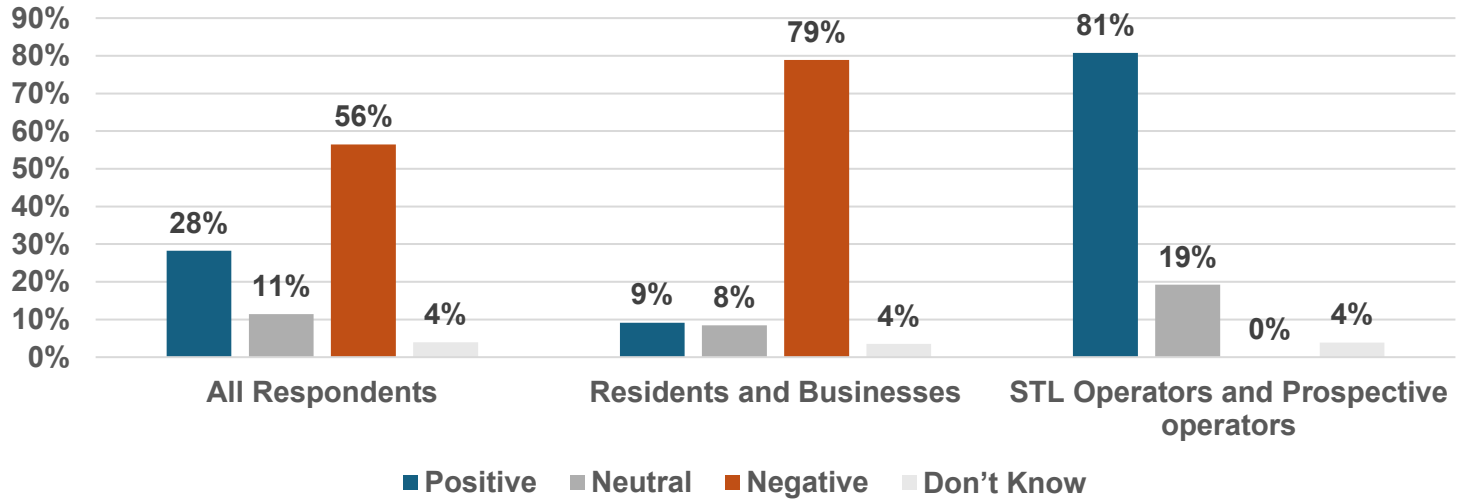


A greater share (67%) of Inverness City residents reported that their overall view of the impact of STLs on the neighbourhood was negative, while a large share (79%) of respondents outwith the Highlands reported their overall view to be positive.

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

Breakdown by respondent category

Which of the following best describes your overall view of the impact that short term lets have on your neighbourhood?	**All Respondents**	**Residents and Businesses**	**STL Operators and Prospective operators**
Positive	57	13	42
Neutral	23	12	10
Negative	114	112	-
Don't Know	8	5	2
TOTAL	**202**	**142**	**52**



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

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

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

IC-72-1, IC-56-1, IC-20-1, IC-19-1	Safety concern
IC-198-1, IC-135-1, IC-94-1, IC-72-1, IC-69-1, IC-55-1, IC-45-1, IC-36-1, IC-19-1	STL owners are absent and properties are poorly managed
IC-201-1, IC-198-1, IC-197-1, IC-194-1, IC-187-1, IC-182-1, IC-181-1, IC-176-1, IC-171-1, IC-170-1, IC-169-1, IC-167-1, IC-164-1, IC-155-1, IC-154-1, IC-153-1, IC-152-1, IC-146-1, IC-139-1, IC-129-1, IC-128-1, IC-125-1, IC-124-1, IC-119-1, IC-118-1, IC-117-1, IC-113-1, IC-110-1, IC-108-1, IC-104-1, IC-101-1, IC-98-1, IC-97-1, IC-95-1, IC-92-1, IC-90-1, IC-87-1, IC-84-1, IC-72-1, IC-69-1, IC-60-1, IC-59-1, IC-56-1, IC-55-1, IC-54-1, IC-53-1, IC-52-1, IC-45-1, IC-43-1, IC-35-1, IC-34-1, IC-33-1, IC-31-1, IC-29-1, IC-22-1, IC-17-1, IC-13-1, IC-10-1, IC-8-1, IC-5-1, IC-1-1	Creates nuisance for local people (e.g. anti-social behaviour, increased traffic, increased noise and parking and refuge issues)
IC-163-1, IC-116-1, IC-114-1, IC-86-1, IC-75-1, IC-17-1	Impacts workforce
IC-197-1, IC-184-1, IC-172-1, IC-145-1, IC-82-1, IC-49-1	Balance is needed

Positive impact views

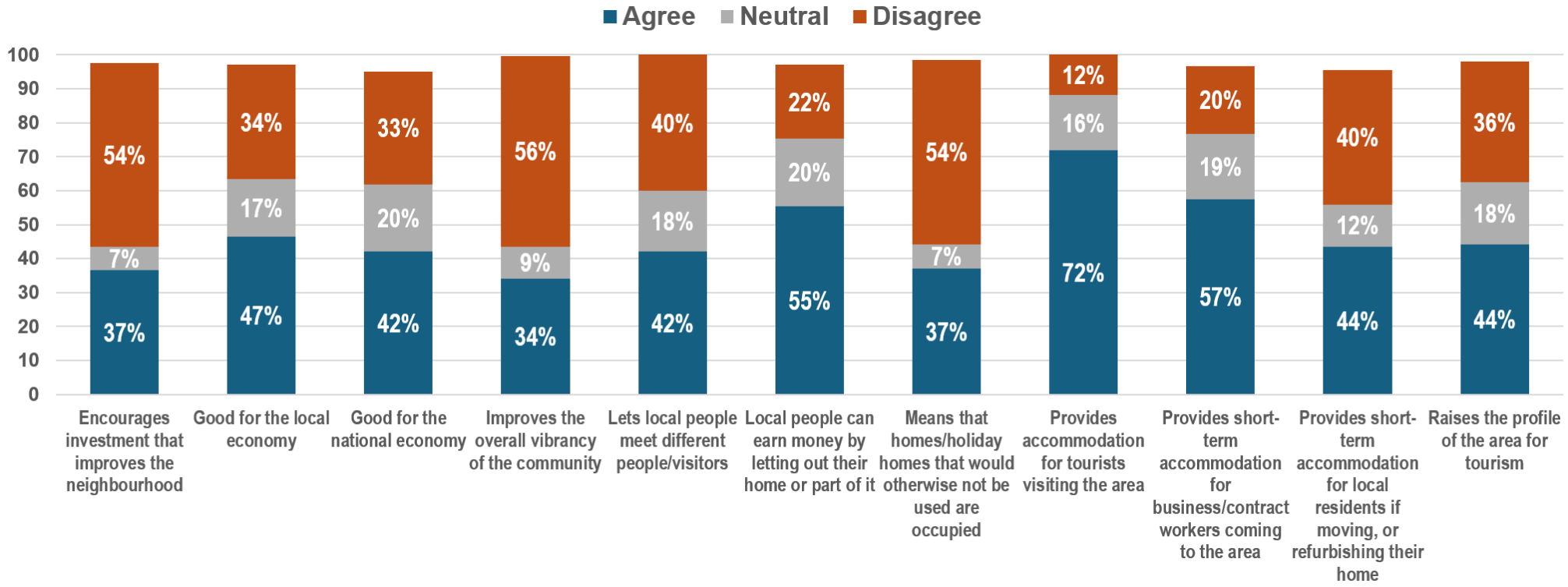
IC-200-1, IC-199-1, IC-190-1, IC-185-1, IC-178-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-157-1, IC-148-1, IC-141-1, IC-134-1, IC-133-1, IC-132-1, IC-111-1, IC-107-1, IC-74-1, IC-71-1, IC-67-1, IC-51-1, IC-50-1, IC-48-1, IC-46-1, IC-44-1, IC-42-1, IC-41-1, IC-39-1, IC-38-1, IC-32-1, IC-9-1, IC-3-1	Supports and sustains tourism
IC-200-1, IC-199-1, IC-195-1, IC-190-1, IC-188-1, IC-185-1, IC-178-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-162-1, IC-161-1, IC-159-1, IC-157-1, IC-156-1, IC-151-1, IC-149-1, IC-141-1, IC-140-1, IC-134-1, IC-133-1, IC-132-1, IC-130-1, IC-111-1, IC-110-1, IC-107-1, IC-106-1, IC-74-1, IC-71-1, IC-68-1, IC-65-1, IC-61-1, IC-50-1, IC-49-1, IC-48-1, IC-47-1, IC-46-1, IC-44-1, IC-42-1, IC-41-1, IC-39-1, IC-38-1, IC-32-1, IC-28-1, IC-18-1, IC-15-1, IC-9-1	Supports the local economy and businesses

IC-199-1, IC-190-1, IC-188-1, IC-175-1, IC-168-1, IC-159-1, IC-157-1, IC-151-1, IC-140-1, IC-134-1, IC-99-1, IC-74-1, IC-51-1, IC-48-1, IC-47-1, IC-46-1, IC-44-1, IC-39-1, IC-38-1, IC-32-1, IC-18-1, IC-14-1	"Provides direct and indirect employment opportunities
IC-200-1, IC-168-1, IC-162-1, IC-111-1, IC-107-1, IC-77-1, IC-67-1, IC-65-1, IC-51-1, IC-46-1, IC-42-1, IC-39-1, IC-9-1	Offers flexible visitor accommodation
IC-188-1, IC-173-1, IC-168-1, IC-149-1, IC-102-1, IC-66-1	Alterative to empty or underused properties
IC-189-1, IC-188-1, IC-168-1, IC-162-1, IC-161-1, IC-158-1, IC-149-1, IC-132-1, IC-103-1, IC-81-1, IC-62-1, IC-46-1	STLs improves the quality and appearance of the environment
IC-168-1, IC-149-1, IC-134-1, IC-82-1, IC-71-1, IC-28-1, IC-23-1, IC-18-1	Not enough evidence to suggest STLs directly impact housing provision and/or that a reduction in them will increase housing provision
IC-25-1	Property owners should be able to use and develop their property as they see fit

Council Response: A range of reasons for views on the impacts of short term lets are therefore noted.

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

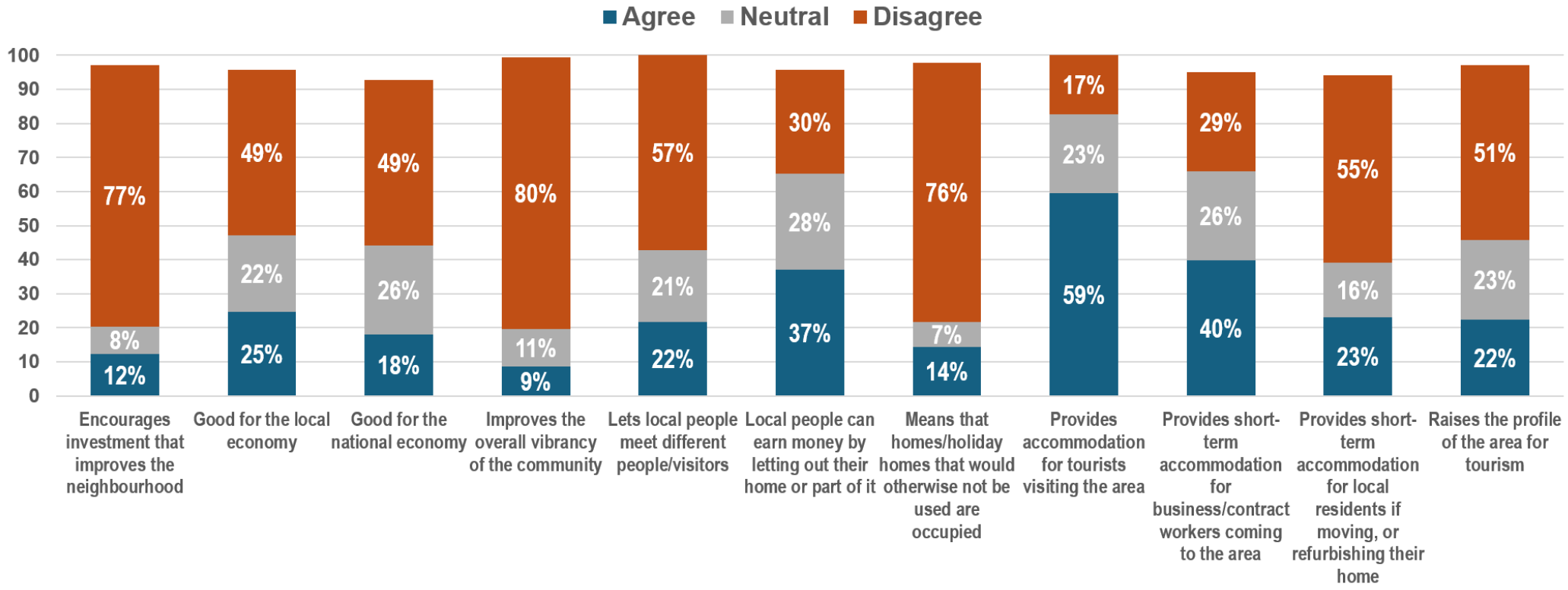
Responses for all respondent categories (n=202)
The balance of 100% is "Don't know" in each case.



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

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

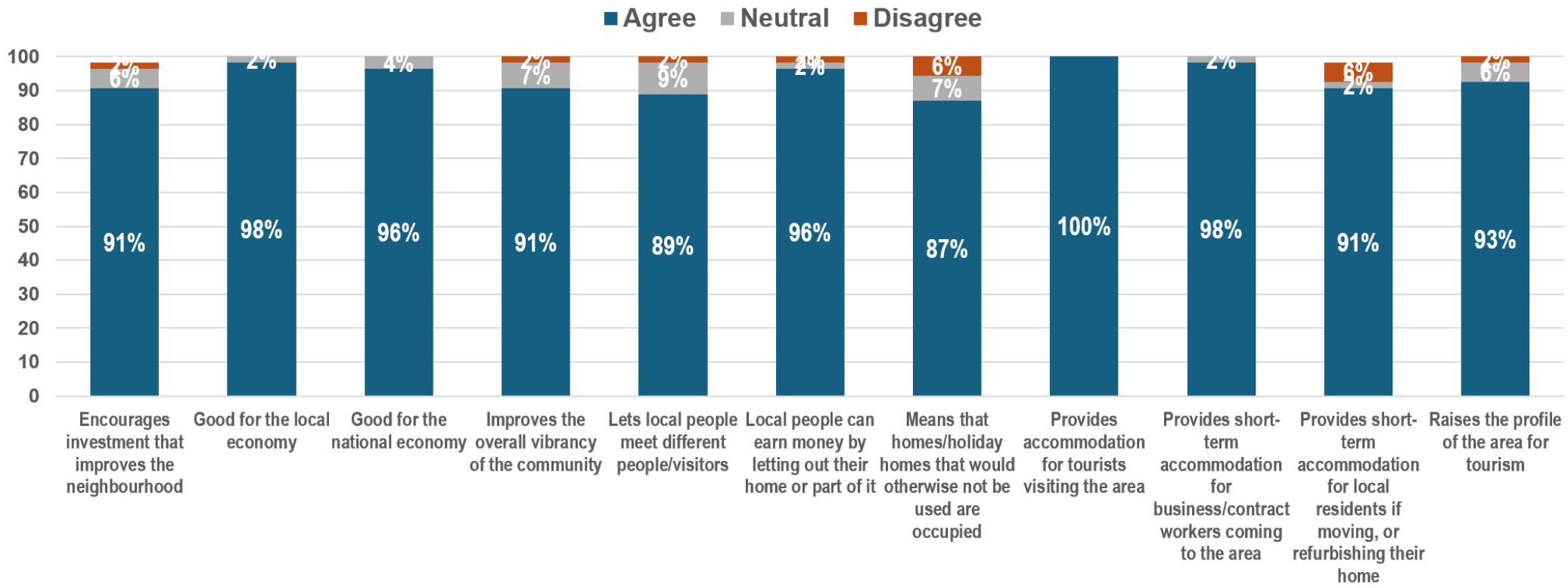
Responses for Residents and Businesses (n=138)
The balance of 100% is "Don't know" in each case.



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

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

Responses for STL Operators and Prospective Operators (n=54)
The balance of 100% is "Don't know" in each case.



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

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

Responses from all respondents.

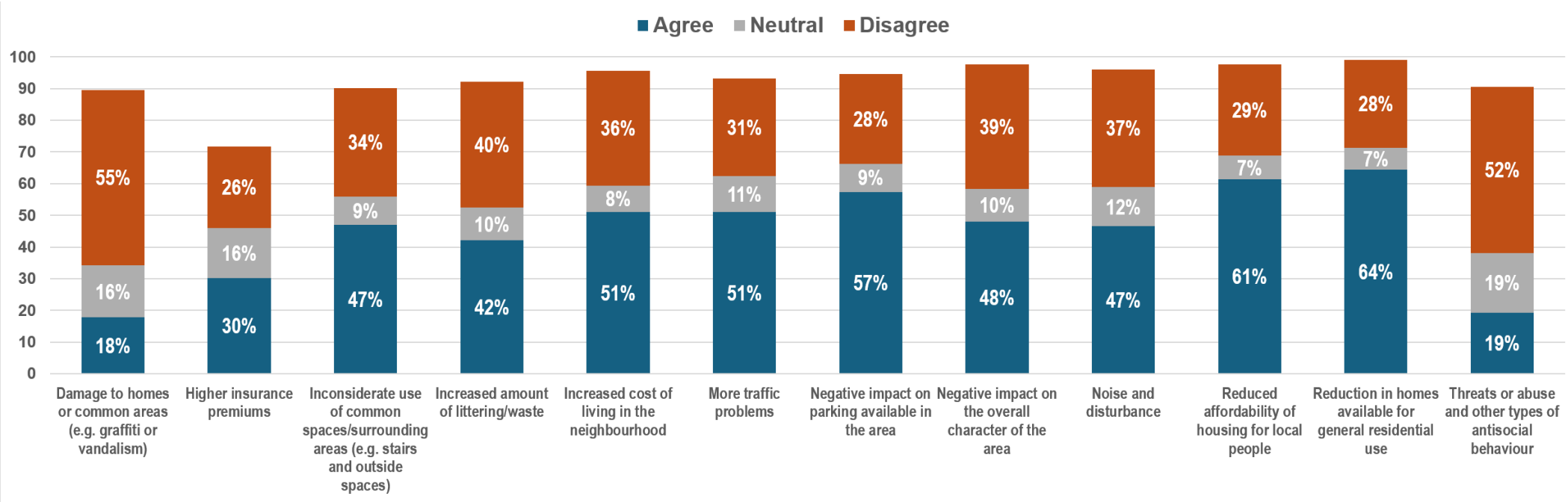
Respondent Reference	Points raised and responses.
IC-200-1, IC-188-1, IC-183-1, IC-159-1, IC-157-1, IC-151-1, IC-149-1, IC-140-1, IC-111-1, IC-102-1, IC-82-1, IC-81-1, IC-65-1, IC-63-1, IC-49-1, IC-48-1, IC-46-1, IC-38-1, IC-32-1, IC-11-1	Creates jobs and flexible work and income opportunities, especially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

IC-202-1, IC-198-1, IC-194-1, IC-184-1, IC-180-1, IC-179-1, IC-170-1, IC-143-1, IC-137-1, IC-127-1, IC-124-1, IC-117-1, IC-98-1, IC-96-1, IC-94-1, IC-92-1, IC-86-1, IC-78-1, IC-69-1, IC-64-1, IC-36-1, IC-28-1, IC-19-1, IC-16-1, IC-13-1	Disputes suggested positive impacts
IC-146-1, IC-143-1, IC-124-1, IC-117-1, IC-109-1, IC-52-1	Too many STLs in certain areas of Inverness, where residents feel outnumbered by visitors and are being priced out
IC-190-1, IC-185-1, IC-175-1, IC-124-1, IC-81-1, IC-67-1, IC-62-1, IC-60-1, IC-46-1, IC-32-1, IC-18-1, IC-14-1, IC-9-1, IC-3-1	Operators invest in property maintenance and improvements which enhance the appearance of neighbourhoods
IC-198-1, IC-194-1, IC-143-1, IC-124-1, IC-118-1, IC-88-1, IC-75-1, IC-52-1, IC-45-1, IC-36-1	Negative impact on neighbourly relationships and sense of belonging and cohesion.
IC-197-1, IC-194-1, IC-138-1, IC-65-1	Impacts are variable, as it depends on type of STL or who the STL visitors are and how they behave
IC-157-1, IC-111-1, IC-107-1, IC-106-1, IC-46-1	Boosts the reputation of Inverness as a visitor destination, distinct from larger city destinations
IC-96-1, IC-94-1, IC-75-1, IC-36-1	View that hotels provide many of the same benefits, with less negative impacts.
IC-67-1	Creates less traffic problems than camper vans and caravans (alternative accommodation option)
IC-175-1, IC-174-1, IC-107-1, IC-98-1, IC-82-1, IC-49-1, IC-48-1, IC-46-1	Supplements traditional tourism accommodation capacity, and meets demand in peak-periods
IC-184-1	Brings together communities in opposition to the harm that STL do, hopefully radicalising and raising the class consciousness of people who without them would be happy enough to get on with their lives.

Council Response: A range of additional suggested positive impacts are therefore noted.

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

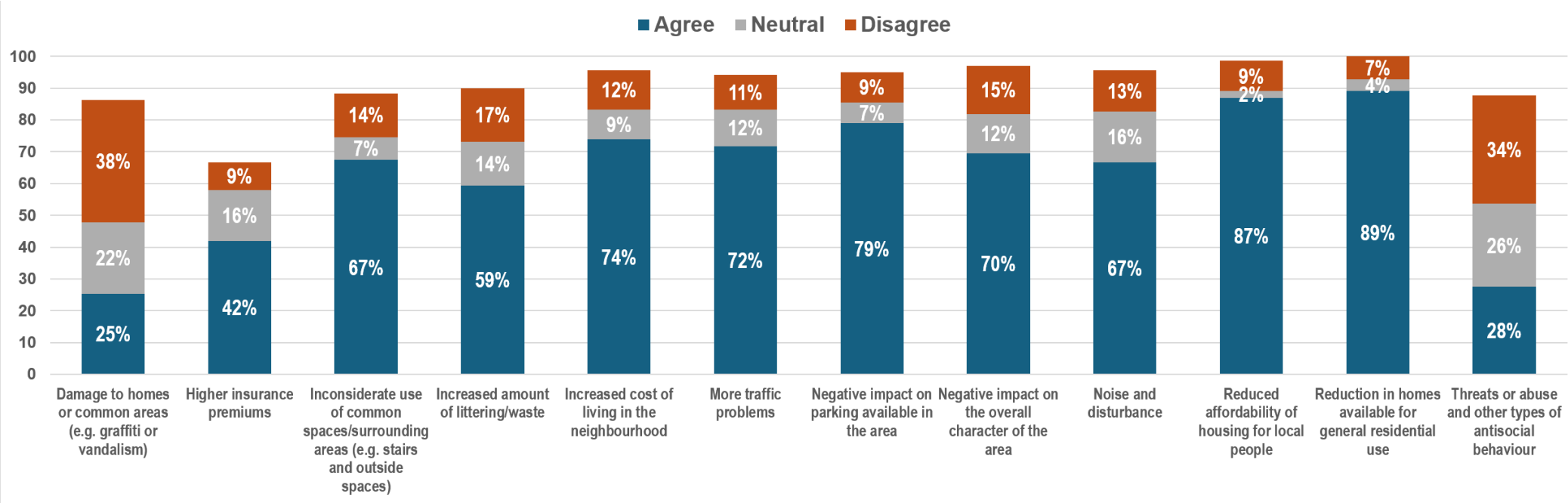
Responses for all respondent categories (n=202)
The balance of 100% is "Don't know" in each case.



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

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

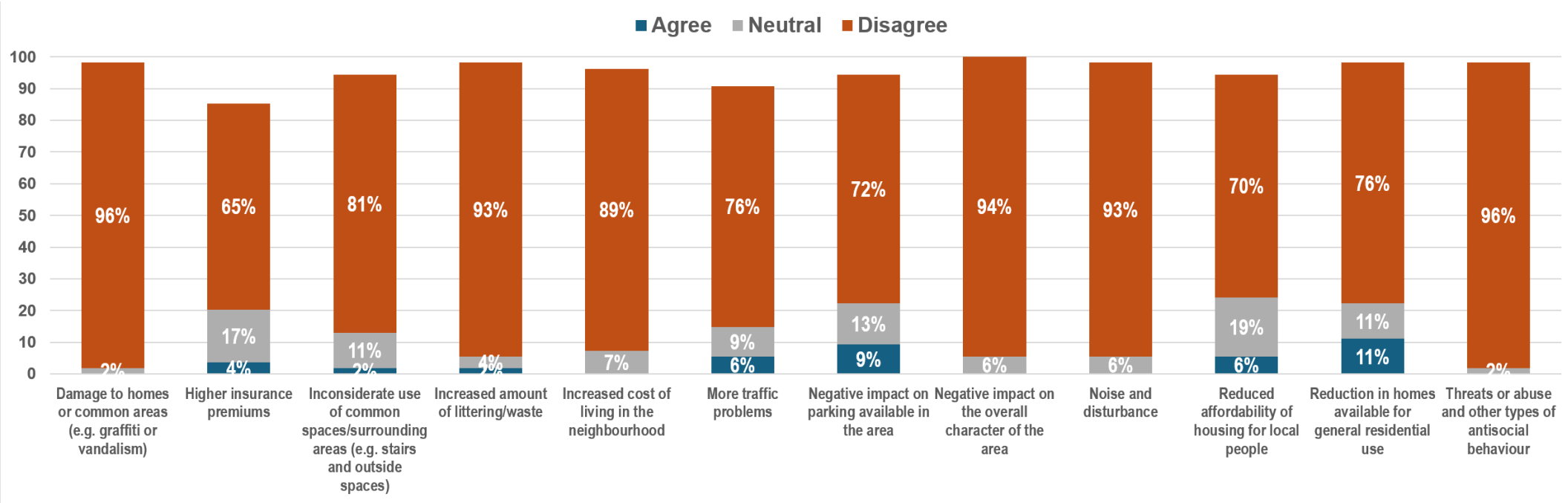
Responses for Residents and Businesses (n=138)
The balance of 100% is "Don't know" in each case.



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

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

Responses for STL Operators and Prospective Operators (n=54)
The balance of 100% is "Don't know" in each case.



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

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

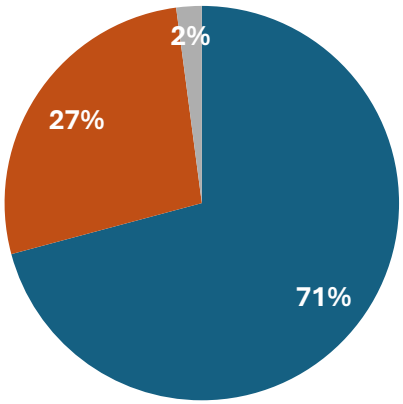
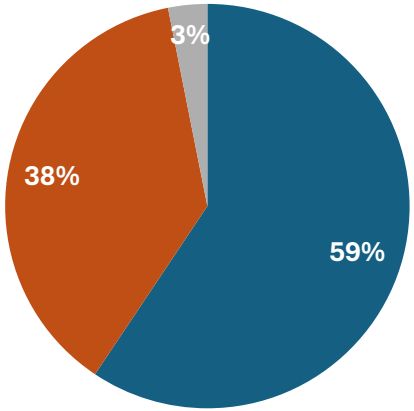
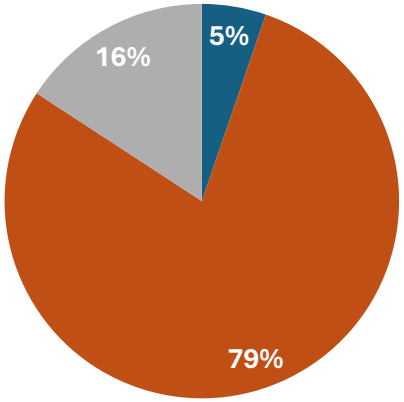
Respondent Reference	Points raised and responses
IC-200-1, IC-192-1, IC-172-1, IC-159-1, IC-157-1, IC-151-1, IC-149-1, IC-140-1, IC-130-1, IC-82-1, IC-71-1, IC-63-1, IC-46-1, IC-44-1, IC-32-1, IC-28-1, IC-27-1, IC-23-1, IC-3-1	Dispute any negative impacts
IC-194-1, IC-187-1, IC-182-1, IC-181-1, IC-176-1,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

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

Council Response: A range of additional suggested negative impacts are therefore noted.

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

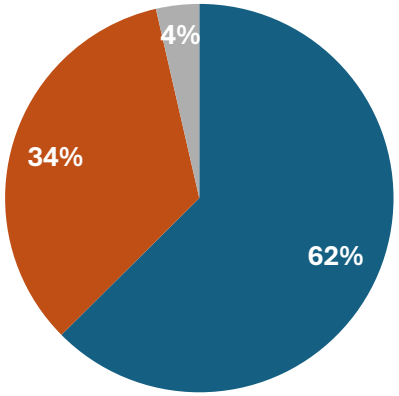
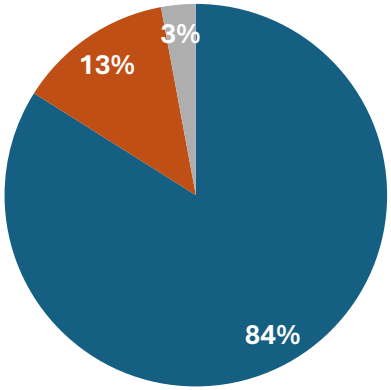
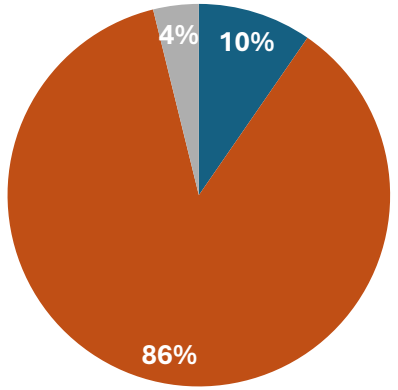
Breakdown by area of residence

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

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

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

Breakdown by respondent category

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

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

Question 25. Please explain your answer (optional question)

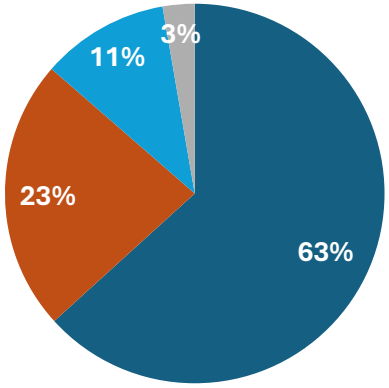
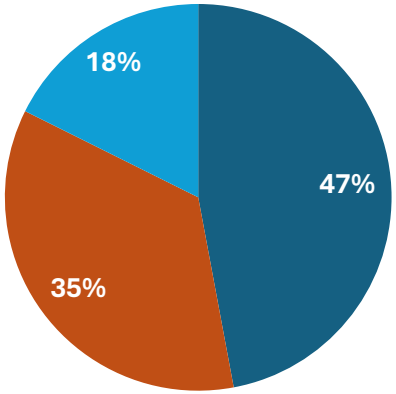
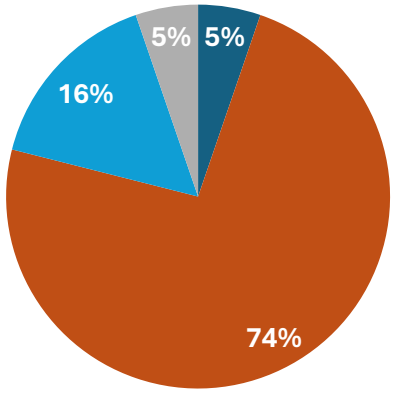
Respondent Reference	Points raised and responses
Explanations in support of proposed control area	
IC-201-1, IC-187-1, IC-182-1, IC-180-1, IC-179-1, IC-166-1, IC-160-1, IC-154-1, IC-153-1, IC-144-1, IC-142-1, IC-127-1, IC-125-1, IC-123-1, IC-122-1, IC-120-1, IC-116-1, IC-114-1, IC-110-1, IC-109-1, IC-104-1,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

IC-197-1, IC-194-1, IC-170-1, IC-166-1, IC-152-1, IC-147-1, IC-145-1, IC-142-1, IC-127-1, IC-124-1, IC-120-1, IC-113-1, IC-105-1, IC-104-1, IC-101-1, IC-95-1, IC-92-1, IC-55-1, IC-52-1, IC-45-1, IC-40-1, IC-35-1, IC-33-1, IC-26-1, IC-22-1, IC-17-1, IC-7-1, IC-6-1	Prioritise the needs of residents over tourists/visitors.
IC-197-1, IC-189-1, IC-175-1, IC-173-1, IC-146-1, IC-137-1, IC-127-1, IC-124-1, IC-114-1, IC-110-1, IC-101-1, IC-77-1, IC-49-1, IC-45-1, IC-30-1, IC-4-1	Balance the needs of residents, housing supply and communities with the need for visitor accommodation and tourism
IC-191-1, IC-176-1, IC-127-1, IC-116-1, IC-114-1, IC-113-1, IC-100-1, IC-87-1, IC-86-1, IC-66-1, IC-60-1, IC-54-1, IC-43-1, IC-13-1, IC-7-1	STLs have a negative impact on employment, recruitment, workforce availability by reducing accommodation for workers
IC-166-1, IC-129-1, IC-119-1, IC-112-1, IC-105-1, IC-104-1, IC-53-1, IC-45-1, IC-19-1, IC-16-1, IC-12-1	Absentee ownership, external investors and loss of local economic benefit
IC-78-1, IC-55-1, IC-35-1, IC-33-1, IC-29-1	STLs create tourism dependency/over tourism/seasonality/importance of tourism is overstated
Explanations against proposed control area	
IC-199-1, IC-196-1, IC-183-1, IC-177-1, IC-175-1, IC-168-1, IC-159-1, IC-158-1, IC-157-1, IC-141-1, IC-134-1, IC-102-1, IC-81-1, IC-77-1, IC-74-1, IC-65-1, IC-63-1, IC-51-1, IC-50-1, IC-41-1, IC-39-1, IC-32-1, IC-9-1	There is insufficient evidence to suggest STLs cause housing problems/critical of evidence submitted
IC-199-1, IC-177-1, IC-175-1, IC-168-1, IC-158-1, IC-151-1, IC-149-1, IC-134-1, IC-65-1, IC-9-1	STLs do not adversely impact housing prices
IC-189-1, IC-178-1, IC-158-1, IC-151-1, IC-77-1, IC-65-1, IC-48-1, IC-46-1, IC-42-1, IC-15-1, IC-9-1	Build more houses or address housing supply through development
IC-200-1, IC-193-1, IC-189-1, IC-185-1, IC-175-1, IC-174-1, IC-168-1, IC-162-1, IC-158-1, IC-157-1, IC-133-1, IC-130-1, IC-111-1, IC-81-1, IC-74-1, IC-65-1, IC-48-1, IC-46-1, IC-39-1	Opposed to additional planning controls but favours licensing, compliance and enforcement
IC-190-1, IC-189-1, IC-185-1, IC-168-1, IC-162-1, IC-158-1, IC-157-1, IC-151-1, IC-141-1, IC-133-1, IC-132-1, IC-130-1, IC-93-1, IC-81-1, IC-74-1, IC-65-1, IC-48-1, IC-46-1, IC-42-1, IC-32-1, IC-25-1	The STLCA represents overreach/overregulation or is an unnecessary burden on operators
IC-200-1, IC-173-1, IC-158-1, IC-141-1, IC-82-1, IC-74-1, IC-65-1, IC-61-1, IC-47-1, IC-44-1, IC-18-1	The STLCA should not be applied retrospectively: grandfathering or protection of existing operators.

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

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

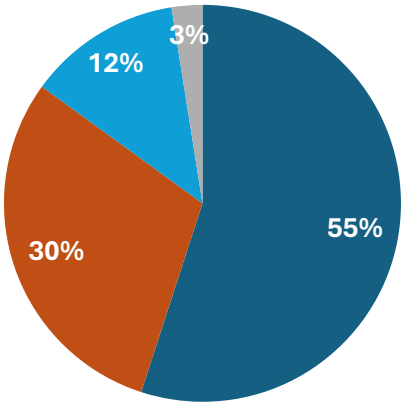
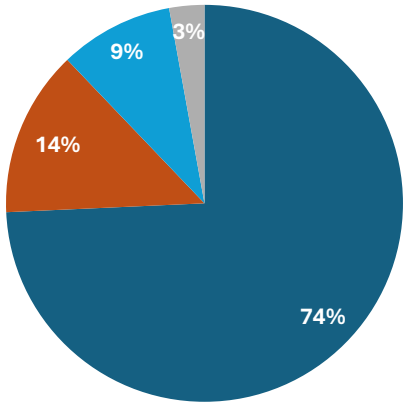
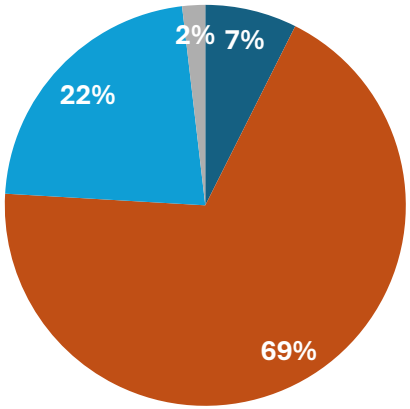
Breakdown by area of residence

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

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

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

Breakdown by respondent category

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

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

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

Respondent Reference	Points raised and responses
Additional negative views on the Statement of Reasons for the proposed control area	
IC-199-1, IC-196-1, IC-190-1, IC-188-1, IC-178-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-172-1, IC-168-1, IC-158-1, IC-157-1, IC-156-1, IC-148-1, IC-132-1, IC-130-1, IC-111-1, IC-81-1, IC-68-1, IC-67-1, IC-65-1, IC-61-1, IC-50-1, IC-48-1, IC-47-1, IC-46-1, IC-44-1, IC-42-1, IC-32-1, IC-28-1, IC-9-1	There is insufficient evidence to suggest STLs cause housing problems/critical of evidence submitted
IC-199-1, IC-183-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-172-1, IC-168-1, IC-158-1, IC-157-1, IC-156-1, IC-132-1, IC-111-1, IC-81-1, IC-68-1, IC-67-1, IC-65-1, IC-61-1, IC-49-1, IC-47-1, IC-46-1, IC-42-1, IC-32-1, IC-21-1	Report is biased or the data/analysis/conclusions are faulty
IC-200-1, IC-188-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-172-1, IC-168-1, IC-158-1, IC-156-1, IC-130-1, IC-111-1, IC-102-1, IC-81-1, IC-67-1, IC-65-1, IC-61-1, IC-49-1, IC-48-1, IC-47-1, IC-46-1, IC-32-1, IC-28-1, IC-9-1, IC-3-1	STLs do not adversely impact housing prices
IC-188-1, IC-178-1, IC-175-1, IC-172-1, IC-111-1, IC-102-1, IC-81-1, IC-48-1, IC-46-1, IC-28-1, IC-3-1	Build more houses or address housing supply through development
IC-193-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-158-1, IC-130-1, IC-82-1, IC-81-1, IC-65-1, IC-62-1, IC-49-1, IC-48-1, IC-46-1, IC-44-1, IC-18-1	Opposed to additional planning controls but favours licensing, compliance and enforcement
IC-200-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-161-1, IC-158-1, IC-149-1, IC-130-1, IC-111-1, IC-82-1, IC-81-1, IC-65-1, IC-49-1, IC-48-1, IC-46-1, IC-44-1, IC-32-1, IC-27-1, IC-3-1	The STLCA represents overreach/overregulation or is an unnecessary burden on operators
IC-200-1, IC-149-1, IC-82-1, IC-49-1, IC-44-1	The STLCA should not be applied retrospectively: grandfathering or protection of existing operators.
IC-193-1, IC-177-1, IC-175-1, IC-174-1, IC-173-1, IC-168-1, IC-158-1, IC-130-1, IC-82-1, IC-81-1, IC-49-1, IC-48-1, IC-46-1	STLs are already sufficiently regulated/no further controls needed
IC-155-1, IC-70-1	The STLCA should be bigger/cover a wider area

IC-174-1, IC-173-1, IC-149-1, IC-81-1, IC-65-1, IC-48-1, IC-46-1, IC-27-1	The STLCA is too large/covers inappropriate area
IC-172-1, IC-102-1	STLs have a positive impact on employment, recruitment, workforce availability by increasing accommodation for workers
IC-200-1, IC-185-1, IC-177-1, IC-175-1, IC-168-1, IC-158-1, IC-111-1, IC-106-1, IC-81-1, IC-48-1	STLs support employment and jobs through economic activity
IC-200-1, IC-185-1, IC-177-1, IC-175-1, IC-173-1, IC-168-1, IC-158-1, IC-130-1, IC-111-1, IC-65-1, IC-49-1, IC-48-1, IC-46-1	STLS are an essential/important component of the tourism industry

Additional positive views on the Statement of Reasons for the proposed control area

IC-194-1, IC-191-1, IC-180-1, IC-176-1, IC-160-1, IC-154-1, IC-152-1, IC-144-1, IC-126-1, IC-125-1, IC-118-1, IC-114-1, IC-113-1, IC-112-1, IC-109-1, IC-104-1, IC-101-1, IC-100-1, IC-98-1, IC-97-1, IC-95-1, IC-92-1, IC-86-1, IC-84-1, IC-75-1, IC-72-1, IC-33-1, IC-22-1, IC-20-1, IC-19-1, IC-17-1, IC-13-1, IC-11-1, IC-5-1, IC-4-1	Too many residential properties are being converted to STLs decreasing housing supply
IC-202-1, IC-201-1, IC-184-1, IC-182-1, IC-165-1, IC-146-1, IC-136-1, IC-135-1, IC-127-1, IC-110-1, IC-88-1, IC-87-1, IC-57-1, IC-55-1, IC-40-1, IC-29-1	Support/agreement with evidence as submitted
IC-191-1, IC-180-1, IC-160-1, IC-126-1, IC-113-1, IC-100-1, IC-95-1, IC-92-1, IC-58-1, IC-19-1, IC-17-1, IC-11-1, IC-5-1, IC-4-1	Rising house prices/rent linked to increase in STLs
IC-197-1, IC-193-1, IC-186-1, IC-181-1, IC-175-1, IC-139-1, IC-124-1, IC-118-1, IC-112-1, IC-101-1, IC-98-1, IC-89-1, IC-84-1, IC-80-1, IC-75-1, IC-70-1, IC-69-1, IC-59-1, IC-45-1, IC-22-1, IC-20-1, IC-17-1, IC-11-1, IC-10-1	Requirement for planning controls, regulation and oversight
IC-189-1, IC-181-1, IC-176-1, IC-155-1, IC-122-1, IC-112-1, IC-101-1, IC-70-1, IC-59-1, IC-17-1, IC-11-1	The STLCA does not go far enough and additional measures are required
IC-194-1, IC-181-1, IC-136-1, IC-125-1, IC-118-1, IC-104-1, IC-101-1, IC-97-1, IC-95-1, IC-72-1, IC-69-1, IC-53-1, IC-45-1, IC-43-1, IC-37-1, IC-35-1, IC-22-1, IC-20-1, IC-13-1, IC-10-1, IC-6-1, IC-5-1	Concerned about protecting communities and preserving neighbourhood character
IC-118-1, IC-108-1, IC-104-1, IC-101-1, IC-72-1, IC-62-1, IC-53-1, IC-37-1, IC-27-1, IC-20-1, IC-13-1, IC-5-1	Negative impact of STLs on residential amenity (noise, traffic, parking, antisocial behaviour, waste/bins)

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

Question 28. Supporting Documents (optional question)

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

• Predominantly self-contained flats property type in historic central areas. • On these findings, the Council's analytical work is sound. Doesn't contest that the central concentration of STLs is real. A planning intervention to manage further conversions in these specific central neighbourhoods would be proportionate and evidence-based.	
View that the proposed Control Area boundary is however, wider than the evidence supports. Disagree with the proposal as drawn, while agreeing in part with the Statement of Reasons. The Council's stated justification for city-wide scope is the risk of displacement, but displacement is asserted rather than evidenced. Edinburgh's experience with planning control areas has not produced documented STL migration into adjacent areas at material scale.	Noted. Council maintains that displacement risks are still relevant to consider, and that areas showing high rates of change (where STLs as a share of dwellings are growing fastest), indicates that a wider area than the inner city centre warrants consideration for designation. Areas where the rate of change of STLs are increasing higher than the Highland average are not just in central data zones.
Reasons that are less well-supported than presented in Statement of Reasons: • Private rental sector (PRS) decline, not attributed to PRS to STL conversion. Though Council notes the influences of changes to private rental tenancy regulation through the years of Covid-19 and the aftermath, including Section 24 mortgage-interest restrictions, the 2022 Cost of Living (Tenant Protection) Act rent controls, EPC minimum-standards uncertainty, and the Renters' (Reform) Bill.	Noted. Many parts of Highland do not have a sufficiently functioning private rented sector. While Inverness is one of the few areas where rental properties remain comparatively more available, the market has tightened significantly since the Covid-19 pandemic. The Council does not contend that short term lets (STLs) are the sole cause of this change. However, within an evolving private rented sector, the potential for properties used as STLs to generate higher financial returns than long-term residential lets, particularly in central and tourist-focused locations, can create a market imbalance. This has the potential to encourage the continued conversion of residential properties to STL use within Inverness neighbourhoods, further reducing the supply of homes available for permanent residents.

• External buyer shares: The 16% average non-Highland buyer share, and 22–50% in the top data zones, is presented as an indicator of STL-driven housing market harm but lacks comparator context. Equivalent figures for central data zones in Edinburgh, Aberdeen, York, Bath, and Manchester routinely sit in the 30–50% range — characteristic of UK regional capitals with universities, healthcare hubs and tourism economies. No causal link to STL activity is established, STL represent 4% of the city's dwelling stock and could not plausibly drive the price-to-income rations observed.	The Council's concern is not simply the presence of non-Highland buyers, but the extent to which additional investment demand, including demand associated with short term letting, may compete with local housing needs in neighbourhoods where housing availability is already constrained. Furthermore, the purpose of the analysis is not to demonstrate a direct causal relationship between non-Highland purchases and STL activity. Rather, it provides contextual evidence of market pressures and external demand which, when considered alongside STL concentration data, housing supply indicators and private rented sector trends, helps inform the Council's assessment of the potential cumulative impacts on housing availability. Comparisons with cities such as Edinburgh, Aberdeen, York, Bath or Manchester should also be treated with caution given the significant differences in housing market and rental market scale, development capacity, and population size. The Council's assessment is necessarily focused on the specific circumstances of Inverness and Highland, where relatively modest changes in housing use or ownership patterns can have a proportionately greater effect on local housing availability.
• Amenity and waste complaints: Environmental health complaints reported in the Statement of Reasons is in a category that already addressed by the existing STL licensing scheme, which has enforcement powers including refusal, revocation and prosecution. A planning control area does not remedy unlicensed operation, over-occupancy, or licensing breaches — the licensing scheme already exists for those purposes.	The Council's proposal for the Control Area is not founded solely on individual complaints or licensing breaches. Rather, Environmental Health data is one indicator of the cumulative effects that can arise where concentrations of short term lets become established within predominantly residential neighbourhoods. Even where operators are fully licensed and compliant, changes in the character of an area, reductions in the availability of permanent housing, and the intensification of transient occupation are matters that licensing is not designed to address.

Recommended alternative: A more proportional boundary confined to the affected central neighbourhoods would address the demonstrated planning concern (85% of registered STLs) without imposing regulatory burden across areas where no evidence of STL-driven harm has been presented. The amended boundary should be confined to: • All of postcode sector IV1 1 (City Centre core including the Longman/Innes Street corridor); • All of IV3 5 (West End, Dalneigh, Ballifeary); • All of IV2 3 (Crown, Hilton, Drumossie, Old Edinburgh Road, Millburn); • The riverside portion of IV2 4 covering Ness Bank, Haugh Road, Island Bank Road, the Gordonville and Rosebery streets. This alternative is consistent with the legislative requirement at section 26B of the Town & Country Planning (Scotland) Act 1997 (as amended) that a Control Area boundary be drawn to reflect where the planning concern is materially present, rather than as an administrative convenience. Highland Council has done genuine analytical work in identifying that Inverness has an STL concentration problem in specific central neighbourhoods. That part of the case is sound. The proposed remedy — a Control Area covering the whole urban area plus the northern portion of Ward 19 — is, on the Council's own evidence, considerably wider than the problem. Planning control areas restrict the property rights of homeowners across the area they designate. The threshold for that restriction should be evidence that the planning concern is materially present, not administrative convenience or unevidenced concerns about hypothetical displacement.	The Council notes this suggestion and agrees that these suggested areas fall within the highest levels of concentration in Inverness but considers that the proposed Inverness-wide boundary provides a clear, easily understood and administratively workable framework for residents, operators, investors and decision-makers. While administrative convenience is not, in itself, a justification for designation, clarity and certainty are legitimate planning considerations that assist in the consistent operation of the regulatory framework. Given the mobility of investment demand and the attractiveness of Inverness as a tourism destination, there is a reasonable prospect that operators seeking to avoid future planning requirements within a more limited Control Area would look to nearby areas with similar accessibility and visitor appeal. A boundary drawn tightly around only the areas of highest existing concentration within what is a relatively compact city, risks creating a displacement effect, whereby proposals are redirected to adjoining residential neighbourhoods that experience similar housing market and amenity pressures but fall outside the Control Area. This would hinder timely intervention in those areas, reduce the effectiveness of the designation as a strategic planning tool and could necessitate further boundary reviews in the future. The Council therefore proposes to take a precautionary and forward-looking approach that seeks to manage not only existing clusters but also the potential redistribution of STL activity across the wider urban area. A wider boundary reduces the risk of such displacement and provides a more effective mechanism for managing cumulative impacts on housing availability and residential amenity across Inverness as a whole.

A boundary drawn around the demonstrated concentration would be a proportionate and defensible response, and I would encourage the Council to consider that alternative before progressing to formal designation.	
IC-45-1 Photo supplied of numerous large vehicles (4-5 for one property) parked in the street from when groups of workmen stay in short term lets in the neighbourhood.	Noted.
IC-82-1 Scottish Tourism Alliance The STA recognises the significant housing pressures facing many communities across Highland and supports the need for balanced, evidence-led and sustainable policymaking.	Noted. Council recognises that housing challenges in the Highland, including in rural and fragile communities are complex. The Statement of Reasons for Inverness City does not seek to or make a causal link between short term lets and all housing challenges: the evidence is presented in support of the proposal to designate a STLCA. Council recognises and is using a range of policy mechanisms for managing housing pressures in Highland.
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.	See full response to ASSC views below (IC-71-1) for response to this matter.

Key points: • Tourism and hospitality are fundamental to Scotland's economy, employment and communities, and self-catering accommodation are a critical component of this industry. Many parts of Highland rely heavily upon flexible visitor accommodation infrastructure in areas where traditional hotel provision is limited or economically unviable.	Noted. Council has also received responses from hoteliers and serviced accommodation providers expressing the opposite view and support the proposal to help maintain a balanced accommodation market and reduces the risk of visitor demand being diverted away from traditional hotels to an expanding short-term let sector.
• Concern that the current consultation narrative frames tourism and housing as competing interests, which is an oversimplification and seems to causally link short term lets to wider issues such as depopulation, school and community decline, without sufficient evidence.	It is acknowledged that tourism and housing are both important to Highland's economy and communities. The Control Area is intended to manage changes of use specifically from housing to secondary letting short term lets and the Council's justification therefore must focus on evidence specific to these forms of short term let. The Council does not claim that all short term lets are a previous form of housing supply.
• 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 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 (IC-71-1) for response to this matter of definitional clarity.
• The current proposal risks undermining the objectives of Scotland Outlook 2030 and the STA's 2026 election priorities. This includes calls to nurture tourism and hospitality sector, avoid unnecessary regulatory burdens, strengthen investment confidence, support sustainable tourism and position tourism sector for major future growth.	The proposed Control Area is not intended to restrict tourism accommodation or place unnecessary burdens on existing operators. Rather, it introduces a planning framework for changes of use from residential housing to secondary letting short-term lets, enabling the impacts on local housing and communities to be considered where appropriate. The Council considers that supporting a sustainable visitor economy and addressing housing pressures are complementary objectives, and that providing greater oversight of such changes can contribute to the long-term sustainability of both.
• 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.	See full response to ASSC views below (IC-71-1) for response to this same matter.

• 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.	See full response to ASSC views below (IC-71-1) for response to this same matter. Consideration of a formal Use Class Order is noted but is out of scope for this local consultation and is in the remit of Scottish Government.
• 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.	See full response to ASSC views below (IC-71-1) 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 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 *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 Control Area. Operators who are uncertain can contact the planning service by submitting a free short term let development enquiry, where they will receive a view from the planning service as to whether their short term let is a material change of use. They will be advised whether they ought to apply for planning permission or a Certificate of Lawful Use.

IC-71-1 Association of Scotland's Self-Caterers The Association of Scotland's Self-Caterers does not agree with the proposal to designate a Highland Rural and Inverness City Short Term Let Control Areas (STLCAs). Considers that the proposals are not supported by sufficient evidence and could have significant economic, legal and practical consequences for the tourism sector. The association, which represents over 1,700 self-catering operators in Scotland, accepts that housing pressures exist but that any intervention must be evidence-led, proportionate and legally robust.	Noted. It is unclear how many self-caters in the proposed Highland Rural Short Term Let Control Area the Association represents.
Key points raised: • Need for definitional clarity and distinguishing between different forms of short term let and visitor accommodation, and how they contribute to residential housing loss. View that the "short-term let" term encompasses a wide range of operating types and models, by contrast "self-catering accommodation" is hospitality-led and is a long-standing recognised tourism infrastructure. Concern about a single narrative which collapses distinct short term let categories into one and centres the discourse around housing loss. • Failure to distinguish between different types of accommodation in the consultation documents, which consider overall STL concentrations and adjusted STL prevalence whereas the proposal relates specifically to loss of formal residential dwellings to short term letting. Relates to definitional clarity point, on the range of different types of short term lets and tourist accommodation.	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.

• 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 proposed Highland Rural STL Control Area is not intended to replicate any real or perceived success of the Badenoch and Strathspey Control Area. While the Council's Post 2 year review of the Badenoch and Strathspey Control Area indicates that changes of use to short-term lets are now being managed, the current proposal is based on its own evidence of housing pressures and short-term let prevalence. Even where the Badenoch and Strathspey Control Area found to have coincided with suggested indicators such as subsequent declining house prices and rental prices, those trends alone would not justify the current proposal which to be consistent with planning practice, must be grounded in its own evidence base demonstrating an issue and that the Council through designating a Control Area proposes to take a proportionate response to that issue. There is no legislative or policy requirement to delay consideration of further control areas until the long-term effects of existing designations are known. Local authorities are required to assess the need for control areas based on the evidence available at the time, and requiring definitive proof of impacts on housing affordability, population retention or community sustainability (which may take many years to emerge) would create an unreasonable barrier to timely and proportionate intervention where current evidence demonstrates a need for action.
• Wider concerns regarding the evidence base for the proposed Control Area.	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 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 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 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.
• 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.	As such, it would not be possible to meaningfully assess the economic effects of a control area designation in isolation from the planning policy framework and future planning decisions that would apply within it. The potential economic implications of specific proposals are therefore considered at the planning application stage rather than through the designation itself. In addition, the wider regulatory and business impacts of the Short Term Let Control Area Regulations were already assessed by the Scottish Government through its Business and Regulatory Impact Assessment (BRIA) when introducing the national legislative framework. It is therefore not necessary for individual planning authorities to repeat that exercise when considering whether local circumstances justify designation of a control area. Noted. The insertion of Section 26B into the Planning Act does not retrospectively alter the planning requirements that applied to a property. Where clarity and certainty regarding planning status are required, that status must be demonstrated through evidence rather than presumed.

	This principle is not unique to Short Term Lets; it is a fundamental aspect of planning law that applies 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.
• 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.	The distinction is a deliberate feature of the statutory framework, introduced to enable planning authorities to respond to evidenced local circumstances where concentrations of short-term lets create particular planning issues. Consistency of treatment is achieved through the application of the same statutory framework to all properties within a designated Control Area and the same planning principles to developments elsewhere. The fact that different regulatory consequences apply in different locations reflects the established operation of the planning system, which regularly applies different policy approaches to different areas in order to address distinct local planning circumstances and considerations. Consequently, the planning authority considers that the Control Area framework strikes an appropriate balance between regulatory certainty, local flexibility and the legitimate public interest objectives it was designed to address.

	This matter has already been raised directly by the ASSC to Scottish Government and a response was provided by the then Cabinet Secretary for Housing Màiri McAllan MSP in February 2026. The suggestion that planning controls relating to short term lets are incompatible with Convention rights is not supported by the Scottish Government's own assessment of the legislation. In its 2025 review of the Data Protection Impact Assessment for the short-term let licensing and control area framework, the Scottish Government concluded that any such impact would arise only where it was the policy intention of the local authority and only where the restriction was necessary to protect the rights and freedoms of others or the wider economic well-being of the local community. While Article 1 of Protocol 1 protects peaceful enjoyment of possessions, Cabinet Secretary Màiri McAllan MSP accepted that the regulation of short term lets via planning and licensing regimes represents a control of the use of a host's property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were "satisfied that the creation of powers for a local authority to designate a short-term let control area is a proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity". The Council concurs that requiring planning consideration of short term lets therefore represents a proportionate exercise of planning control rather than an unlawful interference with property rights.
• 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 dis-proportionate retrospective procedural or regulatory burden arising from evolving interpretation of planning policy and practice; ○ and that long-term clarity should instead be pursued through development of a formal Use Class Order capable of delivering national consistency, legal certainty and a more proportionate planning framework.	

Specific comments on the Inverness City STLCA • ASSC recognise that urban housing pressures in Inverness differ materially from those within rural Highland.	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.
• Evidence also does not demonstrate that STL growth is the primary driver of affordability pressures, that PCA designation materially improves housing outcomes or that the proposed intervention is proportionate relative to the scale of demonstrated impact.	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 should not be deferred in anticipation of a hypothetical alternative framework that may or may not be introduced. Noted.

• The ASSC also notes that Inverness functions as a major tourism and business hub, visitor accommodation flexibility is strategically important; and tourism demand supports significant economic activity throughout the region. ASSC calls for a pause on further STLCA expansion pending a full review of existing control areas, comprehensive economic and regulatory impact assessment, establishment of transparent and measurable success criteria. Express statutory protection for existing lawful operators is sought. Existing lawful self-catering businesses should not become a proxy target for broader structural housing failures absent robust evidence. ASSC would like Highland Council to work collaboratively with the sector towards development of a formal Short Term Let Use Class Order capable of delivering long-term legal certainty, national consistency and a more proportionate planning framework.	The Council does not contend that short-term lets are the sole, or even necessarily the primary, driver of housing affordability and availability pressures in Inverness. However, that does not mean that their contribution can be disregarded. In a housing market where supply is already constrained and affordability is a significant concern, the Council must consider all factors that have the potential to reduce the stock of homes available for permanent occupation. The relevant question is not whether STLs are solely responsible for current pressures, but whether continued conversion of residential properties to STL use could exacerbate existing challenges. Significant public and private investment is currently directed towards increasing housing delivery, with housebuilding expected to accelerate in the coming years. The purpose of that investment is to increase the supply of homes for Highland communities, support population retention and growth, address housing need and help sustain communities and local services. While tourism remains a vital part of the Highland economy, it would be difficult to justify a situation where a consistent share of new housing stock, supported directly or indirectly through substantial public expenditure on infrastructure, site servicing, affordable housing interventions and wider enabling investment, continues to be diverted into commercial visitor accommodation without any planning scrutiny.

	It would similarly be difficult to justify allowing a further source of pressure on housing supply to develop unchecked simply because other factors are also contributing to the problem, particularly when some of these factors fall outwith the scope of the planning system to manage (Long term empty homes, second homes etc). Noted. Points previously addressed in above responses. Points previously addressed in above responses.

Summary of Responses from Community Councils, Groups or Organisations

Respondent issues raised	Officer Response
IC-202-1 Lochardil and Drummond Community Council Agree with the proposal to establish the City of Inverness Short Term Let Control Area. Short term lets have the potential to be highly disruptive to neighbours. They in turn may complain to the police or council services. Better to at least attempt to avoid this situation before it happens. Support the Statement of Reasons and view that there is plenty of evidence that the [Reasons] are correct. Have not heard of anyone saying that it is a positive thing to have short term lets in a residential area. Disputes the suggested positive impacts of short term lets in the neighbourhood. For example, the fact that an individual makes money from a let cannot be construed as positive for the neighbourhood.	Noted.
Organisations	
IC-82-1 Scottish Tourism Alliance See summary above, for Question 28.	See response above, for Question 28.

IC-71-1 Association of Scotland's Self-Caterers See summary above, for Question 28.	See response above, for Question 28.
IC-100-1 Living Rent	
Agree with the proposal to establish the City of Inverness Short Term Let Control Area.	Noted.
One in five properties in Inverness are Short Term Lets (STLs) and in some parts of the city it is rising higher than the rest of the Highlands. The introduction of controls will slow down the growth of STLs, leaving more homes to rent or buy for those that want to live and work in Inverness, and providing real benefits to communities, businesses and the local economy. Controls will also deter prospective owners from buying properties to convert into STLs, making more homes available for long-term residents.	It is not accurate to state that one in five properties are STLs in Inverness, as these rates are typically found within more central areas in central Inverness City, however it is correct that some parts of the city it is rising higher than the rest of the Highlands, as set out in the Statement of Reasons.
Agree with the Statement of Reasons. As evidenced in the Statement of Reasons, Inverness is facing a significant housing crisis. In all parts of Inverness, the concentration of STLs is more than 15% of all dwellings, and in two parts of Inverness it is over 20%. This rise in short term lets has coincided with a rise in house prices across the city, resulting in 62% of Inverness residents finding they can't afford the average house price in Inverness (which is over £200,000) and only 41% can afford an entry level house in Inverness, the average price of which is £141,000. There has also been a simultaneous rise in the price of properties on the private rental market, with average monthly rental prices increasing, jumping from £550 in 2014 to over £800 in 2024. This tallies with evidence from the Scottish Government that shows that private rents have increased in Inverness by 51% on average, since 2010. 88% of the 1,714 Short Term Lets across the Inverness Area, are potential homes. That's over 1,500 homes we could have in the middle of a housing crisis. Meanwhile, the waiting list for social housing in Inverness grows and lengthens, especially as Inverness makes up 40% of first-choice allocation for social housing across the Highland Council, given the proximity to available work. This inevitably results in a rise in homelessness across the city and wider Highland Council region.	Noted. While the consultation is not intended to be a representative sample, the responses are consistent with the evidence cited by Living Rent, and outlined in the Statement of Reasons: 14 consultation respondents are on the Highland Council Housing Register (14 out of 202), and 67 total respondents cited severe or moderate difficulty in buying or renting a house for full-time occupancy within the proposed control area (67 out of 202), of these 10 are on the Housing Register.
There are too many short-term lets in the neighbourhood, which have increased significantly. There were over 900,000 overnight stays at short-term lets (STLs) in the Highlands between	Noted.

April and June 2025, which is one of the highest in the UK (only Cornwall and Westminster were higher). Our members who are first time buyers have told us how they have repeatedly been outbid by absentee STL owners. For instance, in one case, one of our members was outbid by over £40K. In addition, all of our members who rent have both struggled to find properties that remain available for rent, and when in properties they have struggled with the rent levels which have been increasing steadily. Properties are usually let by the time a call is made to arrange a viewing. Some members have been forced to move back home with their parents, with one ending up living in a caravan in their parents' garden for two years. Many are forced to live outside of Inverness and commute in for work from a long distance. Average rents have increased by 4% in 1-bedroom across the Highlands, with an average of £722. This represents a third of the average disposable income in the region, at £23,625, hitting the poorest the hardest. Our members who are on minimum wage, which is very prevalent in the service industry jobs across the Highlands, often spend 40 to 50% of their income on rent.	
The rise in STL's has had, and continues to have, a negative effect on local populations. One of the most prominent of those being the shortage of affordable housing and increase in rental prices. With long term private landlords choosing to outsource services, selling or converting properties into short term let accommodation, this results in higher rental prices for the few properties left on the market. It also pushes up prices for homes and excludes first time buyers. The social impacts of STL's must also not be ignored – we are already seeing the effects of the lack of housing in small communities, with schools facing closure due to a lack of families being able to live in the area and hospitals not being able to recruit for key frontline jobs. This has a knock-on effect on services, shops and facilities, without a local permanent population many businesses and facilities are often reoriented towards the tourists' preferences rather than those of residents – alienating them in their own area. It is also essential to recognise the negative emotional effects on residents that high concentrations of STL's can cause, such as leaving streets and neighbourhoods feeling 'hollowed' out, with few community members left who are able to support each other (e.g. picking up post, checking on pets and each other, etc). There is also the issue of new "neighbours" every few days, a lack of knowledge or safety of who might be sharing the stairwell or garden or issues such as parking, "party houses" and disruptive behaviour by tourists. Neighbourhoods with a high concentration of short term lets can often become	Noted.

“museum-ized”, leading to locals feeling alienated and observed in their own neighbourhood. The commercialisation of local neighbourhood can lead to a loss of families and overall sense of identity – something the Highlands knows all too well.

Appendix 4

This appendix presents a summary of **all** 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 A4.1**. Using cohorts supports the presentation of this analysis by grouping respondents with similar characteristics.

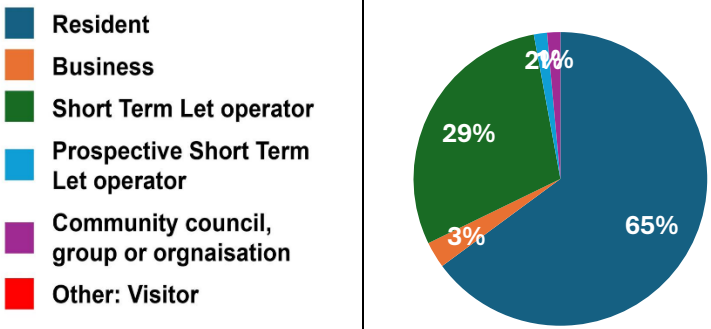
Table A4.1: Summary of cohorts for survey analysis

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

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

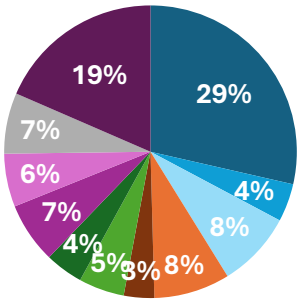
Question 4. Are you responding as:
Where relevant, 'Other' responses which relate to a listed category have been added to that category.

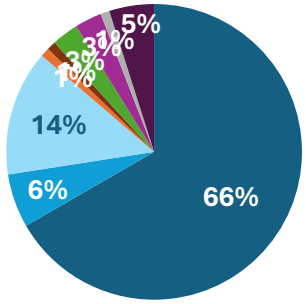
Respondent type	Resides in the Highland Rural STLCA	Resides in the Highland Council Area	Resides Outwith Highland Council Area
Total Residing in Area	**409**	**466**	**121**
Resident (Not a short term let operator)	270	308	23
Business (Not a short term let operator)	12	13	1
Short term let operator	121	138	86
Prospective short term let operator	6	7	10
Community Council, Group, Organisation	**6**	**7**	**4**
Other: Visitor	-	-	10
TOTAL Responses	**415**	**473**	**135**



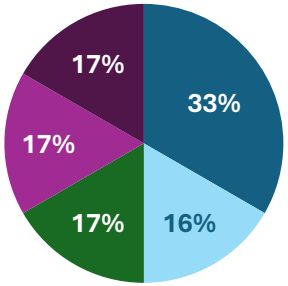
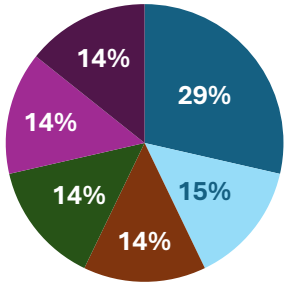
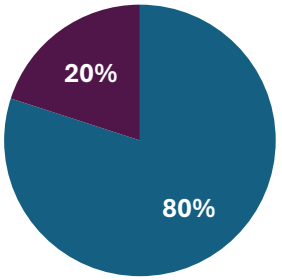
Question 5. What kind(s) of Short Term Lets do you currently operate? (Only asked to Short Term Let Operators)
Where relevant, 'Other' responses which relate to an already listed category have been added to that category for accuracy.

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





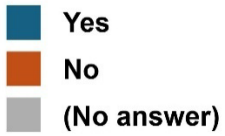
Question 6. What kind(s) of Short Term Lets do you intend to operate? (Only asked to Prospective Short Term Let Operators)
Where relevant, 'Other' responses which relate to an already listed category have been added to that category for accuracy.

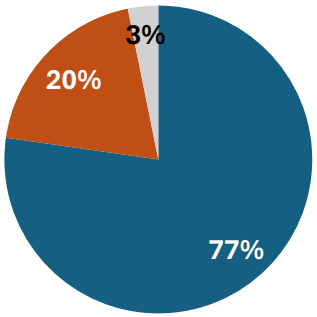
Short Term Let Type	Resident within the Highland Rural STLCA	Resident in Highland Council Area	Non-Resident in the Highland Council Area
Converted from previous house terraced, semi-detached detached	2	2	8
Converted from previous self-contained flats/apartments	-	-	-
Purpose-built holiday home	1	1	-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

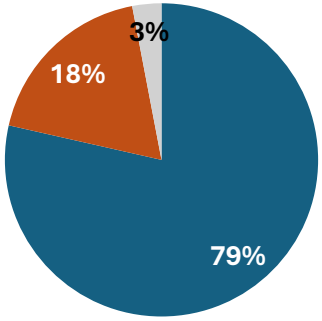
Question 12. Do you currently work in Highland? (optional question)

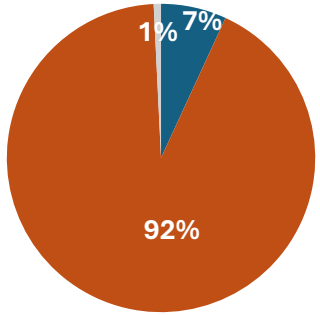
Breakdown of responses by area of residence

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





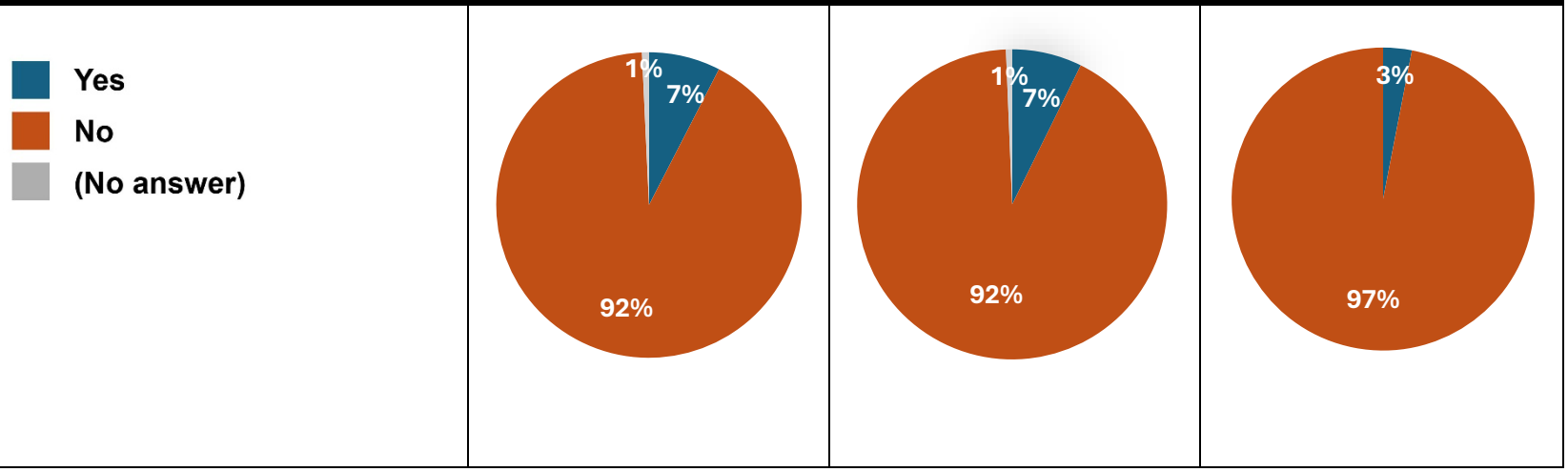




Question 13. Are you on the Council's Housing Register? (optional question)
This means you have submitted an application for social rented housing to The Highland Council and its partner housing associations.

Breakdown of responses by area of residence

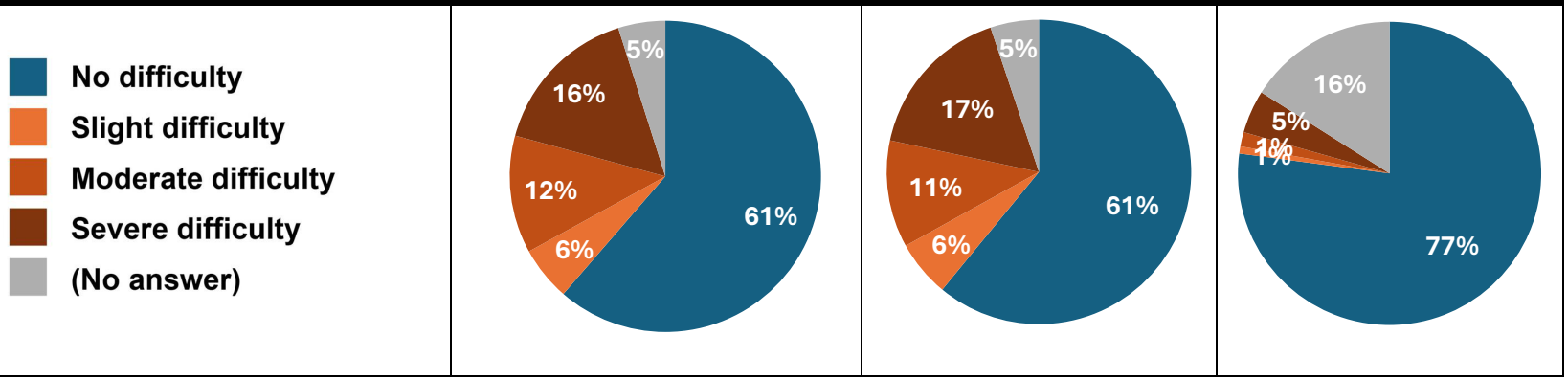
Are you on the Council's Housing Register?	**Resident in Highland Rural STLCA**	**Resident in Highland Council Area**	**Non-resident in Highland Council**
Yes	31	34	9
No	375	429	121
(No answer)	3	3	1
TOTAL	**409**	**466**	**131**



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 Highland Rural STLCA**	**Resident in Highland Council Area**	**Non-resident in Highland Council**
	251	284	101
	23	28	1
	50	53	2
	65	77	6
(No answer)	20	24	21
TOTAL	**409**	**466**	**131**



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-608-1, HR-605-1, HR-561-1, HR-557-1, HR-495-1, HR-487-1, HR-382-1, HR-369-1, HR-355-1, HR-353-1, HR-202-1, HR-138-1, HR-113-1, HR-51-1, HR-579-1, HR-570-1, HR-545-1, HR-501-1, HR-499-1, HR-464-1, HR-453-1, HR-410-1, HR-339-1, HR-251-1, HR-204-1, HR-150-1, HR-135-1, HR-61-1, HR-50-1, HR-30-1, HR-16-1, HR-494-1, HR-481-1, HR-468-1, HR-425-1, HR-334-1, HR-239-1, HR-217-1, HR-203-1, HR-187-1, HR-179-1, HR-171-1, HR-169-1, HR-108-1, 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, HR-573-1, HR-455-1, HR-372-1, HR-321-1, HR-10-1	• Limited choice and supply of housing and land
HR-564-1, HR-560-1, HR-495-1, HR-487-1, HR-382-1, HR-358-1, HR-356-1, HR-155-1, HR-138-1, HR-113-1, HR-89-1, HR-87-1, HR-67-1, HR-63-1, HR-51-1, HR-606-1, HR-588-1, HR-579-1, HR-577-1, HR-517-1, HR-493-1, HR-464-1, HR-453-1, HR-434-1, HR-424-1, HR-251-1, HR-204-1, HR-151-1, HR-149-1, HR-104-1, HR-38-1, HR-494-1, HR-492-1, HR-481-1, HR-468-1, HR-438-1, HR-425-1, HR-378-1, HR-334-1, HR-217-1, HR-203-1, HR-169-1, HR-90-1, HR-15-1, HR-439-1, HR-407-1, HR-159-1, HR-107-1, HR-94-1, HR-37-1, HR-553-1, HR-400-1	• High house prices and affordability challenges

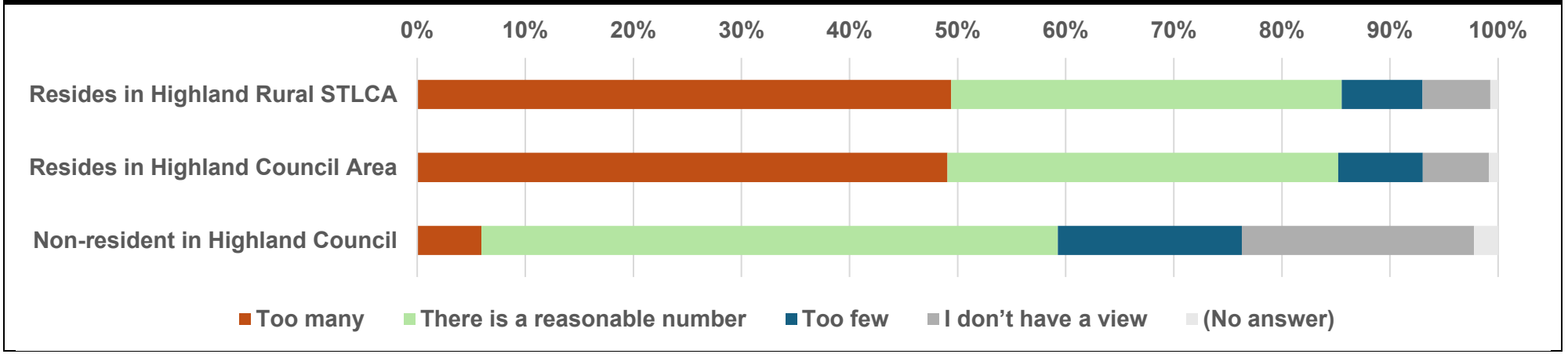
HR-350-1, HR-601-1, HR-588-1, HR-579-1, HR-570-1, HR-251-1, HR-518-1, HR-378-1, HR-334-1, HR-203-1, HR-15-1, HR-409-1, HR-400-1, HR-372-1, HR-371-1, HR-321-1	• Competitive purchasing/rental market
HR-588-1, HR-579-1, HR-577-1, HR-568-1, HR-517-1, HR-501-1, HR-493-1, HR-464-1, HR-434-1, HR-339-1, HR-251-1, HR-16-1, HR-518-1, HR-468-1, HR-394-1, HR-235-1, HR-203-1, HR-373-1, HR-49-1, HR-589-1, HR-455-1, HR-372-1, HR-371-1	• Short-term lets impacting housing availability
HR-357-1, HR-350-1, HR-194-1, HR-67-1, HR-410-1, HR-251-1, HR-245-1, HR-149-1, HR-104-1, HR-494-1, HR-492-1, HR-235-1, HR-217-1, HR-203-1, HR-409-1, HR-407-1, HR-62-1, HR-37-1, HR-23-1	• Competition from second-home owners, investors and external buyers
HR-608-1, HR-564-1, HR-495-1, HR-382-1, HR-353-1, HR-579-1, HR-570-1, HR-568-1, HR-545-1, HR-468-1, HR-438-1, HR-425-1, HR-203-1, HR-187-1, HR-90-1, HR-582-1, HR-439-1, HR-417-1, HR-413-1, HR-375-1, HR-553-1, HR-399-1, HR-372-1, HR-371-1	• Reliance on family and friends support and informal housing arrangements
HR-344-1, HR-298-1, HR-588-1, HR-568-1, HR-483-1, HR-394-1, HR-285-1	• Reliance on council housing/ government schemes
HR-388-1, HR-369-1, HR-356-1, HR-214-1, HR-251-1, HR-108-1, HR-285-1	• Council housing stock is too limited

HR-388-1, HR-356-1, HR-202-1, HR-588-1, HR-568-1, HR-545-1, HR-517-1, HR-251-1, HR-468-1, HR-438-1, HR-394-1, HR-378-1, HR-203-1, HR-108-1, HR-413-1, HR-375-1, HR-373-1, HR-144-1, HR-589-1, HR-400-1, HR-399-1, HR-372-1, HR-371-1	• Housing insecurity and displacement
HR-588-1, HR-429-1, HR-373-1	• Reliance on inheritance

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

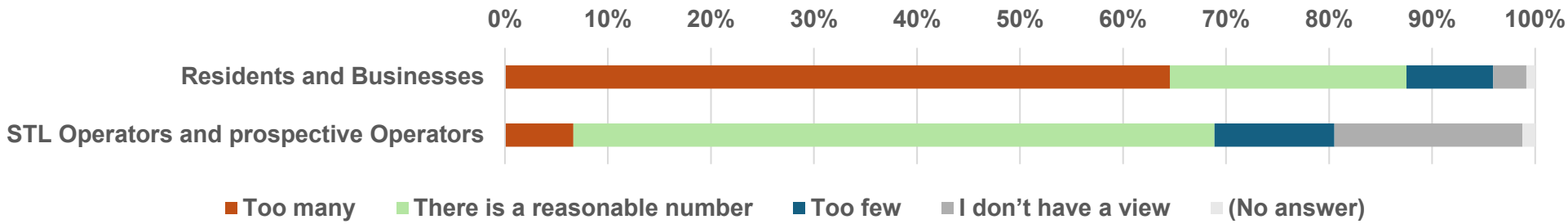
Which of the following best describes the amount of short term lets in your neighbourhood?	**Resides in Highland Rural STLCA**	**Resides in Highland Council Area**	**Non-resident in Highland Council**
There are too few STLs	31	37	23
There is a reasonable number of STLs	150	171	72
There are too many STLs	205	232	8
I don't have a view	26	29	29
(No answer)	3	4	3
TOTAL	**415**	**473**	**135**



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

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

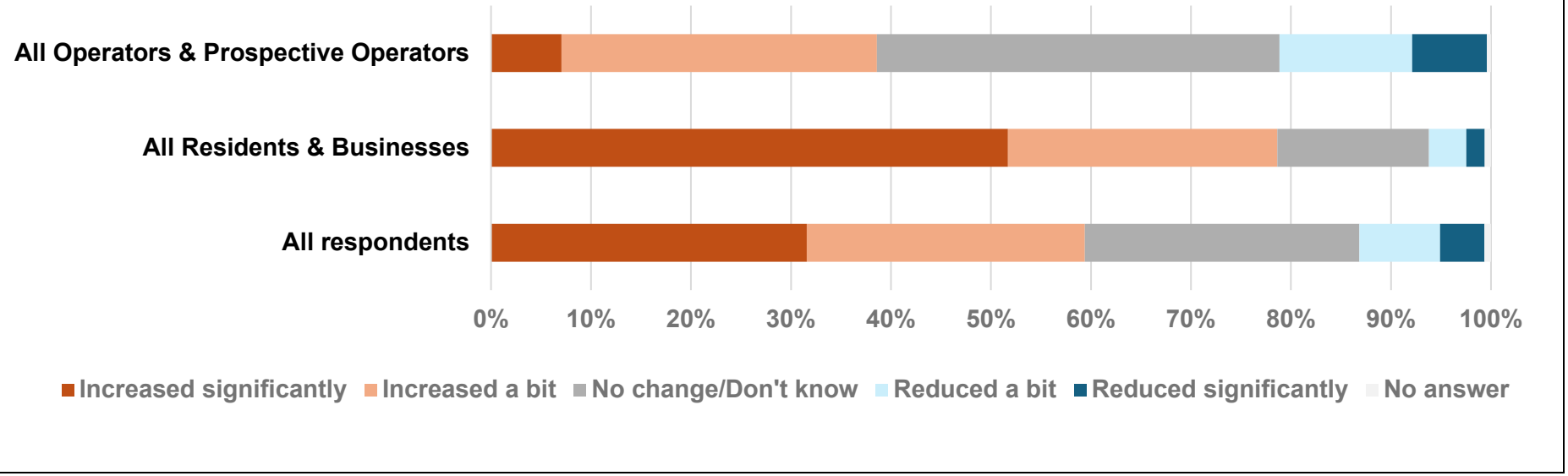
	Total Sample	
Which best describes the amount of short term lets in your neighbourhood?	**Residents and Businesses**	**STL Operators and prospective Operators**
There are too few STLs	29	28
There is a reasonable number of STLs	79	150
There are too many STLs	222	16
I don't have a view	11	44
(No answer)	3	3
TOTAL	**344**	**241**



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

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

How would you say that the number of short term lets in your neighbourhood has changed over the past three years or so?	**All Respondents**	**Businesses and Residents**	**STL Operators and Prospective operators**
	27	6	18
Reduced a bit	49	12	32
No change/Don't know	167	49	97
Increased a bit	169	87	76
	192	167	17
No answer	4	2	1
TOTAL	**608**	**323**	**241**

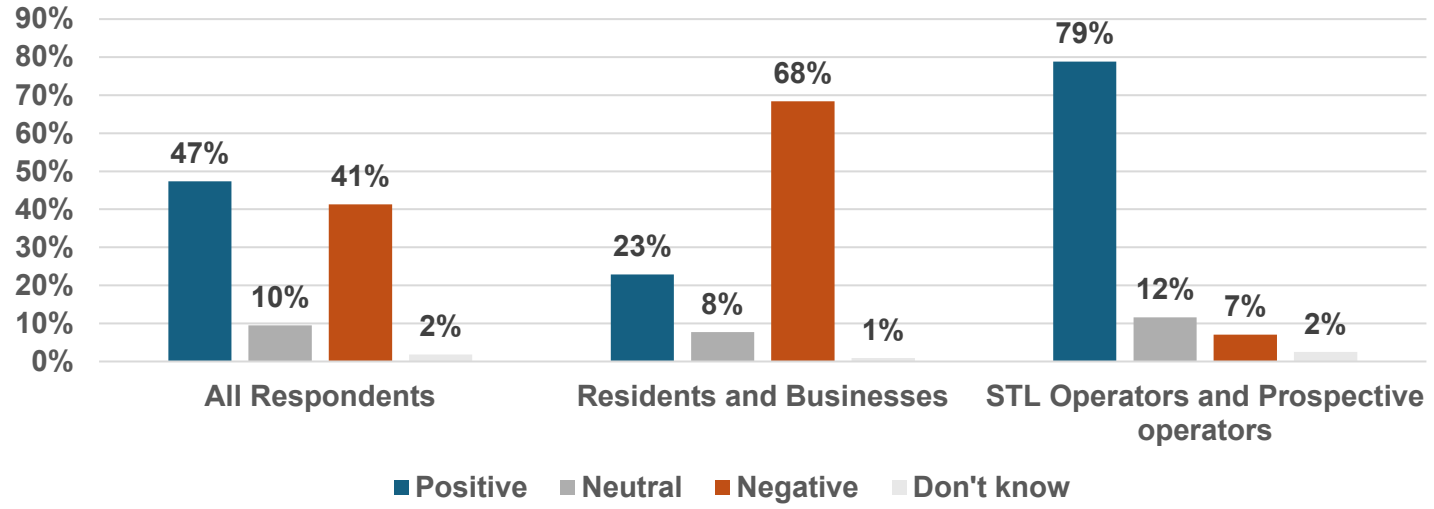


The divergence in views by respondent category observed among the total sample of respondents.

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 Total Sample

Which of the following best describes your overall view of the impact that short term lets have on your neighbourhood?	**All Respondents**	**Residents and Businesses**	**STL Operators and Prospective operators**
Positive	288	74	190
Neutral	58	25	28
Negative	251	221	17
Don't Know	11	3	6
TOTAL	**608**	**323**	**241**



The divergence in views on the overall view of the impact of STLs differed by respondent category across the total sample.

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

Respondent Reference	Points raised
Neutral impact views	
HR-237-1, HR-125-1, HR-36-1, HR-450-1, HR-182-1, HR-285-1, HR-594-1	Need to balance STLs with housing stock
HR-541-1, HR-386-1, HR-377-1, HR-298-1, HR-288-1, HR-118-1, HR-86-1, HR-503-1, HR-205-1, HR-129-1, HR-58-1, HR-492-1, HR-450-1, HR-232-1, HR-226-1, HR-201-1, HR-171-1, HR-603-1, HR-593-1, HR-582-1, HR-447-1, HR-303-1, HR-162-1, HR-144-1, HR-415-1	Impacts depend on the type and location of STL
Negative impact views	
HR-469-1, HR-454-1, HR-441-1, HR-288-1, HR-241-1, HR-138-1, HR-118-1, HR-234-1, HR-183-1, HR-609-1, HR-447-1, HR-413-1, HR-383-1, HR-365-1, HR-341-1, HR-234-1	Properties used as STLs are unaffordable or unsuitable for permanent housing
HR-608-1, HR-605-1, HR-567-1, HR-560-1, HR-557-1, HR-457-1, HR-449-1, HR-382-1, HR-356-1, HR-355-1, HR-308-1, HR-298-1, HR-266-1, HR-194-1, HR-139-1, HR-113-1, HR-87-1, HR-83-1, HR-67-1, HR-606-1, HR-588-1, HR-570-1, HR-501-1, HR-493-1, HR-488-1, HR-486-1, HR-483-1, HR-477-1, HR-474-1, HR-465-1, HR-464-1, HR-453-1, HR-445-1, HR-339-1, HR-267-1, HR-263-1, HR-259-1, HR-195-1, HR-193-1, HR-160-1, HR-150-1, HR-135-1, HR-124-1, HR-61-1, HR-53-1, HR-50-1, HR-32-1, HR-31-1, HR-16-1, HR-13-1, HR-566-1, HR-494-1, HR-491-1, HR-463-1, HR-394-1, HR-332-1, HR-239-1, HR-235-1, HR-230-1, HR-229-1, HR-228-1, HR-227-1, HR-169-1, HR-154-1, HR-109-1, HR-93-1, HR-15-1, HR-	Loss of housing for local people

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, HR-594-1, HR-592-1, HR-589-1, HR-436-1, HR-419-1, HR-416-1, HR-372-1, HR-322-1, HR-321-1, HR-41-1, HR-23-1	
HR-605-1, HR-561-1, HR-560-1, HR-557-1, HR-420-1, HR-369-1, HR-358-1, HR-357-1, HR-356-1, HR-350-1, HR-219-1, HR-202-1, HR-139-1, HR-102-1, HR-87-1, HR-83-1, HR-67-1, HR-601-1, HR-486-1, HR-477-1, HR-465-1, HR-464-1, HR-453-1, HR-339-1, HR-258-1, HR-195-1, HR-151-1, HR-149-1, HR-50-1, HR-31-1, HR-16-1, HR-13-1, HR-566-1, HR-463-1, HR-425-1, HR-332-1, HR-239-1, HR-230-1, HR-229-1, HR-216-1, HR-169-1, HR-109-1, HR-81-1, HR-363-1, HR-159-1, HR-107-1, HR-43-1, HR-554-1, HR-419-1, HR-416-1, HR-322-1, HR-321-1, HR-73-1	Increases in house prices
HR-557-1, HR-402-1, HR-266-1, HR-219-1, HR-67-1, HR-588-1, HR-488-1, HR-486-1, HR-483-1, HR-464-1, HR-267-1, HR-195-1, HR-30-1, HR-494-1, HR-491-1, HR-463-1, HR-235-1, HR-228-1, HR-217-1, HR-169-1, HR-164-1, HR-93-1, HR-582-1, HR-417-1, HR-602-1, HR-436-1, HR-416-1	Impacts on the local workforce
HR-561-1, HR-495-1, HR-414-1, HR-308-1, HR-276-1, HR-266-1, HR-601-1, HR-577-1, HR-499-1, HR-493-1, HR-410-1, HR-195-1, HR-50-1, HR-40-1, HR-492-1, HR-491-1, HR-468-1, HR-463-1, HR-230-1, HR-227-1, HR-222-1, HR-203-1, HR-186-1, HR-182-1, HR-169-1, HR-164-1, HR-154-1, HR-140-1, HR-108-1, HR-81-1, HR-15-1, 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, HR-573-1, HR-428-1, HR-416-1, HR-401-1, HR-400-1, HR-399-1	Loss of community cohesion

HR-561-1, HR-560-1, HR-557-1, HR-356-1, HR-355-1, HR-202-1, HR-72-1, HR-67-1, HR-486-1, HR-149-1, HR-230-1, HR-187-1, HR-179-1, HR-140-1, HR-439-1, HR-285-1, HR-262-1, HR-159-1, HR-60-1, HR-573-1, HR-416-1, HR-23-1	Demographic changes
HR-587-1, HR-276-1, HR-266-1, HR-113-1, HR-89-1, HR-63-1, HR-568-1, HR-545-1, HR-480-1, HR-13-1, HR-547-1, HR-479-1, HR-405-1, HR-373-1, HR-159-1, HR-502-1, HR-416-1	Properties remaining vacant for much of the year
HR-586-1, HR-564-1, HR-515-1, HR-356-1, HR-350-1, HR-298-1, HR-214-1, HR-63-1, HR-577-1, HR-545-1, HR-496-1, HR-480-1, HR-477-1, HR-474-1, HR-453-1, HR-445-1, HR-410-1, HR-327-1, HR-317-1, HR-275-1, HR-274-1, HR-259-1, HR-251-1, HR-245-1, HR-195-1, HR-193-1, HR-146-1, HR-104-1, HR-50-1, HR-46-1, HR-40-1, HR-27-1, HR-482-1, HR-468-1, HR-229-1, HR-90-1, HR-81-1, HR-427-1, HR-376-1, HR-363-1, HR-262-1, HR-49-1, HR-416-1, HR-322-1, HR-29-1	Nuisance impacts on local residents (e.g. antisocial behaviour, traffic, noise, parking, and waste issues)
HR-608-1, HR-457-1, HR-51-1, HR-460-1, HR-429-1, HR-409-1	Competition with hotels and B&Bs, reducing occupancy rates and increasing closures
HR-402-1, HR-266-1, HR-219-1, HR-267-1, HR-230-1, HR-222-1, HR-203-1, HR-93-1, HR-285-1, HR-282-1, HR-262-1, HR-22-1, HR-502-1	Contributions to local service closures (e.g. schools)
HR-450-1, HR-203-1, HR-187-1, HR-169-1, HR-140-1, HR-285-1	Loss of local culture and heritage (e.g. Gaelic and crofting traditions)
HR-515-1, HR-487-1, HR-480-1, HR-474-1, HR-434-1, HR-482-1, HR-378-1, HR-229-1, HR-427-1, HR-376-1, HR-363-1, HR-49-1, HR-416-1	Pressure on community infrastructure
HR-586-1, HR-577-1, HR-493-1, HR-477-1, HR-394-1, HR-607-1, HR-407-1, HR-592-1, HR-456-1, HR-415-1, HR-400-1, HR-399-1	Incompatible land uses within residential areas

Positive impact views	
HR-591-1, HR-580-1, HR-575-1, HR-574-1, HR-541-1, HR-529-1, HR-523-1, HR-511-1, HR-509-1, HR-469-1, HR-449-1, HR-441-1, HR-421-1, HR-418-1, HR-384-1, HR-381-1, HR-319-1, HR-312-1, HR-304-1, HR-288-1, HR-281-1, HR-254-1, HR-253-1, HR-248-1, HR-241-1, HR-233-1, HR-225-1, HR-206-1, HR-199-1, HR-192-1, HR-161-1, HR-110-1, HR-80-1, HR-572-1, HR-540-1, HR-536-1, HR-533-1, HR-528-1, HR-524-1, HR-516-1, HR-503-1, HR-489-1, HR-485-1, HR-475-1, HR-411-1, HR-336-1, HR-330-1, HR-302-1, HR-286-1, HR-273-1, HR-185-1, HR-76-1, HR-57-1, HR-52-1, HR-38-1, HR-7-1, HR-597-1, HR-562-1, HR-525-1, HR-461-1, HR-442-1, HR-433-1, HR-361-1, HR-338-1, HR-334-1, HR-314-1, HR-299-1, HR-292-1, HR-290-1, HR-283-1, HR-191-1, HR-177-1, HR-165-1, HR-141-1, HR-120-1, HR-111-1, HR-24-1, 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, HR-559-1, HR-552-1, HR-550-1, HR-543-1, HR-542-1, HR-510-1, HR-490-1, HR-458-1, HR-451-1, HR-283-1, HR-10-1	Supports tourism
HR-591-1, HR-587-1, HR-580-1, HR-565-1, HR-558-1, HR-541-1, HR-529-1, HR-527-1, HR-523-1, HR-520-1, HR-511-1, HR-509-1, HR-504-1, HR-449-1, HR-448-1, HR-441-1, HR-437-1, HR-421-1, HR-418-1, HR-381-1, HR-344-1, HR-342-1, HR-331-1, HR-319-1, HR-318-1, HR-312-1, HR-308-1, HR-304-1, HR-288-1, HR-281-1, HR-280-1, HR-256-1, HR-254-1, HR-253-1, HR-237-1, HR-225-1, HR-206-1, HR-199-1, HR-161-1, HR-158-1, HR-155-1, HR-125-1, HR-119-1, HR-110-1, HR-106-1, HR-88-1, HR-86-1, HR-80-1, HR-71-1, HR-56-1, HR-42-1, HR-35-1, HR-19-1, HR-572-1, HR-540-1,	Supports the local economy and businesses

HR-536-1, HR-533-1, HR-528-1, HR-524-1, HR-516-1, HR-507-1, HR-478-1, HR-475-1, HR-471-1, HR-423-1, HR-411-1, HR-397-1, HR-336-1, HR-330-1, HR-302-1, HR-295-1, HR-277-1, HR-273-1, HR-264-1, HR-261-1, HR-246-1, HR-242-1, HR-234-1, HR-231-1, HR-197-1, HR-185-1, HR-183-1, HR-180-1, HR-173-1, HR-130-1, HR-76-1, HR-61-1, HR-58-1, HR-18-1, HR-7-1, HR-597-1, HR-562-1, HR-508-1, HR-506-1, HR-473-1, HR-461-1, HR-450-1, HR-444-1, HR-433-1, HR-361-1, HR-338-1, HR-324-1, HR-316-1, HR-314-1, HR-299-1, HR-292-1, HR-290-1, HR-283-1, HR-212-1, HR-191-1, HR-177-1, HR-176-1, HR-165-1, HR-141-1, HR-120-1, HR-109-1, HR-105-1, HR-68-1, HR-24-1, 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, HR-559-1, HR-552-1, HR-550-1, HR-543-1, HR-542-1, HR-534-1, HR-510-1, HR-490-1, HR-423-1, HR-349-1, HR-342-1, HR-315-1, HR-283-1, HR-261-1, HR-234-1, HR-181-1, HR-178-1, HR-166-1, HR-163-1, HR-21-1, HR-4-1	
HR-591-1, HR-580-1, HR-575-1, HR-565-1, HR-556-1, HR-541-1, HR-538-1, HR-530-1, HR-529-1, HR-527-1, HR-523-1, HR-511-1, HR-509-1, HR-484-1, HR-454-1, HR-448-1, HR-446-1, HR-441-1, HR-437-1, HR-431-1, HR-421-1, HR-319-1, HR-318-1, HR-304-1, HR-281-1, HR-256-1, HR-254-1, HR-248-1, HR-237-1, HR-225-1, HR-199-1, HR-155-1, HR-133-1, HR-125-1, HR-110-1, HR-106-1, HR-88-1, HR-80-1, HR-66-1, HR-56-1, HR-35-1, HR-572-1, HR-536-1, HR-533-1, HR-516-1, HR-489-1, HR-485-1, HR-475-1, HR-471-1, HR-423-1, HR-411-1, HR-397-1, HR-336-1, HR-330-1, HR-302-1, HR-300-1, HR-295-1, HR-277-1, HR-273-1, HR-264-1, HR-261-1, HR-236-1, HR-234-1, HR-231-1, HR-185-1, HR-183-1, HR-	Provides direct and indirect employment opportunities

173-1, HR-65-1, HR-58-1, HR-33-1, HR-18-1, HR-7-1, HR-597-1, HR-562-1, HR-549-1, HR-508-1, HR-473-1, HR-450-1, HR-444-1, HR-360-1, HR-347-1, HR-338-1, HR-333-1, HR-316-1, HR-314-1, HR-299-1, HR-293-1, HR-212-1, HR-177-1, HR-141-1, HR-120-1, HR-111-1, HR-70-1, HR-68-1, HR-24-1, 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, HR-552-1, HR-542-1, HR-490-1, HR-451-1, HR-423-1, HR-261-1, HR-234-1, HR-178-1, HR-166-1, HR-163-1, HR-157-1, HR-148-1, HR-33-1, HR-21-1, HR-4-1	
HR-591-1, HR-574-1, HR-565-1, HR-556-1, HR-541-1, HR-529-1, HR-527-1, HR-520-1, HR-511-1, HR-509-1, HR-484-1, HR-469-1, HR-454-1, HR-446-1, HR-437-1, HR-344-1, HR-319-1, HR-318-1, HR-298-1, HR-288-1, HR-199-1, HR-138-1, HR-125-1, HR-71-1, HR-544-1, HR-533-1, HR-516-1, HR-489-1, HR-424-1, HR-411-1, HR-336-1, HR-307-1, HR-295-1, HR-286-1, HR-236-1, HR-183-1, HR-597-1, HR-562-1, HR-549-1, HR-506-1, HR-444-1, HR-442-1, HR-360-1, HR-316-1, HR-232-1, HR-212-1, HR-207-1, HR-100-1, HR-77-1, HR-24-1, 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, HR-559-1, HR-543-1	Income generator for residents
HR-591-1, HR-565-1, HR-527-1, HR-511-1, HR-509-1, HR-437-1, HR-298-1, HR-256-1, HR-254-1, HR-125-1, HR-88-1, HR-66-1, HR-524-1, HR-516-1, HR-302-1, HR-246-1, HR-299-1, HR-232-1, HR-207-1, HR-367-1, HR-345-1, HR-26-1, HR-163-1	Supports population retention and local services (e.g. schools)

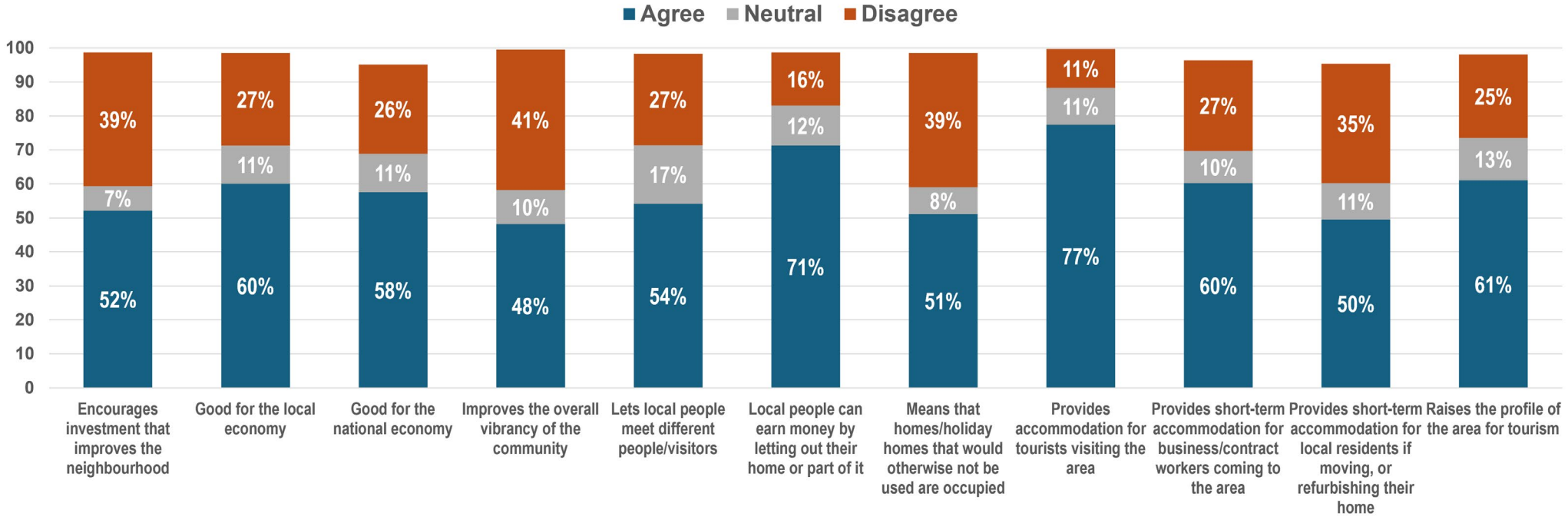
HR-529-1, HR-454-1, HR-192-1, HR-106-1, HR-516-1, HR-302-1, HR-452-1, HR-444-1, HR-292-1, HR-383-1, HR-340-1, HR-268-1, HR-244-1, HR-200-1, HR-5-1, HR-543-1, HR-452-1	Provides essential accommodation
HR-155-1, HR-572-1, HR-551-1, HR-516-1, HR-180-1, HR-52-1, HR-340-1, HR-291-1, HR-162-1, HR-91-1, HR-559-1	Offers alternative accommodation when hotels are unavailable or full
HR-454-1, HR-448-1, HR-437-1, HR-312-1, HR-516-1, HR-264-1, HR-261-1, HR-242-1, HR-234-1, HR-183-1, HR-180-1, HR-18-1, HR-293-1, HR-497-1, HR-354-1, HR-200-1, HR-162-1, HR-153-1, HR-115-1, HR-341-1, HR-261-1, HR-234-1	Bring derelict or unused buildings back into use
HR-511-1, HR-331-1, HR-125-1, HR-88-1, HR-264-1, HR-508-1, HR-444-1, HR-552-1, HR-550-1, HR-458-1	Contributes to a multicultural and socially vibrant community
HR-469-1, HR-319-1, HR-304-1, HR-288-1, HR-158-1, HR-88-1, HR-80-1, HR-38-1, HR-24-1, HR-497-1, HR-291-1, HR-200-1, HR-162-1, HR-153-1, HR-62-1, HR-490-1	Reduces reliance on self-sufficient tourism (e.g. caravanning and camping)
HR-241-1, HR-513-1, HR-442-1, HR-593-1	No impact on the provision of affordable housing
HR-323-1, HR-318-1, HR-288-1, HR-56-1, HR-6-1, HR-328-1, HR-576-1, HR-143-1	Empty homes and second homes as the primary cause of housing issues

Council Response: A range of reasons for views on the impacts of short term lets are therefore noted.

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

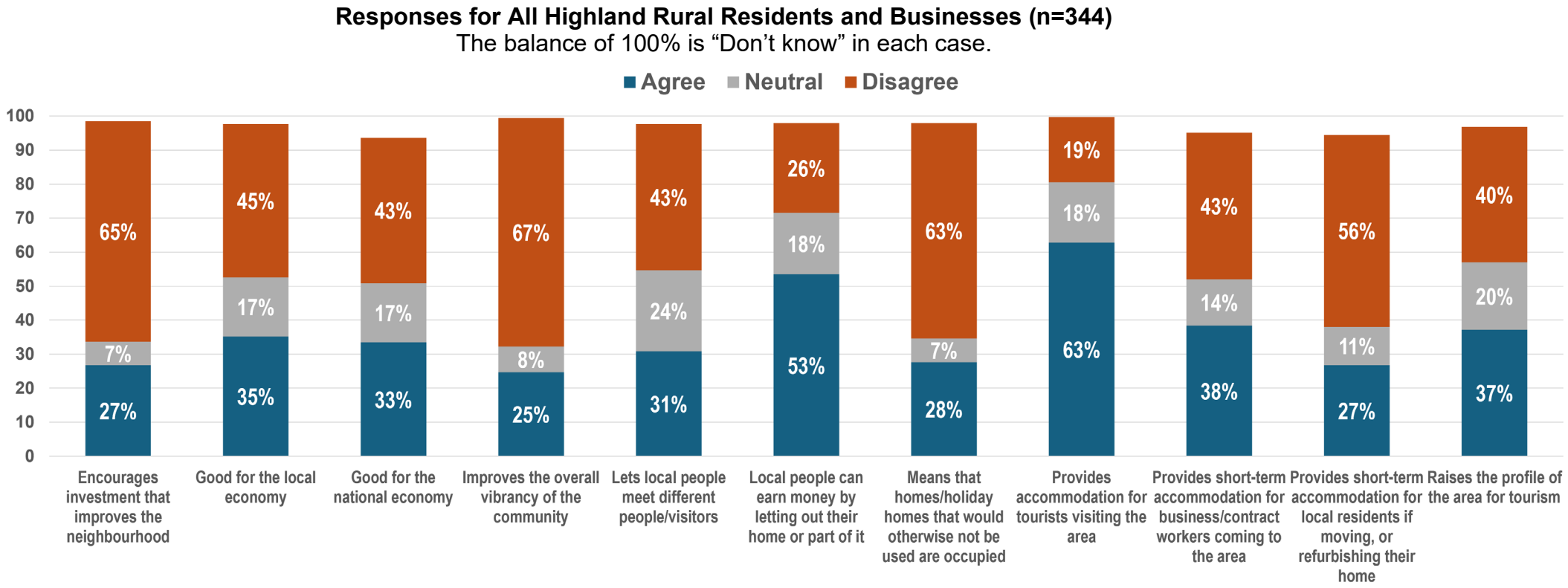
Responses for All Highland Rural – all respondent categories (n=608)

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



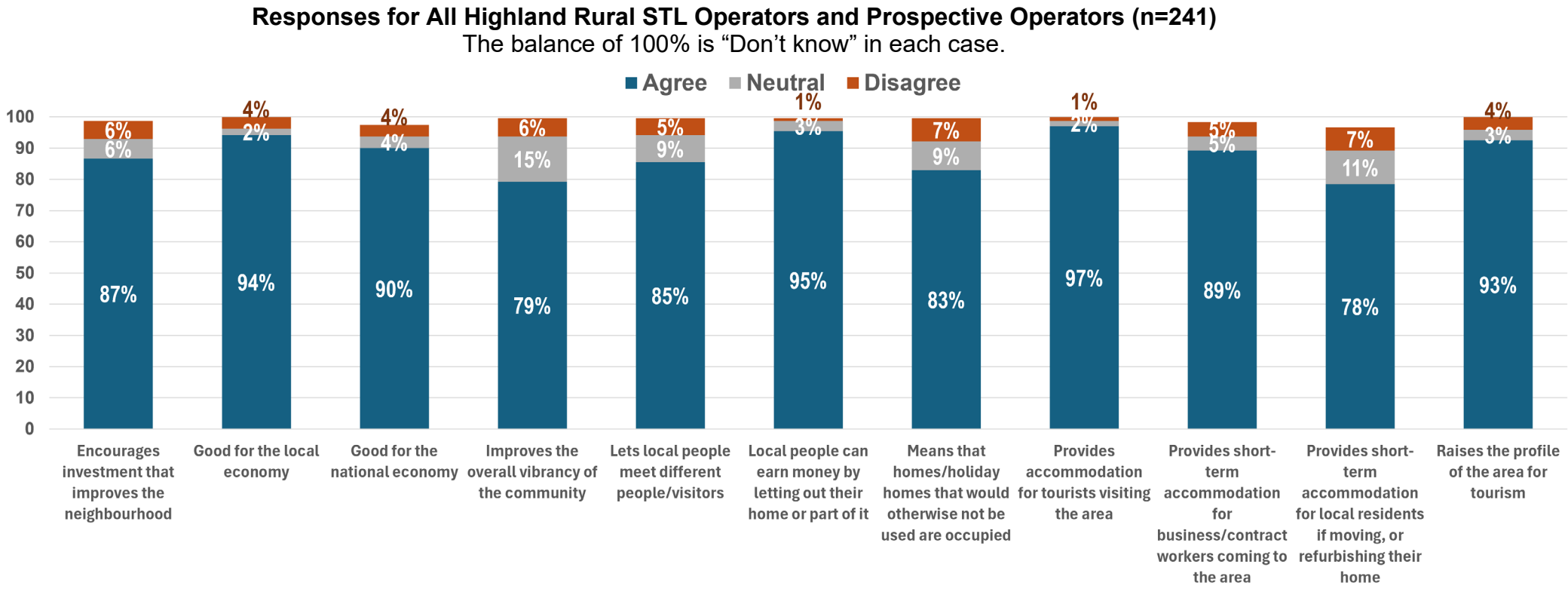
When presented with a list of suggested positive impacts attributed to Short Term Lets, there are varying levels of agreement from respondents with the highest agreement recorded towards "Provides accommodation for tourists visiting the area" with lower levels of agreement for "Improves the overall vibrancy of the community". The statement with the highest level of neutral responses was "Lets local people meet different people/visitors". The category of respondent is the dominant predictor of variation to these responses, with residents and businesses differing sharply in their agreement, relative to STL operators and prospective operators.

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



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

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



Turning to STL Operators and prospective Operators, there is a broad consensus and near unanimous agreement that the statements provided are indeed positive impacts of STLs. The highest levels of agreement are attributed to "Provides accommodation for tourists visiting the area", "Good for the national economy", "Local people can earn money by letting out their home or part of it" and "Raises the profile of the area for tourism". 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 Highland Rural, alongside non-resident operators in the area.

Respondent Reference	Points raised and responses.
HR-580-1, HR-557-1, HR-527-1, HR-511-1, HR-454-1, HR-437-1, HR-381-1, HR-369-1, HR-308-1, HR-256-1, HR-248-1, HR-199-1, HR-125-1, HR-63-1, HR-6-1, HR-524-1, HR-486-1, HR-424-1, HR-336-1, HR-104-1, HR-85-1, HR-65-1, HR-17-1, HR-506-1, HR-360-1, HR-212-1, HR-207-1, HR-203-1, HR-177-1, HR-172-1, HR-141-1, HR-120-1, HR-547-1, HR-238-1, HR-60-1, HR-542-1, HR-534-1, HR-490-1	Offers additional income and flexible work opportunities compatible with caring responsibilities
HR-565-1, HR-558-1, HR-556-1, HR-538-1, HR-448-1, HR-446-1, HR-441-1, HR-437-1, HR-414-1, HR-353-1, HR-331-1, HR-304-1, HR-281-1, HR-248-1, HR-241-1, HR-215-1, HR-214-1, HR-199-1, HR-133-1, HR-125-1, HR-119-1, HR-106-1, HR-80-1, HR-71-1, HR-66-1, HR-6-1, HR-572-1, HR-544-1, HR-536-1, HR-503-1, HR-480-1, HR-478-1, HR-336-1, HR-307-1, HR-302-1, HR-279-1, HR-246-1, HR-180-1, HR-160-1, HR-104-1, HR-85-1, HR-65-1, HR-48-1, HR-33-1, HR-17-1, HR-562-1, HR-508-1, HR-360-1, HR-338-1, HR-316-1, HR-314-1, HR-311-1, HR-229-1, HR-226-1, HR-207-1, HR-165-1, HR-120-1, HR-111-1, HR-109-1, HR-105-1, HR-77-1, HR-70-1, HR-24-1, 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, HR-490-1, HR-458-1, HR-451-1, HR-315-1, HR-313-1, HR-166-1, HR-163-1, HR-143-1, HR-101-1, HR-33-1, HR-21-1	Demand and spend from visitors helps sustain local businesses and services, including shops, pubs, public transport and trades

HR-556-1, HR-527-1, HR-454-1, HR-448-1, HR-437-1, HR-358-1, HR-256-1, HR-254-1, HR-133-1, HR-125-1, HR-116-1, HR-71-1, HR-66-1, HR-63-1, HR-35-1, HR-478-1, HR-424-1, HR-286-1, HR-264-1, HR-246-1, HR-183-1, HR-180-1, HR-85-1, HR-58-1, HR-508-1, HR-506-1, HR-324-1, HR-232-1, HR-229-1, HR-228-1, HR-210-1, HR-191-1, HR-164-1, HR-68-1, HR-374-1, HR-365-1, HR-326-1, HR-325-1, HR-270-1, HR-243-1, HR-238-1, HR-60-1, HR-178-1	Retains population and reduces depopulation in fragile rural areas, especially through providing employment and maintaining a balanced demographic
HR-556-1, HR-527-1, HR-256-1, HR-254-1, HR-35-1, HR-178-1	Supports local schools through employment and population retention
HR-538-1, HR-437-1, HR-342-1, HR-66-1, HR-473-1, HR-450-1, HR-293-1, HR-212-1, HR-342-1	Support local cultural heritage and Gaelic-speaking communities
HR-580-1, HR-511-1, HR-454-1, HR-331-1, HR-304-1, HR-298-1, HR-199-1, HR-155-1, HR-88-1, HR-66-1, HR-544-1, HR-540-1, HR-536-1, HR-471-1, HR-246-1, HR-242-1, HR-180-1, HR-452-1, HR-154-1, HR-70-1, HR-532-1, HR-447-1, HR-374-1, HR-278-1, HR-153-1, HR-115-1, HR-5-1, HR-559-1, HR-452-1	Brings derelict or neglected buildings back into productive use, and reduces homes being left empty
HR-580-1, HR-511-1, HR-509-1, HR-454-1, HR-395-1, HR-66-1, HR-302-1, HR-180-1, HR-347-1, HR-177-1, HR-70-1, HR-412-1, HR-270-1, HR-5-1, HR-349-1	Helps modernise and maintain older, historic, traditional or inherited family properties, by generating funds for upkeep.
HR-557-1, HR-454-1, HR-342-1, HR-266-1, HR-42-1, HR-290-1, HR-222-1, HR-412-1, HR-342-1	Supports farm and croft diversification, by providing alternative income sources
HR-580-1, HR-516-1, HR-411-1, HR-279-1, HR-246-1, HR-597-1, HR-452-1, HR-238-1, HR-37-1, HR-20-1, HR-458-1, HR-452-1	Provides accommodation suitable for families, groups, those with pets, those with accessibility or other specialist needs

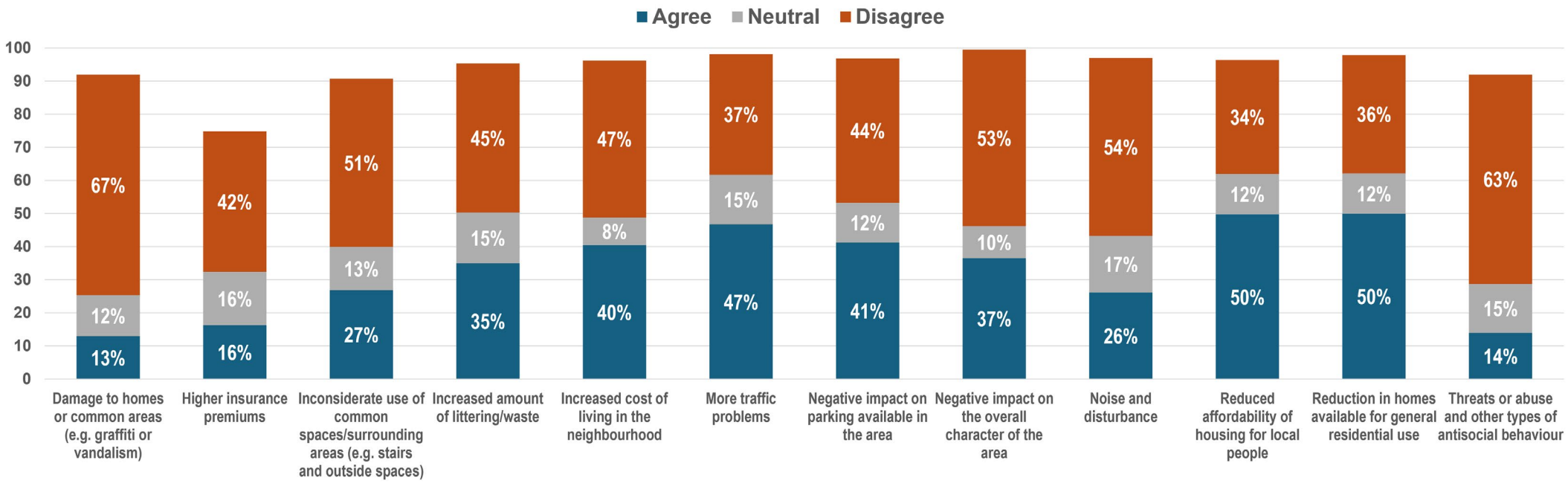
HR-381-1, HR-319-1, HR-158-1, HR-86-1, HR-71-1, HR-302-1, HR-525-1, HR-578-1, HR-143-1	Reduced reliance on campervans and informal camping, which have negative local impacts (such as parking, environmental impact)
HR-580-1, HR-565-1, HR-431-1, HR-206-1, HR-186-1, HR-609-1, HR-396-1, HR-269-1	Encourages future residents and repeat visitation
HR-591-1, HR-565-1, HR-529-1, HR-511-1, HR-484-1, HR-469-1, HR-331-1, HR-319-1, HR-288-1, HR-237-1, HR-206-1, HR-118-1, HR-86-1, HR-71-1, HR-572-1, HR-397-1, HR-205-1, HR-197-1, HR-203-1, HR-109-1, HR-238-1, HR-552-1, HR-550-1, HR-458-1, HR-451-1	Encourages slow tourism which helps tourists feel invested and connected to the area, adds vibrancy to community
HR-268-1, HR-5-1	Provides emergency or transitional accommodation for residents
HR-33-1, HR-5-1, HR-33-1	Provides temporary worker accommodation (e.g. renewables projects)
HR-567-1, HR-557-1, HR-495-1, HR-459-1, HR-382-1, HR-570-1, HR-50-1, HR-32-1, HR-566-1, HR-452-1, HR-334-1, HR-15-1, HR-576-1, HR-429-1, HR-22-1, HR-592-1, HR-455-1, HR-452-1	Negative impacts on local housing availability and affordability not outweighed by any positive impacts of short term lets.
HR-567-1, HR-557-1, HR-541-1, HR-515-1, HR-495-1, HR-459-1, HR-449-1, HR-382-1, HR-377-1, HR-369-1, HR-356-1, HR-355-1, HR-350-1, HR-298-1, HR-266-1, HR-202-1, HR-88-1, HR-87-1, HR-83-1, HR-601-1, HR-570-1, HR-568-1, HR-551-1, HR-517-1, HR-503-1, HR-499-1, HR-493-1, HR-477-1, HR-474-1, HR-464-1, HR-327-1, HR-267-1, HR-258-1, HR-151-1, HR-150-1, HR-135-1, HR-129-1, HR-58-1, HR-50-1, HR-40-1, HR-32-1, HR-31-1, HR-16-1, HR-13-1, HR-566-1, HR-494-1, HR-492-1, HR-468-1, HR-425-1, HR-404-1, HR-334-1, HR-239-1, HR-228-1, HR-226-1, HR-217-1, HR-216-1, HR-187-1, HR-	Disputes suggested positive impacts

169-1, HR-90-1, HR-15-1, 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, HR-592-1, HR-589-1, HR-455-1, HR-436-1, HR-416-1, HR-400-1, HR-399-1, HR-371-1, HR-322-1, HR-240-1	
HR-318-1, HR-66-1, HR-588-1, HR-572-1, HR-536-1, HR-236-1, HR-195-1, HR-52-1, HR-232-1, HR-177-1, HR-367-1, HR-303-1, HR-291-1, HR-143-1	Provides accommodation options and supports tourism in communities without hotels and B&Bs, or areas with high demand
HR-558-1, HR-557-1, HR-556-1, HR-511-1, HR-448-1, HR-441-1, HR-357-1, HR-241-1, HR-214-1, HR-199-1, HR-133-1, HR-71-1, HR-66-1, HR-63-1, HR-56-1, HR-42-1, HR-544-1, HR-183-1, HR-180-1, HR-104-1, HR-85-1, HR-65-1, HR-58-1, HR-17-1, HR-232-1, HR-228-1, HR-212-1, HR-210-1, HR-207-1, HR-203-1, HR-177-1, HR-172-1, HR-141-1, HR-340-1, HR-270-1, HR-244-1, HR-91-1, HR-60-1, HR-163-1	Seasonal and diversified income for locals, income stays local
HR-557-1, HR-541-1, HR-437-1, HR-358-1, HR-32-1, HR-566-1, HR-450-1, 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 Highland Rural – all respondent categories (n=608)

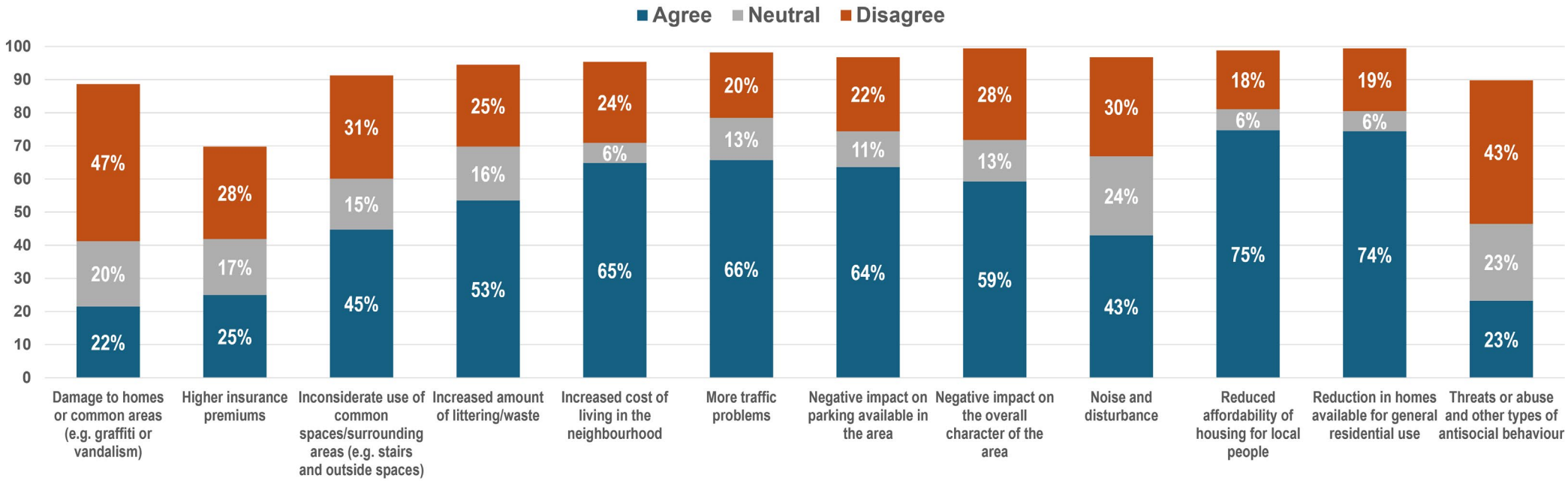
The balance of 100% is "Don't know" in each case.



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

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

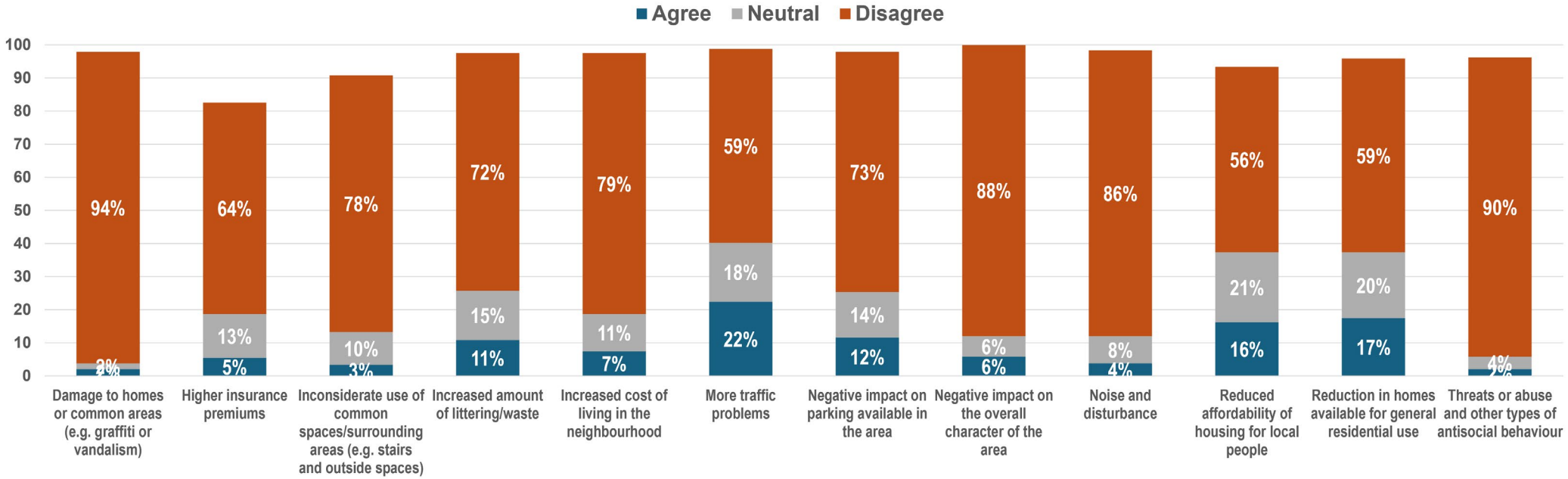
Responses for all Highland Rural Residents and Businesses (n=344)
The balance of 100% is "Don't know" in each case.



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

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

Responses for all Highland Rural STL Operators and Prospective Operators (n=241)
The balance of 100% is "Don't know" in each case.



Among operators, a more consistent and homogenous disagreement with the suggested negative impacts of STLs is apparent, with several options receiving little agreement at all among this cohort, albeit there is some agreement among STL operators and prospective operators regarding the negative impacts of STLs on "More traffic problems", "Reduced affordability of housing for local people", and "Reduction in homes available for general residential use".

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

Respondent Reference	Points raised and responses
HR-495-1, HR-388-1, HR-308-1, HR-215-1, HR-202-1, HR-139-1, HR-102-1, HR-568-1, HR-499-1, HR-486-1, HR-480-1, HR-445-1, HR-295-1, HR-195-1, HR-104-1, HR-53-1, HR-46-1, HR-40-1, HR-31-1, HR-27-1, HR-492-1, HR-468-1, HR-425-1, HR-378-1, HR-235-1, HR-169-1, HR-154-1, 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, HR-573-1, HR-534-1, HR-455-1, HR-426-1, HR-416-1, HR-400-1, HR-399-1, HR-371-1, HR-322-1	Loss of community cohesion, neighbourliness, community spirit and sense of belonging
HR-608-1, HR-605-1, HR-215-1, HR-63-1, HR-104-1, HR-53-1, HR-40-1, HR-36-1, HR-32-1, HR-31-1, HR-492-1, HR-378-1, HR-203-1, HR-154-1, HR-417-1, HR-406-1, HR-370-1, HR-352-1, HR-262-1, HR-60-1, HR-416-1, HR-400-1	Increasing community transience due to constant turnover of visitors
HR-587-1, HR-557-1, HR-358-1, HR-356-1, HR-424-1, HR-251-1, HR-566-1, HR-473-1, HR-230-1, HR-226-1, HR-179-1, HR-171-1, HR-169-1, HR-285-1, HR-554-1	Rural depopulation, decline of resident base especially young people and families
HR-377-1, HR-308-1, HR-202-1, HR-139-1, HR-179-1, HR-375-1	Declining school rolls threatening or causing school closure
HR-608-1, HR-587-1, HR-567-1, HR-557-1, HR-377-1, HR-357-1, HR-356-1, HR-353-1, HR-202-1, HR-568-1, HR-551-1, HR-424-1, HR-251-1, HR-31-1, HR-235-1, HR-230-1, HR-216-1, HR-203-1, HR-171-1, HR-439-1, HR-405-1, HR-285-1, HR-22-1, HR-573-1	Impact on viability of local public services, including GP services, post offices, transport and community facilities

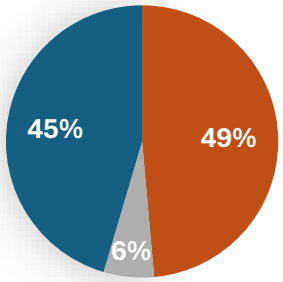
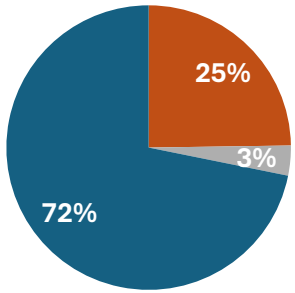
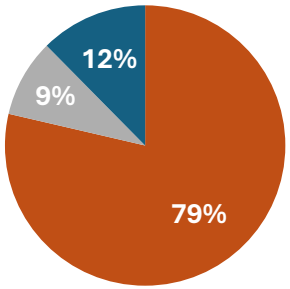
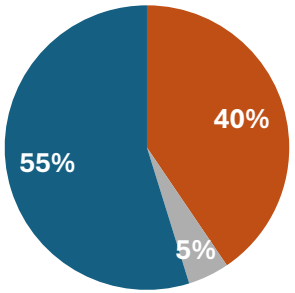
HR-402-1, HR-377-1, HR-202-1, HR-528-1, HR-434-1, HR-32-1, HR-31-1, HR-481-1, HR-425-1, HR-230-1, HR-22-1, HR-602-1, HR-573-1, HR-401-1, HR-372-1, HR-371-1	Local businesses increasingly targeted to visitor needs (e.g. souvenirs) rather than resident needs
HR-567-1, HR-557-1, HR-457-1, HR-358-1, HR-357-1, HR-356-1, HR-237-1, HR-80-1, HR-588-1, HR-568-1, HR-503-1, HR-251-1, HR-45-1, HR-32-1, HR-566-1, HR-216-1, HR-179-1, HR-171-1, HR-169-1, HR-90-1, HR-405-1, HR-285-1, HR-268-1, HR-436-1, HR-416-1	Difficult recruiting and retaining key workers due to difficulty securing housing for key workers
HR-605-1, HR-402-1, HR-308-1, HR-266-1, HR-158-1, HR-51-1, HR-545-1, HR-46-1, HR-492-1, HR-547-1, HR-285-1, HR-22-1	Communities becoming seasonal, "ghost towns" in winter season, with unoccupied short term lets.
HR-388-1, HR-424-1, HR-566-1, HR-222-1, HR-169-1	Housing pressures in Gaelic speaking areas increasing language decline.
HR-495-1, HR-388-1, HR-480-1, HR-424-1, HR-195-1, HR-566-1, HR-518-1, HR-425-1, HR-222-1, HR-179-1, HR-169-1, HR-140-1, HR-112-1, HR-60-1	Loss of local cultural heritage, traditions, place-based knowledge and identity
HR-538-1, HR-437-1, HR-35-1, HR-536-1, HR-65-1, HR-444-1, HR-216-1, 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-558-1, HR-504-1, HR-495-1, HR-484-1, HR-437-1, HR-421-1, HR-377-1, HR-331-1, HR-319-1, HR-281-1, HR-215-1, HR-125-1, HR-118-1, HR-88-1, HR-66-1, HR-6-1, HR-588-1, HR-572-1, HR-551-1, HR-536-1, HR-533-1, HR-513-1, HR-434-1, HR-336-1, HR-328-1, HR-277-1, HR-193-1, HR-151-1, HR-150-1, HR-58-1, HR-38-1, HR-32-1, HR-444-1, HR-334-1, HR-299-1, HR-212-1, HR-203-1, HR-187-1, HR-141-1, HR-109-1, HR-15-1, HR-429-1, HR-406-1, HR-393-1, HR-282-1,	Additional pressure on local infrastructure and services (including roads, healthcare) due to wider tourism, NC500 and campervans, not just short term lets

HR-270-1, HR-91-1, HR-37-1, HR-5-1, HR-502-1, HR-372-1, HR-315-1	
HR-515-1, HR-266-1, HR-63-1, HR-513-1, HR-140-1, HR-15-1, HR-547-1, HR-159-1, HR-321-1	Harm to nature, wildlife and conflict with crofting activities from tourism related activities
HR-457-1, HR-50-1, HR-32-1, HR-438-1, HR-171-1	Impact on traditional accommodation providers including hotels and B&Bs
HR-457-1, HR-369-1, HR-202-1, HR-86-1, HR-486-1, HR-195-1, HR-135-1, HR-58-1, HR-32-1, HR-13-1, HR-217-1, HR-216-1, HR-212-1, HR-169-1, HR-436-1, HR-372-1	Economic leakage from non-local owners extracting profit from communities.
HR-556-1, HR-541-1, HR-538-1, HR-520-1, HR-395-1, HR-386-1, HR-331-1, HR-288-1, HR-280-1, HR-248-1, HR-155-1, HR-118-1, HR-106-1, HR-88-1, HR-71-1, HR-42-1, HR-6-1, HR-536-1, HR-471-1, HR-424-1, HR-411-1, HR-336-1, HR-330-1, HR-286-1, HR-234-1, HR-52-1, HR-44-1, HR-360-1, HR-347-1, HR-316-1, HR-314-1, HR-299-1, HR-293-1, HR-290-1, HR-201-1, HR-177-1, HR-105-1, HR-100-1, HR-77-1, HR-70-1, 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, HR-543-1, HR-502-1, HR-341-1, HR-315-1, HR-234-1, HR-178-1, HR-166-1, HR-163-1, HR-157-1, HR-10-1	Dispute with negative impacts of short term lets
HR-567-1, HR-561-1, HR-557-1, HR-487-1, HR-457-1, HR-420-1, HR-358-1, HR-357-1, HR-350-1, HR-202-1, HR-80-1, HR-606-1, HR-588-1, HR-570-1, HR-568-1, HR-551-1, HR-503-1, HR-471-1, HR-424-1, HR-258-1, HR-151-1, HR-150-1, HR-50-1, HR-45-1, HR-40-1, HR-33-1, HR-32-1, HR-438-1, HR-404-1, HR-216-1, HR-179-1, HR-171-1, HR-169-1, HR-90-1, HR-576-1, HR-413-1, HR-409-1, HR-285-1, HR-200-1, HR-559-1, HR-554-1, HR-33-1	Loss or lack of housing for local people, impacts staffing for local businesses and independence for young people

HR-556-1, HR-437-1, HR-241-1, HR-237-1, HR-66-1, HR-65-1, HR-597-1, HR-299-1, HR-141-1, HR-578-1, HR-269-1, HR-268-1, HR-552-1	The problem isn't short term lets, its total available properties: Highland needs to build more homes to address the shortage including affordable and social housing
HR-567-1, HR-561-1, HR-557-1, HR-487-1, HR-420-1, HR-369-1, HR-358-1, HR-356-1, HR-350-1, HR-202-1, HR-89-1, HR-80-1, HR-568-1, HR-533-1, HR-327-1, HR-258-1, HR-251-1, HR-50-1, HR-45-1, HR-40-1, HR-33-1, HR-32-1, HR-444-1, HR-438-1, HR-404-1, HR-299-1, HR-232-1, HR-226-1, HR-217-1, HR-212-1, HR-179-1, HR-169-1, HR-578-1, HR-479-1, HR-352-1, HR-200-1, HR-94-1, HR-91-1, HR-62-1, HR-552-1, HR-436-1, HR-371-1, HR-341-1, HR-33-1	Investment property purchases for letting, often from higher income outsiders, driving up prices to be unaffordable for local permanent residents with lower incomes
HR-580-1, HR-319-1, HR-179-1	Properties used for short term let often not suitable, affordable or desirable for permanent residents
HR-561-1, HR-437-1, HR-89-1, HR-486-1, HR-438-1, HR-334-1, HR-552-1, HR-21-1	Low long-term rental housing availability impacts reflect preference or incentive toward short term lets due to increased private sector tenancy requirements and higher potential revenue from short term lets.
Council Response: A range of additional suggested negative impacts are therefore noted.	

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

Breakdown for 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-586-1, HR-567-1, HR-564-1, HR-561-1, HR-557-1, HR-548-1, HR-546-1, HR-487-1, HR-457-1, HR-386-1, HR-358-1, HR-357-1, HR-355-1, HR-350-1, HR-308-1, HR-276-1, HR-241-1, HR-194-1, HR-118-1, HR-89-1, HR-83-1, HR-80-1, HR-67-1, HR-35-1, HR-588-1, HR-579-1, HR-577-1, HR-570-1, HR-499-1, HR-496-1, HR-493-1, HR-483-1, HR-465-1, HR-317-1, HR-267-1, HR-146-1, HR-129-1, HR-124-1, HR-45-1, HR-40-1, HR-31-1, HR-566-1, HR-491-1, HR-468-1, HR-466-1, HR-438-1, HR-425-1, HR-334-1, HR-299-1, HR-296-1, HR-239-1, HR-228-1, HR-227-1, HR-217-1, HR-187-1, HR-186-1, HR-177-1, HR-171-1, HR-169-1, HR-164-1, HR-108-1, HR-90-1, 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, HR-594-1, HR-592-1, HR-589-1, HR-554-1, HR-428-1, HR-426-1, HR-419-1, HR-416-1, HR-415-1, HR-400-1, HR-372-1, HR-321-1, HR-29-1	Need/desire for control of and managing short term lets
HR-546-1, HR-515-1, HR-457-1, HR-420-1, HR-395-1, HR-386-1, HR-377-1, HR-369-1, HR-358-1, HR-353-1, HR-241-1, HR-67-1, HR-517-1, HR-486-1, HR-483-1, HR-453-1, HR-317-1, HR-251-1, HR-53-1, HR-40-1, HR-36-1, HR-32-1, HR-31-1, HR-13-1, HR-473-1, HR-450-1, HR-425-1, HR-334-1, HR-332-1, HR-299-1, HR-296-1, HR-235-1, HR-187-1, HR-186-1, HR-169-1, HR-164-1, HR-108-1, HR-15-1, 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, HR-594-1, HR-553-1, HR-502-1, HR-455-1, HR-428-1, HR-416-1, HR-372-1, HR-322-1, HR-255-1, HR-240-1	Need for a balance with STL, between housing and tourism

HR-561-1, HR-546-1, HR-356-1, HR-355-1, HR-89-1, HR-83-1, HR-579-1, HR-568-1, HR-434-1, HR-566-1, HR-425-1, HR-296-1, HR-171-1, HR-108-1, HR-90-1, HR-609-1, HR-607-1, HR-439-1, HR-417-1, HR-352-1, HR-296-1, HR-602-1, HR-592-1, HR-573-1, HR-426-1, HR-400-1, HR-371-1	View that the proposal is an obvious and necessary response
HR-608-1, HR-587-1, HR-586-1, HR-561-1, HR-557-1, HR-546-1, HR-520-1, HR-459-1, HR-457-1, HR-449-1, HR-420-1, HR-395-1, HR-386-1, HR-382-1, HR-377-1, HR-369-1, HR-353-1, HR-335-1, HR-276-1, HR-241-1, HR-194-1, HR-89-1, HR-87-1, 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, 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, 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-587-1, HR-557-1, HR-546-1, HR-520-1, HR-457-1, HR-369-1, HR-358-1, HR-298-1, HR-276-1, HR-194-1, HR-89-1, HR-545-1, HR-517-1, HR-501-1, HR-489-1, HR-486-1, HR-317-1, HR-193-1, HR-104-1, HR-61-1, HR-53-1, HR-52-1, HR-32-1, HR-334-1, HR-229-1, HR-227-1, HR-109-1, HR-406-1, HR-365-1, HR-265-1, HR-262-1, HR-416-1	View that it could help cost/affordability of housing
HR-515-1, HR-487-1, HR-457-1, HR-420-1, HR-395-1, HR-369-1, HR-113-1, HR-517-1, HR-274-1, HR-45-1, HR-32-1, HR-31-1, HR-27-1, HR-296-1, HR-186-1, HR-460-1, HR-409-1, HR-296-1, HR-94-1, HR-594-1, HR-455-1	Tourists should be staying in tourist accommodation/supporting serviced providers
HR-520-1, HR-369-1, HR-194-1, HR-139-1, HR-72-1, HR-588-1, HR-517-1, HR-129-1, HR-32-1, HR-566-1, HR-187-1, HR-93-1, 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-587-1, HR-567-1, HR-564-1, HR-557-1, HR-546-1, HR-520-1, HR-420-1, HR-402-1, HR-386-1, HR-377-1, HR-358-1, HR-357-1, HR-308-1, HR-214-1, HR-194-1, HR-139-1, HR-102-1, HR-501-1, HR-486-1, HR-483-1, HR-480-1, HR-434-1, HR-259-1, HR-251-1, HR-204-1, HR-195-1, HR-129-1, HR-104-1, HR-50-1, HR-46-1, HR-40-1, HR-33-1, HR-32-1, HR-31-1, HR-30-1, HR-566-1, HR-482-1, HR-466-1, HR-296-1, HR-227-1, HR-187-1, HR-186-1, HR-169-1, HR-154-1, HR-140-1, 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, HR-553-1, HR-436-1, HR-428-1, HR-416-1, HR-401-1, HR-399-1, HR-33-1	View that STLs harm community cohesion/sustainability

HR-587-1, HR-557-1, HR-402-1, HR-395-1, HR-386-1, HR-358-1, HR-517-1, HR-501-1, HR-486-1, HR-483-1, HR-317-1, HR-129-1, HR-50-1, HR-32-1, HR-31-1, HR-27-1, HR-494-1, HR-182-1, HR-584-1, HR-460-1, HR-409-1, HR-282-1, HR-159-1, HR-144-1, HR-60-1, HR-602-1, HR-455-1, HR-416-1	View that lack of housing is harming recruitment and retention of key workers and essential services
HR-369-1, HR-327-1, HR-317-1, HR-32-1, HR-31-1, HR-334-1, HR-94-1	Impacts on parking need to be considered
HR-369-1, HR-588-1, HR-327-1, HR-317-1, HR-150-1, HR-53-1, HR-32-1, HR-473-1, HR-450-1, HR-299-1, HR-322-1	Negative impacts on roads and traffic need to be considered
HR-557-1, HR-459-1, HR-486-1, HR-483-1, HR-317-1, HR-150-1, HR-53-1, HR-40-1, HR-32-1, HR-31-1, HR-584-1, HR-406-1, HR-455-1, HR-428-1	Negative impacts on other infrastructure
HR-564-1, HR-487-1, HR-420-1, HR-386-1, HR-86-1, HR-480-1, HR-327-1, HR-259-1, HR-150-1, HR-129-1, HR-40-1, HR-32-1, HR-482-1, HR-186-1, HR-93-1, HR-514-1, HR-429-1, HR-409-1, HR-406-1, HR-60-1, HR-54-1, HR-415-1, HR-372-1	Negative amenity/antisocial impacts
Explanations against proposed control area	
HR-591-1, HR-580-1, HR-574-1, HR-565-1, HR-558-1, HR-556-1, HR-529-1, HR-527-1, HR-523-1, HR-511-1, HR-509-1, HR-454-1, HR-446-1, HR-437-1, HR-421-1, HR-384-1, HR-381-1, HR-366-1, HR-304-1, HR-288-1, HR-254-1, HR-253-1, HR-248-1, HR-237-1, HR-199-1, HR-133-1, HR-125-1, HR-97-1, HR-88-1, HR-66-1, HR-56-1, HR-42-1, HR-572-1, HR-551-1, HR-536-1, HR-533-1, HR-528-1, HR-516-1, HR-513-1, HR-485-1, HR-478-1, HR-471-1, HR-423-1, HR-300-1, HR-286-1, HR-261-1, HR-246-1, HR-242-1, HR-185-1, HR-180-1, HR-173-1, HR-76-1, HR-38-1, HR-597-1, HR-	Concern about impact on the tourism industry

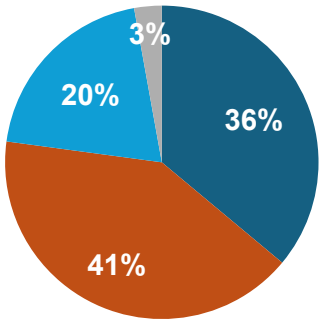
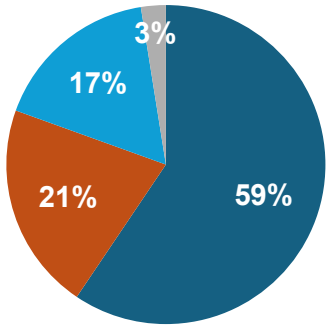
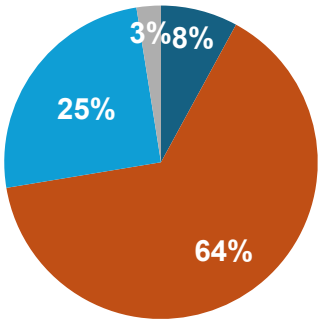
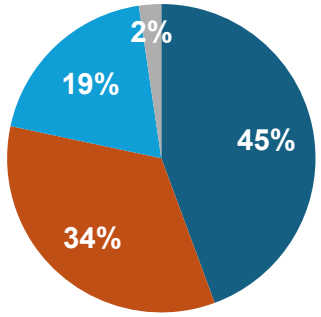
562-1, HR-525-1, HR-508-1, HR-461-1, HR-444-1, HR-361-1, HR-338-1, HR-333-1, HR-324-1, HR-316-1, HR-311-1, HR-299-1, HR-293-1, HR-292-1, HR-290-1, HR-210-1, HR-191-1, HR-176-1, HR-165-1, HR-111-1, HR-68-1, HR-24-1, HR-593-1, HR-532-1, HR-412-1, HR-408-1, HR-396-1, HR-393-1, HR-383-1, HR-367-1, HR-365-1, 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, HR-559-1, HR-552-1, HR-543-1, HR-542-1, HR-519-1, HR-490-1, HR-458-1, HR-423-1, HR-315-1, HR-261-1, HR-178-1, HR-166-1, HR-157-1, HR-143-1, HR-21-1, HR-4-1	
HR-591-1, HR-565-1, HR-558-1, HR-529-1, HR-527-1, HR-511-1, HR-509-1, HR-484-1, HR-454-1, HR-446-1, HR-421-1, HR-414-1, HR-381-1, HR-366-1, HR-318-1, HR-254-1, HR-253-1, HR-248-1, HR-225-1, HR-199-1, HR-155-1, HR-133-1, HR-97-1, HR-88-1, HR-66-1, HR-56-1, HR-572-1, HR-536-1, HR-533-1, HR-516-1, HR-471-1, HR-300-1, HR-279-1, HR-246-1, HR-185-1, HR-180-1, HR-65-1, HR-48-1, HR-18-1, HR-597-1, HR-508-1, HR-433-1, HR-316-1, HR-293-1, HR-226-1, HR-210-1, HR-70-1, HR-68-1, 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, HR-542-1, HR-519-1, HR-294-1, HR-178-1, HR-21-1, HR-4-1	Loss of jobs from tourist sector will fuel depopulation
HR-580-1, HR-556-1, HR-538-1, HR-527-1, HR-454-1, HR-437-1, HR-331-1, HR-318-1, HR-304-1, HR-288-1, HR-254-1, HR-125-1, HR-110-1, HR-88-1, HR-86-1, HR-66-1, HR-544-1, HR-536-1, HR-533-1, HR-524-1, HR-516-1, HR-478-1, HR-336-1, HR-300-1, HR-279-1, HR-277-1, HR-246-1, HR-242-1, HR-205-1, HR-185-1, HR-183-1, HR-173-1, HR-76-1, HR-44-1, HR-18-1, HR-562-1, HR-508-1, HR-361-1, HR-292-1, HR-283-1, HR-226-1, HR-207-1, HR-175-1, HR-141-1, HR-77-1, HR-68-1, 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-	Overregulation/bureaucracy

291-1, HR-268-1, HR-244-1, HR-243-1, HR-238-1, HR-153-1, HR-82-1, HR-62-1, HR-559-1, HR-543-1, HR-519-1, HR-510-1, HR-349-1, HR-341-1, HR-315-1, HR-294-1, HR-283-1, HR-163-1, HR-148-1, HR-143-1, HR-10-1, HR-4-1	
HR-437-1, HR-318-1, HR-66-1, HR-205-1, HR-361-1, HR-283-1, HR-141-1, HR-581-1, HR-412-1, HR-349-1, HR-283-1, HR-10-1	Licensing process is sufficient
HR-580-1, HR-509-1, HR-454-1, HR-344-1, HR-318-1, HR-288-1, HR-254-1, HR-158-1, HR-63-1, HR-533-1, HR-478-1, HR-411-1, HR-336-1, HR-330-1, HR-277-1, HR-185-1, HR-183-1, HR-7-1, HR-562-1, HR-191-1, HR-100-1, HR-609-1, HR-512-1, HR-365-1, HR-297-1, HR-238-1, HR-200-1, HR-100-1, HR-62-1, HR-534-1, HR-519-1, HR-315-1	Property rights/fairness
HR-580-1, HR-565-1, HR-484-1, HR-454-1, HR-331-1, HR-319-1, HR-318-1, HR-304-1, HR-298-1, HR-288-1, HR-281-1, HR-280-1, HR-254-1, HR-125-1, HR-66-1, HR-536-1, HR-533-1, HR-489-1, HR-471-1, HR-339-1, HR-277-1, HR-197-1, HR-185-1, HR-173-1, HR-18-1, HR-292-1, HR-216-1, HR-370-1, HR-354-1, HR-326-1, HR-115-1, HR-510-1, HR-4-1	Second/empty homes are the main issue
HR-441-1, HR-421-1, HR-248-1, HR-88-1, HR-328-1, HR-18-1, HR-442-1, HR-299-1, HR-412-1, HR-278-1, HR-270-1, HR-315-1	Campervans are the main issue
HR-484-1, HR-454-1, HR-448-1, HR-344-1, HR-304-1, HR-298-1, HR-248-1, HR-215-1, HR-125-1, HR-66-1, HR-478-1, HR-424-1, HR-330-1, HR-307-1, HR-295-1, HR-287-1, HR-197-1, HR-562-1, HR-361-1, HR-290-1, HR-210-1, HR-207-1, HR-109-1, HR-537-1, HR-392-1, HR-383-1, HR-269-1, HR-200-1, HR-91-1, HR-62-1, HR-552-1, HR-519-1, HR-163-1, HR-143-1	Other causes of pressure not STLs

HR-565-1, HR-556-1, HR-541-1, HR-437-1, HR-342-1, HR-288-1, HR-248-1, HR-80-1, HR-71-1, HR-66-1, HR-524-1, HR-516-1, HR-411-1, HR-300-1, HR-185-1, HR-76-1, HR-33-1, HR-461-1, HR-452-1, HR-433-1, HR-293-1, HR-226-1, HR-383-1, HR-370-1, HR-363-1, HR-326-1, HR-301-1, HR-291-1, HR-243-1, HR-542-1, HR-452-1, HR-342-1, HR-157-1, HR-143-1, HR-33-1, HR-4-1	Proposed area is too large and broad-brush.
HR-556-1, HR-437-1, HR-319-1, HR-318-1, HR-281-1, HR-254-1, HR-199-1, HR-125-1, HR-88-1, HR-66-1, HR-544-1, HR-533-1, HR-290-1, HR-207-1, HR-162-1, HR-163-1, HR-4-1	No evidence that it will work or that is has worked in Badenoch and Strathspey.
HR-530-1, HR-484-1, HR-437-1, HR-298-1, HR-254-1, HR-42-1, HR-516-1, HR-336-1, HR-185-1, HR-562-1, HR-508-1, HR-444-1, HR-433-1, HR-361-1, HR-210-1, HR-77-1, HR-70-1, HR-383-1, HR-297-1, HR-243-1, HR-519-1, HR-313-1, HR-4-1	View that STL operators have invested heavily in their properties and maintain them to a higher standard than residential property owners.
HR-66-1, HR-593-1, HR-365-1, HR-310-1, HR-163-1, HR-4-1	No economic impact assessment.
HR-556-1, HR-448-1, HR-437-1, HR-344-1, HR-281-1, HR-199-1, HR-125-1, HR-97-1, HR-556-1, HR-448-1, HR-437-1, HR-344-1, HR-281-1, HR-199-1, HR-125-1, HR-97-1, HR-556-1, HR-448-1, HR-437-1, HR-344-1, HR-281-1, HR-199-1, HR-125-1, HR-97-1, HR-556-1, HR-448-1, HR-437-1, HR-344-1, HR-281-1, HR-199-1, HR-125-1, HR-97-1, HR-556-1, HR-448-1, HR-437-1, HR-344-1, HR-281-1, HR-199-1, HR-125-1, HR-97-1	Council should be building more homes, including affordable homes.
HR-591-1, HR-527-1, HR-484-1, HR-318-1, HR-254-1, HR-125-1, HR-56-1, HR-516-1, HR-485-1, HR-471-1, HR-246-1, HR-242-1, HR-85-1, HR-65-1, HR-48-1, HR-338-1, HR-293-1, HR-290-1, HR-111-1, HR-68-1, HR-383-1, HR-310-1	Supports 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 total Highland Rural sample, including non-resident STL Operators in the Area

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

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

Respondent Reference	Points raised and responses
Additional negative views on the Statement of Reasons for the proposed control area	
HR-575-1, HR-556-1, HR-411-1, HR-433-1, HR-189-1, HR-542-1, HR-341-1, HR-181-1, HR-101-1	Housing pressures should be addressed through targeted measures rather than broad restrictions
HR-558-1, HR-529-1, HR-511-1, HR-509-1, HR-448-1, HR-446-1, HR-431-1, HR-342-1, HR-331-1, HR-312-1, HR-304-1, HR-281-1, HR-248-1, HR-215-1, HR-206-1, HR-80-1, HR-19-1, HR-544-1, HR-513-1, HR-489-1, HR-261-1, HR-76-1, HR-562-1, HR-549-1, HR-347-1, HR-333-1, HR-324-1, HR-316-1, HR-283-1, HR-228-1, HR-226-1, HR-212-1, HR-207-1, HR-191-1, HR-177-1, HR-111-1, HR-609-1, HR-374-1, HR-345-1, HR-310-1, HR-224-1, HR-20-1, HR-602-1, HR-552-1, HR-550-1, HR-490-1, HR-349-1, HR-342-1, HR-283-1, HR-261-1, HR-143-1, HR-21-1, HR-4-1	No evidence that Control Areas increase affordable housing, reduce rents or solve housing crisis
HR-527-1, HR-469-1, HR-254-1, HR-161-1, HR-110-1, HR-42-1, HR-6-1, HR-572-1, HR-540-1, HR-478-1, HR-307-1, HR-302-1, HR-286-1, HR-183-1, HR-173-1, HR-65-1, HR-44-1, HR-508-1, HR-314-1, HR-293-1, HR-70-1, 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, HR-178-1	Tourism is vital (employment) to the Highland economy and Control Areas could affect that
HR-495-1, HR-369-1, HR-258-1	Criticism of the Consultation and/or the evidence presented. The evidence doesn't mention the positives brought by tourism
HR-580-1, HR-574-1, HR-199-1, HR-133-1, HR-246-1, HR-168-1, HR-460-1	Criticism of the Consultation and/or the evidence presented. Evidence doesn’t talk about wider housing market pressures

HR-538-1, HR-454-1, HR-158-1, HR-125-1, HR-119-1, HR-536-1, HR-242-1, HR-185-1, HR-537-1, HR-162-1, HR-519-1	Criticism of the Consultation and/or the evidence presented. Evidence doesn't mention the detrimental impacts to other tourism businesses such as hotels
HR-88-1, HR-371-1	Policy does not distinguish between locals with family connections to the area and non-residents
HR-395-1, HR-323-1, HR-319-1, HR-298-1, HR-66-1, HR-516-1, HR-503-1, HR-279-1, HR-58-1, HR-334-1, HR-109-1, HR-354-1, HR-348-1, HR-268-1, HR-265-1, HR-126-1, HR-255-1	Regulation not Required
HR-565-1, HR-523-1, HR-384-1, HR-277-1, HR-234-1, HR-205-1, HR-18-1, HR-361-1, HR-176-1, HR-141-1, HR-120-1, HR-105-1, HR-77-1, HR-571-1, HR-497-1, HR-325-1, HR-20-1, HR-534-1, HR-234-1, HR-10-1	Does not go far enough
HR-118-1, HR-468-1, HR-370-1	Proposal area too wide (disagree)
HR-484-1, HR-381-1, HR-318-1, HR-280-1, HR-461-1, HR-290-1, HR-447-1, HR-396-1, HR-383-1, HR-451-1, HR-157-1	Controls should be applied across the whole of Highland
HR-26-1	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-605-1, HR-548-1, HR-520-1, HR-457-1, HR-402-1, HR-388-1, HR-386-1, HR-382-1, HR-357-1, HR-350-1, HR-335-1, HR-308-1, HR-266-1, HR-241-1, HR-237-1, HR-233-1, HR-219-1, HR-202-1, HR-113-1, HR-89-1, HR-83-1, HR-67-1, HR-606-1, HR-601-1, HR-579-1, HR-577-1, HR-480-1, HR-339-1, HR-317-1, HR-231-1, HR-193-1, HR-53-1, HR-46-1, HR-45-1, HR-36-1, HR-30-1, HR-16-1, HR-13-1, HR-394-1, HR-378-1, HR-296-1, HR-235-1, HR-172-1, HR-169-1, HR-154-1, HR-81-1, 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,	General support for the policy and controls

HR-107-1, HR-91-1, HR-78-1, HR-37-1, HR-436-1, HR-400-1, HR-387-1, HR-322-1, HR-29-1	
HR-557-1, HR-487-1, HR-568-1, HR-493-1, HR-273-1, HR-251-1, HR-236-1, HR-135-1, HR-566-1, HR-491-1, HR-332-1, HR-222-1, HR-187-1, HR-352-1, HR-94-1, HR-502-1	Addresses housing affordability & availability
HR-587-1, HR-420-1, HR-276-1, HR-139-1, HR-486-1, HR-483-1, HR-453-1, HR-129-1, HR-104-1, HR-50-1, HR-40-1, HR-31-1, HR-492-1, HR-481-1, HR-227-1, HR-186-1, HR-144-1, HR-112-1	Balances Tourism with Community needs
HR-35-1, HR-146-1, HR-32-1, HR-217-1, HR-216-1, HR-179-1, HR-93-1	Does not go far enough, including retrospective planning permission for existing STL's
HR-459-1, HR-195-1, HR-363-1, HR-159-1, HR-510-1	Support but controls should be applied to other areas/whole of Highland

Question 28. Supporting Documents (optional question)

Summary of Respondent issues raised	Officer Response
Rural Inverness-shire	
No responses received on Q28	
Skye and Raasay	
HR-290-1 Supporting information provided from a long-term Skye resident and operator, who moved to the area to operate a historic Inn and later, purchased a self-catering property in 2013 (returned empty property to use) and another in 2017 (conversion of byre to long-term self-catering use in 2000). Respondent notes that these properties have never been used as residential since conversion, and employ 3 people on a part-time basis. Also, properties have required services of local decorators, electricians, plumbers, joiners etc and local marketing and photography specialists. Income from these properties supports the respondents' retirement.	Noted. Council acknowledges that some forms of STL require planning permission in any event and several forms of STL do not result in a net loss of a house as were not always previously residential. Statement of reasons provides indicators such as house sales subsequently converted to STL or housing completed converted to STL to assess relationship between STLs and the housing supply in stances where this relationship is more direct. Council acknowledges direct and indirect employment of STL uses.

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.

Lochaber	
HR-445-1 Photo of waste associated with short term let.	Noted.
HR-279-1 Notes that the Highland Council non-statutory short term let control area planning policy (2023) do not apply to the Highlands as much to Ward 20. There are minimal commercial units with dwellinghouse above in rural communities. Most rural villages and towns have small (1-3 bed) attached or semi-attached houses around 'the centre'. Out with 'the centre' there are more detached houses of 3+ bedrooms which have been new builds by the occupiers or old historic detached houses, few are STLs. On point 3 of the non-statutory guidance, it would cap the housing market as policy is simplified for more of these larger houses to be converted into STL in the current wording. This would have a negative impact on people wanting to move up the housing chain and therefore hinder the smaller 1-2 bed properties coming onto the market. People who live locally who want to diversify their income are more likely to be able to afford a 1-3 bed STL than a 5+ bed detached house. The policy as worded for Ward 20 control area would stunt future economic growth in these small communities.	Noted. Planning applications would be determined in accordance with the development plan policies. The short term let control area policy for Ward 20 is non-statutory and will not automatically be applied to the proposed Highland Rural STLCA. The purpose of the Control Area consultation is to seek views on whether designation is justified having regard to the evidence of housing, amenity and community impacts. The planning merits of individual short term let proposals are matters for the subsequent development management process, to be assessed against the adopted development plan and other material considerations. Consulting simultaneously on policy tests would risk conflating support for the designation of a Control Area with support for particular planning policies, potentially prejudicing the clarity and effectiveness of the consultation exercise. Noted. See response above regarding the proposal to designate not being conflated with the policy tests.

More weight and support should be given to locals would also live and work in the area that they own and operate their STL as stated in NPF4 Policy 30 b)i): 'Contributions made to the local economy'. This would support remote and rural communities by keeping the profits in the local communities and also the families that run them. Job opportunities are small compared to Ward 20 (commuting on the good A9 to Inverness) and Inverness and STL are a viable income for owners and helps to increase the local wealth of communities. Not only spending the profits in the local community but also employing cleaners, joiners, electricians etc.	Noted. See response above regarding the proposal to designate not being conflated with the policy tests. In any event, there are practical and legal limitations on the extent to which such factors can influence planning decisions. The planning system must determine applications on their planning merits and cannot discriminate on the basis of the personal characteristics, circumstances, or place of residence of an applicant. Consequently, the identity of the applicant is not generally a material planning consideration.
Tourists are choosing to stay in self-catering accommodation in these remote areas, tourism is only going to keep increasing and there is not enough alternative holiday accommodation available for them. The increase in STL is in line with tourism demand as promoted by the Scottish Government over the years, housing development and investment from larger accommodation companies has not been.	Noted.
More focus needs to be put on hotel development and house building to keep in line with demand rather than cap STL which will not help generate new housing and will create an inflated price on STL accommodation as tourism demand increases making the Highlands a destination for the wealthy. This would potentially force local people to move to access other employment instead of running a STL or locals who serve STLs: cleaners, joiners, electricians etc. would see their income decrease as well.	Noted.

In conclusion the current proposed control area would increase the expectation from prospective home owners that more housing would be available but it would not solve the lack of housing issue. It would cap remote local communities' employment options, potentially increase investment from further afield who can afford to buy 5+ bed houses, therefore limiting movement of the housing market. More support needs to be focused on local STL owners and operators keeping the local economy going and meeting tourism demand regardless of the size of their STL. The current proposed control area makes local, small-scale investment harder for people who live and work in the communities and potentially creates opportunity for more remote investment on larger properties.	Noted. It is a mechanism to manage future changes of use and decide whether proposals comply with the development plan. Noted. The proposed designation is not a 'cap' on short term lets, it establishes that any conversion of a flat or dwellinghouse to a short term let for secondary letting is a material change of use and therefore requires planning permission. Council recognises and is using a range of policy mechanisms for managing housing pressures in Highland.

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.	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.
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.	See full response to ASSC views below (HR-260-1) for response to this matter.

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. • 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.	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 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 current proposal risks undermining the objectives of Scotland Outlook 2030 and the STA's 2026 election priorities. This includes calls to nurture tourism and hospitality sector, avoid unnecessary regulatory burdens, strengthen investment confidence, support sustainable tourism and position tourism sector for major future growth.	The proposed Control Area is not intended to restrict tourism accommodation or place unnecessary burdens on existing operators. Rather, it introduces a planning framework for changes of use from residential housing to secondary letting short-term lets, enabling the impacts on local housing and communities to be considered where appropriate. The Council considers that supporting a sustainable visitor economy and addressing housing pressures are complementary objectives, and that providing greater oversight of such changes can contribute to the long-term sustainability of both.
• 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.	See full response to ASSC views below (HR-260-1) for response to this same matter.

• 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.	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 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 *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 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: • Need for definitional clarity and distinguishing between different forms of short term let and visitor accommodation, and how they contribute to residential housing loss. View that the "short-term let" term encompasses a wide range of operating types and models, by contrast "self-catering accommodation" is hospitality-led and is a long-standing recognised tourism infrastructure. Concern about a single narrative which collapses distinct short term let categories into one and centres the discourse around housing loss. • Failure to distinguish between different types of accommodation in the consultation documents, which consider overall STL concentrations and adjusted STL prevalence whereas the proposal relates specifically to loss of formal residential dwellings to short term letting. Relates to definitional clarity point, on the range of different types of short term lets and tourist accommodation.	Noted. It is unclear how many self-caters in the proposed Highland Rural Short Term Let Control Area the Association represents. The terminology in question is not optional or interpretive but is established in legislation. Under Scotland's short-term let licensing framework, a "short-term let" and its sub-category, a "secondary let", are legally defined classifications that underpin regulation, licensing and enforcement. Self-catering accommodation does not exist outside this regulatory framework. Many self-catering properties fall within these definitions, particularly where they are let on a secondary basis, and their classification is determined by how they are used rather than how they are marketed or the perceived character of their business model. As such, planning and housing policy must focus on the land-use and housing impacts of secondary letting rather than branding or sectoral identity. The fact that such accommodation may be hospitality-led does not negate its classification under the law, nor its potential interaction with housing supply. Introducing alternative terminology would risk confusion and undermine the consistent application of the statutory framework.

• Concern about the evidential basis for the proposed expansion of Control Area, that Highland Council is proposing a new designation without robust evidence that the existing STLCA in Badenoch and Strathspey has materially achieved its intended policy objectives (with reference to the Post 2 Year Review of the Ward 20 Badenoch and Strathspey Short Term Let Control Area). Council has not demonstrated increased affordable housing supply, reduced rents, improved affordability, reduced depopulation or measurable housing market stabilisation. • Wider concerns regarding the evidence base for the proposed Control Area.	The proposed Highland Rural STL Control Area is not intended to replicate any real or perceived success of the Badenoch and Strathspey Control Area. While the Council's Post 2 year review of the Badenoch and Strathspey Control Area indicates that changes of use to short-term lets are now being managed, the current proposal is based on its own evidence of housing pressures and short-term let prevalence. Even where the Badenoch and Strathspey Control Area found to have coincided with suggested indicators such as subsequent declining house prices and rental prices, those trends alone would not justify the current proposal which to be consistent with planning practice, must be grounded in its own evidence base demonstrating an issue and that the Council through designating a Control Area proposes to take a proportionate response to that issue. There is no legislative or policy requirement to delay consideration of further control areas until the long-term effects of existing designations are known. Local authorities are required to assess the need for control areas based on the evidence available at the time, and requiring definitive proof of impacts on housing affordability, population retention or community sustainability (which may take many years to emerge) would create an unreasonable barrier to timely and proportionate intervention where current evidence demonstrates a need for action. It is important to recognise that there is no prescribed methodology in legislation, or the Planning circular 1/2023: short-term lets and planning requiring a particular form or level of technical analysis for control area designation. The relevant test is whether sufficient and appropriate information has been gathered to inform a reasoned planning judgment.

• 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 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. 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 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 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.
• Concern about the cumulative interaction between planning and licensing requirements, and the confusion, uncertainty and procedural burden they create for operators.	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.

• 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.	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 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.

• 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.	This matter has already been raised directly by the ASSC to Scottish Government and a response was provided by the then Cabinet Secretary for Housing Màiri McAllan MSP in February 2026. The suggestion that planning controls relating to short term lets are incompatible with Convention rights is not supported by the Scottish Government's own assessment of the legislation. In its 2025 review of the Data Protection Impact Assessment for the short-term let licensing and control area framework, the Scottish Government concluded that any such impact would arise only where it was the policy intention of the local authority and only where the restriction was necessary to protect the rights and freedoms of others or the wider economic well-being of the local community. While Article 1 of Protocol 1 protects peaceful enjoyment of possessions, Cabinet Secretary Màiri McAllan MSP accepted that the regulation of short term lets via planning and licensing regimes represents a control of the use of a host's property for the purposes of Article 1 of the First Protocol to the ECHR. However, they were "satisfied that the creation of powers for a local authority to designate a short-term let control area is a proportionate measure to allow them to consider and manage the impacts of short-term lets on the availability of residential housing and on nearby amenity". The Council concurs that requiring planning consideration of short term lets therefore represents a proportionate exercise of planning control rather than an unlawful interference with property rights. Similarly, the Provision of Services Regulations 2009 do not preclude planning controls which pursue legitimate public policy objectives and are applied in a non-discriminatory and proportionate manner.

	Planning regulation of land use is a recognised and established function of the planning system and does not prevent the operation of short term let businesses where planning considerations support such use.

• 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 dis-proportionate retrospective procedural or regulatory burden arising from evolving interpretation of planning policy and practice;
	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.

○ 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.	The creation of a new use class or amendment of the planning use classes framework is a matter for the Scottish Government through legislation. In the meantime, the Council is required to apply the planning system as it currently exists and does not have the power to establish an alternative regulatory framework at a local level. Timely intervention to address an existing issue should not be deferred in anticipation of a hypothetical alternative framework that may or may not be introduced.
• 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.	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.

• 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 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.	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. Points previously addressed in above responses.

Summary of Responses from Community Councils, Groups or Organisations

Respondent issues raised	Officer Response
Rural Inverness-shire	
No Rural Inverness-shire responses from Community Councils, Groups or Organisations	
Skye and Raasay	
No Skye and Raasay responses from Community Councils, Groups or Organisations	
Lochaber	
HR-453-1 Fort William Inverlochy & Torlundy Community Council Fort William Inverlochy & Torlundy Community Council agree with the proposal to establish the Highland Rural Short Term Let Control Area because it brings more balance between business needs and residential needs - clearer legislation for Planning. Some form of control is necessary to maintain the balance between, business, residential and tourism needs.	Noted.
More support needs to be focused on local STL owners and operators keeping the local economy going and meeting tourism demand regardless of the size of their STL. The current proposed control area makes local, small-scale investment harder for people who live and work in the communities and potentially creates opportunity for more remote investment on larger properties.	Noted.
As a CC we appreciate that we cannot speak for the entire community but the following issues are those that have been raised to us. • In the flatted areas in particular there is a social issue around strangers coming in and out, loss of privacy, parking, noise and in particular in our area contamination of bins which prevents uplift - all these issues have a negative impact on permanent residents. • This also occurs in areas where off street parking is unavailable.	Noted.

• lack of affordable housing for young families and incoming workers. • Short term lets are unaffordable to transient workers, contractors, NHS & Education workers etc	
Wester Ross Strathpeffer and Lochalsh	
HR-580-1 Supporting image provided	Noted.
HR-558-1 Notes complexity of STL as an issue, change in community over time from a crofting community to now. Notes the opportunities for economic sustainability offered by STLs and concern for affordable housing for local population. Concern that effort and evidence to put forward proposed STLCA and Statement of Reasons will not be sufficient to reach a decision on proposal to designate. Supports Statement of Reasons, acknowledging need for detailed local knowledge, including consultation, which is welcomed. Seeks refinement in the assessment methods for assessing suitability of a STL property to operate, with a policy that aims to proportionally seek greater net community benefit from STLs. Unsure what impact an STLCA would have on local affordable housing availability. Seeks long-term policy definition which 'enhances, controls and develops this tourism component of the local economy, to the community's greater benefit, and to the benefit of those whose efforts sustain it'. Idea of a community-controlled service for managing bookings. Noted cost of recent STL license legislation to operators, causing some to withdraw, and uncertainty that an STLCA could mean for licensing. Risk that this will undermine the fragile local economy (though note the fortune in having a local economy that is functioning). Seeks long term strategic objectives for resolving these problems and a more 'imaginative' policy, developed in partnership with community. View that large, external corporations operating STLs should be limited to avoid monopolisation. Ideas about how to support community sustainability through crofts, grant funding and tourist accommodation.	Noted. Preparation of the new Highland Local Development Plan will consider 10-year spatial strategy for Highland and long-term policy definition regarding short term lets.

HR-557-1 Report of the Applecross Community Company Housing Needs Assessment, which identified a clear need for affordable housing in Applecross. The poor quality of private rented accommodation is highlighted within these results. All respondents would prefer to remain in Applecross, but an increasing percentage of respondents said they were considering leaving the area due to the unsuitable housing situation (15%, in comparison to only 7% of respondents in 2016). Interviews with local businesses highlighted the significant impact the lack of affordable housing is currently having on the operation and expansion of local businesses, which is subsequently negatively impacting on economic development and job opportunities within the area. According to the 2011 census data for Applecross, 33.4% of the housing stock on the peninsula are second homes or short-term lets. Separate from this housing needs survey, an anecdotal analysis undertaken by ACC of local residents concluded that by 2023 the proportion of second homes and short-term lets had increased to 50% of the total housing stock. This is also significantly higher than the Highland average of 5.7% and the Scottish average of 1.5% (2011 Census).	Additional evidence on housing need in Applecross noted.
HR-530-1 Supporting images of cottage provided	Noted.
HR-395-1 View that STLs are dividing community. Need for genuinely affordable homes, suited to local salaries. No demand for regular houses in the village, only high-end properties are selling which are not affordable for locals due to upgrade requirements and high fuel bills. View that newly completed houses should not be allowed to be converted to STLs, not even with planning permission or perhaps only when the property has been held by owners for 10-15 years. Identifies factors that have led to the current housing crisis, including renter's rights act, removal of fixed-term tenancies and winter lets being less common, HMO regulations (too hard or costly for owners). Notes the cost of affordable housing often isn't affordable, view that wooden houses would be cheaper or we should look to overseas examples for solutions.	Noted the wider housing system challenges and the need for affordable housing. Affordable housing is one of the priorities for the Highland Housing Challenge that is progressing a range of initiatives to address this including Mid-Market Rent housing.
HR-331-1 Provides additional detail, on working in the Highlands remotely from their property (~3 weeks a year) which is also used for holidays.	Noted.

HR-312-1 Urge Council to postpone consideration of STLCAs until full evaluation of the impact of Ward 20 STLCA, including impact on the local economy. Makes reference to report HC/27/25 of 18 September 2025 and the report's conclusions that it is difficult to determine the effect of a Control Area in its own right. View that data presented on the housing demonstrates that in some areas there are more second homes and properties used as STLs and most would agree that there is a shortage of affordable housing (whether to buy or let). View that the data fails to show that STLCAs will result in more affordable housing available to local residents and that limiting the number of STLs may simply result in an increase in second homes rather than providing a larger stock of houses available to local people. View that both average local salaries and average house prices need to be taken into consideration (see NW2045 Vision) to understand affordable housing for local people. Unrealistic that STLCA will provide more affordable housing [with a Control Area]. View that Council has not sufficiently considered the importance of tourism to the local economy, and the potential impact of STLCA on the local economy. View that visitors in STLs arguably have greater impact on the local economy than other tourists staying in hotels, B&Bs, yurts, motor homes, camping etc as they stay longer and spend more in local businesses such as restaurants, shops, heritage attractions etc. So to control their numbers could have a devastating impact on local businesses.	Noted. See response to ASSC below (HR-260-1). Affordable housing is one of the priorities for the Highland Housing Challenge that is progressing a range of initiatives to address this including expansion of Mid-Market Rent housing.
HR-304-1 News article about Gwynedd village in Wales where the local council proposed legislation to require planning permission before turning a residential property into a second home. Refers to Article 4, and the community campaign group which took legal action against the Council. A judge ruled Cyngor Gwynedd's cabinet had not been given the full details before making their decision, and quashed Article 4. The council's request to appeal was rejected in February of this year. Gwynedd has the highest proportion of second homes in Wales at 8.3%. Research from the council found, on average, 65.5% of Gwynedd households were being priced out of the housing market.	This comparison is noted. Wales and Scotland have different planning legislation and there is no current planning use class for second homes, nor any legal route to manage these using the Scottish planning system. This legislation is not in place in Scotland, and is not related to the proposed Highland Rural STLCA.

HR-256-1 Operators providing income for several people in Shieldaig area, including supporting the primary school. Urged the SCC most strongly to vote against the Short Term Let Control Area (STLCA) as currently proposed for Shieldaig. View that Ward 5 members voted to consider an STLCA mistakenly thinking that it would not affect existing STLs. Notes that existing STL will have to apply for planning permission when they next apply for their STL license.	Noted. A Control Area does not retrospectively alter the planning requirements for existing operators. All lawfully operating secondary let STLs, with either planning permission or a Certificate of Lawfulness, can demonstrate this when renewing their STL license. Operators are encouraged to submit a Development Enquiry to understand their planning status and whether they have or need planning permission for their operation, or can apply for a Certificate of Lawfulness where certainty is required. The purpose of the Control Area consultation is to seek views on whether designation is justified having regard to the evidence of housing, amenity and community impacts. The planning merits of individual short-term let proposals are matters for the subsequent development management process, to be assessed against the adopted development plan and other material considerations

Notes the non-statutory planning policy that applies to STL applications in Ward 20, which allows change of use to STL for three categories of dwelling. Seems unreasonable for Highland Council to apply these same policies to other STLCAs. It would not seem reasonable to vote for a policy that is not yet formulated, and this is the reason to urge the Area Committee and Shieldaig Community Council to re-visit the proposals as they stand.	Consulting simultaneously on policy tests would risk conflating support for the designation of a Control Area with support for particular planning policies, potentially prejudicing the clarity and effectiveness of the consultation exercise.
Recent figures collated for the Shieldaig Community Council (SCC) area suggest that Short Term Lets (STLs), and indeed the increase in STLs over recent years, can be beneficial to the local economy and to the community including raising the school roll. A significant number of the Shieldaig Primary School pupils (54%) have parents who derive income from the STL sector. STLs and their guests contribute considerable income to the tourist economy through cafes, bar and restaurants, to local trades and services, and to such as shellfish and smokehouse sales, marine and outdoor activity guides and local galleries and artists. Don't believe that un-let second homes contribute to the economy of the area or to the Primary School to the same extent as do STLs.	Noted.
View that it is unjust that local STL operators would have to apply for planning permission for their Short Term Let licences to be renewed. The Association of Scotland's Self Caterers has taken legal counsel's opinion which says that the proposals for STLCAs are illegal and contrary to the European Convention on Human Rights.	See full response to ASSC views below on this same matter (HR-260-1).
Highland Council has been unable to provide evidence that house prices have fallen in Badenoch and Strathspey since the start of their STLCA. If STLs are limited or reduced in Shieldaig, most of the houses concerned would become un-let second homes, or be sold to people out-with the area to be used as un-let second homes, contributing very little to the local economy and nothing to the primary school.	See full response to ASSC views below on this same matter (HR-260-1).

HR-254-1 Same as HR-256-1.	Refer to HR 256-1 response.
HR-125-1 STLs have a role in providing income for many residents within the community. A significant number of families with children attending Shieldaig school benefit directly from their own STLs. Notes the benefits of STLs to other businesses, including trades, restaurants, cleaners, gardeners. A reduction in STLs likely to undermine the viability of vital infrastructure and services, making the area less attractive for permanent residents. Respondent derives most of their income from letting, from these guests and visitors to the area, and enables family to stay living in the area (including school attendance). View that it is a misconception that proposed measures would encourage more people to live and work in our community. Even if there was more affordable housing stock, view that this is unlikely to address depopulation in the area or improve the local economy. Area is not attractive for working-age people due to poor transport, technology infrastructure, lack of childcare services, sporting and cultural opportunities, social isolation and long travelling distances for schools and hospitals. Concern that STLCA would negatively impact the local area, potentially leading to unoccupied homes and less employment opportunities. A 'blanket' control of such a large area fails to account for the unique economic profiles of each community. Wish for Shieldaig Community Council area to be excluded from a Ward 5 STLCA.	Noted. Noted. This response is not submitted on behalf of the Community Council in that capacity.

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.	Noted.
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.	Noted.
Main concerns are: • **Detrimental impact on the visitor economy in North Highland:** o 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 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. o 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.	Noted. Council recognises the importance of tourism in Sutherland and rural Highland, and the range of economic benefits that tourism brings to 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.	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.
• **Regulatory burden and business uncertainty:** o 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. o 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. o 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.	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 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 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.	Noted. The proposed Highland Rural STL Control Area is not intended to replicate any real or perceived success of the Badenoch and Strathspey Control Area. While the Council's Post 2 year review of the Badenoch and Strathspey Control Area indicates that changes of use to short-term lets are now being managed, the current proposal is based on its own evidence of housing pressures and short-term let prevalence. Even where the Badenoch and Strathspey Control Area found to have coincided with suggested indicators such as subsequent declining house prices and rental prices, those trends alone would not justify the current proposal which to be consistent with planning practice, must be grounded in its own evidence base demonstrating an issue and that the Council through designating a Control Area proposes to take a proportionate response to that issue. There is no legislative or policy requirement to delay consideration of further control areas until the long-term effects of existing designations are known.

	Local authorities are required to assess the need for control areas based on the evidence available at the time, and requiring definitive proof of impacts on housing affordability, population retention or community sustainability (which may take many years to emerge) would create an unreasonable barrier to timely and proportionate intervention where current evidence demonstrates a need for action.
○ It 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.	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.

• **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 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.
	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 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's 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.	Noted. The proposed Short Term Let Control Area is not a licensing proposal, but rather a planning proposal.
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.	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.

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.	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. 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. Noted.
HR-567-1 Plockton District & Community Trust Plockton & District Community Trust supports the introduction of a Short Term Let Control area in our community to improve the sustainability of our community by ensuring over time that houses are available to be lived in permanently by local residents and bring in some control to counter the over provision of short term lets which are hollowing out our villages. There are too many short-term lets in the village, a number which has increased over last 3 years. Overall have a negative view of the impact of STLs. Plockton & District Community Trust has been a long-standing advocate for designating Plockton & District as a Short Term Let Control Area (STLCA). Our position is grounded in clear evidence and a strong community mandate: • Housing crisis: An inventory compiled by Trust revealed the stark reality: one-third of properties in our area are not lived in as a primary residence. This loss of housing stock is severely impacting our community's sustainability. The uncontrolled growth in Short Term Lets in our community is a huge part of this problem causing reduced availability of housing for people who live and work here or want to live and work here, and impact on house prices rising beyond the reach of most permanent residents.	Noted.

• Community mandate: A well-attended member's meeting in November 2022 unanimously backed the Trust's formal request to Highland Council for STLCA consideration and this position has not changed in the time since then with the community becoming increasingly concerned about the availability of housing. Furthermore, the Lochalsh Collaboration's Community Survey (2022) cited lack of affordable housing and need for controls on holiday houses and holiday lets as a top priority second only to road infrastructure. We recognise that SLTCA status alone will not fix our housing challenges but it signals the community's need to safeguard housing for residential purposes. On positive impacts, short term lets are an important part of the tourism mix however the uncontrolled nature of Airbnb-style short term lets over a number of years has led to a local housing stock being bought up to be used as short term lets to the detriment of people living and working in our communities.	
HR-556-1 Wester Loch Ewe Community Council Wester Loch Ewe Community Council do not support the proposal to designate a Highland Rural STLCA. Overall positive view of short term lets in Wester Loch Ewe, as the area has limited access to well-paid, full-time, year-round employment. Much of the work available is seasonal and so, consequently, many people in our area rely on STL income as part of their family budget. STLs in Wester Loch Ewe are run by people living in the community who generate income which is spent in local shops and businesses. Maintaining them provides work for local tradesmen and these STL operators contribute to the community, put their kids through the local schools and volunteer in community organisations.	Noted.

We sympathise with areas like Plockton with STL problems, we do not think it proportionate to create a Control Area over the whole of Wester Ross because certain communities are experiencing problems – not a one-size fits all situation. We understand the problems that too many STLs can cause in a community, but do not feel that Wester Loch Ewe suffers in this way. For example, increased traffic problems over the summer are far more the consequence of the massive increase in camper vans caused by the NC500.	Noted – Wester Ross is not included due to isolated hotspot areas but because 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. Evidence suggests that widespread areas across Wester Ross have high rates of STLs as a share of total dwellings.
We are aware there are problems with affordable housing in the area which is why Wester Loch Ewe Community Council participate in the local Housing Group and why WLECC are working to purchase 25ha of land via the Scottish Land Fund to build some affordable housing. We're trying to solve the problem but don't feel STLs are necessarily its cause or that the material provided by Highland Council demonstrates STLs are its cause.	Noted.
Applying ever more regulatory pressure on accommodation providers is no substitute for building more affordable housing with a range of tenure options under a rural housing burden - a mechanism already available. We are concerned that after the introduction of STL Licensing, the non-domestic rates revaluation and the prospect of more stringent EPC requirements a Control Area will further depress local accommodation providers who already report stress, fear and frustration.	The Council does not consider that increasing affordable housing supply and managing the loss of existing housing stock are 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 limited market interest across large parts of the region. New housing can take many years to bring forward.

	The Council does not consider rural housing burdens to be a direct alternative to a Control Area. Scottish Government policy has generally moved away from occupancy restrictions as a preferred mechanism for addressing housing pressures, while rural housing burdens do not prevent the loss of existing housing stock to secondary short term lets. The Control Area instead provides a targeted planning tool to manage changes of use from residential accommodation to short term letting where housing impacts may arise.
Consider the material in Highland Council's Statement of Reasons does not clearly demonstrate that a Control Area would fulfil the stated objectives of reducing the loss of residential housing stock and helping address housing pressures for local people. Further, we do not feel the Control Area in Badenoch and Strathspey has demonstrated increased housing availability or improved affordability however we are concerned that depressing property values in an attempt to achieve this will not be welcomed by homeowners. We feel the Control Area needs to be more adaptable to the circumstances of individual communities. It does not address empty/second homes which may be a greater problem and do not provide the sort of positives to the local economy that STL businesses do. We are concerned that a Control Area will not be able to distinguish between STLs operated by locals - which is a positive contribution to the community - and STLs bought up speculatively by people from outwith the area whose only interest in the area is extractive. Tourism is the main business activity in our area. We asked about the Control Area's inability to distinguish between STLs run by locals and those owned outwith the area.	See full response to ASSC views above (HR-260-1) for response to this same matter. Noted. The purpose of the Control Area consultation is to seek views on whether designation is justified having regard to the evidence of housing, amenity and community impacts.

The answer given explained the proposal is a change in process rather than policy which suggests the Council proposes establishing a Control Area before clarifying the planning criteria that will used to determine whether to grant or refuse future STL applications.	The planning merits of individual short term let proposals are matters for the subsequent development management process, to be assessed against the adopted development plan and other material considerations. Consulting simultaneously on policy tests would risk conflating support for the designation of a Control Area with support for particular planning policies, potentially prejudicing the clarity and effectiveness of the consultation exercise.
HR-548-1 Contin Community Council Overall, Contin Community Council agree with the proposal to designate a Highland Rural STLCA. Although STLs are not currently a major problem in Contin, and we have a neutral view on their impacts, to have powers to manage future change before there is a problem seem to be a good idea, given that STLs are known to be causing problems elsewhere. We understand that managing STLs does not imply banning them and that the proposed measure is not retro-active. We are aware of the high proportion of STLs 'out west' but note (anecdotally) that a number of these properties have passed to their present owners by inheritance, and that some have been re-furbished to a higher standard than local people might have afforded. Hence the need to be able to manage short term lets, which is different from preventing them.	Noted.

HR-318-1 Torridon and Kinlochewe Community Council Torridon and Kinlochewe Community Council do not agree with the proposal to designate a Highland Rural STLCA. Overall positive view of STLs in Torridon and Kinlochewe.	Noted.
This area relies on tourism and Short Term Lets are an essential part of this. A very large number of people in our area rely on STLs for their income. STLs help to drive the economy, bring in income, provide employment, benefit local businesses. These local businesses frequently employ incomers, including younger people, all of whom are essential to keep our communities going. These benefits outweigh any negative impacts of STLs in our area. STL businesses are already struggling under new regulations and STLCA will be another obstacle which could impact the local economy and employment opportunities. We have had reports of a widespread feeling among local STL and self-catering owners of frustration, stress and even despair at the continuing bureaucracy, legislation and rising costs of operating their businesses. These include the STL licence scheme, non-domestic rates re-evaluation, visitor levy, and now the proposed planning changes (as well as the general hike in cost of living).	In relation to existing STL operators, a free pre-development enquiry can be submitted to understand whether a Certificate of Lawful Use or Planning Permission is required to demonstrate the planning status of a STL.
Empty second homes are more of a problem than STLs. Yet an owner seeking to do STLs instead of leaving a second home empty would be required to apply for planning permission.	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.

We understand that in some places such as Edinburgh, STLs have caused communities to be hollowed out. We don't suffer significantly from that here, therefore don't understand why an STLCA is necessary.	Noted.
If STLCA is introduced, it is essential that HC makes it clear what the criteria will be for allowing a property to be a STL. At present, no criteria have been proposed and without transparent, definite criteria, we are concerned the system could be unfair. Also, without transparent, definite criteria, people may be unwilling to apply and properties may be difficult to sell.	Planning applications would be determined in accordance with the development plan policies. The purpose of the Control Area consultation is to seek views on whether designation is justified having regard to the evidence of housing, amenity and community impacts. The planning merits of individual short term let proposals are matters for the subsequent development management process, to be assessed against the adopted development plan and other material considerations. Consulting simultaneously on policy tests would risk conflating support for the designation of a Control Area with support for particular planning policies, potentially prejudicing the clarity and effectiveness of the consultation exercise.
The wording in relation to existing STLs must be clarified. We understand that STLCA will not affect these (provided they are not in breach of any previous rules). However, we have been advised that, because of vague/woolly wording, if the property was ever sold, some lawyers may wish to see either planning permission or a Certificate of Lawful Use. This could cause a hiccup in the sale process. Obtaining a Certificate of Lawful Use could also take a long time and be considered onerous.	Whether a prospective purchaser seeks planning evidence, including a Certificate of Lawful Use, is ultimately a matter for the parties involved in a property transaction.

	The Council does not consider this possibility to be a material consideration in determining whether a Control Area should be designated. The process of applying for a Certificate of Lawfulness is not within the Council's ability to modify at a local level.
We understand STLCA has been in place in Badenoch & Strathspey (B&S) for a few years. Highland Council's own report states it is too early to understand the effects of this properly. Key sources of information are not available yet, also the timing of the adoption of STLCA coincided with a very unusual housing market and the adoption of other housing policies. Therefore, Highland Council has not provided any evidence that STLCA solves housing problems, increases housing availability, reduces rents, or improves affordability or measurable housing benefit. The HC report further states that further and continuous monitoring is required to understand the impact of STLCA in B&S. Highland Council should wait for the results of STLCA in B&S to become clear before deciding whether to go ahead in the rest of the HC area.	See full response to ASSC views above (HR-260-1) for response to this same matter.

Highland Rural Organisations

HR-284-1 Scottish Tourism Alliance See summary above, for Question 28.	See response above, for Question 28.
HR-260-1 Association of Scotland's Self-Caterers See summary above, for Question 28.	See response above, for Question 28.

HR-604-1 Scottish Land and Estates Scottish Land and Estates are undecided on the proposal to establish the Highland Rural short term let control area. The existing 'one size fits all' modelling of the STLCA proposals across the Highland region does not appear to have been adequately considered as part of these existing proposals. It does not represent the diversity and property availability within town, village or remote communities, and how existing infrastructure would be impacted by any changes in the number of short term lets. Evidence from Badenoch and Strathspey, an area with distinctly different characteristics and more concentrated pressures, cannot necessarily be applied across a much more diverse rural geography.	Noted. Despite covering a large geographic area, short term let prevalence has been analysed at data zone level, the smallest geographic area for which official statistics on households and dwellings are routinely published. This approach enables a highly localised assessment of the distribution and concentration of short term lets, rather than relying on broad Highland-wide averages. The designation therefore reflects the aggregation of multiple localised areas where the evidence supports intervention, rather than the application of a blanket approach across a heterogeneous rural area. Evidence of the concentration of short term lets from Badenoch and Strathspey has not been used to inform the proposed Highland Rural STLCA designation.
Designation of an STLCA would potentially remove case-by-case assessments, automatically requiring planning permission for secondary letting. While the Council argues this will help balance tourism growth with housing need by managing concentrations of short-term lets, it is vitally important to recognise that housing pressures are not uniform across Highland.	Noted.

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.	Noted.
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.	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 Council has previously accounted for when determining the policy framework that applies within its existing Control Area.

HR-546-1 Scottish Crofting Federation The Scottish Crofting Federation supports the designation of a Highland Rural Short Term Let Control Area.	Noted.
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.	Noted.
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.	Noted.
Views differ among crofters on what level of short term letting activity on crofts, by crofters themselves, is desirable. Crofters compliant with their crofting duties of residency and cultivation are part of the permanent resident community, they work their crofts and value generated from short term lets is kept local. The introduction of short term let control areas is a step in the right direction, but in and of itself insufficient to prevent crofts from being misused as short term lets whilst the legal occupiers remain absent. There are a number of factors at play, namely the lack of enforcement of crofting duties and the lack of effective procedures ensuring proper communication between different public bodies, namely the Crofting Commission and local planning authorities.	Noted. Noted.

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. 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.

HR-184-1 Nairn BID Do not agree with the proposal to establish the Highland Rural STLCA.	Noted.
Nairn BID don't think the causal link between having a control area and increasing the availability of housing has been made. I think operators of short term lets need protection for their valuable businesses and the part they play in the prosperity of the Highlands. Investing in a property to let out may be providing a local family with the income to send their children to a local school. We need to have a range of holiday accommodation to maintain our tourism industry.	The Council does not consider that increasing social or affordable housing supply and managing the loss of existing housing stock are mutually exclusive approaches. While increasing the delivery of housing is important, this is not a simple or immediate solution in Highland, where housing delivery is constrained by factors including infrastructure capacity, development viability, land ownership, peat and ground conditions, workforce availability and limited market interest across large parts of the region. New housing can take many years to bring forward.
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 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.	Noted.