The Highland Council

Agenda Item	**5**
Report No	**BIER/31/26**

Committee: **Black Isle and Easter Ross**

Date: **9 November 2026**

Report Title: **Short Term Let Control Area**

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

1 Purpose/Executive Summary

1.1 This report provides an update to the Short Term Let Control Area report previously considered by Black Isle and Easter Ross Members at its meeting on 10 November 2025. This previous report summarised the local prevalence and impacts of Short Term Lets. Members did not at that time seek to progress considering the introduction of a Short Term Let Control Area covering all or part of the Black Isle and Easter Ross Area but agreed to reconsider the evidence base within a further report brought to the Area Committee again at a future period, after 12 months.

1.2 This report revisits the indicators available to the Council and considers whether there has been any material change in circumstances since the previous assessment. While some datasets have been updated, the evidence available at this time does not indicate any significant change in the scale, distribution or impacts of short term lets within Black Isle and Easter Ross that would warrant the introduction of a Short Term Let Control Area. The available indicators continue to suggest that relative to other parts of Highland and to Highland as a whole, levels of Short Term Let interaction with the local housing supply within the area are not significant and sustained. Ongoing monitoring and review remains reasonable, and Members have the option to revisit local evidence in future should material differences in circumstances arise.

2 Recommendations

2.1 Members are asked to:-

i. **Note** that the evidence available at this time does not demonstrate a material change in the prevalence or impacts of Short Term Lets within Black Isle and Easter Ross that would justify the introduction of a Short Term Let Control Area at this time;

ii. **Agree** that the Black Isle and Easter Ross Area Committee does not at this time seek to progress with the process of considering the introduction of a Short Term Let Control Area covering all or part of the Black Isle and Easter Ross Area; and

iii. **Agree** that the evidence base regarding the prevalence and impact of Short Term Lets within Black Isle and Easter Ross be kept under review, with a further report to be brought to the Area Committee should updated evidence indicate a need for reconsideration.

3 Implications

3.1 **Resource** – any decision taken to progress work on bringing into effect a Short Term Let Control Area will have resource implications that will not be met through existing budgets. This will relate to officer time and consultancy fees in establishing a control area and, if agreed, thereafter its implementation. While fees can be recovered for any subsequent processing of planning applications, these do not necessarily result in full cost recovery, and it is likely to result in a significant increase in enquires where fee income will not cover cost.

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 Short Term Let Control Area. Potential risks of legal challenge can be mitigated by careful consideration of the evidence to support such proposition.

3.3 **Risk** – any decision taken to progress with a Short Term Let Control Area may be subject to legal challenge. This risk can be mitigated by careful consideration of the evidence to support such proposition.

3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – no specific implications to highlight.

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 in relation to 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 This report does not relate to the formal implementation of a Short Term Let Control Area. It provides an update and considers whether there is an evidence base that would justify progressing to a full evidence gathering and consultation phase. An impact assessment is therefore not required. Were a decision taken to progress to the next stage, which would involve evidence gathering and consultation, an impact assessment would be required in order to inform the decision on whether to progress with such a scheme.

5 Background

5.1 Members will recall that The Planning (Scotland) Act 2019 introduced provision for Planning Authorities to designate all or part of their area as a STLCA:-

- to help manage high concentrations of STLs (where it affects the availability of residential housing or the character of a neighbourhood);
- to restrict or prevent short term lets in places of types of building where it is not appropriate; and
- to help local authorities ensure that homes are used to best effect.

5.2 The regulatory process to designate a Short Term Let Control Area (STLCA) as set out in regulation 3 of The Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 follows three steps: notification and consultation; submission to, and approval from, Scottish Ministers; followed by public notice of the designation. The Highland Council, at its meeting on 18 September 2025 agreed a new structure for how such decisions can be reached where Area Committees will first decide on whether to progress with the introduction of a Short Term Let Control Area covering all or part of their Area. There is currently one STLCA within Highland, established in Ward 20 Badenoch and Strathspey.

5.3 The Short Term Let Control Area report previously considered by Black Isle and Easter Ross Members at its meeting on 10 November 2025 was produced in tandem with the Council's ongoing Housing Need and Demand Assessment (HNDA) to support Members decide whether to progress to the first stage of the implementation of a short term let control area, namely the evidence gathering and consultation phase. The report provided detail on STL prevalence to allow consideration of impacts on the availability of undertaken residential housing using records from the mandatory STL Public Register.

5.4 Compared to other areas of Highland, the evidence available across a range of indicators suggested that Short Term Lets were less prevalent, less concentrated and less central to housing pressure in the Black Isle and Easter Ross area. Other Local Area Committees sought to progress consideration of their areas through the statutory consultation process and following this, the Economy and Infrastructure Committee at its meeting on 28 September 2026, agreed to submit the proposed Inverness City STLCA and Highland Rural STLCA designations to Scottish Minsters for their approval.

6 Assessment of Short Term Lets in Black Isle and Easter Ross

6.1 The Highland Housing Need and Demand Assessment (HNDA) has progressed through 2025 and 2026 and has been recently finalised. The containment analysis presented within the previous Short Term Let Control Area report is therefore unaltered and will only be updated and reassessed through a subsequent HNDA cycle. Given that the HNDA is undertaken on a five-year cycle in accordance with Scottish Government guidance, there is limited scope for a substantive refresh of this evidence in the intervening period.

6.2 By way of update to the previous Short Term Let Control Area report which provided a breakdown of STL types by Ward as of July 2025, **Table 1** provides a comparison with the figures as of July 2026. This suggests there has been minimal changes in the overall numbers of STLs within Ward 6, Ward 7 and Ward 9. Owing to the small scale of change in numbers, the previous Short Term Lets Map (which ascribes this to the overall share of dwellings) is not anticipated to change significantly in the Black Isle and Easter Ross area. Officers will be updating this map in due course, but it has not been possible to finalise this in time for this report. The majority of STLs in Black Isle and Easter Ross remain detached dwellings or unconventional accommodation (pods and chalets).

Table 1 Profile of Black Isle and Easter Ross (Wards 6, 7 and 9) STLs

	Ward 6 - Cromarty Firth		**Ward 7 - Tain and Easter Ross**		**Ward 9 - Black Isle**		**Total**	
	2025	**2026**	**2025**	**2026**	**2025**	**2026**	**2025**	**2026**
Detached House STLs	**41**	**41**	**49**	**53**	**86**	**84**	**176**	**178**
Semi-Detached House STLs	20	21	31	31	34	36	85	88
Terraced House STLs	12	11	18	19	17	17	47	47
Self-Contained Flat STLs	16	19	8	9	13	15	37	43
All Potential Dwelling STLs	**89**	**92**	**106**	**112**	**150**	**152**	**345**	**356**
Unconventional Accommodation STLs (Pods, chalets etc)	21	21	25	25	37	40	83	86
All Short Term Lets	**110**	**113**	**131**	**137**	**187**	**192**	**428**	**442**

6.3 Analysis of Total New Housing Completions and the STL Licence Register was provided to members previously and an update with the additional year of 2025/2026 is shown in **Table 2** and **Table 3**. This reveals no significant increase from when this was last considered. For all three Wards in Black Isle and Easter Ross Area, the percentage of new build completions becoming STLs over the last 6 years is below the Highland average of 4.7%.

Table 2 Newbuild Completions in Cromarty Firth (Ward 6) and Tain and Easter Ross (Ward 7) since used as STLs

	Ward 6			**Ward 7**		
Year	**Total Completions**	**Became STLs**	**%**	**Total Completions**	**Became STLs**	**%**
2020/2021	27	-	-	13	1	7.7%
2021/2022	65	-	-	51	2	3.9%
2022/2023	59	-	-	13	-	-
2023/2024	51	4	7.8%	12	-	-
2024/2025	54	-	-	15	1	6.7%
2025/2026	35	-	-	9	-	-
Total	**291**	**4**	**1.4%**	**113**	**4**	**3.5%**

Table 3 Newbuild Completions in Black Isle (Ward 9) since used as STLs

	Ward 9		
Year	**Total Completions**	**Became STLs**	**%**
2020/2021	10	-	-
2021/2022	82	1	1.2%
2022/2023	50	1	2.0%
2023/2024	31	1	3.2%
2024/2025	26	4	15.4%
2025/2026	20	1	5.0%
Total	**219**	**8**	**3.7%**

6.4 The Council utilised the Registers of Scotland Highland property sales data and matched these to the STL Public Register to identify those that were subsequently granted secondary letting Short Term Let Licenses shown in **Table 4**. These reveal a modest degree of house sales subsequently converted to Secondary Letting STLs, where Ward 7 had 3.4% of house sales subsequently granted secondary letting Short Term Let licenses, while 1% of house sales in Ward 6 did so. The equivalent rate for the whole of Highland was 4.7%, with some Highland wards exceeding 7%,10% and 13% as detailed within the Highland Rural STLCA Statement of Reasons.

Table 4 House Sales since granted Secondary Letting STL Licenses

	Ward 6			Ward 7			Ward 9		
Year	**Total Sales**	**Granted STL License**	**%**	**Total Sales**	**Granted STL License**	**%**	**Total Sales**	**Granted STL License**	**%**
2019/2020	182	2	1.1%	151	4	2.6%	195	3	1.5%
2020/2021	202	2	1.0%	148	4	2.7%	151	3	2.0%
2021/2022	190	1	0.5%	180	8	4.4%	216	5	2.3%
2022/2023	171	1	0.6%	117	5	4.3%	158	1	0.6%
2023/2024	162	3	1.9%	104	3	2.9%	149	4	2.7%
Grand Total	**907**	**9**	**1.0%**	**700**	**24**	**3.4%**	**869**	**16**	**1.8%**

6.5 A review of registered Local Places Plans identifies communities that have expressed concern regarding prevalence of STLs. The Local Place Plan Register Map shows the status of areas that have formally registered LPPs, in addition to those that have notified that they intend to submit one. There is presently one registered LPP in the Black Isle and Easter Ross Area – The Black Isle Local Place Plan, which also serves as the Area Place Plan. Under the 'Priorities for Affordable Homes for All,' the Black Isle LPP seeks to prevent existing homes becoming full-time holiday lets (using Short Term Let Control Area) and to control the growth of second homes, albeit this is a separate issue not covered within the scope of a STLCA.

6.6 There are now five notified LPPs in the Black Isle and Easter Ross Area in the process of being developed. Communities may wish to come forward in due course with further LPPs, which would be duly considered at the appropriate stage, but at the present time, only registered LPPs in Black Isle and Easter Ross can be taken into consideration regarding STLs in their communities. Easter Ross Area Place Plan makes no explicit mention of STL accommodation as a priority within the plan.

7 Conclusion

7.1 This report reconsiders the prevalence of Short Term Lets in Black Isle and Easter Ross and potential impacts on availability of residential housing in Black Isle and Easter Ross specifically. Since the Committee's previous consideration of this matter, monitoring of short-term let activity has continued. However, a comprehensive assessment of the relationship between Short Term Lets and housing market pressures can only be undertaken alongside the Housing Need and Demand Assessment (HNDA) process. The HNDA provides the principal evidence base for understanding housing need and market conditions across the area and is prepared by local authorities in accordance with Scottish Government guidance on a five-year cycle. Consequently, the availability of new evidence capable of materially informing consideration of a Short Term Let Control Area is in part constrained by the timing of the HNDA process, and limited additional information has become available since the Committee's previous consideration of the matter.

7.2 Noting the limitations on the availability of updated evidence, the indicators available at this time continue to suggest that relative to other parts of Highland and to Highland as a whole, Black Isle and Easter Ross does not experience a level of Short Term Lets prevalence or associated housing market pressure that would justify the introduction of a Short Term Let Control Area at this time. The evidence therefore does not indicate a material change in circumstances since the Committee's previous consideration of this matter. Indicators such as the spatial concentration of Short Term Lets, the proportion of new housing completions subsequently operating as Short Term Lets, and the proportion of residential property transactions that are later converted to Short Term Lets use will continue to be monitored and reviewed by the Council. Should future monitoring identify a material increase in Short Term Let prevalence or evidence of associated housing market pressures within Black Isle and Easter Ross, the position can be reassessed and reported to Members as appropriate.

Designation:	Assistant Chief Executive - Place
Date:	5 October 2026
Authors:	Meadhbh Maguire, Principal Planner
Background Papers:	Report to Highland Council 18 September 2025 Report to Black Isle and Easter Ross 10 November 2025
Appendices:	None