

# LICENSING COMMITTEE INFORMATION SHEET

14 May 2025

## Public Application

**TYPE OF APPLICATION:** SHORT TERM LET LICENCE APPLICATION

NEW HOST-SECONDARY LETTING

**APPLICANT:** HOLT ACCOMODATION SERVICES LTD

**PROPERTY MANAGER:** REBECCA DARE

**ADDRESS:** 41 SHIELHILL AVENUE, ABERDEEN

## INFORMATION NOTE

- Application Submitted 24/09/2024
- Determination Date 23/06/2025

This Short Term Let licence application is on the agenda of the Licensing Committee for the reason that 2 representations/objections were submitted to the Private Sector Housing Team.

If, after consideration of the representations/objections, the Committee is minded to grant the Short Term Let licence, it may do so since at the time of drafting this report, the necessary upgrading works and certification have been completed.

## DESCRIPTION

The property at 41 Shielhill Avenue, Aberdeen, is the subject of this new Short Term Let licence application and its accommodation comprises of a mid terraced house, with 3 bedrooms, bathroom, shower room, kitchen and living room. The applicant wishes to accommodate a maximum of 6 guests, which is acceptable in terms of space and layout. The location of the premises is shown on the plan attached as Appendix A.

## CONSULTEES

- Police Scotland
- Scottish Fire & Rescue Service
- Aberdeen City Council's Planning Team
- A public Notice of Short Term Let Application was displayed outside the building, alerting the public to the licence application.

## REPRESENTATIONS/OBJECTIONS

- Police Scotland – no objections
- Scottish Fire & Rescue Service – no objections
- Aberdeen City Council's Planning Team – no objections
- One objection email from Catherine Reynolds (Attached as Appendix B)

- One objection email from Bruce Lawrie (Attached as Appendix C)
- One representation letter from the Property Manager (Attached as Appendix D)

The objections were received within the statutory time period therefore the Council must consider.

## COMMITTEE GUIDELINES/POLICY

All applications for Short Term Let licences are dealt with in accordance with the Scottish Government's document:

[Short term lets - licensing scheme part 2: supplementary guidance for licensing authorities, letting agencies and platforms](#)

## GROUND'S FOR REFUSAL

This application is being dealt with under the provisions of '[Civic Government \(Scotland\) Act 1982 \(Licensing of Short Term Lets\) Order 2022](#)' (the 2022 Order)

Available [grounds of refusal](#) are as follows:

A licensing authority shall refuse an application to grant or renew a licence if, in their opinion—

**(a)**the applicant or, where the applicant is not a natural person, any director of it or partner in it or any other person responsible for its management, is either—

(i)for the time being disqualified under section 7(6) of this Act, or

(ii)not a fit and proper person to be the holder of the licence;

**(b)**the activity to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant or renewal of such a licence if he made the application himself;

**(c)**where the licence applied for relates to an activity consisting of or including the use of premises or a vehicle or vessel, those premises are not or, as the case may be, that vehicle or vessel is not suitable or convenient for the conduct of the activity having regard to—

(i)the location, character or condition of the premises or the character or condition of the vehicle or vessel;

(ii)the nature and extent of the proposed activity;

(iii)the kind of persons likely to be in the premises, vehicle or vessel;

(iv)the possibility of undue public nuisance; or

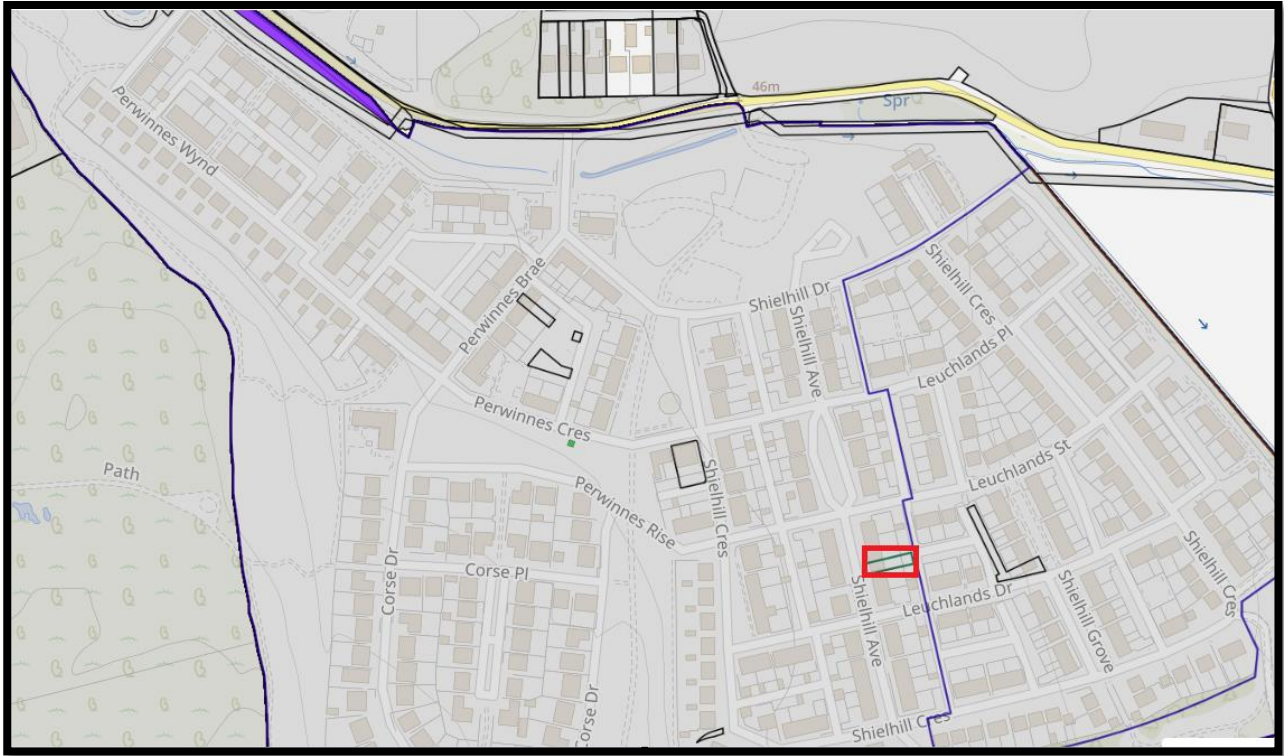
(v)public order or public safety; or

**(d)**there is other good reason for refusing the application;

## OTHER CONSIDERATIONS

- Landlord Registration is not a requirement of Short Term Let licensing.
- The Council's Community Safety Team has no record of anti-social behaviour complaints in respect of 41 Shielhill Avenue, Aberdeen.
- There are no Granted Short Term Let licences at Shielhill Avenue.
- Information within the Deed of Conditions is not a ground for refusing a Short Term Let licence within the legislation. Licensing cannot be used to enforce other legal issues and that would have to be enforced via other means.
- The property is currently unlicensed. As the applicant is a new operator, the property cannot operate as a Short Term Let until the Licence application is determined.

**'A'**



**‘B’**

**From:** Catherine Reynolds  
**Sent:** 07 October 2024 14:35  
**To:** ShortTermLets <[ShortTermLets@aberdeencity.gov.uk](mailto:ShortTermLets@aberdeencity.gov.uk)>  
**Subject:** 41 Shielhill Avenue, Aberdeen, AB23 8JE

Hi,

I wish to object to planning permission for use of the above address as a short-term let.

This house is located within a quiet, residential, family-oriented development and is surrounded by family homes with young children. This estate does not lend itself to being an appropriate place for short-term lets.

As a resident of this estate, around the corner from this property with a young family, I have lots of concerns including:

1. The transient nature of short-term lets means that us neighbors do not know who is coming and going, potentially increasing our concerns about crime or security in the area.
2. Short-term renters, often being tourists or visitors, might not adhere to the neighborhood norms, leading to increased noise levels and disruption, especially late at night.
3. Frequent turnover means more comings and goings, which could cause disturbances and reduce the overall tranquility of our residential area.
4. Short-term rentals will impact the sense of community, as neighbours frequently see new faces instead of long-term residents, making the area feel less cohesive and safe.
5. Increased traffic and demand for parking spaces that can result from a continuous influx of visitors, could lead to congestion in areas that were not designed for such high turnover. This could cause inconvenience for permanent residents and could result in conflict.
6. If this short-term let license is granted, it sets a precedence for hundreds of other houses in the development. This could lead to a further reduction in the already scarce and difficult to find, long-term rental properties, contributing to housing shortages and pushing local residents out.

There are often requests for houses for rent or for sale in this development as there are a lot of families who are keen to live here. The owner of this property would not have any problem letting this house out long term which is more suitable and fitting with the environment in which the house is situated.

I hope my views on this which I am sure reflect the view of a lot of residents in this development are heard.

Yours sincerely,

[Redacted signature]

[Redacted address]



**From:** Bruce Lawrie  
**Sent:** 07 October 2024 09:18  
**To:** ShortTermLets <ShortTermLets@aberdeencity.gov.uk>  
**Subject:** Short Term Let Objection

### **Private Sector Housing**

Business Hub 11,  
Second Floor West,  
Marischal College,  
Broad Street,  
Aberdeen,  
AB10 1AB  
Dear Sir/Madam

Ref: 41 Shielhill Avenue Short-Term Let Application (HSTL649485138).

I wish to formally object to Holt Accommodation Services limited application (HSTL649485138) for a short term let licence at 41 Shielhill Avenue.

1. The property has been and is still being used unlicensed for short term lets, since April 2024. There have been numerous individuals arriving and departing with suitcases. This has been witnessed by multiple neighbours residing in the community. It transpires this property is being used as accommodation for a multitude of workers who work days and nights on a rotational 3/3 or 2/2 shift pattern for a company on Denmore road in Bridge of Don.
2. In respect to the properties within the Dubford/Shielhill Estate, in the Burdens/Deeds lodged with Land Register of Scotland, Restrictions on use section 1.2:  
*Each dwellinghouse shall be used and occupied as a private dwellinghouse and shall not be sub-divided or occupied by more than one family or group of individuals living together as a family at that time.*  
The above restriction would be understood by the applicant (Holt Accommodation Services limited), yet they persist in operating an unlicensed short term let and have made the present application despite being aware of the current restrictions laid out clearly in the Burdens.
3. In the Burdens/Deeds lodged with Land Register of Scotland, Restrictions on use section 1.8:  
*No power-boats, marine crafts, caravans, motor homes, commercial vehicles or vehicles other than private motors cars, motor cycles or cycles shall be parked on any plot or on any other part of the development*  
As per previous note, the applicant (Holt Accommodation Services limited), have made the present application despite being aware of the current restrictions laid out clearly in the Burdens and there is a good probability using the property for short-term letting will result in commercial vehicles being parked in an area used for private dwellinghouses. With reference to the above points outlined above, I wish to present my objection to any consent of short-term let in respect of 41 Shielhill Avenue. The applicant (Holt Accommodation Services limited) obviously is aware of restrictions placed upon the property, yet despite is currently operating an unlicensed short term let and has presented a formal application for a short term let.  
The development was built as a residential area, with notion of providing a safe and pleasant area for families with children, not for property companies to buy up family houses and alter properties to provide short-term letting for strangers who will have no investment in the development and in all probability no care for others that reside there.

Similarly, Holt Accommodation Services Limited appear to be solely concerned with maximising profit with no thought for those already residing in the area. Clearly the company does not respect or understand the importance of fostering a stable and cohesive community environment.

The environment and quality of life for the residents of the Dubford development was one of the primary intentions of the Burdens and to provide protection against the development being used for letting.

Why should a company ignore Burdens/Deeds with the intention of maximising profits. Additionally, given the company is already operating unlicensed it demonstrates their contempt for residents, Aberdeen City Council and the legal process.

Yours faithfully.

A large black rectangular redaction box covering the signature area.

# 'D'

Dear Sir/Madam,

**Application Number: HSTL649485138. 41 Shielhill Avenue, Bridge of Don, Aberdeen, AB23 8JE**

Please accept this statement in support of our application, along with addressing the two objections received.

41 Shielhill Avenue has been leased as a corporate let since April 2024. Due to the nature of the lease, we were unaware that we required a Short Term Let licence and assumed we were working within current laws and regulations.

In September 2024 we were advised that we may require a Short Term Let licence. We immediately contacted Aberdeen City Council Planning to inquire and were advised that yes, we needed a STL licence for a corporate let. Please note that the house is not classed as a main residence for any of our guests, they all reside full time elsewhere, this house is for work stays only.

We began the application process the same day. The applicant's checklist was sent to Strategic Planning, and we were given permission to apply for a STL licence. As responsible landlords, all required certification and documentation were already in place as a matter of course.

We displayed the Notice of Application and for the sake of complete transparency to ensure that all residents in the area saw this, we erected a post for the sign at the end of the front garden, close to the pavement. Please see the picture below.



The notice was displayed for the required 21 days and since this time, there have been two objections from residents in the neighbourhood, and we have also had communications with a third resident who voiced concerns.



## Objections

We are aware of a post from 22/09/24 on a Facebook group specifically for the residents of Dubford/Shielhill, which informs and encourages other residents to object to our application. We have followed this with interest. We have found that almost all responses to the post are very positive regarding the planning application, and out of the 1100+ members, only two people have objected.

██████████ lives in the immediate neighbouring property, and voiced concerns about why a Short Term Let licence was being applied for at that time and did this mean that a change in type of lease/guests was going to happen in the future.

We corresponded with ██████████ directly and explained who we were and assured ██████████ that there were no plans to change who we leased to. ██████████ was satisfied with our explanation and told us that ██████████ was "more than happy with the current arrangement" and that our guests were "ideal neighbours". ██████████ did not see a reason to object based on our explanation and is very happy with the current status quo.

### Mr Lawrie's Objection.

We received our first objection from Mr Lawrie who gave 3 (main) reasons for objecting to our application. We would like to address these and alleviate Mr Lawrie's concerns.

#### Point 1.

Mr Lawrie's says "The property has been and is still being used unlicensed for short term lets, since April 2024. There have been numerous individuals arriving and departing with suitcases. This has been witnessed by multiple neighbours residing in the community. It transpires this property is being used as accommodation for the multitude of workers who work days and nights on rotational 3/3 or 2/2 shift pattern for a company on Denmore road in Bridge of Don".

- Mr Lawrie is partially correct. The property has been leased since April 2024 as a corporate let and at the time of leasing, we were unaware that we would require a STL licence due to the nature of the lease. However, under good advice we are now correcting this. Our guests work 2/2 shifts, rarely is the house full and guests who do stay tend to stay for at least one month. This property does not have "numerous individuals arriving and departing with suitcases". We would be willing to provide our booking records since April 2024 which will show very few people arrive and leave with suitcases. The guests who do arrive go through the back lane, through the back garden and access the house from the back door. We are confident that neighbours are not disturbed by this.

#### Point 2.

Mr Lawrie says "In respect to the properties within the Dubford/Shielhill Estate, in the Burdens/Deeds lodged with Land Register of Scotland, Restrictions on use section 1.2:

*Each dwellinghouse shall be used and occupied as a private dwellinghouse and shall not be sub-divided or occupied by more than one family or group of individuals living together as a family in this home.*

The above restrictions would be understood by the applicant (Holt Accommodation Services Ltd), yet they persist in operating an unlicensed short term let and have made the present application despite being aware of the current restrictions laid out clearly in the Burdens."

- Our interpretation of this is that the house should not be changed to a business, nor should it be subdivided into flats/apartments. We believe that Mrs Holt is fully within her rights to lease out her property.
- Mr Lawrie does not include the entire text taken from the Land Registers of Scotland, Restrictions on use section 1.2 – it continues on to say "However nothing herein contained will be deemed to be a prohibition upon the leasing of any Dwellinghouse, provided that the use of such Dwellinghouse by the occupiers thereof is as a private dwellinghouse or residence in accordance with the provisions of this deed"
- Further to this, we note that in a review of Short Term Lets by Aberdeen City Licensing Committee which took place 05/06/24 the following was decided; (3.9) *"A common theme contained within public objections, mentioned Title Deeds. In each case, objectors were advised Deed of Conditions for a property are not grounds for refusing a Short Term Let license within the legislation. Licensing cannot be used to enforce other legal issues and that would have to be enforced via other legislation".*

### **Point 3.**

"In the Burdens/Deeds lodged with Land Register of Scotland, Restrictions on use section 1.8: No powerboats, marine crafts, caravans, motor homes, commercial vehicles or vehicles other than private motor cars, motorcycles or cycles shall be parked on any plot or on any other part of the development. As per previous note, the applicant (Holt Accommodation Services limited), have made the present application despite being aware of the current restrictions laid out clearly in the Burdens and there is a good probability using the property for short-term letting will result in commercial vehicles being parked in an area used for private dwellinghouses."

- This was addressed in Point 2.  
However, we would very much like to alleviate Mr Lawrie's concerns.  
To the rear of 41 Shielhill Avenue are two parking spaces. Most of our guests walk to work due to the proximity. Some of our guests cycle to work, we provide bicycles, and they are secured within a shed in the rear garden. Occasionally a guest will use a company car. These are small electric cars. None of our guests would ever require a commercial vehicle regardless of Mr Lawrie telling you that there is a "good probability" of this happening.

### **Catherine Reynolds' Objection**

Ms Reynolds is entirely reasonable and justified in raising objections, she has young children and would like to know who is living in the proximity of her family. We would like to assure Ms Reynolds that our guests are scrutinized, monitored and checked in contrast with average resident who moves into a property without such checks and monitoring.  
We invite her to speak to us any time with any concerns she has. We shall talk about who our guests are, which we are confident will answer Ms Reynold's questions and concerns about cohesion.

### **Our Guests.**

Our contract is with a large, reputable oil company whose focus is wind farms and geotechnical data gathering. This company employs over 11,000 people in 57 different countries and has been part of Aberdeen's oil and gas industry for over 45 years. The offices of our guests are located on Denmore Road in the Bridge of Don, which is about 10 minutes' walk away from 41 Shielhill Avenue.

There was a requirement for a house in the area rather than a hotel so that guests have a home away from home experience, where they can cook and eat at a table, do their laundry and sit in a garden. This type of environment is important for our guest's wellbeing and mental health, whereas living in a hotel for months at a time can be limiting and stressful. There are very few options (if any) available within walking distance of their offices.

Our guests are all highly skilled professionals who work long hours (12 hours per day) they work night and day shifts, and it's crucial that they have adequate sleep and are well rested. A quiet neighbourhood is essential for their well-being.

The company our guests work for have a zero-tolerance policy to any level of alcohol and drug use, and regular testing is mandatory for these professionals due to the highly skilled nature of their work. In addition to this, each of the guests must undergo full police checks on an international level to gain employment within the company.

If any complaint were to be received by a neighbouring property, this would be taken very seriously by Holt Accommodation Solutions Ltd and our guest's Head Office - where an investigation would be carried out. There has not been a complaint of any kind over the past year, and we are confident that there will not be one in the future.

The project that our guests are working on has the potential to last many years. However, because they work remotely, it means that their work can be carried out from any location within or even outside the UK. Currently the Bridge of Don is an important hub for operations, and we hope that this continues to be the case for years to come, especially in light of the downturn in the oil and gas sector over recent years. If finding accommodation were to become difficult, then a move in operations would be inevitable.

Aberdeen is forecast to experience the lowest economic growth of any UK city from 2025 to 2028. Oil workers living in Aberdeen contribute significantly to the national economy and on a local scale our guests contribute in cabs, purchases, use of gyms etc. We hire local cleaners, launderettes and use local tradesmen to ensure that the house is kept up to and beyond the legal standards required, as well as hiring local staff to manage the house.

**Future.**

If/when the contract with the oil company finally comes to an end, the plan is to sell the house. We have no interest in the house being leased as an Airbnb or similar, the intention was always to purchase a house for leasing as a corporate let and sell when the contract ends to free up capital and purchase wherever the next requirement may be.

If this should change, then we would hope that our lack of complaints to date and kind comments from neighbours would go some way to showing how we conduct ourselves and manage the house.

**Summary**

Louise Holt is a registered landlord in Aberdeen and also runs her own company (Holt Accommodation Solutions Ltd). Louise has a team of staff who ensure that all properties are managed correctly, and that all guests and neighbours are happy. This is an essential part of running a business long term and also her personal pride.

Since leasing 41 Shielhill Avenue in April 2024 there has not been a single complaint about our guests. More than one neighbour has commented that our guests are fantastic, they're quiet and friendly and have been called the "ideal neighbour". Their carbon footprint is practically zero, they work 7 days a week and are monitored by the company they work for. They contribute to the local economy, and we agree that they are the ideal neighbours.

We have addressed the concerns that objectors have raised and will always be open to any suggestions or comments that anyone on the development has, we ourselves wish to keep Dubford/Shielhill as quiet and lovely as it is now.

Kind regards

Rebecca Dare