

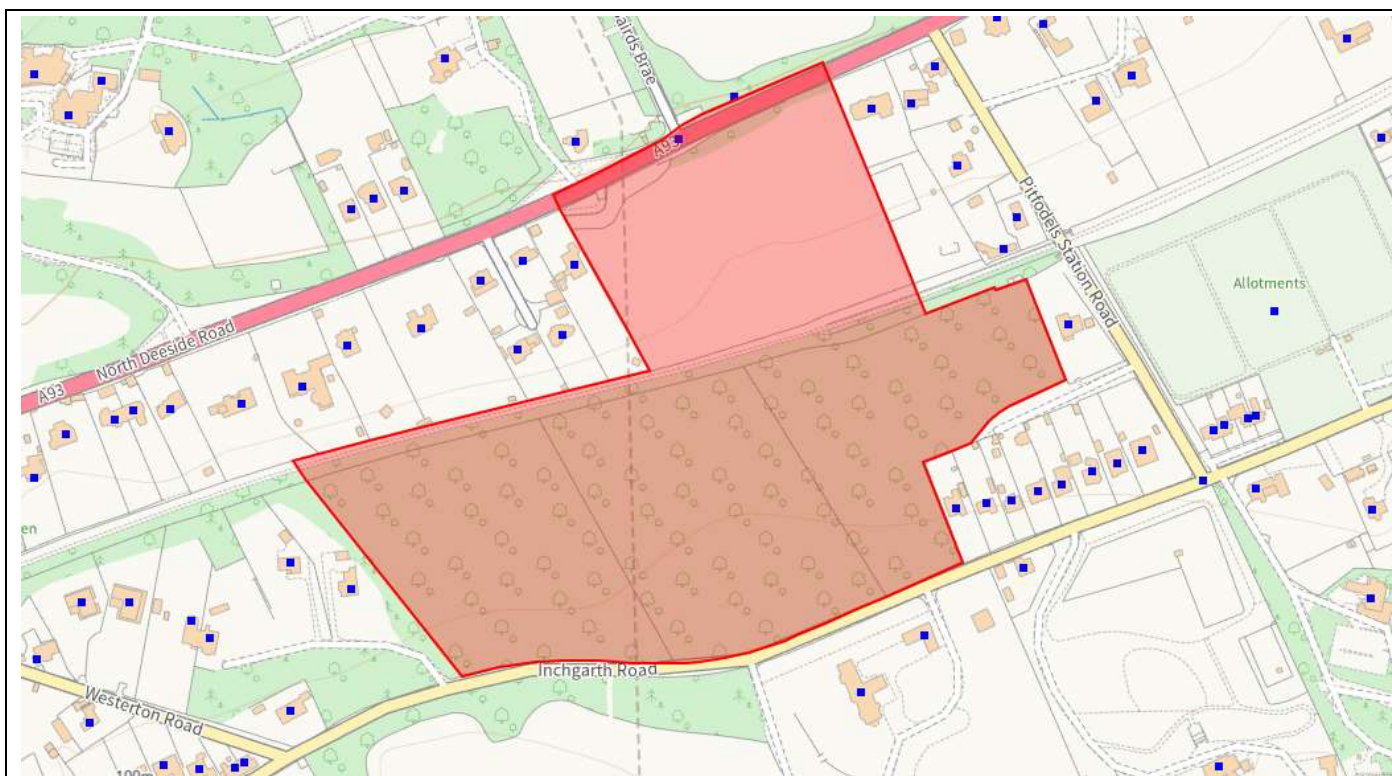


## Pre-Application Forum

Report by Development Management Manager

**Meeting Date:** 25 September 2025

<b>Site Address:</b>	Land At Inchgarth Road, Cults, Aberdeen
<b>Description of Proposal:</b>	Major residential development with associated open space, landscaping, infrastructure including link road and engineering works
<b>Notice Ref:</b>	250723/PAN
<b>Notice Type:</b>	Proposal of Application Notice
<b>Notice Date:</b>	8 July 2025
<b>Applicant:</b>	Cala Management Ltd
<b>Ward:</b>	Lower Deeside
<b>Community Council:</b>	Cults, Bieldside and Milltimber



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## **RECOMMENDATION**

It is recommended that the Forum –

- a) note the key issues identified;
- b) if necessary seek clarification on any particular matters; and
- c) identify relevant issues which they would like the applicants to consider and address in any future application.

## **APPLICATION BACKGROUND**

### **Site Description**

The site subject to this proposal comprises an area of 10.6 hectares within the green belt and the Pitfodels Conservation Area, broadly separating the established residential areas of Garthdee and Cults.

The site is on the northern side of the Lower Deeside Dee valley and slopes from north to south towards the River Dee, which is located approximately 500m to the south. It is bisected by the Deeside Old Railway Local Nature Conservation Site (LNCS) and the Deeside Way (Core Path Number 66). The defined boundary of the River Dee Special Area of Conservation is at its closest approximately 300m to the southeast. The River Dee Corridor LNCS is approximately 130m to the south. North Deeside Road (A93) and Inchgarth Road bound the northern and southern extremities of the site respectively. The residential curtilage of low-density detached dwellinghouses within large residential plots bound the site to the west and east.

The site mainly consists of former fields that have largely become self-seeded with plants and woodland and is primarily identified as open space in the Open Space Audit 2024. The site includes a significant proportion of the green belt in this part of Aberdeen City

The open space within the site is also included in the Aberdeen Local Development Plan 2023 as Green Space Network, primarily as undeveloped natural / semi-natural open space of open ground and woodland. There are several informal recreational paths within the open spaces and historic granite boundary walls. An overhead power line crosses the site from the north to the south and a pylon is located at the edge of the site near the Deeside Way. There are mature trees throughout the site visible from a range of public areas within and around the site. All trees on the site are protected by Tree Preservation Orders (TPO) 8, 21 and 237. An area to the south of the site is included within the Ancient Woodland Inventory.

The nearest listed buildings are the category C listed (former) Pitfodels Station Building, which is approximately 20m outside of the application boundary on the northern side of the Deeside Way. The boundary walls of the category C listed Inchgarth House bound the site to the south, on the opposite side of Inchgarth Road. The application site is located within the Pitfodels Conservation Area. There are several historic assets within the site boundary. These are part of the former Pitfodels Railway Station infrastructure (Historic Environment Record Reference (HER) NJ90SW0075), boundary stone (HER NJ90SW0171), milestone (HER NJ90SW0135), and war memorial (HER NJ90SW0891). The Pitfodels Castle Motte (HER NJ90SW1) is approximately 300 m to the south-east.

### **Relevant Planning History**

- 181224/PPP – Planning permission in principle for a residential led development for the retired/elderly (including affordable housing), a 50 bedroom care home and approximately 500sqm of ancillary retail/community use, together with public open space and associated

infrastructure including a link road was approved by the Planning Development Management Committee on 30 April 2020, subject to a legal agreement. The legal agreement was subsequently signed, and the decision notice was issued on 24 March 2023. The planning permission has not been implemented but remains valid. No matters specified in conditions applications pursuant to this planning permission in principle have been received.

- 241327/TPO – An application to carry out work to protected trees on the site within 5 m of the Craigton Road to Bairds Brae overhead power line that runs through the site was granted consent under delegated powers on 2 December 2024. The consent works to the trees on the site solely concerned the reduction in heights of trees, and no felling.
- 250744/ESC – A request was made to the planning authority to adopt a screening opinion under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 to determine whether the proposed development requires an environmental impact assessment (known as an EIA Development). A screening opinion was adopted by the planning authority under delegated powers on 30 July 2025, which confirmed that the development is an EIA Development.
- 250936/ESP – A request was made to the planning authority on 29 August 2025 to adopt a scoping opinion under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (regarding the scope and level of detail of information to be provided in the EIA report). This is pending, with an opinion due to be adopted by the planning authority by 2 October 2025.

## **APPLICATION DESCRIPTION**

### **Description of Proposal**

The proposed development comprises a major residential development with associated open space, landscaping and infrastructure, including a link road and engineering works.

The number of residential dwellings, the extent of ground developed, the details of any link road, including its relationship with the Deeside Way, would be established through a subsequent application for planning permission. However, the documentation submitted to the planning authority with the Proposal of Application Notice states that there would be 100 – 115 new dwellinghouses, a link road running north-south through the site connecting Inchgarth Road and North Deeside Road, and engineering works, comprising land cutting and filling to create suitable levels for development, due to the slope of the site.

## **MATERIAL CONSIDERATIONS**

### **Legislative Requirements**

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that where making any determination under the planning acts, regard is to be had to the provisions of the Development Plan; and, that any determination shall be made in accordance with the plan, so far as material to the application, unless material considerations indicate otherwise.

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 requires the planning authority to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

## **Development Plan**

### National Planning Framework 4

National Planning Framework 4 (NPF4) is the long-term spatial strategy for Scotland and contains a comprehensive set of national planning policies that form part of the statutory development plan.

- Policy 1 (Tackling the Climate and Nature Crises)
- Policy 2 (Climate Mitigation and Adaptation)
- Policy 3 (Biodiversity)
- Policy 4 (Natural Places)
- Policy 5 (Soils)
- Policy 6 (Forestry, Woodland and Trees)
- Policy 7 (Historic Assets and Places)
- Policy 8 (Green Belts)
- Policy 11 (Energy)
- Policy 12 (Zero Waste)
- Policy 13 (Sustainable Transport)
- Policy 14 (Design, Quality and Place)
- Policy 15 (Local Living and 20 Minute Neighbourhoods)
- Policy 16 (Quality Homes)
- Policy 18 (Infrastructure First)
- Policy 20 (Blue and Green Infrastructure)
- Policy 21 (Play, Recreation and Sport)
- Policy 22 (Flood Risk and Water Management)
- Policy 23 (Health and Safety)
- Policy 24 (Digital Infrastructure)
- Policy 25 (Community Wealth Building)

### Aberdeen Local Development Plan 2023

- Policy CI1 (Digital Infrastructure)
- Policy D1 (Quality Placemaking)
- Policy D2 (Amenity)
- Policy D3 (Density)
- Policy D4 (Landscape)
- Policy D5 (Landscape Design)
- Policy D6 (Historic Environment)
- Policy D7 (Our Granite Heritage)
- Policy H3 (Density)
- Policy H4 (Housing Mix and Need)
- Policy H5 (Affordable Housing)
- Policy I1 (Infrastructure Delivery and Planning Obligations)
- Policy NE1 (Green Belt)
- Policy NE2 (Green and Blue Infrastructure)
- Policy NE3 (Our Natural Heritage)
- Policy NE4 (Our Water Environment)
- Policy NE5 (Trees and Woodland)
- Policy R2 (Degraded and Contaminated Land)
- Policy R5 (Waste Management Requirements for New Developments)
- Policy R6 (Low and Zero Carbon Buildings and Water Efficiency)
- Policy T1 (Land for Transport)

- Policy T2 (Sustainable Transport)
- Policy T3 (Parking)
- Policy WB1 (Healthy Developments)
- Policy WB2 (Air Quality)
- Policy WB3 (Noise)

## **Aberdeen Planning Guidance**

- Affordable and Specialist Housing
- Air Quality
- Amenity and Space Standards
- Flooding, Drainage and Water Quality
- Materials
- Natural Heritage
- Noise
- Outdoor Access
- Open Space and Green Infrastructure
- Outdoor Access
- Planning Obligations
- Resources for New Development
- Transport and Accessibility
- Trees and Woodlands
- Waste Management Requirements for New Developments

## **Other National Policy and Guidance**

- Historic Environment Policy for Scotland
- NPF4 Planning Guidance: Policy 2 - Climate Mitigation and Adaptation

## **Other Material Considerations**

Pitfodels Conservation Area Character Appraisal

## **POLICY CONTEXT**

### **Principle of Development**

The entire site is zoned as both Green Belt and as Green Space Network in the Aberdeen Local Development Plan 2023 (ALDP).

### **Green Belt**

Policy 8 (Green Belts) of NPF4 states that the intent of the policy is to encourage, promote and facilitate compact urban growth and use the land around our towns and cities sustainably.

Paragraph 6.5 of the ALDP states that the *“aim of the Green Belt is to maintain the distinct identity of Aberdeen, and the communities within and around the city, by defining their physical boundaries clearly. Safeguarding the Green Belt helps to avoid coalescence of settlements and sprawling development on the edge of the city, maintain Aberdeen’s landscape setting, and provide access to open space. The Green Belt directs planned growth to the most appropriate locations and supports regeneration.”*

Policy 8 (Green Belts) of NPF4 and Policy NE1 (Green Belt) of the ALDP only allow development in specific circumstances, which are listed in each of these policies. Mainstream residential development is not included on the list. Policy 8 (Green Belts) of NPF4 also requires the following requirements to be met:

- *reasons are provided as to why a green belt location is essential and why it cannot be located on an alternative site outwith the green belt;*
- *the purpose of the green belt at that location is not undermined;*
- *the proposal is compatible with the surrounding established countryside and landscape character;*
- *the proposal has been designed to ensure it is of an appropriate scale, massing and external appearance, and uses materials that minimise visual impact on the green belt as far as possible; and*
- *there will be no significant long-term impacts on the environmental quality of the green belt.*

### Green Space Network

Policy NE2 (Green and Blue Infrastructure) of the ALDP states that development proposals will seek to protect, support and enhance the Green Space Network. This broadly encompasses the wildlife, biodiversity, ecosystem services and functions, access, recreation, landscape and townscape value of the Green Space Network. It states that development that does not achieve this will not be supported.

Policy NE2 (Green and Blue Infrastructure) of the ALDP requires coherence of the Green Space Network to be maintained when considering any development and infrastructure proposals and that where infrastructure projects or certain developments necessitate crossing the Green Space Network, they should maintain and enhance the coherence and quality of the network. In doing so, appropriate provision should be made for access across roads for wildlife and outdoor recreation.

Policy 20 (Blue and Green Infrastructure) of NPF4 states that development proposals that result in fragmentation or net loss of existing blue and green infrastructure will only be supported where it can be demonstrated that the proposal would not result in or exacerbate a deficit in blue or green infrastructure provision, and the overall integrity of the network will be maintained.

### **Historic Environment**

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 requires the planning authority to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Policy D6 (Historic Environment) of the ALDP requires appropriate developments to be designed to respect the character, appearance and setting of the historic environment and protect the special architectural or historic interest of listed buildings and conservation areas. Policy 7 (Historic Assets and Places) of NPF4 states that development proposals in or affecting conservation areas will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced. Relevant considerations include the: i. architectural and historic character of the area; ii. existing density, built form and layout; and iii. context and siting, quality of design and suitable materials. Policy D6 (Historic Environment) of the ALDP expects the physical in situ preservation of all scheduled monuments and archaeological sites.

## **Landscape**

Policy D4 (Landscape) of the ALDP states that landscape / townscape character and existing elements which provide, or contribute to, a distinct 'sense of place' will not be adversely affected by development. It requires development to provide opportunities for conserving or enhancing existing landscape / townscape elements (natural and built), including linear and boundary features or other components which contribute to character and 'sense of place'. It states that development should avoid adversely affecting the character of landscapes which are important for the setting of the city.

It also seeks development to avoid disturbance to, or loss or damage to important recreation, wildlife or natural resources (such as woodland, rivers, coast) or to the physical and functional links between them. It states that green spaces between and around places or communities, and those which can provide opportunities for countryside activities, will not be eroded by development.

## **Biodiversity**

Policy 1 (Tackling the Climate and Nature Crises) of NPF4 requires significant weight to be given to the global nature crisis. Policy 4 (Natural Places) of NPF4 states development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported. Policy 3 (Biodiversity) of NPF4 requires proposals for major development and development that requires an EIA to demonstrate that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention.

## **Climate Crisis**

Policy 1 (Tackling the Climate and Nature Crises) of NPF4 requires significant weight to be given to the global climate crisis in the consideration of all development proposals. Policy 2 (Climate Mitigation and Adaptation) requires development proposals to be designed and sited to minimise lifecycle greenhouse gas emissions as far as possible, and to adapt to current and future risks from climate change. The Scottish Government's NPF4 Planning Guidance: Policy 2 - Climate Mitigation and Adaptation supports the application of Policy 2 in terms of climate mitigation and adaptation and assessing lifecycle greenhouse gas emissions.

## **Designated Sites and Protected Species**

In terms of regulations 60 to 63 of the Conservation (Natural Habitats, & c.) Regulations 1994, An appropriate assessment would need to be undertaken of the potential impact on the qualifying interests of the of the River Dee Special Area of Conservation. Policy 4 (Natural Places) of NPF4 and Policy NE3 (Our Natural Heritage) reiterates this requirement. Policy NE3 (Our Natural Heritage) of the ALDP requires a thorough assessment of all natural heritage assets, including protected species, which may be impacted by development.

Policy 4 (Natural Places) of NPF4 states that development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:

- i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*
- ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.*

Policy 4 (Natural Places) of NPF4 states that if there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored

into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.

## **Open Space**

Policy NE2 (Green and Blue Infrastructure) of the ALDP states that we will protect, support and enhance the city's Urban Green Space (parks, playing fields, sports pitches, outdoor sport facilities, woods, food-growing spaces, or all other areas including smaller spaces not identified on the Proposals Map such as amenity space or garden ground) and that development proposals that do not achieve this will not be supported.

## **Outdoor Access and Core Paths**

Policy NE2 (Green and Blue Infrastructure) of the ALDP states that new development will maintain and enhance the integrity of existing access rights to; land and water, Core Paths, other paths and rights of way, or safeguard potential access opportunities to these. This includes any impacts on access during the construction, operation, decommissioning and reclamation phases of development.

Policy T2 (Sustainable Transport) of the ALDP also requires that existing access rights, including Core Paths, rights of way and paths within the wider network to be protected and enhanced.

## **Trees**

Policy 6 (Forestry, Woodlands and Trees) of NPF4 states that development will not be supported where it results in the loss of woodlands, ancient and veteran trees, hedgerows and individual trees of high biodiversity value. It furthermore does not support the fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy. Policy NE5 (Trees and Woodland) of the ALDP likewise states that development should not result in the loss of, or damage to, trees and woodlands, and places particular emphasis on the protection and ongoing management of ancient woodlands.

## **Soils**

Policy 5 (Soils) of NPF4 states that development proposals will only be supported if they are designed and constructed in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and in a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.

## **Land Contamination**

Policies 9 (Brownfield, Vacant and Derelict Land and Empty Buildings) of NPF4 and R2 (Degraded and Contaminated Land) of the ALDP require land that is suspected to be unstable or contaminated, development proposals to demonstrate that the land is, or can be made, safe and suitable for the proposed new use, and may involve site investigations and risk assessments.

## **Flood Risk and Drainage**

Policy 22 (Flood Risk and Water Management) of NPF4 and Policy NE4 (Our Water Environment) of the ALDP both require development to not be at risk of flooding or to increase the risk of flooding, a flood risk assessment and drainage impact assessment to be provided, and for SuDS to be incorporated into the proposal. Policy NE4 (Our Water Environment) of the ALDP also requires connection to the public sewer for foul drainage as a prerequisite.



## **Development of New Homes on Land not Allocated for Housing**

Policy 15 (Local Living and 20 Minute Neighbourhoods) of NPF4 requires development proposals to contribute to local living including, where relevant, 20 minute neighbourhoods by giving consideration to existing settlement pattern, and the level and quality of interconnectivity of the proposed development with the surrounding area.

Development proposals for new homes on land not allocated for housing in the local development plan are only supported by Policy 16 (Quality Homes) of NPF4 in limited circumstances where:

- i. the proposal is supported by an agreed timescale for build-out; and*
- ii. the proposal is otherwise consistent with the plan spatial strategy and other relevant policies including local living and 20 minute neighbourhoods;*
- iii. and either:*
  - delivery of sites is happening earlier than identified in the deliverable housing land pipeline. This will be determined by reference to two consecutive years of the Housing Land Audit evidencing substantial delivery earlier than pipeline timescales and that general trend being sustained;*
  - or the proposal is consistent with policy on rural homes;*
  - or the proposal is for smaller scale opportunities within an existing settlement boundary; or the proposal is for the delivery of less than 50 affordable homes as part of a local authority supported affordable housing plan.*

Policy 16 (Quality Homes) of NPF4 also requires development proposals that include 50 or more homes to be accompanied by a statement of community benefit. The statement will explain the contribution of the proposed development to:

- i. meeting local housing requirements, including affordable homes;
- ii. providing or enhancing local infrastructure, facilities and services; and
- iii. improving the residential amenity of the surrounding area.

## **Sustainable Transport**

Policy 13 (Sustainable transport) of NPF4 seeks to improve, enhance or provide active travel infrastructure and that transport requirements are considered in line with the sustainable travel and investment hierarchy. Policy T2 (Sustainable and active travel) of the ALDP states that new developments must demonstrate that sufficient measures have been taken to minimise traffic generated, and must be accessible by a range of transport modes, with an emphasis on active and sustainable transport. It sets out thresholds whereby transport assessments are required.

Policy T3 outlines vehicle parking requirements, including electric vehicle charging infrastructure, in line with the Transport and Accessibility Aberdeen Planning Guidance.

## **Air Quality**

Policy WB2 (Air Quality) of the ALDP states that development proposals which may have a detrimental impact on air quality will not be permitted unless measures to mitigate the impact of air pollutants are proposed and agreed with the planning authority, with there being a requirement for an assessment of the likely impact of development on air quality and any mitigation measures. The Air Quality Aberdeen Planning Guidance determines the criteria whereby an assessment on air quality is required.

## **Health**

Policy WB1 (Healthy Developments) requires developments to provide healthy environments, reduce environmental stresses, facilitate physical activity and promote physical and mental wellbeing. As a major development and an EIA development, this policy requires that a health impact assessment to be undertaken, to enhance health benefits and mitigate any identified impacts on the wider determinants of health. The health impact assessment Aberdeen Planning Guidance is relevant.

## **Amenity**

Policy D2 (Amenity) of the ALDP sets out principles for ensuring new development affords occupants acceptable levels of amenity. Policy 21 (Play, Recreation and Sport) of NPF4 seeks development proposals that include new streets and public realm to be inclusive and enable children and young people to play and move around safely and independently, maximising opportunities for informal and incidental play in the neighbourhood.

Policy 23 (Health and Safety) of NPF4 and Policy WB3 (Noise) of the ALDP require a noise impact assessment in cases where significant exposure to noise is likely to arise from development.

## **Placemaking**

Policy 14 (Design, quality and place) of NPF4 states that development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale and that development proposals will be supported where they are consistent with the six qualities of successful places: healthy, pleasant, connected, distinctive, sustainable and adaptable. Policy D1 (Quality Placemaking) of the ALDP requires that all development must ensure high standards of design, create sustainable and successful places and that all proposals will be considered against the six qualities of successful placemaking. Policy D5 (Landscape) requires development to be designed with an effective, functional and attractive landscape framework supported by clear design objectives.

## **Open Space in New Development**

Policy NE2 (Green and Blue Infrastructure) of the ALDP requires the provision of biodiverse, usable and appropriate open space in new developments to ensure functionality and that new development proposals should include new or improved provision for public access, permeability, and links to the core path network and green spaces for recreation and active travel within their design.

## **Housing Mix and Affordable Housing**

Policy H4 (Housing Mix) of the ALDP states housing developments of larger than 50 units are required to achieve an appropriate mix of dwelling types and sizes, in line with a masterplan, including smaller one and two bedroom units, and appropriate housing mix and design to reflect the diverse housing need in the area, including older people and disabled people.

Policy H5 (Affordable Housing) of the ALDP requires housing developments of five homes or more are required to contribute no less than 25% of the total number of homes as affordable housing.

## **Low and Zero Carbon Buildings, and Water Efficiency**

Policy R6 states that to reduce the pressure on water abstraction from the River Dee, and the pressure on water infrastructure, all new buildings are required to use water saving technologies

and techniques. The level of efficiency required, and types of efficiencies are detailed in the Resources for New Development APG.

### **Waste Storage and Collection**

Policy R5 of the ALDP requires all new developments to have sufficient space for the storage of general waste, recyclable materials and compostable wastes where appropriate.

### **Digital Infrastructure**

Policy CI1 (Digital Infrastructure) of the ALDP expects residential development for five or more units to have access to high-speed communications infrastructure.

### **Developer Obligations**

The requirement for developer contributions to offset the infrastructure impact of development is set out within Policies 18 (Infrastructure First) of NPF4 and I1 (Infrastructure Delivery and Planning Obligations) of the ALDP.

## **PRE-APPLICATION CONSULTATION**

In accordance with the Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021, two public exhibitions were held on 5 August 2025 and 1 September 2025 at the Marcliffe at Pitfodels Hotel between 3pm and 7pm. Information on the proposed development and associated public consultation events were advertised in the Press and Journal seven days in advance. A copy of the Proposal of Application Notice was sent to Cults Community Council, Garthdee Community Council and Braeside and Mannofield Community Council and councillors of the Lower Deeside Ward. These parties were also notified of the public consultation events. A website was created which included details of the proposed development and the consultation events.

As agreed with the planning authority, targeted mailshot was also undertaken with the residential properties in the surrounding area based on the specific postcodes and street addresses surrounding the site; direct electronic communication was issued which encouraged feedback with Garthdee Field Allotments Association, Robert Gordon University, Scottish Water, Sustrans and Aberdeen Cycle Forum. A poster drop regarding the public exhibitions and details of the website was undertaken in businesses and community facilities in the wider area.

## **NECESSARY INFORMATION TO SUPPORT ANY FUTURE APPLICATION**

As part of any forthcoming planning application, it is anticipated that the following information would need to accompany the formal submission:

- Pre-Application Consultation Report
- Design and Access Statement
- Environmental Impact Assessment Report (the scope of which is to be confirmed through the forthcoming scoping opinion, 250936/ESP).
- Construction Environmental Management Plan
- Contaminated Land Assessment
- Noise Impact Assessment
- Flood Risk Assessment
- Drainage Impact Assessment

- Heritage Statement
- Ecological Impact Assessment
- Arboricultural Impact Assessment
- Light Assessment
- Noise Impact Assessment
- Landscape and Visual Impact Assessment
- Transport Assessment

## **RECOMMENDATION**

It is recommended that the Forum –

- a) note the key issues identified;
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