



# Dee District Salmon Fishery Board

Garfield Prentice, Case Officer  
Planning and Sustainable Development,  
Business Hub 4,  
Marischal College,  
Broad Street,  
Aberdeen,  
AB10 1AB.

Dear Sir,

**Detailed Planning Permission (EIA): Planning Authority Ref. 170021/DPP**

**Proposed Community and Sports Facilities, Football Academy, (comprising outdoor pitches, pavilion, ancillary buildings), Stadium (20,000 capacity), ancillary uses, formation of access roads, parking and associated landscaping and engineering works.**

The Dee District Salmon Fishery Board (Dee DSFB) welcomes the opportunity to comment on the Development proposal.

The jurisdiction of the Dee DSFB covers the Rivers flowing into the sea at Stonehaven, the small streams that flow into the sea north of Stonehaven and finally to the River Dee itself, for all matters relating to salmon and sea trout. The powers of the Dee DSFB are governed by the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 and subsequently the Aquaculture and Fisheries (Scotland) Act 2013.

After consideration of the material provided and visiting this site, the Board has the following comments.

## **Background Information**

### **1. The Conservation Value of Rivers**

The Dee district supports populations of salmon, trout, eels and brook, river and sea lampreys. Atlantic Salmon are protected under the European Community Habitats Directive and are one of the species for which the Dee is designated a Special Area of Conservation. All lamprey species are protected under the EC Habitats Directive whilst river and sea lampreys are additionally protected under the UKBAP priority list. Eels are a UKBAP priority species, critically endangered under the IUCN red list and protected under CITES.

## **The Economic Value of Rivers**

In addition to the high conservation value of the Dee and associated tributaries, the River Dee salmon fishery supports approximately 500 full time equivalent jobs (FTE) and generate in excess of £15 million to the local rural economy.

## **The Brodiach Burn**

The proposed development site is bordered to the north and west by the Brodiach burn a tributary of the Culter burn catchment. The Culter Dam just up from the A93 road bridge in Peterculter once represented the upstream limit of salmon migration and the Dee SAC. However since the installation of the fish pass in 2014 by the River Dee Trust salmon have established a juvenile population along 13 km of the upstream tributaries of the Culter Burn. As such the area upstream of the Culter Dam should be treated as if it is part of the SAC.

There has been no survey done on fish species and density as part of the EIA. In order to evaluate the likely impacts a fish survey should be carried out to provide information on species, density of populations and instream and riparian habitat.

## **General impacts of large developments**

The main impacts that can accrue to the watercourses as a result of large scale development within the Dee District can be summarised as the following:

1. Increased abstraction
2. Increased demand on Waste Water Treatment
3. Increase in surface water discharge
4. Flood Risk
5. Increased sediment loading during construction
6. Loss or reduction of habitat complexity and biodiversity
7. Cumulative impacts on the water environment may be significant due to the scale of development proposed in an area which already has significant developments close by such as the AWPR.

### **1. Increased Abstraction**

The River Dee has been the main source of domestic water for the whole of Aberdeen City and over half of Aberdeenshire for the last 130 years, a population of around 300,000. The Invercannie Water Treatment Plant (WTP) has a treatment capacity of 49ML/D (million litres per day) and Mannofield WTP a treatment capacity of 70ML/D. This is all surface water from the Dee as there are no storage facilities within the district.

By the 2080s, summer precipitation in the east of Scotland is predicted to decrease by 10-20% under the low emissions (Global Sustainability), and to decrease by 20-30% under the high-emissions (World Markets). Reduction in precipitation during the summer and an increase in water consumption from industrial and residential development will put increased pressure on water resources, and in particular will adversely affect populations of freshwater pearl mussels, Atlantic salmon and otters for which the River Dee Special Area of Conservation is designated. Note that freshwater pearl mussels are already failing to meet conservation status.