



# Dee District Salmon Fishery Board

Gavin Evans, Case Officer  
Planning and Sustainable Development,  
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16<sup>th</sup> June 2017

Dear Sir,

## **Planning Application: 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 new supplementary information for the above planning application.

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 new material provided and visiting this site, the Board has the following comments.

### **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.

During the initial consultation there had been no survey done on fish species and density as part of the EIA. Brindley Associates have since contracted Thomson Management Consultants Ltd to undertake a

preliminary assessment in order to evaluate the suitability of the adjacent watercourses to support fish.

This basic survey found no salmonid spawning habitat and little quality habitats to support salmonids. Suitable juvenile lamprey habitat was observed.

The Brodiach burn is likely to have brown trout, lamprey and perhaps eel in my opinion, however only an electric fishing survey would confirm this.

**Advice for planning authority.**

I would agree with the general assessment from the fish survey that the watercourses are not high quality habitats, but I would stress that any pollution such as excessive sediment input to the watercourses from this development may impact not only the relatively small number fish in the area but could also damage species and habitats downstream. Therefore sediment and pollution control measures must remain effective at all times. Strict adherence to CIRIA's SUDS manual and to SEPA's Pollution Prevention Guidelines (PPG's) for construction near watercourses is required. All temporary detention ponds, swales and other pollution prevention measures must be checked and maintained on a regular basis particularly before periods of rain are forecast and be designed to attenuate at least 1 in 50 year flood event. No adverse impact on the water quality of the River Dee SAC should be permitted.

Many large scale developments have taken place recently. There is always an assertion during the consultation process that there is unlikely to be sediment issues due to proposed mitigation measures. However in my experience there are often failures in the measures put in place and sediment pollution often occurs, the AWPR and the AECC developments are examples of this along with many smaller scale housing developments which take place.

In summary the Dee District Salmon Fishery Board would like to work with the Local Authority and the Developers to ensure that the development is undertaken in a sustainable manner with respect to local watercourses, the River Dee SAC and fisheries and fisheries tourism. To this end we would be happy to discuss this proposal with the developer so that measures to reduce impacts on rivers and fisheries can be built in at the start of the process and are not considered as an afterthought.

If you require any further detail on the points raised in this consultation response then please do not hesitate to contact me.

Yours faithfully



Edwin Third

For and on behalf of the Dee District Salmon Fishery Board

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