



**Scottish Natural Heritage**  
**Dualchas Nàdair na h-Alba**

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Nàdar air fad airson Alba air fad

Garfield Prentice  
Communities, Housing and Infrastructure  
**Planning & Sustainable Development**  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen AB10 1AB

26 January 2017

Our ref: CNS/DC/Aberdeen  
Your ref: 170021/DPP

Dear Mr Prentice

**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**

**West Kingsford, Aberdeen**

**The Environmental Impact Assessment (Scotland) Regulations 2011**

Thank you for your email of 16 January 2017 requesting our advice on the above development proposal and the supporting Environmental Statement.

We provide advice in relation to the River Dee Special Area of Conservation (SAC) and nature conservation interests in the wider countryside.

**River Dee Special Area of Conservation**

The proposal could affect the River Dee SAC designated for its freshwater pearl mussels, Atlantic salmon and otter.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply. Consequently, Aberdeen City Council is required to consider the effect of the proposal on the SAC before it can be consented (commonly known as Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (<http://www.snh.gov.uk/docs/A423286.pdf>).

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Given the undertaking within the ES to install a construction phase SuDS, our view is that this proposal is unlikely to have a significant effect on either freshwater pearl mussels or salmon. The absence of signs of otter during the initial species walkover survey suggests that it is also unlikely that the proposal will have a significant effect on this species. However, we note that an otter specific survey is still to be undertaken and we can provide further advice on this once it has been completed.

### **Ecology, biodiversity and nature conservation**

We note ecological survey work, namely breeding and winter bird surveys, the reptile survey and the otter survey, is ongoing or still to begin. We note and broadly agree with the conclusions of Chapter 5 that, based on the information that is available to date, impacts on ecology, biodiversity and nature conservation are likely to be largely negligible. However, we can provide further advice on this once the results of these outstanding surveys are available.

We welcome the proposed ecological mitigation strategy and the incorporation of native species in landscaping. However, we consider some of the benefits may not be as great as suggested. For example, the created habitat is unlikely to benefit small blue, northern brown argus or small pearl bordered fritillary butterflies, as suggested in the ES, when the primary larval food plants for these species are absent from the seed mixes. In addition, the ES suggests that the provision of wildflower and amenity grassland will provide foraging opportunities for badger. While we welcome this, it is possible that badgers foraging in these areas may be considered problematic in the future.

We note that mitigation is proposed in the event that otters and/or badgers are found in subsequent surveys or move onto the site prior to work beginning. However, we suggest that the following measures should be put in place as good practice whether or not otters/badgers signs are discovered:

- avoiding illuminating the burn or its banks both during and after construction;
- storing chemicals and other hazardous materials away from the burn;
- capping/blocking pipe work during storage; and
- covering excavations or providing a means of escape for animals that may get into holes.

We note that there is a relatively brief overlap between the optimal time to clear vegetation to avoid impacts on birds and reptiles. This means ideally clearance would be carried out in September/October. We recommend that this is timetabled into the construction timeline at an early stage.

We note the mitigation proposed in relation to reptiles. Should the survey indicate that there are important areas for reptiles within the site, it may be appropriate to install a reptile proof barrier and capture and remove reptiles from the site before work begins. We can provide further advice on this once the reptile survey has been completed. We note the proposal to

removal potential reptile refuges 'by hand where possible or slowly by machine' (second bullet point, page 91). If refuges are to be dismantled 'slowly by machine' this should be done in the presence of an observer who is in a position to see any reptiles exposed by the work.

The last bullet point on page 91 states:

'If an inactive reptile is found during this process, works within the delineated area must cease and the feature under which the reptile was identified must be carefully replaced. No works will be allowed in areas where hibernating reptiles are found until the *reptile active season (March to October) is over.*'

We assume that the applicant's proposal is to only move reptiles during their active season and that they will not disturb them during the hibernation period – ie between November and February.

### **Landscape and visual impact**

We are content to defer to the planning authority on landscape and visual impacts.

Please let me know if you require any further information or advice from SNH in relation to this proposal.

Yours sincerely

**Isla Martin**  
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