

Our Ref: RW/JD
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Dear Scott

Kingsford Stadium ES EP team Comments – Structural Woodland Belt Mitigation

In reply to the mitigation comments by ACC environmental team (dated 12 June 2017) and subsequent clarification of required information:

<u>Issue</u>	<u>Response</u>
Width of peripheral Structure planting	The structural woodland belts are a minimum depth of 10m on the northern and southern boundary, and 12m on the eastern boundary. At planting centres of 1.5m this will produce an initial minimum depth of 6 plants per 10m or 8 plants per 12 cross section. We would expect this to form a closed canopy scrub woodland that will be managed over time to create a mature shelterbelt containing dominant, under-canopy and shrub layer species as detailed below. It should also be understood that the broadleaved trees on the edges of the structural woodland belts will break branches to the ground.
Planting Mix	The species mixes has been developed to be locally appropriate and to create habitat. Both mixes contain canopy dominant species (A. glutinosa, P. tremula, U. glabra, P. sylvestris, Q. petraea) secondary and under-canopy species (B. pendula, P. avium, S. acuparia) and shrub layer species (C. monogyna, S. viminalis, V. opulus, J. communis) to create as full a woodland profile as is possible in their respective locations. P. sylvestris is included in the site for local appropriateness and seasonal interest, not due to its limited screening properties. Additionally, native wild flower species will be seeded into the structural woodland in order to assist the formation of a field layer within the woodland areas to create a fully diverse woodland profile.

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EP team comments – Ecology, Biodiversity and Nature Conservation

In reply to the ecology, biodiversity and nature conservation comments by ACC environmental team (dated 12 June 2017) and subsequent clarification of required:

Issue **GWDTE**

Response

The National Vegetation Classification (NVC) studies of the development site have confirmed that two Ground Water Dependent Terrestrial Ecosystem (GWDTE) NVC communities are present within the marshy grassland on the northern boundary of the site.

These two NVC communities are; MG9, *Holcus lanatus* – *Deschampsia cespitosa* grassland and MG10, *Holcus lanatus* – *Juncus effusus* rush pasture. Both of these NVC communities are moderately ground water dependent.

The species-list obtained for the marshy grassland strip, which comprises the two NVC communities, highlights that these habitats are relatively species poor and consist of common species, where no locally important plant species were identified. Therefore, as these NVC communities cover a small area within the site, they are considered of low conservation value.

These GWDTE habitats will be lost as a result of the planned development. Within these areas riparian soft landscape habitat will be created, bounded on both sides by fencing, strengthening the protection of the burn wildlife and habitat from interaction with the site.

Within SEPA's consultation response of 5th June 2017, in relation to the updated NVC survey of the site, they advised "We welcome the further consideration of wetland habitats on the site. We note that the conclusions of this work are that it confirmed the findings of the original report and submissions. As a result we are still content that any impacts on Groundwater Dependant Terrestrial Ecosystems are not significant and can be adequately compensated for by positive riparian habitat proposals."

Hydrological Ecology Without mitigation measures in place, the removal of the MG9 and MG10 habitat from the banks of the Brodiach Burn will make this watercourse more susceptible to pollution incidents. Any pollution incidents in the Brodiach Burn could have far reaching effects, as the watercourse is hydrologically connected to the River Dee Special Area of Conservation (SAC). Therefore, the proposed development's Construction Environmental Management Plan (CEMP) will incorporate appropriate pollution prevention and silt mitigation to protect the Brodiach Burn.

Chapter 8 of the ES concludes that there will be no negative effect upon the quality of water entering the adjacent watercourses and has concluded that, in conjunction with the mitigation measure proposed, the development will have no significant cumulative effects on the existing water environment.

Within SEPA's consultation response of 5th June 2017, in relation to the Preliminary Fish Survey Report, they advised "In relation to fish we note the

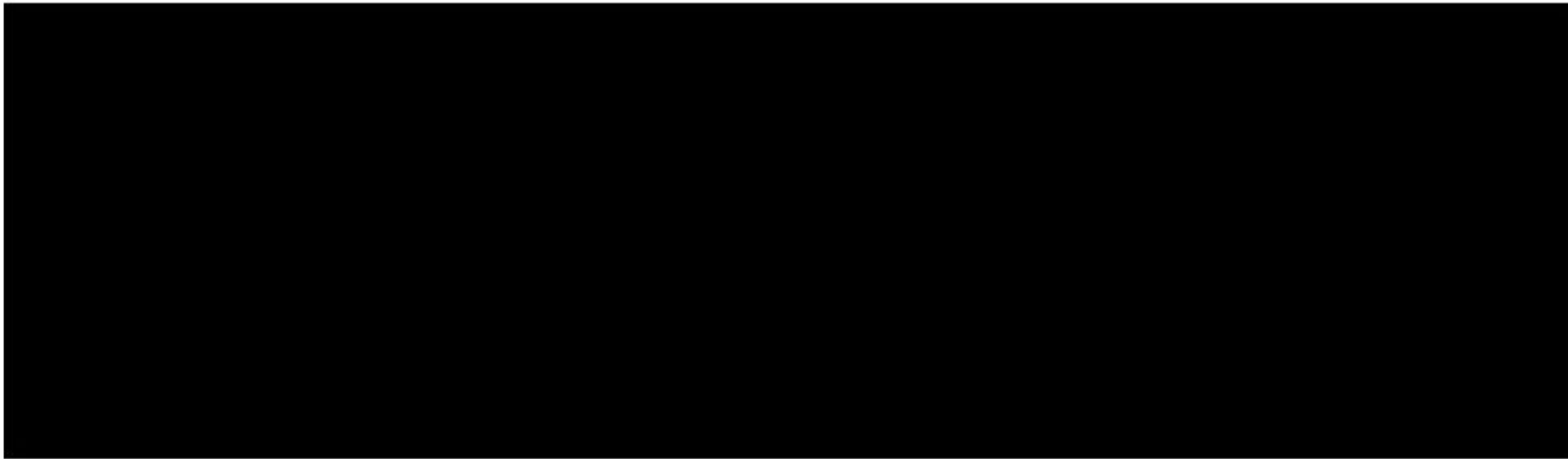
response provided on the lack of local spawning habitats. We ask that the developer ensures that the submission provided to discharge the condition referred to above includes information on improved spawning areas."

Within SNH's consultation response of 26th January 2017, they advised that "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."

As a result of the above mentioned water quality assessment in Chapter 8 of the ES, the mitigation measures proposed to be delivered through the CEMP and results of the ecological studies it is considered that there will be no off-site or downstream effects upon the hydrological ecology within the wider water environment.

If you require any further information at this time, please do not hesitate to contact me.

Yours sincerely



Ross Wilkie
Director