



5th October 2022

Concerns over the Viney's Farm development proposal

WildFish, formerly Salmon & Trout Conservation, was established in 1903 to address the damage done to our rivers and wild fish stocks by the polluting effects of the Industrial Revolution. WildFish is the UK's leading campaigning wild fish charity. We work to increase awareness of the growing need to protect our wild fish stocks and the rivers, lakes and oceans upon which they depend. Our aim is to achieve better protection for wild fish, water life and their habitats, employing policies supported by sound scientific evidence.

WildFish is deeply concerned over the potential impact the proposed development could have on the River Avon Special Area of Conservation (SAC). WildFish believe that the development and consequential sewage pressure and water-demand will further deteriorate the Avon. This would be in direct conflict with Wiltshire County Council's (WCC) Goal 2, set out in the Green & Blue Infrastructure Strategy for Wiltshire. Particularly relating to strategy's aims of restoring freshwater protected sites to favourable condition and taking action to recover threatened, iconic or economically important species. This development would appear to undermine c15 of the National Planning Policy Framework (NPPF), especially in terms of contributing towards water quality deterioration, conflicting with s174(e) of the NPPF.

WildFish volunteers operate numerous monitoring sites on the Avon in West Amesbury. Our data from 2015 has flagged a gradual increase in phosphate pressure on this section of the river. This is supported by government data which classifies both waterbodies between Amesbury and Salisbury in an unfavourable condition, according to the Water Framework Directive, as a result of phosphate thresholds being surpassed. Our local Avon [SmartRivers](#) hub have identified that this increase, in phosphate, is partly attributed to increasing phosphate discharge concentrations from local sewage treatment works (STWs). Accordingly, the addition of 1,200 new homes will further exacerbate this already damaging situation, even if the resulting waste is treated by a newly constructed STW.

Given that the proposed development borders the Avon, WildFish is also concerned about any surface water run-off coming from the site, during development and once completed into the Avon. According to our data from our Amesbury sites, the Avon is also suffering from sediment pressure. All four sites, sampled twice a year since 2019, consistently displayed sediment stress. Our Moor Hatch site, situated less than 1km downstream of the proposed development, has exhibited moderate sediment pressure

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with every sample collected. Sediment pressure would undoubtedly increase as a result of the development, significantly impacting the integrity of the SAC.

Invertebrate species loss is a good indication that a river is under stress. Our River Avon 'Stonehenge' site has highlighted a gradual decrease in mayfly species richness since 1998. Our Avon hub lodged an incident report and contacted the local Environment Agency after their invertebrate sample failed on the 'Queensbury' site in May of this year. That site is less than 500m from the proposed development site.

As outlined, the proposed development could increase phosphate and sediment pressure and decrease invertebrate numbers- the base of any rivers foodweb and on which all other species depend. All of these impacts will harm Atlantic salmon populations. The Hampshire Avon represents one of the last refuges for salmon, whose numbers are continuing to decline in the UK.

We understand that there is an increasing demand for new housing in Wiltshire and that WCC are under pressure to deliver. However Viney's Farm site is not the right location to do it.

Given the above reasoning, WildFish object to the Viney's Farm development proposal.

Yours sincerely,



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