



**Caroline Russell AM**  
**City Hall**  
**The Queen's Walk**  
**LONDON SE1 2AA**

11 October 2019

Environment Agency  
By email

Dear Madam/Sir,

**High Speed Rail Review and Affinity Water Limited (NPS/WR/031635): application made to abstract water**

Constituents in Hillingdon have brought to my attention an application by Affinity Water.

Please find below a submission from them outlining their concerns.

**Submission from Hillingdon Constituents**

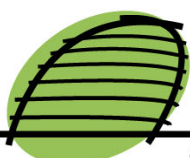
We strongly object to the application by Affinity Water Ltd to vary the location of water abstraction in the Colne Valley under serial number 28/39/28/0480.

Application NPS/WR/031635 seeks to increase water for public supply from a site near Watford by 8.5 megalitres grid reference is given. The application also seeks an equivalent reduction of 8.5 megalitres per day from an undisclosed site with no grid reference provided. The reason for the application must be because of what is or may happen at the site where water abstraction will decrease. No mention is given as to why the decrease in abstraction is needed. This could indeed be because of pollution or damage to the aquifer. Loss of clean water at a source currently abstracting 8.5 megalitres per day.

Not giving the location or National Grid Reference of the site is not in keeping with Section 37 of the Water Resources Act 1991 and not advertising the application for license for those that will be affected; in a way calculated to bring the application to the attention of persons who in the Agency's view are likely to be affected by the licence.

The reason for the application is all to do with what is happening at the site where water abstraction will be reduced by 8.5 megalitres per day.

This could be at the Blackford group in the Mid Colne Valley where HS2 is undertaking very risky engineering and where pollution of controlled waters is taking place from the Special Site of Contamination at Newyears Green landfill site.



City Hall Green — Caroline Russell AM

**caroline.russell@london.gov.uk 020 7983 4388 @carolinerussell**

Without a national grid reference it is impossible to say. However wherever the reduction is being sort it is the nearby private abstracters who would need to be informed.

Regulation 6 of the Water Resources Act 2006 requires advertisement of an application in at least one newspaper circulating in the locality of the proposed point of abstraction or impounding.

It appears that detrimental impacts to the current source are/will be emanating from works in connection with HS2. We have already sought assurances from the DfT regarding potential increase in groundwater pollution to Affinity Water License 28/39/28/0450 which could arise from deep pile driving on the eastern side of the Mid Colne Valley floodplain in Hillingdon. The chalk aquifer here is fragile and susceptible to cracking and fissuring when under pressure and affected by groundwater contamination from New Years Green Special Site of Contamination. As this site is designated as a Special Site it is the responsibility of the EA to manage the remediation and ensure no activities take place which would increase transit of pollutants to Controlled Waters.

We would like to know what assurances Affinity Water Ltd have given to the EA that the switch in supply is of a temporary nature (until 2025). Is the EA assured that the current source of 8.5 megalitres per day, will be able to come back on stream by 2025? Or are there risks of permanent detrimental impacts to a source which currently supplies a sizable area of London?

#### **Request for additional information from constituents**

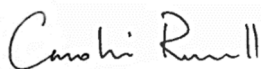
My constituents would like to ask for additional information outlined below.

Three sites are mentioned in the application, only two with grid references. We would like to know:

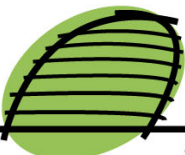
- The locations of all three abstraction points?
- At which one is abstraction being increased, at which is abstraction being reduced and at which will the abstraction license revoked?
- If in fact HS2 would affect the area of the aquifer where the direction of groundwater flow may change due to this change in abstraction.

I hope that you will give due consideration to the concerns outlined by these constituents and pause any planned works to review any potential harm to the site.

Yours sincerely,



**Caroline Russell**  
**Green Party Member of the London Assembly**



City Hall Green — Caroline Russell AM

[caroline.russell@london.gov.uk](mailto:caroline.russell@london.gov.uk) 020 7983 4388 @carolinerussell