

## HS2 confirms they are carrying out illegal works to our drinking water

HS2 is building the Colne Valley Viaduct through the main drinking water protected areas in the Colne Valley. The eastern end of the viaduct commences near Harvil Road (Harefield) in the inner source protection zone for the Ickenham public water source. The viaduct proceeds north-east through the Hillingdon Outdoor Activity Centre Lake (HOAC) and very close to the Blackford public water source on Moorhall Road (Harefield). From here it proceeds north-east through the protection zones for the Northmoor and West Hyde water sources.

In September 2021, the HS2 Head of Engagement Maddelyn Sutton, confirmed in writing to Boris Johnson, (MP for Uxbridge & South Ruislip) that HS2 has closed Blackford pumping station and built new purification works at Northmoor and West Hyde pumping stations. Vast sums of money are being spent to mitigate for the effects of HS2 construction on the raw water quality in these sources. This effectively admits that works are taking place which require additional purification processes.

Why is this being permitted when there are strict laws in the UK which prevent deterioration of all drinking water, even for a short time?

The Water Environment Regulations for England and Wales (2017) updates the Drinking Water Directive and transpose EU into UK law. Part 3 Protected Areas; section 8 states the following:

### **Bodies of water used for the abstraction of drinking water**

**8.(2) For each drinking water protected area, the programme of measures for the river basin district within which it is located must include measures with the aim of avoiding deterioration in the quality of the water in that area, in order to reduce the level of purification treatment required in the production of drinking water abstracted from it.**

Not only has the Blackford pumping station been closed and additional treatment added to Northmoor there is no mitigation for the Ickenham source which is expected to achieve good chemical status by 2027, according to the European Commission (14 June 2019) [Answer to Question No P-002104/19 \(europa.eu\)](#)

HS2 have cleared thousands of trees from the Ickenham inner source protection zone, at Newyears Green Covert and along the Harvil Road. This must be having detrimental effects on the quality of water replenishing this source. According to Water Environment Regulations Part 7 an economic analysis of water use must be regularly undertaken. This should include costs of programme of measures to achieve promised commitments. The Ickenham source was granted short term exemptions from good chemical status from 2015 to 2027, due to disproportionate costs. [Pollution of drinking water: the Mid-Chilterns Chalk groundwater body \(Thames River Basin District, UK06\) and the UK's obligations under EU drinking water legislation \(europa.eu\)](#)

Time to cut the losses and for damage limitation

Boris Johnson is right to cut the eastern leg of HS2 as it is not what the people of the east Midlands and Yorkshire want. The negative experiences at the hands of HS2, felt by those along the line in east Midlands, echo the suffering of local people in Harefield, Ickenham and Ruislip. Watch the compilation video of news coverage from the East Midlands and Yorkshire. <https://youtu.be/JNHhCVpV51c>

The whole of the HS2 route is now in question particularly because of recent revelations about the threats to Drinking Water sources in Hillingdon and Buckinghamshire. Hillingdon Green Party are calling on Hillingdon Council and local MPs, to require HS2 to halt work on the aquifer and Drinking Water Protected Areas until HS2 can demonstrate they can comply with the law. **As stated above UK law requires no additional purification in the production of our drinking water. Sources such as the Ickenham source need to be able to achieve good chemical quality by 2027, as promised, without the disadvantages of HS2 impacts.**

Sarah Green

Joint Coordinator Hillingdon Green Party

**Note this is what Ms Sutton was responding to:**

<b>Boris Johnson MP</b> <b><u>Surgery Enquiry Form</u></b>
<b><u>Summary</u></b>

<b>Please provide a detailed summary of the points you wish to raise and please note any <u>reference numbers relevant to your case.</u></b>
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This request is to see my MP about a serious threat to the quality of my tap water supply and the water supply of Uxbridge and South Ruislip. On 21 May 2021 a great deal of worrying information was released under court decision Appeal No: EA/2020/0088V from the Information Rights Tribunal. I have the documents and would like to share these and the concerns they raise.

We like our tap water in Hillingdon. It comes via the Water Undertaker to us, from the chalk aquifer under the nature reserves of the Colne Valley. Very little purification is/was needed before it gets to us. This is already changing as the released documents show that additional treatment works have been built at West Hyde and Northmoor pumping stations to filter water up to 144 nephelometric turbidity units (NTU). Whereas pre HS2 the pumps would shut down at 0.8 NTU. The only water purification process needed before HS2 works was ultraviolet light. Now water is passing through many other processes and this is only the beginning. Blackford pumping station on Moorfield Road in Harefield is due to close for 2 years as the turbidity will not be treatable during underground works. Northmoor will also have to close when heavy works are close by, as turbidity is expected to be above 144 NTU.

HS2 are making a vast difference in the quality of the raw water in the Drinking Water Protected Areas. They claim this is only for a short period of time but this is not certain. The Water Environment Regulations (England and Wales) 2017 have not been disapplied by the HS2 Act.

The Water Environment Regulation (2017) Part 3 Protected Areas, para 8 Bodies of water used for the abstraction of drinking water;

8 (2) For each drinking water protected area, the programme of measures for the river basin district within which it is located must include measures with the aim of avoiding deterioration in the quality of the water in that area, in order to reduce the level of purification treatment required in the production of drinking water abstracted from it.

[The Water Environment \(Water Framework Directive\) \(England and Wales\) Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

At the Hillingdon water sources impacted by HS2, there is a need for increased level of purification. This equates to deterioration in water quality. Parliament was not told this in the Environmental Statements. Scrutiny has been avoided by excluding London Borough of Hillingdon from the authorisation process for the Colne Valley Viaduct. There are ongoing concerns about lack of priority of water quality issues regarding the leaking Newyears Green Landfill Site. Vast areas of wetlands are being cleared and no assessment is made of the effect of this on future water quality. We need help to save our water.



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**Rt Hon Boris Johnson MP**

MP for Uxbridge and South Ruislip

House of Commons

London

SW1A 0AA

07 September 2021

Dear Mr Johnson,

Thank you for contacting HS2 on behalf of your constituent regarding the water supply in Hillingdon.

HS2 Ltd is committed to protecting impacts on the quality and supply of water in the Chilterns and Colne Valley during our works and the operation of the new railway.

HS2 Ltd has progressed its construction processes, asset designs, monitoring and mitigation actions under scrutiny from the Environment Agency (the regulator), and Affinity Water (the water undertaker).

Before any HS2 Ltd work below the water table is started, a comprehensive risk assessment is completed and provided to the Environment Agency and Affinity Water for review and comment. Each organisation issues a consent to allow the work to progress if the work is approved. The assessments take into account numerous protective measures to reduce the risk of adversely affecting drinking water. The protective measures include the selection of the cleanest construction techniques, choice of materials, the implementation of robust pollution prevention measures, the provision of enhanced protection at pumping stations and an extensive monitoring programme to check on effects and implement additional mitigation if required. HS2 Ltd cannot progress its construction activities until the Environment Agency and Affinity Water are satisfied that any risks to water quality are adequately controlled. The Environment Agency receive regular updates on the results of water monitoring across site and are kept informed of the progress of the project. Where there are effects in the aquifer they will be localised, and largely temporary.

HS2 Ltd has been working closely with Affinity Water for many years to ensure that high-quality drinking water continues to be supplied from the aquifer. We have installed new water treatment facilities to reduce the risk of any impact on water supply by adding extra filtration capacity at the existing abstractions, without the use of chemical treatment of this water.

Your constituent raised concerns about the closure of two pumping stations in the area, Northmoor and Blackford. HS2 has been undertaking deep bored piles close to Northmoor since

March 2021 and this has not had a significant effect on turbidity or water quality and as a result, Northmoor has remained open. The long-planned pause of abstraction at Blackford is a precautionary measure. These are protective measures which have been put in place to reflect the importance of groundwater quality.

Although the London Borough of Hillingdon does not perform a regulatory function with respect to groundwater quality, HS2 Ltd have met with the London Borough of Hillingdon to discuss the potential effects of the Colne Valley Viaduct on the water environment and the role of mitigation, including the shut-down of Blackford and turbidity treatment at Northmoor, as part of a precautionary package of measures.

I hope your constituent finds this helpful. If they would like any further information they may like to have a look at the online webinar we recently held on how we are protecting water quality in the local area. A link to the webinar can be found here: <https://www.hs2.org.uk/in-your-area/local-community-webpages/hs2-in-buckinghamshire-and-oxfordshire/colne-valley-viaduct/>

Alternatively, they might like to have a look at the frequently asked questions leaflet we have provided which goes into more detail about the work we are doing in this area. If they have further questions, they can contact the HS2 helpdesk on 08081 434 434 or email at [hs2enquiries@hs2.org.uk](mailto:hs2enquiries@hs2.org.uk).

Yours sincerely,



**Maddelyn Sutton**

Head of Engagement and Interface - South  
HS2 Ltd