River Chess Association to the Environment Agency

I have just finished reviewing this document. It is alarming not only by what it tells us but by what it does not tell us.

It is clear that the document produced by Align has been reviewed by the Environment Agency and Affinity Water so you will be aware of its contents. Here are the main points of concern-

A significant amount of bentonite, a pollutant, was lost into the chalk aquifer at the Chalfont Saint Peter vent shaft work site during the period August to November 2020, up to 1,600 cubic meters, +or- 1,600 tonnes. To help you understand the magnitude of this loss that would be more than 53 large lorry loads.

The losses started in late August and continued until mid November. As we have always predicted if Align see a problem the incentives are in place for them to continue to damage the environment rather than stop and resolve the problem. What happened at Chalfont Saint Peter vent shaft supports our argument. We need you to tell us when Align first informed the Environment Agency about the bentonite losses at Chalfont Saint Peter and what action you took when you were informed.

According to Align the lost Bentonite remains in the aquifer, it is open to conjecture if this materiel will be re-mobilised by ground water. As you can imagine Align say there is a low probability of this happening, but surely by now anything they say must be treated with suspicion. Just from this incidents alone their assessment of risk is doubtful.

According to Align they estimate that the lost bentonite will be contained within a 500m radius from the location of the loss. This is a significant area of impact to the aquifer and groundwater. Judging from experience it is best not rely Align estimates.

No effort has been made to recover the 1,600 tonnes of lost bentonite and for good reason as we have always said any damage to the aquifer from HS2 work is irreversible. This incident clearly demonstrates this.

In a number of places in the report we find statements like

3.2.5 This was not a consideration prior to commencement of the works, based upon the available information.

4.1.2 This new information is inconsistent with the previous GI undertaken prior to commencement of the works.

4.1.3 This was not a consideration prior to commencement of the works based upon the available information.

If Align and the Environment Agency had listen to the numerous consultation submissions and correspondence made by many local groups none of this would have come as surprise. The arrogance and incompetence of both Align and the Environment Agency will be their downfall.

One other key factor, these large and sudden losses of fluid also brings into question the overall water requirement for the tunnelling operation, is this being reassessed in light of this incident?

There are many more detailed comments and we feel it appropriate to meet to discuss them.

Finally we have read the conclusions and recommendations in this report and there is no mention of how this event impacts the risks associated with the HS2 Tunnelling operation. **We have always said that we anticipate significant drilling and cement losses in the tunnelling operation putting the aquifer and groundwater at risk, the event at Chalfont Saint Peter vent shaft completely supports our arguments.** So was this incident taken into account when the Environment Agency "approved" on 23rd April 2021 the HS2 application to start tunnelling. We note that the supporting documentation to that approval application did not include this report. I am guessing you turned that now famous blind eye.

Please excuse the aggressive tone to this email but frustration is getting the better of me. When we see all our predictions becoming a reality it does have an impact on us.

We look forward to your prompt response, all the time we waste puts the aquifer at further risk, as we know from this incident Align/HS2 will not stop work for the sake of the environment.

Best regards

Paul Jennings

River Chess Association