



# Walton Parish Council

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HyNet Consultation  
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cc. Mr Steve Fraser, CEO.

Dear Sir/Madam,

The proposed HyNet pipeline will directly affect the residents of our parish, the degree to which would vary dependent upon the route chosen. The precise siting of the pipeline and its various access points cannot and should not be simply decided on a financial basis alone. However, following careful study of the submission documents and the sudden change in the Walton area HAGI siting preference, we fear that this may be the case.

In view of the potential impact on the environment as well as the lives and future safety of Walton parishioners, Walton Parish Council is duty bound to put forward comments and suggestions on their behalves.

To this end, please find appended a copy of the Walton Parish Council response to the HyNet North West Gas Pipeline Consultation.

For and on behalf of Walton Parish Council.

Yours sincerely,

Councillor Chrstina Hewitt  
Councillor Robert Hardie  
Councillor Dr. Stephen Saberi

Consultation Document Cadent Hynet Hydrogen Pipeline.  
Section B North Corridor

**Q5.** *Please share your views on the potential Hydrogen Above Ground Infrastructure (HAGI) locations we've identified along the North Corridor, including the alternative location for the Higher Walton HAGI*

Due to the late change in the HAGI siting preference, this is the Council's first response to the PEIR Scoping Report Stakeholder Engagement Summary.

Environmental Aspects:

Design Evolution Report 2024 Appendix A Green Belt Revision.

*"The primary aim of the Green Belt is to prevent urban sprawl "*

(NPPF para 142) Walton Parish Council submit the land HWH8 contributes a strong contribution to the visual separation of Walton as a separate identity and plays a major role in preventing encroachment due to openness. Walton village is a Conservation area which is historically found in a rural location. The Green Belt in this area is preventing the sprawl of the Halton and Warrington built environments which is encroaching along the A56 corridor.

We note that the size of the two proposed sites HWH2 ( 9.3 acres) and the Higher Walton HWH8 (19.1 acres) is disproportionate in the land being allocated. It is unclear why the size needed for the HAGI site sound differ so greatly and why the Greenbelt in Higher Walton is so adversely affected.

It is of deeply troubling that there are no compensatory improvements beyond those needed to mitigate the immediate impacts of the proposal for the parish. Walton PC have been through a series of plantings upgrading the amenity of Mill Lane as a recognised leisure asset for walkers and cyclists. The Council is concerned of the visual impact of palisade fencing up to 3.5 m that will surround the site and the years it will take for any landscaping measures to mature. We highlight the designation of Higher Walton as a tourist amenity with the regional promotion of Walton Hall estate. Mill Lane has been designated as part of our publicised series of scenic local walks highlighting the historical use of the Mill Lane stream as being mentioned in the Doomsday Book as a working water mill. Grange Mill House is designated as a Grade 3 Listed Building of Historical Interest and its boundary with be the HAGI site.

The Council also has concerns about the site lighting and its impact on the Conservation area. Whilst it is of note that both option HWH2 and HWH8 have similar construction costs (Q&A Online Consultation answer 12/11/24), the negative impact which the HWH8 option would have on this historical and rural landscape appears to have been completely ignored.

The Council is very disturbed by the potential use of Mill Lane for HGVs and other heavy construction equipment. It would be the sole access route to the HAGI and is totally unsuitable for industrial usage, being an un-adopted single track lane with no passing places, no drainage, no footpaths, a 3 tonne weight limit. There is also no street lighting and we note that HAGI construction is designated for the Winter months with restricted daylight.

Walton PC also request that a surface water drainage survey be consulted – due to the topology of the HWH8 site, which is the lowest land in the surrounding area and serves as a drain for surrounding surface water, including that from the main A56 carriageway. There is a United Utilities installation in the field which we can report is frequently needing maintenance due to water logging.

### Safety and Technical Aspects:

Can we be assured that in the event of a leak, sufficiently accurate modelling has been used to develop safety protocols and mitigation strategies? Hydrogen is a very buoyant gas exhibiting high diffusion rates; this results in the rapid development of stoichiometric H<sub>2</sub>/O<sub>2</sub> mixtures in the event of leaks. It is of note that a very recent paper is highly critical of the accuracy of many of the currently used models.<sup>1</sup> Standard empirical simulations underestimate some risks by as much as 40%.<sup>1</sup> This is especially pertinent when considering the potential siting's for HAGIs and BVIs, especially those proposed near residential dwellings; large risk underestimates lead to underestimates of safety distance minima. Indeed, the 1km buffer zone sited in Chapter 16 of the Cadent submission is based upon a thirty-year old report.<sup>2</sup>

In terms of the potential for leaks, hydrogen easily infiltrates both metals and plastics, thus causing embrittlement. This in turn leads to a concomitant increase in leak risk from any hydrogen containment system, especially those consisting of valves and bolted compression joints.

Again, this is of special relevance if consideration is being given to the positioning HAGIs or BVIs near residential areas. Having read through the detailed proposals and reports, Cadent does not appear to give a properly detailed safety case regarding any of the points raised above. None of the evaluations or assessment methods seem to include any accurate modelling of material/equipment failure or modelling of the evolution and consequences of hydrogen leaks, fires or explosions. This is certainly less than satisfactory when contemplating the positioning of HAGIs/BVIs close to even minor areas of population.

In terms of the risk attitude currently taken by Cadent, one quote in Chapter 16 is very telling:

*16.1.11 Due to the ongoing industry research being undertaken with regard to the assessment of hydrogen hazards affecting human populations, it is not possible to fully assess the impact of hydrogen releases at this stage.*

The degree of uncertainty regarding risk distance would seem to indicate the unsuitability of HWH2 and HWH5 - 10. It is the contention of WPC that the selection of HWH4 would be by far the best option from a combined safety and environmental standpoint. The environmental impact of this choice would also be minor, since it is poor quality habitat with a green belt impact rating of Moderate to Limited.

#### References :

1. Calabrese, M.; Portarapillo, M.; Di Nardo, A.; Venezia, V.; Turco, M.; Luciani, G.; DiBenedetto, A. Hydrogen Safety Challenges: A Comprehensive Review on Production, Storage, Transport, Utilization, and CFD-Based Consequence and Risk Assessment. *Energies* 2024, 17, 1350.
- 2 HSE (1994). Risks from Hazardous Pipelines in the United Kingdom. Contract Research Report 82.

***Q6. Please share your views on the areas we've chosen for temporary construction activity along the North Corridor***

Mill Lane has been zoned as a construction compound for the HWH8 option.

As previously stated, this is a completely unsuitable access route for the following reasons:

- a) Weight limit 3 tons.
- b) Single track country lane with no passing points
- c) No pavements
- d) Un-adopted by the council – there have never been any standard construction details applied to this track merely tarmac over hard standing.
- e) No drainage – water drains into proposed HAGI field site.
- f) No street lighting – impact on Winter construction period and hours of construction (until 6pm).
- g) If the lane is upgraded to a highway there will be an impact on the loss of further Greenbelt arable land and habitats.
- h) The impact of construction traffic on the main highway access to Warrington and the M56

***Q13. Do you have any comments on the baseline surveys and assessment presented within the Draft Environmental Statement and its appendices?***

Walton Parish Council would like to comment on the Comms of this project giving insufficient time to produce a measured response to the Consultation. We received notification by email on 14/10/24 which meant we were able to discuss it in the November meeting leaving less than two weeks to respond.

We are aware that due to the late designation of the HWH8 site as a viable option for the HAGI the necessary ecological surveys have not been completed. We have been informed that the Preliminary Survey carried out in October 2024 recommends further scoping reports for the site prior to any selection process.

*Trees*

An initial Arboricultural Survey of the site has identified a high number of red level trees requiring further investigation. The site clearly requires a Tree Protection Plan together with and an Arboricultural Method Statement to ensure the survival of retained trees in a development site.

*Water Quality Management*

There is no mains drainage on or indeed near to the HWH8 site.

How is the water from the proposed hard standing facility to be channelled? Will it contaminate Mill Lane stream, which is an important sandstone-based historic feature of the local environment?

The plan is to cross the stream and not tunnel under it adding a need for further security fencing around the pipeline in addition to the proposed HAGI- has this been accounted for in the landscaping? In fact we cannot see a Method statement or an Environmental Appraisal of this part of the site.

### *Biodiversity.*

We are unable to see the opportunity to improve the environmental value of this site due to its tight location on the site .How is the project going to achieve a Bionet score of +10 from arable land and provide a net gain in Biodiversity on the development site?

We have confirmed sightings of Protected Species within the vicinity of HWH8 and are concerned that there is not enough information to fully consider the protected species due to the time constraints for this option.

### *Bats*

No physical Bat Survey has been carried out for the site –no consideration of Winter or Summer roost options.

Appendix 5G Bat Tree Survey July 22- Jan 24 highlights the stream as habitat.

### *Water Voles*

National Biodiversity Network reports numerous confirmed sightings in the Runcorn Road area.

Appendix 5G Otter & water Vole Survey Report Fig 5G Page 13

The HWH8 site has not been surveyed by Cadent...

### *Badgers*

Confirmed sightings of badgers within the HWH8 site.

### *Stoats*

Confirmed sightings of stoats in the HWH8 site.

### *Dragonflies*

Confirmed sightings in the HWH8 site.

### *Tawny Owls*

Amber list of Birds of Conservation Concern confirmed sightings.

## *Barn Owls*

Red list of Protected Species confirmed within 500m of the site.

## *Migratory Birds Survey*

Not able to access this in the Information Hub as the surveys have not been completed.

Walton Parish Council would like to highlight the additional areas of habitat within 500 m of the site which need to be surveyed consisting of an area of historical Native Woodland to the South of Mill Lane and an extensive area of ponds adjacent to the woodland which Mill Lane stream flows through. The Council notes that in Hedgerow Survey Report Appendix 5D no hedgerows in this location have been scoped.

***Q14.*** *We have provided a number of documents in addition to the Environmental Statement for consultation. Is there anything else within these documents, or within this current consultation, which you would like to comment on?*

The HWH8 alternative has not achieved recognition in the local community due to it not being publicised until the 14/10/24 Consultation process. It feels that the new route has not been given enough time for communities to respond in a measured fashion. Walton Parish Council were only been able to discuss this option at their November meeting and it left us less than two weeks to respond