

# MONA OFFSHORE WIND PROJECT

## Tree Survey Clarification Note

Deadline: 3

Application Reference: EN010137

Document Reference: S\_D3\_17

Document Number: MOCNS-J3303-RPS-10327

30 September 2024

F01



Image of an offshore wind farm

**MONA OFFSHORE WIND PROJECT**

**Document status**

<b>Version</b>	<b>Purpose of document</b>	<b>Authored by</b>	<b>Reviewed by</b>	<b>Approved by</b>	<b>Review date</b>
F01	Submission at D3	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	30 Sept 2024

**Prepared by:**

**RPS**

**Prepared for:**

**Mona Offshore Wind Ltd.**

**MONA OFFSHORE WIND PROJECT**

---

**Contents**

**1 TREE SURVEY CLARIFICATION NOTE ..... 1**

1.1 Introduction ..... 1

1.2 Response..... 1

    1.2.1 Impacts on trees ..... 1

    1.2.2 Trees covered by Tree Protection Orders ..... 2

    1.2.3 Areas of trees to be lost ..... 3

    1.2.4 Tree group data ..... 4

    1.2.5 Updated Survey Data ..... 4

    1.2.6 Replanting ..... 5

## MONA OFFSHORE WIND PROJECT

### Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173

## MONA OFFSHORE WIND PROJECT

Term	Meaning
	of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

## Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
CCBC	Conwy County Borough Council
DCC	Denbighshire County Council
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
HVAC	High Voltage Alternating Current
LIR	Local Impact Report
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
RPA	Root Protection Area
WR	Written Representation

## Units

Unit	Description
GW	Gigawatt
km	Kilometres

## MONA OFFSHORE WIND PROJECT

---

Unit	Description
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

---

# 1 TREE SURVEY CLARIFICATION NOTE

## 1.1 Introduction

1.1.1.1 This document has been prepared in response to points raised in the Local Impact Report (LIR) from Conwy County Borough Council (CCBC) and Denbighshire County Council (DCC) [REP1-049] and Welsh Government's Written Representation (WR) [REP1-051] regarding the arboricultural survey as presented in Volume 7, Annex 6.6: Tree Survey and Arboriculture Impact Assessment [APP-160 to APP-167].

1.1.1.2 This document follows on from:

- the Applicant's response to the LIR [REP2-085] relating to:
  - impacts on trees in the un-surveyed area of the Order Limits [REP1-049.102]
  - trees covered by TPOs within the Conwy County Borough Council [REP1-049.103]
- the Applicant's response to Welsh Government's WR [REP2-079] relating to:
  - uncertainty on the areas of woodland lost and replanted as a result of the Mona Offshore Wind Project [REP1-052.15]
  - repetition of tree group data in APP-161 [REP1-052.15].

1.1.1.3 Responses to the each of the above points is provided below.

1.1.1.4 This document should be read in conjunction with the Outline Code of Construction Practice [REP2-038], Outline Arboriculture Method Statement [REP2-072] and Outline Landscape and Ecological Management Plan [REP2-034]. These documents have been drafted in line with the updated Planning Policy Wales 12 Chapter 6 (February 2024) in particular, the protection of trees and woodland.

## 1.2 Response

### 1.2.1 Impacts on trees

1.2.1.1 In its response to the LIR at Deadline 2 [REP2-085], the Applicant confirmed that in July 2024 a detailed survey of trees and hedges was undertaken on the section of the Onshore Cable Corridor that was not surveyed as part of the 2023 survey campaign due to access for the survey not being secured. The 2024 survey was undertaken in accordance with British Standard BS5837:2012 Trees in Relation to Design, Demolition and Construction – Recommendations (BSI Publication, 2012) (as per the 2023 survey) and meets the policy requirements set out in CCBC's Supplementary Planning Guidance (LPD40) and DCC's Policy RD1.

1.2.1.2 As stated in the Applicant's response to the LIR at Deadline 2 [REP2-085], a precautionary approach (using a number of sources including aerial photography) had been used to assign root protection areas (RPAs) to the trees where detailed survey could not be undertaken (as presented in Volume 7, Annex 6.6: Tree Survey and Arboriculture Impact Assessment [APP-160 to APP-167]). The precautionary approach applied the maximum RPA as advised in section 4.6.1 of BS5837.

1.2.1.3 Data from the July 2024 survey was used to identify specific tree protection measures for those trees where the precautionary methodology had previously been applied. The July 2024 survey data has been incorporated into the Tree Survey Schedules



**MONA OFFSHORE WIND PROJECT**

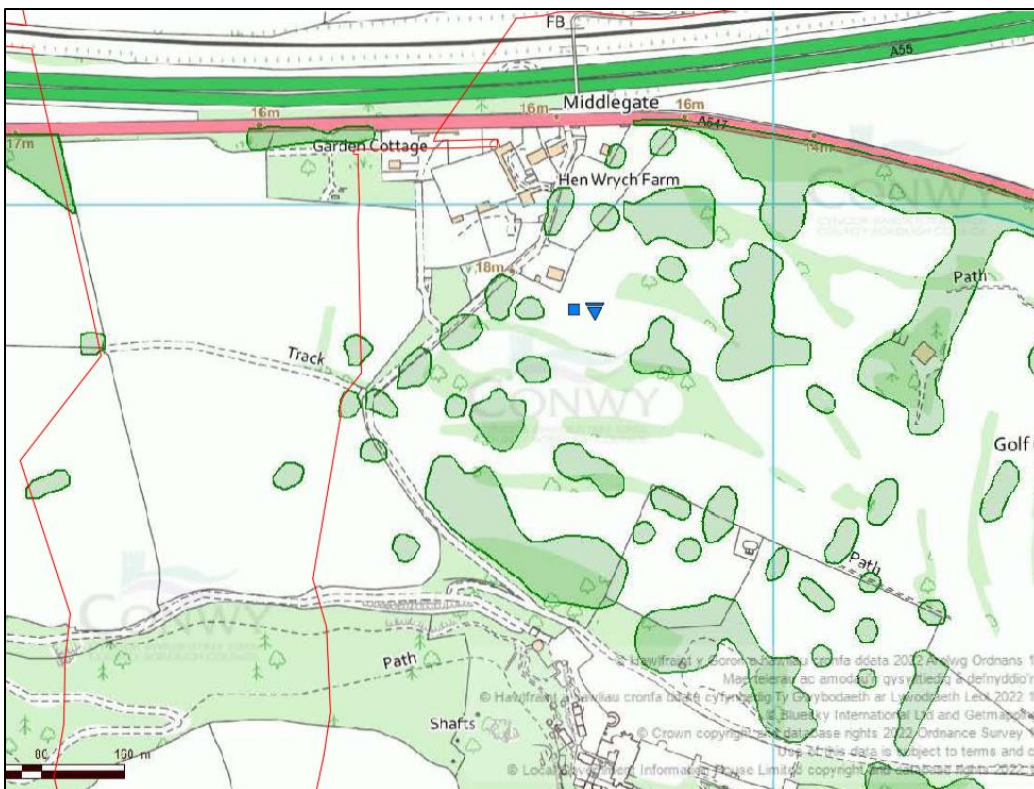
[S\_D3\_17.1 and S\_D3\_17.2], Tree Survey Plans [S\_D3\_17.3 to S\_D3\_17.5] and Tree and Hedgerow Protection Plans [S\_D3\_17.6 to S\_D3\_17.8].

1.2.1.4 The July 2024 survey data demonstrates that the level of tree protection measures shown in Volume 7, Annex 6.6: Tree Survey and Arboriculture Impact Assessment [APP-160 to APP-167] was appropriate and the baseline is robust. Where appropriate, the new survey data has allowed the precautionary tree protection RPAs to be reduced.

**1.2.2 Trees covered by Tree Protection Orders**

1.2.2.1 In its response to the LIR at Deadline 2 [REP2-085], the Applicant noted there were several inconsistencies between the TPO positional data supplied by CCBC and the physical locations of the trees mapped in the survey.

1.2.2.2 There are multiple areas, within CCBC location data, covered by TPOs located near the Mona landfall, as shown in the figure below. The TPO data was provided by CCBC in November 2023.



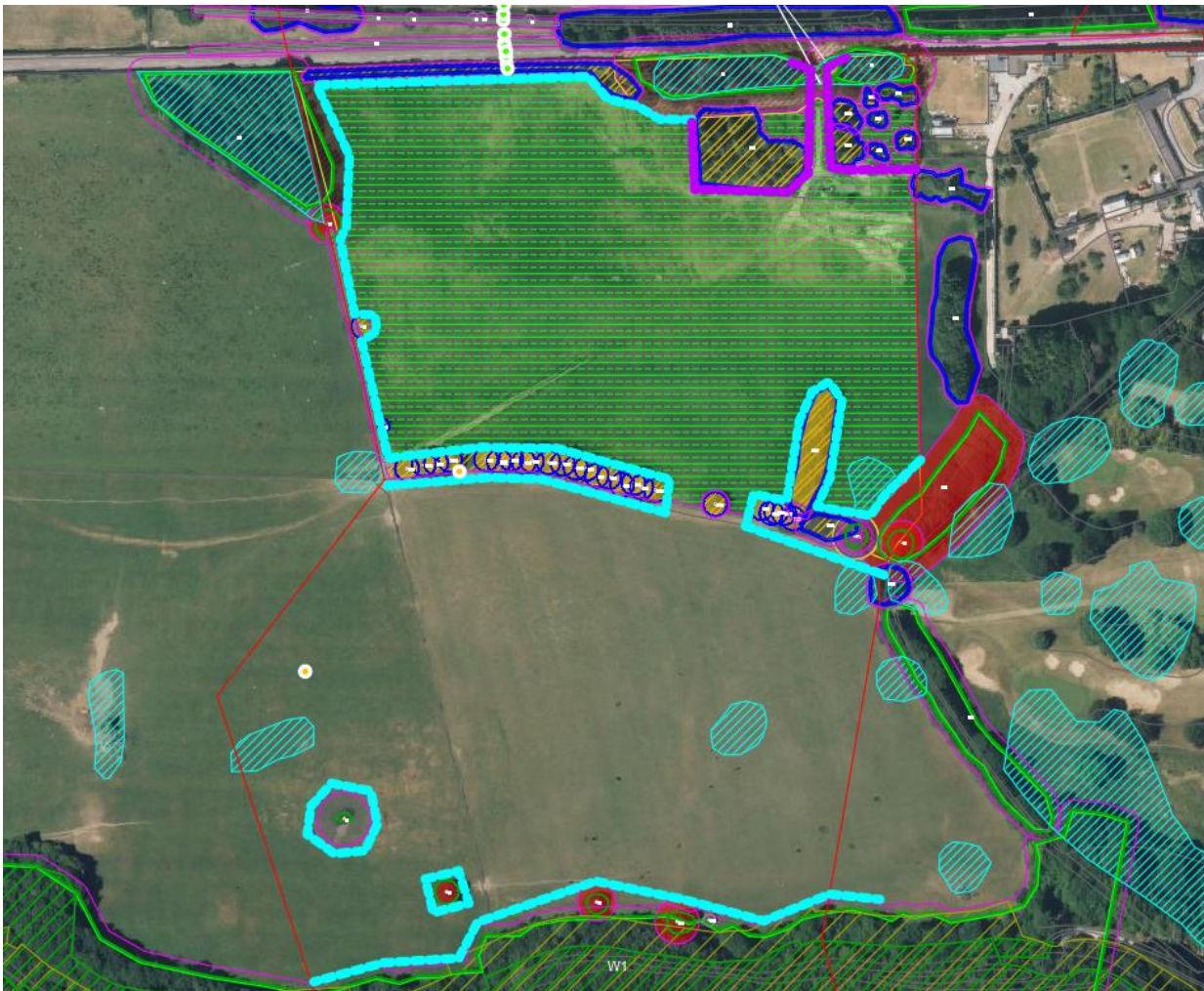
**Figure 1.1: TPOs located near the Mona landfall**

1.2.2.3 Of the above TPO groups there are six that fall within or adjacent to the boundary of the Order Limits:

- one that aligns with G8 – Outside of, but overhanging, the Order Limits.
- one that aligns with G9 – Within the Order Limits.
- four that are within the Order Limits but that do not align with any trees currently on site. These trees have previously been removed without the TPO data being updated.

1.2.2.4 The Onshore Cable Corridor Tree Survey Schedule [S\_D3\_17.1] provides further information about the groups referenced above.





**Figure 1.2: Trees within the Tree Protection Plan**

- 1.2.2.5 These TPO areas can be seen in the Tree Protection Plan (extract shown below) as blue hatches:
- 1.2.2.6 The Applicant is actively seeking confirmation from CCBC which trees within the TPO group G9 are protected by a TPO. On receipt of this information, the Applicant will clarify its position on whether any trees protected by a TPO require removal.

**1.2.3 Areas of trees to be lost**

- 1.2.3.1 The confirmation of which trees will be removed, and their category and their conservation status will be presented in the Arboricultural Method Statement (AMS) as part of the Code of Construction Practice which is secured under Requirement 9 of the draft Development Consent Order. The Applicant can confirm that no Veteran or Ancient trees will be removed and that direct impacts on the RPAs of Ancient Woodland and Veteran trees will be avoided by the Mona Onshore Cable Corridor and Onshore Substation.
- 1.2.3.2 The Applicant notes that ash woodland block (W2) links two ancient woodland sites, however the woodland is badly affected by ash die-back. The proposals as set out in the Outline LEMP (REP2-034) are to selectively fell the affected trees and to encourage natural regeneration with supplementary planting (excluding the area required for the access road) to expand the area of ancient semi-natural woodland improve the woodland link. The total area of tree removal in W2 for the selective removal of ash die back is 1,620 m<sup>2</sup>; 870 m<sup>2</sup> of this area will be used for the permanent

## MONA OFFSHORE WIND PROJECT

access road to the Onshore Substation. However, the increase in woodland planting area is for the Onshore Substation is 60,650 m<sup>2</sup> and therefore, the loss is mitigated by an increase of an area that is 69.7 times larger than the loss. These areas are indicative and will be confirmed during the detailed design of the permanent access road.

- 1.2.3.3 No other woodlands will require any tree removals.
- 1.2.3.4 The impacts on Llanddulas Limestone and Gwyrch Castle Wood Site of Special Scientific Interest (SSSI) are not considered as trenchless techniques will be used to route the cable below ground (as shown in Volume 5, Annex 4.3: Onshore Crossing Schedule F02 (REP1-007)) and this will have no impacts on the trees.
- 1.2.3.5 The Tree Survey and Arboricultural Impact Assessment (APP-160) identified that up to 55 trees would require removal within the Mona Onshore Development Area (excluding the area of tree loss within W2). This has been increased to up to 56 trees following a review of the Tree Survey and Arboricultural Impact Assessment (APP-160). This presents the maximum design scenario. The final number and location of trees to be removed will be confirmed at detail design.
- 1.2.3.6 The operations and maintenance of the Onshore Substation and Onshore Cable Corridor should not necessitate the removal of trees or encroachment on RPAs identified in Tree Survey Schedules, Tree Survey Plans and Tree and Hedgerow Protection Plans and are provided in S\_D3\_17.1 to S\_D3\_17.7.

### 1.2.4 Tree group data

- 1.2.4.1 It was noted that there was a printing error within the 2023 Tree Survey Schedule (Volume 6, Annex 6.6: Tree Survey and Arboricultural Impact Assessment Part 2 – Appendix A(APP-161)) where several groups were repeated within the schedule.
- 1.2.4.2 Corrected survey schedules have been included in the Revised Tree Survey Schedules (S\_D3\_17.1 and 17.2). These also include updated data from the July 2024 survey of the previously un-surveyed section of the cable route.

### 1.2.5 Updated Survey Data

- 1.2.5.1 During the 2023 survey of the Onshore Substation, 222 Individual trees were surveyed while, 21 Groups, 5 Woodlands, 41 Hedgerows and 29 Scrub areas were recorded. This data has not changed following the July 2024 survey.
- 1.2.5.2 During the 2023 survey of the Onshore Cable Corridor, 178 Individual trees were surveyed while 95 Groups, 2 Woodlands, 106 Hedgerows and 1 Scrub areas were recorded.
- 1.2.5.3 During the July 2024 survey of the Onshore Cable Corridor, an additional 244 Individual trees were surveyed while 59 Groups, 2 Woodlands, 108 Hedgerows and 3 Scrub areas were recorded.
- 1.2.5.4 The combined totals from the 2023 and 2024 surveys of the Onshore Cable Corridor are now as follows: 422 Individual trees were surveyed while 154 Groups, 4 Woodlands, 214 Hedgerows and 4 Scrub areas were recorded.
- 1.2.5.5 Two small areas still remain un-surveyed due to access restrictions, where this is the case, it has been noted on the relevant Tree Survey Plans [S\_D3\_17.3 to S\_D3\_17.5] and Tree and Hedgerow Protection Plans [S\_D3\_17.6 to S\_D3\_17.8].

## MONA OFFSHORE WIND PROJECT

---

1.2.5.6 The surveyed data has been cross-checked with the Ancient Tree Inventory (ATI), as recommended in PPW12, and there are currently no ATI records within the order limits.

### 1.2.6 Replanting

1.2.6.1 Where hedgerows are removed during the construction of the Mona Offshore Wind Project, replacement planting will be provided for the most part in the same location. Where this is not possible, measures have been included in the Outline LEMP (REP-034) for the creation of new hedgerows at the Onshore Substation and hedgerow enhancement along the Onshore Cable Corridor to improve connectivity between habitats. It may not be possible to replant trees in the same location (e.g. along the Onshore Cable Corridor), however shallow-rooted species may be planted as an alternative and tree planting at the Onshore Substation will exceed the 1:3 planting requirement.