



ISLE OF ANGLESEY COUNTY  
COUNCIL AND GWYNEDD COUNCIL  
JOINT LOCAL DEVELOPMENT PLAN

SESSION 6 (NATURAL AND BUILT  
ENVIRONMENT)  
HEARING STATEMENT

RESPONDENT: HORIZON NUCLEAR  
POWER WYLFA LIMITED (REF: 2919)

August 2016

Our Ref: Q60570

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## Documents

This statement should be read in conjunction with the Respondents' separate submissions, as listed below:

SESSION 1 HEARING STATEMENT: PLAN PREPARATION, VISION AND STRATEGY

SESSION 2 HEARING STATEMENT: HOUSING PROVISION

SESSION 5 HEARING STATEMENT: ECONOMY - EMPLOYMENT, RETIAL AND TOURISM

SESSION 9 HEARING STATEMENT: WYLFA

## Appendices

Appendix 1 – Policy PS16 (as amended by JPPU)

Appendix 2 – Extract from Interactive Constraints Map, Deposit Version of the JLDP Written Statement (2015)

Appendix 3 – Letter from Horizon to JPPU regarding Wylfa Head (dated 12 August 2016)

# 1 INTRODUCTION

## a) The Respondent

- 1.1 The Respondent, Horizon Nuclear Power Wylfa Limited (“Horizon”), is advancing proposals for the construction and operation of a new nuclear power station at Wylfa (“Wylfa Newydd”). This Hearing Statement (the “Statement”) specifically deals with Session 6 – Natural and Built Environment.
- 1.2 Horizon has continued to maintain a productive dialogue with the Isle of Anglesey County Council and (IACC) Gwynedd Council (collectively, “the Councils”) following the submission of its representations to the various consultation stages of the Joint Local Development Plan (“the Plan”). Horizon has worked with the Councils to reach agreement on matters where possible and this will be detailed in the Statement of Common Ground (“SoCG”) to be filed on 23 August.
- 1.3 This Statement addresses the remaining outstanding matters where agreement has either not been reached, or where discussions are on-going.
- 1.4 As explained within this Statement, Horizon considers that specific amendments are required to policies PS16 and Constraints Map 1 to ensure the soundness of the Plan. Details of the proposed changes to those policies are set out in Section 3 and Appendices 1 and 2.

## b) Structure of Hearing Statement

- 1.5 This Statement demonstrates that, in the context of (a) above, Horizon contends that the Plan is unsound in so far as it relates to the three matters set out in paragraph 1.5 below, when assessed against the soundness test set out in Planning Policy Wales (Edition 8, 2016) (“PPW”), and the ten criteria of soundness set out in the Plan<sup>1</sup>.
- 1.6 This statement is confined to matters raised by the Inspector, in the Matters and Issues Agenda for Session 6, namely:

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<sup>1</sup> Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)  
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- 1. Does Policy PS16 and Table 23 provide an appropriate strategic policy framework for the consideration of development proposals and the protection and conservation of the natural environment, and especially Areas of Outstanding Natural Beauty (AONBs)?
- 5. Does the Plan provide effective protection to the natural environment? Does the approach taken reflect the relative significance of international, national and local designations consistent with Planning Policy Wales chapter 5?
- 8. Any Other Matters (Wylfa Head LNR Designation)

1.7 Horizon is also relying on its submissions in respect of Sessions 1 (Plan preparation, vision and strategy), 2 (Housing provision), 5 (Economy – employment, retail and tourism), and 9 (Wylfa).

1.8 Section 2 of this Statement provides an analysis of the Plan and an assessment of its soundness against the criteria set out in both PPW<sup>2</sup> and the Plan<sup>3</sup> itself, in relation to the identified matters raised by the Inspector.

1.9 Section 3 sets out Horizon's proposed changes it considers to be crucial in ensuring the soundness of the Plan.

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<sup>2</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>3</sup> Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

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## 2 PLANNING ANALYSIS

2.1 The Plan does not currently provide a sufficiently clear policy framework to support and provide the necessary control for significant elements of the Wylfa Newydd Project. There is considerable uncertainty over which policies are relevant, and how they will be applied. Because Horizon needs the associated development to deliver Wylfa Newydd, this presents a very clear risk to the Project itself.

2.2 It is crucial that the Plan is refined and amended so that there is a clear distinction between those policies that relate to general application proposals and those that relate to the Wylfa Newydd Project (associated development in particular). Without this refinement, there is too much uncertainty over which policies will apply and how they will be applied.

- a) **Does Policy PS16 and Table 23 provide an appropriate strategic policy framework for the consideration of development proposals and the protection and conservation of the natural environment, and especially Areas of Outstanding Natural Beauty (AONBs)?**

*(Question 1, Hearing Session 6 Historic and Natural Environment - Matters & Issues Agenda)*

2.1 The current wording of policy PS16 is considered to be unduly rigid, stating that proposals which will have an adverse effect on the natural environment, countryside and coastline will be refused. For example, the Tre'r Gof Sites of Special Scientific Interest ("SSSI") are located within the Wylfa Newydd Nuclear Plant Site ("NPS") site boundary and the Isle of Anglesey County Council ("IACC") is aware of the potential for the construction of the Wylfa Newydd Project to adversely affect this designation. Nor does the outcome sought allow sufficient flexibility for changes in circumstance, not just of the Wylfa Newydd Project, but for any development which would have an adverse effect on the natural environment, countryside and coastline.

2.2 Importantly, the overarching National Policy Statement for Energy ("EN-1") recognises that there may be significant residual effects as a result of Nationally Significant Infrastructure Projects ("NSIPs") and that this should be adequately assessed. It is not considered sufficient to leave such potentially important issues entirely to the development control process without recognising that

there may be instances where developments could be permissible despite their impacts, subject to appropriate assessment and mitigation.

- 2.3 The approach taken by policy PS16 is also considered inconsistent with national policy, as PPW<sup>4</sup> asserts the following:

*“SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI. Before authorising operations likely to damage any of the notified features on a SSSI, local planning authorities must give notice of the proposed operations to Natural Resources Wales, and must take its advice into account in deciding whether to grant planning permission and in attaching planning conditions.”<sup>5</sup>*

- 2.4 This passage, unlike policy PS16, clearly acknowledges that in some instances, developments will result in damage to SSSIs but that this needs to be weighed against the advice of Natural Resources Wales and the benefits of proposals when determining planning applications.

- 2.5 The matter has been subject to ongoing dialogue between Horizon and the JPPU, who have proposed the revised wording for policy PS16, as shown in Appendix 1. This revised wording inserts the phrase, “proposals that have a significant adverse effect on them [*natural environment, countryside and coastline*] will be refused unless the need for and benefits of the development in that location clearly outweighs the value of the site or area and national policy protections for that site or area.”

- 2.6 Horizon considers that this revised wording aligns policy PS16 with national policy and introduces the appropriate flexibility, thus satisfying soundness test 1 and 3 in PPW<sup>6</sup> and test CE2 and CE4 in the Plan<sup>7</sup>.

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<sup>4</sup> Paragraph 5.5.8, Planning Policy Wales (Edition 8, January 2016)

<sup>5</sup> Paragraph 5.5.8, Planning Policy Wales (Edition 8, January 2016)

<sup>6</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>7</sup> Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

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2.7 Horizon and the Councils are seeking to agree equivalent amendments to policies AMG1, 2 and 6 for the same reasons as stated above for PS16. Our joint proposed wording will be provided within the SoCG to be provided on the 23 August.

**b) Does the Plan provide effective protection to the natural environment? Does the approach taken reflect the relative significance of international, national and local designations consistent with Planning Policy Wales chapter 5?**

*(Question 5, Hearing Session 6 Historic and Natural Environment - Matters & Issues Agenda)*

2.8 Horizon considers that the Plan does not provide sufficient flexibility to account for proposals which could have an adverse effect on the environment. Specifically, policy PS16 should be reworded to provide greater flexibility so that development proposals predicted to have an adverse effect will be permissible, subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan.

2.9 The overarching National Policy Statement EN-1 recognises that there may be significant residual effects associated with NSIPs, and that these should be adequately assessed. It is not considered sufficient for policies to contain blanket prohibitions on developments likely to result in adverse environmental impacts, without recognising that there may be instances where such proposals could be permissible, subject to appropriate assessment and mitigation. Without such flexibility, the Plan is considered to fail soundness test 3 in PPW<sup>8</sup> and test CE4<sup>9</sup> in the Plan itself.

2.10 Further explanation is provided under (a) above and (c) and (d) below.

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<sup>8</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>9</sup> Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)

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**c) Any Other Matters (Chapter 5 Vision and strategic objectives, Theme 5)**

*(Question 8, Hearing Session 6 Historic and Natural Environment - Matters & Issues Agenda)*

- 2.11 Theme 5: 'Protect and enhance the natural and built environment' in the Plan confirms that a key output is that "no development given planning permission will have resulted in a loss of a site of international or national nature conservation value or damage to any of their features."<sup>10</sup>
- 2.12 The wording of Theme 5 is unduly rigid. The Tre'r Gof SSSI is located within the NPS and IACC is aware that the Wylfa Newydd Project has the potential to adversely affect this designation although Horizon will be seeking to avoid this. As with policy PS16, the output sought does not allow sufficient flexibility for changes in circumstances and does not acknowledge that there is a process whereby SSSIs can be denotified, as identified in national policy. Horizon therefore consider that the Plan is unsound in regard to soundness test 1 in PPW11 and test C212 in the Plan itself.

**d) Any Other Matters (Wylfa Head LNR Designation)**

*(Question 8, Hearing Session 6 Historic and Natural Environment - Matters & Issues Agenda)*

- 2.13 Constraints Map 1 of the draft JLDP contains a designation "Local Nature Reserves" (LNR) which seeks to show those sites which are existing LNRs.
- 2.14 Horizon consider that the site at Wylfa Head is no longer a Local Nature Reserve (LNR) shown on Constraints Map 1 of the draft JLDP. The designation is therefore factually incorrect.
- 2.15 A letter from Horizon to the JPPU providing further details on why Horizon considers Wylfa Head to no longer be an LBN is provided as Appendix 3. Horizon therefore consider that the Plan is inconsistent with national legislation and therefore unsound in regard to soundness test 1 in PPW<sup>13</sup> and test C2<sup>14</sup> in the Plan itself.

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<sup>10</sup> Theme 5, Chapter 5, Composite Version of the Anglesey and Gwynedd JLDP Written Statement (April 2016)

<sup>11</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>12</sup> Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)

<sup>13</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>14</sup> Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)

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2.16 Furthermore, the JPPU propose to designate through the JLDP a number of “wildlife sites” including a “wildlife site – assessed” on the Wylfa Newydd site, which is recognised through NPS EN-6 as a potentially suitable site for a nuclear power station. Horizon is concerned that such a designation could have implications for its ability to undertake its development and the appropriateness of designating a wildlife site on land identified as potentially suitable for the deployment of nuclear power development, for the reasons given in Horizon’s letter in Appendix 2.

### 3 CHANGES SOUGHT

3.1 It is crucial that policies make exceptions clear, particularly to NSIPs and their associated development, where they are relevant and appropriate to proposals coming forward. This approach is also consistent with the plan-led approach that seeks to ensure (amongst other things) a balance between development and environmental protection.

**a) Amendments to Theme 5: Vision and Strategic Objectives**

3.2 Horizon does not consider that the amendments made by Focused Change Ref: NF 8 address its previous concerns. Horizon and the JPPU have agreed the principle of amending policy PS16 which would address Horizon's concern.

3.3 This change is required in order to meet soundness test 3 in PPW<sup>15</sup> and test CE4<sup>16</sup> in the Plan itself. In its current wording it is not effective nor sufficiently flexible to meet changes in circumstances.

**b) PS16**

3.4 Horizon and the JPPU have agreed the principle of amending policy PS16. The text highlighted in yellow is the amended text proposed by the JPPU. The precise and final wording is subject to on-going discussions a copy of which is provided at Appendix 1.

**c) Amendments to Constraints Map 1**

3.5 For the reasons set out in Section 2 – Planning Analysis, Horizon consider that Wylfa Head is no longer a LNR and as such, this designation should be removed from Constraints Map 1. Furthermore, the site should not be designated as a “wildlife site”. A letter from Horizon to the JPPU which further details their explanation as to why Wylfa Head is no longer an LNR, and should not be designated as a “wildlife site” is provided at Appendix 3 of this Statement.

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<sup>15</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>16</sup> Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)

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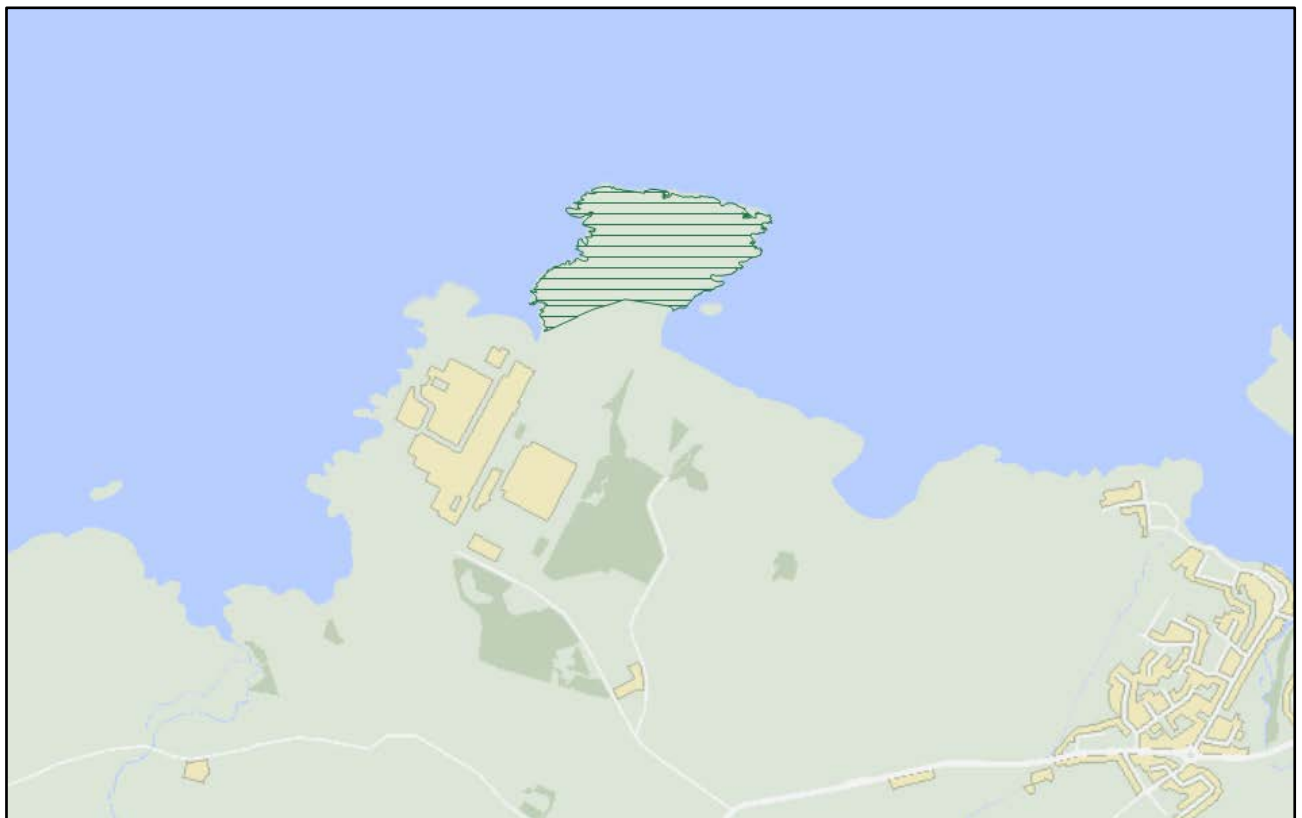
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## APPENDIX 1 – POLICY PS16 ‘CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT’ (AS AMENDED BY JPPU)

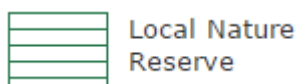
The Councils will manage development so as to conserve and enhance the Plan area’s distinctive natural environment, countryside and coastline, and proposals that have a **significant** adverse effect on them will be refused **unless the need for and benefits of the development in that location clearly outweighs the value of the site or area and national policy protections for that site or area.** When considering permitting an application the Planning Authorities will ensure that they are:

1. Safeguarding the Plan area’s habitats and species, geology, history and landscapes;
2. Protecting and enhancing sites of international, national, regional and local importance and, their settings in line with National Policy;
3. Having regard to the relative significance of the designations in considering the weight to be attached to acknowledged interests in line with National Policy;
4. Protecting and enhancing biodiversity within the Plan area and enhancing and/or restoring networks of natural habitats in accordance with the Local Biodiversity Action Plan and Policy AMG4;
5. Protecting and enhancing biodiversity through networks of green/ blue infrastructure;
6. Safeguarding internationally, nationally and locally protected species;
7. Protecting, retaining or enhancing the local character and distinctiveness of the individual Landscape Character Areas (in line with Policy AMG2) and Seascape Character Areas (in line with Policy AMG3);
8. Protecting, retaining or enhancing trees, hedgerows or woodland of visual, ecological, historic cultural or amenity value.

APPENDIX 2 – EXERT FROM INTERACTIVE CONSTRAINTS  
MAP, DEPOSIT VERSION OF THE JLDP WRITTEN STATEMENT  
(2015)



**Key**





**APPENDIX 3 – LETTER FROM HORIZON TO JPPU  
REGARDING WYLFA HEAD LNR (DATED 12 AUGUST 2016)**

Mr Gwyndaf Jones  
Chief Planning Officer  
Isle of Anglesey County Council  
Council Offices  
Llangefni  
LL77 7TW

**12<sup>th</sup> August 2016**

DCRM Ref. No: HNP-S2-RI-LET-00060

Unique Number: HNP4044N

Dear Mr Jones,

## **FORMER DESIGNATED STATUS OF WYLFA HEAD**

Ahead of Horizon's PAC2 consultation and the forthcoming JLDP hearings, I wanted to summarise Horizon's position in respect of the former designated status of Wylfa Head.

Horizon is committed to both maintaining the nature conservation value of Wylfa Head and to ensuring that the site is managed in the long term as a place to protect and enhance local biodiversity and provide recreational amenity.

However as we move into formal consultation under the Planning Act 2008 and at a time when we are making formal representations to the JPPU in respect for forthcoming JLDP hearings we believe that it is important that IACC understand the legal status of the land.

Based on our investigations to date and in the absence of any evidence to the contrary, we have concluded that Wylfa Head is no longer a Local Nature Reserve (LNR). The reasoning for this is set out in the attached appendix however it may be summarised as follows:

- **Llanbadrig Community Council (LCC) has not entered into a management agreement with Horizon in respect of Wylfa Head**
- **LCC was under a statutory duty to make a declaration that it no longer owned Wylfa Head**

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- **There is evidence that the land was intended to be sold, and was in fact sold, unencumbered**

Furthermore, as explained in the appendix we believe that the description of Wylfa Head in the JLDP as a candidate wildlife site is incorrect. Our PAC2 documentation therefore refers to Wylfa Head as a “proposed candidate wildlife site”

Whilst Horizon consider these positions to be correct from a legal perspective, this does not mean that we have taken, or will take, any different approach in terms of our consideration of the nature conservation interest features associated with Wylfa Head both with regard to our ongoing environmental impact assessment work and to measures that we may need to take to protect nature conservation interests on Wylfa Head.

In addition, we would wish to consider potential measures that could be implemented over the longer term to ensure the protection and potentially the enhancement of the various nature conservation interest features on Wylfa Head. To this aim we are keen to work in co-operation with the Council and other interested parties to develop our plans in relation to Wylfa Head. This could ultimately involve entering into a Habitat Management Agreement and the re-designation as a LNR.

With this in mind it is our intention to set up a meeting with the Council to discuss objectives and next steps including the relationship to each phase of the Wylfa Newydd project. Our regulatory interface team will be in contact to make arrangements for this. In the meantime, please let me know if you have any questions, or wish to discuss any of the above points in more detail.

**Yours sincerely**



**Kieran Somers**

Head of Planning

Enc. Appendix

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# HORIZON COMMERCIAL

## APPENDIX

### **Anglesey & Gwynedd Joint Local Development Plan 2011-2026 – observation on wildlife sites as shown on the Constraints Map and on the status of Wylfa Head**

#### **1. Observations on JLDP**

Horizon made a formal representation to the Joint Planning Policy Unit ("**JPPU**") on the Joint Local Development Plan ("**JLDP**") on 31 March 2015. Since making that representation Horizon has become aware of two further JLDP issues on which it wishes to comment:

- the status of Wylfa Head as a "local nature reserve", as shown on the Constraints Map; and
- the JPPU's proposal to designate through the JLDP a number of "wildlife sites", including a "wildlife site – assessed" on the Wylfa Newydd site as defined by National Policy Statement for Nuclear Power Generation (EN-6) ("**EN6**") ("**Wylfa NPS Site**").

Horizon is aware that the formal JLDP period for representations closed on 31 March 2015. The import of these two issues however has only subsequently become apparent to Horizon following:

- legal investigation into the transfer and status of Wylfa Head and subsequent discussions with Isle of Anglesey County Council ("**IACC**") officers; and
- further discussion with IACC and JPPU officers regarding their intended designation of the wildlife sites through the JLDP process.

#### **2. Incorrect labelling of Wylfa Head as a Local Nature Reserve on the Constraints Map**

The Constraints Map which forms part of the deposit JLDP states that Wylfa Head is designated as a local nature reserve (pursuant to the National Parks and Access to the Countryside Act 1949).

Following further investigation into the sale of Wylfa Head from Llanbadrig Community Council to Horizon in 2010, Horizon does not believe that Wylfa Head remains designated as a local nature reserve. This is for a number of reasons including:

- That Wylfa Head was sold to Horizon on the basis that the vendor released all rights and restrictions over the property. Specific queries of the vendor did not disclose that Wylfa Head was so designated.
- There was no management scheme in place for Wylfa Head when sold to Horizon (nor is there a management scheme at present); the local authorities no longer have a legal interest in the land which would enable them to manage the land for the relevant conservation and community purposes.

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As such, this label should be removed from the Constraints Map.

Horizon remains committed to working with IACC to agree a suitable programme for the appropriate management of Wylfa Head, recognising its ecology. Horizon will continue working with IACC through its DCO application process to this end.

### 3. Purported designation of "wildlife sites" via the JLDP on the Wylfa Newydd site

The Constraints Map shows a "wildlife site – assessed" designation on the north-eastern boundary of the Wylfa Newydd site, adjacent to Cemlyn Bay.

Horizon is not clear as to the process which has occurred to identify this site as an "assessed wildlife site" nor how the JLDP is intending to treat/designate this site.

#### **Background**

Horizon had a number of discussions with IACC during 2010/2011 regarding the possibility of designating a wildlife site on its development land. At a meeting in late 2012 IACC indicated that it was considering designating a wildlife site via the JLDP, although at other meetings IACC had indicated that they were proposing to designate the wildlife site before the end of 2012.

Horizon has not been notified that the wildlife site on its development land has been formally designated.

#### **JLDP**

When the deposit JLDP was issued, it indicated that the designations shown on the Constraints Map were **existing** designations created outside of the JLDP process. It did not suggest that these were **proposed** designations which were open for comment. It states:<sup>1</sup>

Other designations are shown online on the Constraints Maps. Constraints Maps show the geographical location and extent of constraints to development that are created **by legislation or processes outside the development plan**. For example, it identifies the Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest and areas at risk of flooding. The **Constraints Maps collate information that already exists in documents and/or other websites** and it can be readily updated.

(Our emphasis)

Subsequent telephone conversations with IACC and the JPPU in July 2015 have revealed that in fact the wildlife sites shown on the Constraints Map are not existing designations. Horizon now understands that the Councils are in fact intending to designate these sites – as "wildlife sites" (as defined in the JLDP) through the JLDP process.

#### **Effect of designating the wildlife site through the JLDP**

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<sup>1</sup> JLDP Written Statement, para 1.25.

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If this wildlife site is designated wildlife sites in the JLDP then it would take the benefit of a number of proposed policies including Policy AMG5 (Protecting Sites of Regional or Local Significance) and Strategic Policy PS16 (Conserving and Enhancing the Natural Environment). Policy AMG5 for example provides:

Proposals that are likely to cause direct or indirect significant harm to local nature reserves (LNR), Wildlife Sites (WS) or regionally important geological/geomorphologic sites (RIGS) **will be refused, unless it can be proven that there is an overriding social, environmental and/or economic need for the development, and that there is no other suitable site that would avoid having a detrimental impact on sites of nature conservation value and local geological importance.**

(Our emphasis)

This could have implications for Horizon's ability to undertake its development. Horizon also has concerns as to the appropriateness of designating a wildlife site on a site which has been identified as potentially suitable for the deployment of nuclear power development in EN-6, and on which development proposals are underway.

#### 4. Horizon position on wildlife sites

While Horizon's 31 March 2015 representations commented extensively on the JLDP policies, including AMG5, Horizon confirms that it is concerned about the procedure which has led to the purported designation of the wildlife site through the JLDP process and intends to comment further on the matter during the JLDP examination.

Horizon is committed to developing a project which respects the island's ecology as far as practicable, and which will deliver significant community benefits in terms of open space and public facilities, and looks forward to working with the Councils to achieve this through the agreement of an appropriate management plan for Wylfa Head as part of the DCO process.

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