Town & Country Planning Act 1990 Section 77 Anglesey County Council Planning Application by Anglesey Boat Company Ltd.

Gallows Point Marina Report L6805/ X/00/513782

9. Impact on Economy, Jobs & Tourism

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Obligation & Conditions

9.1 Case for the Applicants

- 9.1.1 The applicants' evidence is based on experience of the beneficial economic effect of the relatively new marina at Pwllheli, which is considered to be closely comparable to the proposed development. Pwllheli Marina has 420 floating berths, compared to the proposed 450 floating berths at Beaumaris. As at Pwllheli, no non-marine related development is proposed for Beaumaris and thus the economic benefits for the town would be maximised. Revenue calculations for the proposed development have been carried out at both 85 % and 100% occupancy levels, although current figures indicate the upper level to be more likely.
- 9.1.2 The economic background of Ynys Môn is one of economic deprivation, with the island experiencing the third worst overall unemployment figures and the worst youth unemployment figures in Wales. The area around Beauinaris is identified as a deprived ward by the National Assembly for Wales and its position has been weakened by the closure of the quarries at Penmon and more recently by the closure of the Lairds factory, which once employed 1,700 people.

- 9.1.3 Although the Menai Strait has traditionally been a focal point for boating in north west Wales, recent years have seen a shift towards areas able to offer better facilities. The overall size and quality of boats kept in the Menai Strait has declined: for example, boats over-wintered at Gallows Point are about 30% smaller than those at PwIIheli marina. There has been a noticeable migration of large offshore racing yachts away from Menai Strait, attracted by better marina facilities elsewhere. As a result, the prosperity of the local marine industry has declined and the boatyard at Gallows Point now employs a third of the workforce it did twenty five years ago. The boating season in the Menai Straits has contracted and is now broadly restricted to the summer months only.
- 9.1.4 The construction phase of the marina development would employ up to 45 people over a 21 month period. Wherever possible, construction materials would be sourced locally. Overall costs are estimated at f8m and would bring a major benefit to the local building industry.
- 9.1.5 With regard to marine revenue generation, establishing a new marina would lead to substantial expenditure by berth holders who spend directly on their boats, for example on servicing and repair, chandlery, fuel and utilities such as electricity. The average boat length at Pwllheli Marina is 9.3m and the annual berthing charges are £170-£190 per metre. This would be similar at Beaumaris. Boat related spend is also generated from new boat sales, brokerage, insurance and finance provision. Yachting schools would operate from the marina and these would bring revenue into the local economy in course fees and through expenditure by people on courses. Resident berth holders and visiting yachtsmen spend money in local businesses such as restaurants, pubs, cafes, B&Bs, hotels, shops and on services such as taxis and hairdressers, bringing great benefits to the local economy. It is calculated that the marina would bring approximately £2 million into the local economy per annum (Doc ABC 1). This amount of expenditure in an area as deprived as Ynys Môn would represent a major boost to its economy, bringing vital knock-on effects in terms of employment creation and job security as well as promoting further investment and regeneration.

- 9.1.6 In employment terms, the marine industry supported by the Menai Strait currently employs 76 people. In comparison, 118 new jobs have been created as a result of the development of Pwllheli marina. A new marina at Beaumaris would directly employ 15 people and create some 61 jobs in the marine industry in fields such as marine engineering, chandlery sales, boat repairs, brokerage, boat sales and yachting schools. In addition, it is calculated that the marina would create some 72 jobs indirectly in businesses such as B&Bs, shops, restaurants, pubs, light manufacturing and leisure and tourism. In total, the marina would create nearly 150 jobs. Comparisons with WDA figures and the achieved employment provision at Pwllheli marina suggest that these figures are conservative and may well be an underestimate.
- 9.1.7 The development would create 71 full time jobs and 77 part time jobs (a total of 148 jobs) in an area of high unemployment (Doc ABCI). The new jobs created would be a mix of skilled and unskilled including specialist skills in mechanical engineering, boat building and mast rigging. It is proposed that new training facilities would be established for marine engineering in conjunction with local training agencies. It is hoped that the marina development would enable the establishment of a working museum which would train young people in traditional boat building skills. This would be a joint project between the applicant and members of the School of Ocean Sciences at the University of Wales, Bangor.
- 9.1.8 The construction of a marina at Beaumaris would be unlikely to have any lasting negative effect on other marinas locally. Potential berth holders tend to be attracted to areas where they can cruise from marina to marina and thus the construction of a full-tidal facility at Beaumaris would increase the overall attraction of North Wales and its other marinas to yachtsmen. It is felt that the proposed marina would act as a catalyst for further regeneration across Ynys Môn.
- 9.1.9 An analysis of the figures presented by NW&NWSFC and FoE demonstrates the unreliability of the base data, for example, the 90% over-representation of the number of berths at Pwllheli marina. Furthermore, the projection made in Document SFC 8 for the revenue brought by visiting yachts to Beaumaris is less than one fifth of their calculated figure for Pwllheli and one seventh of the actual figure for Conwy. Where comparisons are made in SFC 8 between the proposed Beaumaris scheme and other marinas, they do not compare like with like. A comparison of similar employment figures demonstrates that the estimated figures for Beaumaris are close to those for Pwllheli in 1998 and well below the current figures.

9.1.10 Overall, the analysis of the NW&NWSFC and FoE evidence shows it to be flawed, being founded on incorrect base data, being assessed wrongly and consequently leading to questionable and unfounded conclusions. The projections made in Document ABC 1 are founded on the analysis of the most recent and correct base data. Even so, the likely beneficial economic and employment effects of the marina are probably underestimated.

9.2 Case for the Local Planning Authority

- 9.2.1 Anglesey is an area of high relative economic need, being the worst placed of existing authority areas in North Wales and one of the worst placed areas in Wales in terms of unemployment rates, low incomes, and youth depopulation. As such, it is an area where the government gives priority and assistance to employment and job creation. This is recognised nationally, and Anglesey has been designated an Assisted Area by the UK government since the 1960s, and is included in the area of North and West Wales recently designated as an "Objective One" area by the European Union.
- 9.2.2 Beaumaris is classified as a "deprived ward" in the application of the National Assembly's index of socio-economic conditions. With the relocation of the Faun (formerly Lairds) engineering works to Llangefni in 1997, Beaumaris lost its long-standing major employer, which provided some 500 jobs in the 1980s. The unemployment rate for the Beaumaris/Llangoed area is similar to that of Anglesey as a whole. The 1991 census shows that an unusually high figure of 24% of all children in Beaumaris live in households without a wage earner. Despite its visually attractive nature, the Beaumaris area is clearly well down the economic scale in both Welsh and UK terms. It needs additional income and employment opportunities if this situation is to change.
- 9.2.3 The Tourism Strategy for Beaumaris is aimed at developing the town as a flagship visitor destination, drawing additional and higher-spending visitors to Beaumaris and the Island in general. The marina project is identified by the Council as a key component of this strategy. The marina development would contribute significantly by providing employment and also increased occupancy levels for local hotels and accommodation providers, increased income for local shops, restaurants, and for other services. The marina would also become a major attraction in itself, as it would add interest and vitality to the town, thereby attracting more people to visit the area. The development of a promenade link between Gallows Point and the town is included as a key proposal in the Historic Towns Strategy for Welsh Tourist Board funding (Document YMCC1/12).

- 9.2.4 As well as employing people directly to run the marina, the development would provide a significant boost to the local marine services, engineering, and boat-building/repairs sector. The potential effects on employment opportunities afforded by the mussel fishery has been considered but, even if there is a loss, then its contribution in absolute and relative terms is far outweighed by the benefits of the marina proposed.
- 9.2.5 The development is considered to be in accordance with the advice given in Planning Policy Guidance (Wales) - Planning Policy in relation to industrial/ commercial/tourism development (CD 1). This stresses that economic development is a key aim, gives priority to the Assisted Areas, and encourages tourism and the improvement of tourist facilities.

9.3 Case for the Mussel Fishermen

- 9.3.1 The Menai Strait is consistently one of the largest mussel production areas in the UK. The Sea Fish Industry Authority has recently identified the Menai Strait, along with the Wash, as the two prime "mussel production centres of excellence". In recent years mussel landings in the UK have varied between 12,000 and 20,000 tonnes, and in Europe between 500,000 and 600,000 tonnes. Over the last few years the Menai Strait has produced at a level of between 2,000 and 9,500 tonnes, and next year a harvest of some 4,000 tonnes is predicted. With sufficient seed mussel availability, it is estimated that the Menai Strait could sustain annual levels of around 5,000 tonnes.
- 9.3.2 Over the last 5 years annual turnover from mussel fishing in this area has ranged from a high point of £3.5 million to £1.2 million last season. With the stock relaid last year, annual turnover next year is set to rise to £2 million. Levels of employment vary, as the work is seasonal. The 4 companies employ a core of 16 personnel, which is supplemented by up to 16 seasonal workers. There are also individual fishermen from Anglesey, Bangor and Conwy. Last year was regarded as a break-even season, whereby the total spent on employment and services was in excess of £1 million.
- 9.3.3 The 4 main operators in the Strait are Deepdock Ltd of Holyhead, Gannet Seafoods of Llangefni, Myti Mussels Ltd of Bangor and Ogwen Mussel Partners of Bangor. All have leases granted by the NW&NWSFC, which expire in 2002, and are expected to be renewed. Seed mussels have been taken from Caernarfon Bar since 1991, as well as from Morecambe Bay and South Wales, by dredging sub-littoral areas. In 1999 Myti Mussels Ltd laid 690 tonnes and harvested 1500 tonnes, whereas Gannet Seafoods laid some 80 tonnes on less than a hectare of Area 3, which extends to 5 or 6 ha exposed at low tide. The area utilised depends on the availability of seed mussels, and is adjusted according to the crop.

- 9.3.4 The proposed marina would remove the most productive part of Area No 4. Should this area be removed, it would also effectively remove Area No 6, which are both operated together, thereby reducing the whole growing area. Area No 4 is a littoral (inter-tidal) area used to harden up the seed mussels before they are transferred to the sub-littoral Area No 6. To place the seed mussels directly into an area that is continually covered by the water would be to invite too much predation by crabs and starfish, and the whole crop could be lost.
- 9.3.5 It is not possible to relocate the mussel lay elsewhere within the Fishery Order area, because no other productive grounds exist, which are not already being utilised. It is also believed that the marina structure would change tidal flow, settlement and erosion patterns for local operators, and adversely affect water quality due to suspended dredging spoil with heavy metal contamination during construction, continued maintenance dredging during marina operation, and the discharge of effluent by some 450 berth-holders. All these factors would harm the mussel industry generally, and directly affect Area Nos 4 and 6.
- 9.3.6 The shellfish beds are classified under EC Shellfish Hygiene Directive and graded in 'B' category, and improvements by Welsh Water are slowly raising the quality of the water to near the 'A' category, whereby the mussels could be sold without purification to the UK supermarket chains. The Menai Strait is classified as a Shellfish Growing Water under EC Directive 79/923/EEC, which is implemented in England and Wales by the Surface Waters (Shellfish Classification) Regulations 1997. These set out the pollution standards to protect shellfish beds and, accordingly, water quality is monitored by the Environmental Agency and Welsh Water.
- 9.3.7 The four mussel farming companies in the Strait do not share their costs or profits, and each negotiates its own market price for produce. Whilst there have been requests by the mussel farmers to the SFC to extend the Order land at Penmon, no trials of areas have been carried out. The leaseholder of Area No 4, Mr Wilson, has a part interest in Area No 6 lease in the name of Deepdock Ltd, who also lease 12 ha at Holyhead, where a Several Fishery Order was made 2 years ago. The company has also applied for leases in Morecambe Bay in 1991, which was unsuccessful, and at Burry Port Inlet near Swansea for about 210 ha in total. This company employs 4 full-time and 4 part time employees, including the skipper, deckhands and mussel hands.

9.3.8 The Menai Strait Oyster and Mussel Fishery Order 1962 is protected under section 7 of the Sea Fisheries (Shellfish) Act 1967, which makes it an offence to disturb or injure, in any manner except for a lawful purpose of navigation or anchorage, any such bed or fishery. The Order has 22 more years to run and, according to the law, neither the local authority nor the SFC has powers to amend or alter its provisions.

9.4 Written representations by North West & North Wales Sea Fisheries Committee

- 9.4.1 The current annual value of the Menai mussel fishery ranges between £1.6-4.5 million, employing 25 full-time and 6 part-time staff. The industry also supports 34 traditional fishermen whose fishery is worth £310,000 per annum. Shellfish processing could be developed in the locality and realise a processed product valued at more than £13 million per annum employing 28 staff, including a significant proportion of skilled personnel.
- 9.4.2 In the context of published data from UK and Irish marinas the predicted level of job creation proposed for the Gallows Point Marina far exceeds that achieved by existing marinas irrespective of size and location. In addition, local authority control over some of these marinas has been a crucial driving force in optimising even current levels of employment and revenue generation to the local community.
- 9.4.3 Damage to mussel lay 4 would have a significant impact on the overall production and value of the fishery, which may restrict opportunity for future development of mussel processing in the locality.
- 9.4.4 The potential risk to the maintenance of current production levels and quality of mussels from, lays adjacent to the proposed marina cannot be simply dismissed. In contrast, sustainable shellfish culture is scientifically proven to support the further purification of coastal waters and reinstatement of degraded habitats.
- 9.4.5 The Menai mussel fishery should be viewed in the general context of developing seafood production and seafood processing during a period when traditional fisheries and agriculture are in decline. This is in contrast to managed fisheries and aquaculture which are both showing rapid growth in Europe due to increasing public demand for seafood.
- 9.4.6 The tourism benefits of the mussel fishing industry to the area should not be ignored. In recent years the mussel operators have organised an annual Mussel Festival at Port Penrhyn. This attracts thousands of visitors to the area.
- 9.4.7 The marina proposal would adversely affect the mussel industry in two ways:

- 9.4.7.1 **Directly:** by sterilising a critical part of Area 4 of the fishery, the marina would severely constrain the operations of Andrew Wilson, leaseholder for this area and also Area 6. Mr Wilson is of the view that his business in the Strait would cease to be viable should this happen.
- 9.4.7.2 **Indirectly:** of possibly greater concern is the indirect effect that the marina could have on the mussel fishery. The indirect effects that cause the greatest concern are:

(a) Water quality - especially the risk of sewage related bacteria. The mussel farming industry in the Strait would be ruined if the shellfish hygiene classification were to change from the present Category 'B' to Category 'C'.

(b) Contamination - especially from any fuel or oil spills in the marina. These can taint mussels and render them unpalatable.

(c) Suspension of sediments from dredging during the construction and operation of the marina - which could suspend pollutants and contaminate mussels.

(d) Changes in current regimes - which could make shellfish beds unproductive. The NW&NWSFC has noted such effects elsewhere in its District.

(e) Changes in sedimentation patterns - which could result in the smothering of shellfish beds, and which have also been seen in association with coastal developments elsewhere in the NW&NWSFC District.

- 9.4.8 Such impacts could place the future of the industry in the Strait in jeopardy. Neither the operators nor NW&NWSFC feel that adequate information has been presented to enable assessment of this risk. Given the great value of the mussel industry to the local economy, and the real risk of such harm arising, it is submitted that these indirect effects speak strongly against the location of a marina at Gallows Point.
- 9.4.9 The ES anticipates certain benefits from the marina, namely the creation of 61 full time and 85 part time jobs. These figures stand in contrast to the level of job creation reported by Gwynedd County Council for Pwllheli marina. Despite having nearly twice as many boats, Pwllheli marina supports a total of 61 jobs. The Gallows Point marina is thus expected to create 2.3 times as many jobs as Pwllheli, despite being little more than half the size.

- 9.4.10 Other aspects of the estimated benefits of the marina in the ES seem to be based upon assumptions that do not tally with experience from other marinas in North Wales. The discrepancies in the ES have the effect of causing a major overestimation of the economic benefits that the marina would bring. For example, the anticipated annual revenue from visiting boats is £375,000. However, if the calculation is repeated using the figures from Conwy and Pwllheli, Gallows Point would be more likely to generate £42-£63,000 per annum.
- 9.4.11 Some concern is also expressed that the economic benefits of the marina do not take into account overheads. Both Pwllheli and Conwy marinas require regular and expensive maintenance dredging. This is not identified as an economic cost of operation, nor as a potential environmental impact of the marina.

9.5 Other Interested Parties/Persons

- 9.5.1 Friends of the Earth
 - 9.5.1.1 The claim that the proposed Gallows Point Marina would lead to the creation of almost 150 jobs requires critical scrutiny. It is known that the larger Pwllheli Marina (600 boats afloat + 200 ashore compared to some 450 berths at Gallows Point) has led to the creation of 10 full-time and 2 part-time jobs within the Marina, and to another 43 full-time and 6 part-time jobs relating to sail repairs, chandlery etc (reported by Gwynedd County Council). The Conwy Marina, of a similar size to the proposed development, has resulted in 10 new full-time jobs and only 12 new part-time jobs (reported by Camper and Nicholsons). Therefore the conclusion to be drawn from comparison with other Welsh marinas is that the number of jobs created would be nothing like the 150 suggested.
 - 9.5.1.2 The proposed marina would adversely affect current and future employment in the Menai Strait shellfish industry. Currently 31 persons are employed in this fishery, 26 of them full-time. The industry also supports 34 part-time traditional shellfish hand-gatherers, and is of benefit to several local companies (e.g. due to the need for vessel maintenance) and to the School of Ocean Sciences, Menai Bridge (which recently received a grant of £146,000 for collaborative research with the Menai mussel fishery). Against this background it must be concluded that the proposed development would potentially lead to a significant number of job losses within and possibly beyond the shellfish fishery. Moreover, it would hamper its further development, especially in the processing of mussels, which as forecast would create permanent jobs for a further 28 people.

- 9.5.1.3 The projected figures for the Gallows Point Marina anticipate that annual revenue generated from visiting boats for the local economy would total £375,000 and that the annual revenue from marina berths would total f 1.155 million (£3000 per boat, which includes the cost of servicing, repair, chandlery, fuel, utilities and food). The comparative figures for the larger Pwllheli marina are revenue from visiting boats of £277,000 (including berthing fees for minimum 7m vessels) and revenue from marina berths of £816,000. The comparison suggests that the projected figures represent overestimates.
- 9.5.1.4 Compared to the estimated number of visiting boats and the average duration of their stay, i.e. 2000 and 3-4 nights respectively, the Conwy Marina has only 500-520 visiting boats and a typical stop-over duration of 1-2 nights. The Marine Institute (1998) has reported that boats visiting Welsh marinas stay an average of 2 nights and most commonly have a crew of 2; the reported daily spend per crew member is £20-30. If the Gallows Point Marina were to receive 1000 visiting boats staying an average of 2 nights and averaging 2.5 crew members who spend £25 a day, the generated income for the local economy would be only around £125,000 rather than the projected £375,000.
- 9.5.2 Parties Supporting the Proposed Marina
 - 9.5.2.1 The Beaumaris Town Council, the Llangoed and Penmon Community Council and the Beaumaris and District Chamber of Trade and Tourism Association all strongly support the proposed development and the creation of jobs in the area. In addition the Royal Anglesey Yacht Club, the Menai Strait Regattas Committee, the North West Venturers Yacht Club and the Welsh Yachting Association all support the proposed marina development. These parties are most concerned about unemployment in Beaumaris and Anglesey generally, since the closure of Lairds engineering works and Penmon Quarry. Lairds once employed some 2000 people, which was reduced to about 100 before relocating in Llangefni.

- 9.5.2.2 There has occurred a serious decline in sailing and boating activity in the Menai Strait, due to the creation of new marinas elsewhere. The proposed marina would re-establish the area as a premier yachting centre and provide a catalyst for a revival in the local economy. The Menai Strait Regatta Fortnight now only attracts about a third of the entries it used to in the 1960's and 1970's. The marina would provide facilities for offshore yachts and easier access to their boats for the less able-bodied sailors and the elderly. "Sailability Wales" and Disability Wales fully support the development of this marina to provide equal opportunities to people with disabilities.
- 9.5.2.3 The activities of the mussel fishermen and the NW&NWSFC have a detrimental effect on the area and other users of the Strait. The former golden sands of the "Swash", opposite Beaumaris Pier, have been turned into mud banks with dead mussel and cockle shells, as a result of dredging operations. This used to be a popular mooring area. In the last few years over 35 moorings have been removed at the insistence of the NW&NWSFC from further west along the Strait. There is now a lack of moorings and facilities for sailing and boating in the locality.
- 9.5.2.4 The Beaumaris Council and Bangor Corporation ensured that Article 18 was included in the Menai Strait Oyster and Mussel Fishery Order 1962 so that nothing in the Order would prejudicially affect that area of the foreshore where the marina is now proposed, so that it could be retained for proposals which would benefit the people of Beaumaris and Bangor. This should be reflected in the licences granted to lay holders covering the relevant areas.
- 9.5.2.5 Beaumaris is designated in the Ynys Môn Local Plan as a priority area for tourism-related development, and this major project is considered to be wholly appropriate to this designation. This enterprise and the other smaller business that would spring from it, would bring investment and tourism to the town and surrounding area.
- 9.5.2.6 Many local business people and residents support the creation of leisure, marine and tourism employment on this part of Anglesey. Mr P Dickie of Dickie's of Bangor, marine engineers and sales outlet on the opposite side of the Strait, has been in business for 75 years and fully supports the proposed marina. Dickie's employs 60 mostly young skilled workers, who train with the company, and they foresee a great need for more training for youngsters to stay in the area. It is also difficult to sell craft when there are no further moorings for them.

- 9.6 <u>Conclusions</u> (The bracketed numbers refer to source material in the parties' cases and documantes)
 - 9.6.1 It is both national and local policy to encourage the development of jobs and tourism in Anglesey and Beaumaris (9.2.1-9.2.3), and in the current economic climate any new development generating employment is to be welcomed. The applicants estimate that the proposed marina would create some 76 new jobs on the site, operating the marina and in marine engineering, chandlery sales, boat repairs, boat sales, insurance brokerage and yachting schools. It is estimated that a further 72 jobs would be created indirectly in local businesses (9.1.6). These would amount to 71 full-time jobs and 77 part time jobs.
 - 9.6.2 These job creation estimates are questioned by those parties opposing the development on the grounds that numbers of boats and visitors, and their expenditure, would not be as great as predicted (9.4.9-10, 9.5.1.1, 9.5.1.3-4), particularly when compared to the Pwllheli and Conwy marinas. The predicted levels of new employment in the marina and the town cannot be precise, but it is clearly the case that the development would be certain to have a significant beneficial effect on tourism, marine-related industry and local businesses in this economically-deprived area. These benefits however need to be balanced against the likely impact upon the economy of the existing mussel fishing industry.
 - 9.6.3 The mussel fishermen claim that the operation of lay Nos 4 and 6 would have to cease with the marina construction, and both the economic and the environmental impact on the rest of the Order could decrease annual mussel production by as much as 40% (5.2.5, 5.2.7, 9.3.5-6, 9.4.1, 9.4.3). In his conclusions (Appendix 1, paragraph A5.6), my Assessor Dr Terry Holt considers that the claims by the mussel farmers and the Sea Fisheries Committee that lay No 4 is involved in a large part of mussel production, possibly up to 40%, are well substantiated. The proposed development would obliterate a large proportion of lay No 4, and as much as 60% of its production would be lost (Appendix 1, paragraph A5.7).
 - 9.6.4 From the evidence given on this, I concur with my Assessor's conclusions on the likely impact of the development on the existing mussel industry (Appendix 1, paragraphs A5.6A5.11). Clearly, a proportion of the 32 existing core and seasonal jobs provided by the 4 mussel farming companies (9.3.2) would be lost as a result of the development. The NW&NWSFC estimates that the mussel fishery employs 25 full-time and 6 part-time staff, and it supports 34 traditional fishermen as well as 28 people working in shellfish processing in the area. With no other alternative mussel lays available in the area (9.3.5), it has to be recognised that the development would be likely to cause the significant loss of some of these jobs in the industry.

- 9.6.5 Whilst I recognise that more jobs would be gained by the development of this site for the proposed marina than those likely to be lost in the mussel fishery industry, and there would be a significant spin-off for the local economy, it has to be recognised that there would little or no direct impact on the mussel fishery if the marina were sited on the east side of the Point in Beaumaris Bay. It is another major advantage of the alternative Beaumaris Bay site that the same benefits to tourism and marine related industry could accrue from the proposed development, with no direct harm to the Menai Strait mussel fishery.
- 9.6.6 Although Beaumaris Bay is not put forward as an alternative site for this development by the applicants, it has to be recognised that where such a major development proposal would clearly harm an existing industry whilst an equally, or more, suitable site is available only a short distance away, the adverse economic impact of the proposals on the mussel fishery becomes all the more unacceptable. I conclude that the Menai Strait mussel farming industry is an important source of employment in North Wales and the UK generally (5.1.1-2, 5.2.3, 9.4.1), which would be adversely affected by the proposed marina development.