

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Housing (email 13)
Date: 04 December 2018 20:01:44
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Annex 8P - 8V \(Batch 3 of 3\).zip](#)

Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.

Pnawn Da/ *Good afternoon,*

Gweler ynghlwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

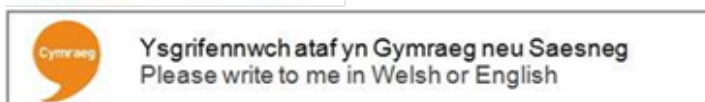
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*
Manon

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd 'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Môn. Mae Cyngor Sir Ynys Môn yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei

rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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Caravan Sites and Tourer Pitches

1. **Adopted Policy Summary**

Ynys Môn Local Plan

Policy 9 presumes against the development of new static caravan sites. Policy 10 allows for extensions only exceptionally where proposals are part of a comprehensive scheme to improve the appearance of the whole site and reduce its impact on the surrounding landscape or forms part of an overall scheme which results in significant and permanent improvements to the area. Extensions should not compromise the areas environmental assets, services, amenities or highway network.

New Nuclear Build at Wylfa: Supplementary Planning Guidance

GP12 requires that the accommodation of the construction workforce has no significant adverse effects upon tourism through:

- The preparation of an assessment of the impacts arising; and
- the implementation of mitigation measures where significant effects are predicted which could include: the provision of additional accommodation, the seasonal rather than year-round use of tourism accommodation and the distribution of construction workers to prevent over concentration.

New accommodation is expected to be well designed and sustainably located in terms of its appearance and quality of materials, the character of the site and its surroundings, impacts on the Island's built and natural environment, the provision of services and facilities, the potential to re-use redundant buildings and impacts on amenity, social cohesion and culture.

Accommodation should be located so as to ensure ease of access by sustainable means of travel to relevant tourism facilities and attractions, community services and facilities and the main NNB site.

There is a presumption against the development of new, or extension of existing caravan sites to accommodate construction workers, unless there would be a proven benefit for the Island's visitor economy.

2. **Emerging Policy Summary**

JLDP – Non Material Change

Policy TAI8 sets out the Council's policy position with regard to new and existing caravan, mobile home and non-permanent accommodation types. It provides for new sites involving the siting of caravans or other forms of non-permanent accommodation for the purpose of temporary residential use provided they conform one of two criteria which consider the linkage to a specific construction project or a proven need in connection with an established rural business. In the case of a new building project, locational criteria are also applied.

When development proposed consists of proposals to extend existing tourist accommodation sites, or their use outside of the usual occupancy period four criteria are to be applied which include for the consideration of the potential for effects upon the tourism industry.

3. Background & Scene Setting

An element of Horizon's Construction Worker Accommodation Strategy is to utilise the existing potential of the island provided by a range of sources of supply including that which currently supports the tourism industry. Potential sources of supply include a number of caravan sites licensed for both static and touring use.

The attractiveness to site operators of allowing their existing caravan sites to be used by construction workers will depend upon the value that they place upon the assured, year round income that construction workers imply versus the income obtained from seasonal tourist market.

Tourism is the most important driver for economic activity on the island contributing some £256M (2013) to the local economy annually. The island's caravan sites form an important part of this with many being mature businesses established for a number of years. It is clear that these businesses have evolved over time to meet the needs of the market (as evidenced by changes to site licences) with a discernible trend towards static sites and away from touring accommodation.

The sites themselves vary in size but display a distinct clustering in two coastal areas which identify strongly with the tourist economy. These are around Treaddur Bay on Holy Isle and on the eastern around the settlements of Moelfre and Benllech.

4. Identification of Local Impacts

Assessment of Capacity of Existing Caravan Accommodation

Table 1 Impacts of Accommodating Temporary Workers on the Tourist Industry

Positive	Negative
Assured occupancy year round	Impact upon tourism - capacity
Assured income	Lower and level rates – no premium season
Worker use would be more reliable than tourism	Impact upon tourism – the concentration of sites would alter the perception of these areas
	Impact will be immediate. Post impact perceptions take time (years) to change
	Travel implications
	Shift time disturbance
	Relationship to Park & Ride sites

To evaluate the attitude of local businesses to the risks implicit in these impacts, the following process has been undertaken:

- identification of all caravan sites on the island from the licencing data held by the Council;
- identification of those sites where licenses would permit year round use for temporary workers; and
- direct approaches to ascertain the reception of each site to the potential to accept temporary workers.

Reference to the Caravan Site Licence data held by the Council has been made. For simplicity at this point this data is presented aggregated at Ward level. Table 2 sets out the licenced provision by ward for the whole island.

Table 2 Summary of All Licensed Static and Touring Caravan Pitches

Ward	Static Sites	Pitches	Touring Sites	Pitches	Total Pitches
Aberffraw	1	78			78
Amlwch Port	1	26			26
Beaumaris	3	47	2	62	109
Bodffordd			1	23	23
Bryngwran	1	4			4
Brynteg	3	82	4	121	203
Llanbadrig			2	17	17
Llanbedrgoch	11	539	5	187	726
Cwm Cadnant			1	30	30
Llanddyfnan	4	167	5	249	416
Llaneilian	2	103			103
Llanfaethlu	5	320	3	266	586
Llanfair-Yn-Neubwll			2	24	24
Llanfihangel					
Ysgeifiog	1	21	1	45	66
Llangoed	1	31	1	29	60
Llanidan	1	327			327
Mechell	2	43	1	3	46
Moelfre	8	218	8	373	591
Rhosyr			1	12	12
Parc a'r Mynydd	1	1			1
Pentraeth	1	21			21
Rhosneigr	2	102	2	75	177
Trearddur	11	948	9	237	1185
Valley			1	11	11
TOTAL	59	3078	49	1764	4842

This raw data is then refined to remove those sites where licence conditions preclude further consideration:

- Static sites licenced under Mobile Home Legislation are discarded. Caravans subject to this legislation are owned but on third party land and conditions of ownership / occupancy prevent letting.
- Licenses for many sites include occupancy restrictions that tie use to certain times of year – usually related to the holiday season. As the potential of using caravans for worker accommodation may require year-round occupation (or if seasonal, then outside of the peak holiday season), sites not licenced for full year occupancy are discounted.

Taken together these refinements reduce the potential of sites under the terms of their existing licences to that in Table 3 and is shown graphically in Figure 1.

Provision is overwhelmingly in coastal wards. Highest concentrations are around Moelfre & Benllech (Brynteg), Treaddur Bay (all 25 to 30 mins drive-time from Wylfa) and Llanidan (40 mins drive time).

Table 3 Summary of Caravan Pitches Licensed for Year Round Occupancy

Ward	Static	Caravans	Touring Caravans		Total		Drive Time from Wylfa
	Sites	Pitches	Sites	Pitches	Sites*	Pitches	
Aberffraw	1	78			1	78	30 mins
Brynteg	2	63	2	44	3	89	30 mins
Llanidan	1	327			1	327	40 mins
Parc a'r mynydd	1	1			1	1	30 mins
Trearddur	6	699	5	120	11	819	30 mins
TOTAL	11	1168	7	164	17	1314	

* Not cumulative due to static and touring pitches being co-located

All but one of the touring sites is co-located with static provision – Bodafon Caravan Park in Brynteg has an exclusively touring license for 18 pitches. the sites are notated on Figure 2.

The most recent licence(s) for each site has been validated against publicly available aerial photographs. The findings are in Table 4.

Table 4 Summary of Consultations

Ward	Sites	Pitches	Tel No.
Aberffraw	Plas Caravan Park	78	
Brynteg	Bodafon Caravan Park	18	
Brynteg	Pant Y Saer Caravan Park	35	
Brynteg	Pen y Parc Caravan Site	54	
Llanidan	Plas Coch Caravan Park	327	
Parc a'r mynydd	Hirfron	1	
Trearddur	Cliff Caravan Site	146	
Trearddur	Gwynfair	178	
Trearddur	Lee Caravan Park	165	
Trearddur	Silver Bay Caravan Park	112	
Trearddur	Trearddur Farm Country Park	150	
Trearddur	Valley of the Rocks Caravan Site	50	

Note:

Two additional figures have been produced which map the sites identified within Table 2.