

Phase 2 Land Use Plan Review Call for Sites Assessment

Reference: PA/075

Site name: Former site of Lager Norderney

AY Parcel(s): Not provided

Submission Type: Protection/enhancement

Source: Private



ARUP  **STATES OF ALDERNEY**



Proposals

Summary of respondent's proposal:

Protection of the site of Lager Norderney to recognise its considerable historic significance and prevent development and further damage to the surviving remnants of the camp structures.

Planning history and other context: This site overlaps with PA/111, which also proposes protection of the site in recognition of its history.

Accordance with the Land Use Plan Evidence Base

Does the proposal accord with the Vision Statement?	Yes	Protection of the site would accord with the vision, which seeks to value and protect the Island's unique cultural environment. It also accords with the guiding principle which seeks to value, protect and sustainably manage the Island's cultural heritage.
Does the proposal accord with the Housing Strategy?	N/A	The Housing Strategy does not relate to the proposed use.
Does the proposal accord with the Economic Development Strategy?	Yes	<p>The Economic Development Strategy recommends that the Land Use Plan should support a range of types of tourism, particularly supporting niche tourism (Recommendation 27). The Strategy identifies that heritage tourism, and particularly military heritage, is a niche market which is currently operating on Alderney, but for which more could be done to support the market. The proposal to provide protection for the site (in combination with protection afforded to other sites of significance) would therefore accord with the Economic Development Strategy.</p> <p>The site is currently used as a campsite.</p>

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Does the proposal accord with the Natural Environment Strategy?	Yes	The site contains fixed coastal dunes with herbaceous vegetation and open grassland, which fall under the EC Habitats Directive and therefore under the international tier of the hierarchy of environmental designations set out in the Natural Environment Strategy (see Map F.4 in the Natural Environment Strategy). The site also contains other habitats which fall under the regional (see Map F.5) and local (see Map F.6) tiers of the hierarchy of environmental designations. Protection of the site for its heritage value would need to align with the protection of these habitats, and may provide opportunities for joint protection and management.
Does the proposal accord with the Built Environment and Heritage Strategy?	Yes	<p>The Built Environment and Heritage Strategy recognises the importance of Lager Norderney, and recommends that it is added to the Register of Historic Buildings and Ancient Monuments and Ancient Monuments (Recommendation 20). It also recommends that further consideration should be given to the need for additional protection, policies and procedures that might be required for such areas, to ensure that these assets are afforded the same level of protection and reflect best practice from other jurisdictions (Recommendation 22). The Strategy recognises the value of Lager Norderney (MH/045) from a World War II constructions perspective, and recommends that it is added to the Register - this area largely overlaps with the submitted site.</p> <p>The site also falls within, and contributes to, Area of Landscape Value LV02 (North east corner of Albert, Bibette Head, Saye Beach, north-east of Lager Norderney to the west front of Chateau L'Etoc).</p> <p>The proposed use therefore aligns with the recommendations of the Built Environment and Heritage Strategy.</p>

Assessment of Suitability, Availability and Achievability

Is the site suitable for the proposed purpose?	Yes	The submission states that the site is of considerable historical importance due to its function as an Organisation Todt and SS camp during the World War II occupation. The submission states that there is evidence that Lager Norderney, along with other camps on Alderney, were inherently linked to other Holocaust sites in Europe. Lager Norderney was primarily used to house forced labourers, mainly from France, Czechoslovakia, Holland and Spain. Apart from several hut bases with steps and a half-buried bunker in the sand dunes, there are few extant signs that this area was the site of a forced labour camp. Given the historical importance of the site (in relation to both the role of forced labour and the wider occupation of the Island), it is considered that protection of the site is justified. Pending registration on the Register of Historic Buildings and Ancient Monuments, interim policy protection will be afforded to this site through the Land Use Plan.
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Is the site available for the proposed purpose?	Yes, with mitigation	<p>The site is largely in the ownership of the States of Alderney, although it is understood that the former kitchen is in private ownership. The submission was not made on behalf of the landowners. Permission would need to be sought to add the site to the Register of Historic Buildings and Ancient Monuments and Ancient Monuments. (Recommendation 5 of the Built Environment and Heritage Strategy stated that the States to should act as a 'leader' in expanding the Register, by registering their own assets first.)</p> <p>The site is currently used as a campsite. It is not anticipated that protection of the site would preclude its continued use as a campsite, although it may impact on its management, and the former function of the site should be acknowledged.</p>
Is the site achievable for the proposed purpose?	Yes, with mitigation	<p>The site could be protected through inclusion on the Register of Historic Buildings and Ancient Monuments, subject to the consultation and publication processes set out in the Building and Development Control (Alderney) Law, 2002 (this would be undertaken outside of the Land Use Plan review process).</p>

Any other comments	
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Conclusions

Does the proposal accord with the emerging Land Use Plan?	Yes, with mitigation	<p>Inclusion on the Register of Historic Buildings and Ancient Monuments is subject to the consultation and publication processes set out in the Building and Development Control (Alderney) Law, 2002. The description included in the Register should include reference to the importance of the site in relation to the suffering of forced labour. In the interim, the site will be afforded policy protection through the Land Use Plan.</p> <p>Any works required to ensure the long term preservation of the heritage assets should be undertaken with regard to the important habitats present on the site.</p>
Indicative development capacity (if applicable)	N/A	

Phase 2 Land Use Plan Review Call for Sites Assessment

Reference: PA/111

Site name: Former site of Lager Norderney

AY Parcel(s): AY 1849

Submission Type: Protection/enhancement

Source: Private



ARUP  **STATES OF ALDERNEY**



Proposals

Summary of respondent's proposal:

Protection of Lager Norderney, reflecting its role in the occupation of the Island during WWII and in particular the suffering of forced labour. Protection should provide long term preservation and sensitive interpretation.

Planning history and other context: This site overlaps with PA/75, which also proposes protection of the site in recognition of its history.

Accordance with the Land Use Plan Evidence Base

Does the proposal accord with the Vision Statement?	Yes	Protection of the site would accord with the vision, which seeks to value and protect the Island's unique cultural environment. It also accords with the guiding principle which seeks to value, protect and sustainably manage the Island's built and cultural heritage.
Does the proposal accord with the Housing Strategy?	N/A	The Housing Strategy does not relate to the proposed use.
Does the proposal accord with the Economic Development Strategy?	Yes	<p>The Economic Development Strategy recommends that the Land Use Plan should support a range of types of tourism, particularly supporting niche tourism (Recommendation 27). The Strategy identifies that heritage tourism, and particularly military heritage, is a niche market which is currently operating on Alderney, but for which more could be done to support the market. The proposal to provide protection for the site (in combination with protection afforded to other sites of significance) would therefore accord with the Economic Development Strategy.</p> <p>The site is currently used as a campsite.</p>

Phase 2 Land Use Plan Review Call for Sites Assessment

Reference: PA/111
Site name: Former site of Lager Norderney

Does the proposal accord with the Natural Environment Strategy?	Yes	The site contains fixed coastal dunes with herbaceous vegetation and open grassland, which fall under the EC Habitats Directive and therefore under the international tier of the hierarchy of environmental designations set out in the Natural Environment Strategy (see Map F.4 in the Natural Environment Strategy). The site also contains other habitats which fall under the regional (see Map F.5) and local (see Map F.6) tiers of the hierarchy of environmental designations. Protection of the site for its heritage value would need to align with the protection of these habitats, and may provide opportunities for joint protection and management.
Does the proposal accord with the Built Environment and Heritage Strategy?	Yes	<p>The Built Environment and Heritage Strategy recommends that additional heritage assets should be added to the Register of Historic Buildings and Ancient Monuments (see for example Recommendation 13). The Strategy recognises the value of the area of Lager Norderney (MH/045), and recommends that it is added to the Register. It also recommends that further consideration should be given to the need for additional protection, policies and procedures that might be required for such areas, to ensure that these assets are afforded the same level of protection and reflect best practice from other jurisdictions (Recommendation 22).</p> <p>The site also falls within, and contributes to, Area of Landscape Value LV02 (North east corner of Albert, Bibette Head, Saye Beach, north-east of Lager Norderney to the west front of Chateau L'Etoc).</p> <p>The proposed use therefore aligns with the recommendations of the Built Environment and Heritage Strategy.</p>

Assessment of Suitability, Availability and Achievability

Is the site suitable for the proposed purpose?	Yes	Lager Norderney was primarily used to house forced labourers, mainly from France, Czechoslovakia, Holland and Spain. Apart from several hut bases with steps and a half-buried bunker in the sand dunes, there few extant signs that this area was the site of a forced labour camp. Given the historical importance of the site (in relation to both the role of forced labour and the wider occupation of the Island), it is considered that protection of the site is justified. Pending registration on the Register of Historic Buildings and Ancient Monuments, interim policy protection will be afforded to this site through the Land Use Plan.
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Phase 2 Land Use Plan Review Call for Sites Assessment

Reference: PA/111

Site name: Former site of Lager Norderney

Is the site available for the proposed purpose?	Yes, with mitigation	<p>The site is largely in the ownership of the States of Alderney, although it is understood that the former kitchen is in private ownership. The submission was not made on behalf of the owner. Permission would need to be sought from the owners to add the site to the Register of Historic Buildings and Ancient Monuments. (Recommendation 5 of the Built Environment and Heritage Strategy stated that the States to should act as a ‘leader’ in expanding the Register, by registering their own assets first.)</p> <p>The site is currently used as a campsite. It is not anticipated that protection of the site would preclude its continued use as a campsite, although it may impact on its management and the former function of the site should be acknowledged.</p>
Is the site achievable for the proposed purpose?	Yes, with mitigation	<p>The site could be protected through inclusion on the Register of Historic Buildings, subject to the consultation and publication processes set out in the Building and Development Control (Alderney) Law, 2002 (this would be undertaken outside of the Land Use Plan review process).</p>

Any other comments	
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Conclusions

Does the proposal accord with the emerging Land Use Plan?	Yes, with mitigation	<p>Inclusion on the Register of Historic Buildings and Ancient Monuments is subject to the consultation and publication processes set out in the Building and Development Control (Alderney) Law, 2002. The description included in the Register should include reference to the importance of the site in relation to the suffering of forced labour. In the interim, the site will be afforded policy protection through the Land Use Plan.</p> <p>Any works required to ensure the long term preservation of the heritage assets should be undertaken with regard to the important habitats present on the site.</p>
Indicative development capacity (if applicable)	N/A	