

Phase 2 Land Use Plan Review Call for Sites Assessment

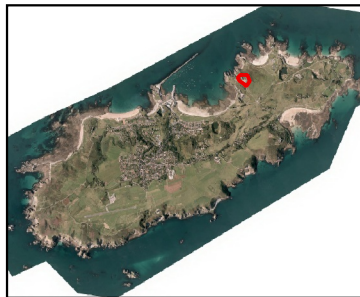
Reference: PA/123

Site name: Fort Albert

AY Parcel(s): AY 1953, AY 1936, AY 1827 (part)

Submission Type: Use/development

Source: Private



ARUP STATES OF ALDERNEY



Proposals

Summary of respondent's proposal:

An alternative spatial extent for the developments proposed under submissions PA/087 and PA/088.

Planning history and other context: The site overlaps with:

- PA/063 which proposes the use of the site for preservation of nature (including butterfly farm), heritage tourism and recreation (including climbing school).
- PA/089 which proposes the formalisation of the existing Longis Nature Reserve as a planning criteria, plus proposed extension of the reserve.
- PA/095 which proposes the protection of woodland areas across Alderney.
- PA/098 which proposes the continued zoning of the land currently designated as Protected Zone.
- PA/104 which proposes the protection of Fort Albert (including its bunkers and field), reflecting its role in the occupation of the Island during WWII.

Accordance with the Land Use Plan Evidence Base

Does the proposal accord with the Vision Statement?	Partial	<p>The proposal accords with the vision, which seeks to support an integrated and holistic approach to land use, maximise opportunities to become a diverse and balanced economy and promote resilient infrastructure systems.</p> <p>However, the proposal would be located in the Designated Area (with the exception of Fort Albert which is located in the Building Area) and in proximity to important biodiversity and heritage assets and therefore does not accord with the guiding principles of a community which protects and sustainably manages its environment and protects and sustainably manages its built and cultural environment.</p>
Does the proposal accord with the Housing Strategy?	Partial	<p>Due to the extensive works that would be required to construct the proposal, there will likely be an uplift of temporary off-Island labour. Some additional labour may also be required to ensure the operation of the scheme on a permanent basis. The Housing Strategy recognises that this temporary workforce will require adequate accommodation and by their very nature, this housing need is likely to be high capacity, short term and low value. Recommendation 10 states that a policy should be introduced in the Land Use Plan which requires proposals for large schemes to submit an 'Employment Strategy' as part of the planning application for both construction and operation phases of the development. As part of a future planning application, it is expected that an Employment Strategy would be submitted to demonstrate how workers would be accommodated on the Island.</p>

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Does the proposal accord with the Economic Development Strategy?	Partial	<p>The Economic Development Strategy recognises that there may be opportunities to harness large scale renewable energy generation (Recommendation 85), such as tidal power and recommends that the Land Use Plan support sustainable electricity generation (Recommendation 51).</p> <p>The Strategy recommends an overarching major infrastructure projects policy be included in the Land Use Plan (Recommendation 79), which could provide support for major infrastructure projects subject to applicants demonstrating:</p> <ul style="list-style-type: none"> - the need for the scheme including the benefits to Alderney as a whole; and - rationale for the location of the proposed scheme including the 'reasonable alternatives' must be considered having regard to technical, economic, social and environmental considerations. <p>Given the scale of the proposal it is considered to fall within the definition of a major infrastructure project and therefore, at a high level, the need for the proposal and the reasonable alternatives considered should be considered as part of the Call for Sites process.</p> <p>With regards to the need for the proposal, the submission states that the project will bring economic benefits to Alderney in the form of payments from the operators and royalties on the electricity generated. The submission continues to state that the arrival of advanced internet links via the FAB link would be of great benefit to the Island's inhabitants.</p> <p>The need for the proposal, including the potential benefits to Alderney, is supported at the strategic level. The proposed FAB Link interconnector is a European Project of Common Interest (PCI) under the provisions of EU 347/2013: Regulation on guidelines for trans-European energy infrastructure (TEN-E Regulation) and it is included in the ENTSO-E 10-year network development plan. The inclusion of the FAB Link interconnector in the PCI list and the ENTSO-E network development plan is indicative of the importance of the interconnector at a European level.</p> <p>In August 2013, the States of Alderney Policy and Finance Committee issued a press release stating that <i>"it is recognised that Alderney faces a unique predicament in terms of the production of clean, low cost, secure energy supplies. The long-term future is known even if the precise timing is unsure - Alderney Renewable Energy is developing a project to deliver tidal power and/or deliver power from an interconnector which will link France and the UK."</i> Following this, the States of Alderney Strategic Plan (2014) was 'received' (as opposed to approved) by States Members on the 15 January 2014. The Strategic Plan includes a high level Energy Plan which includes <i>"support [for] ARE tidal power project" and "support [for] FAB cable project"</i>.</p> <p>The Alderney Economic Development Study (Frontier Economics, Draft final report, August 2014) also identified the following opportunities related to FAB Link and tidal power:</p> <ul style="list-style-type: none"> - <i>"Developing tidal power and the FAB interconnector offers economic and job opportunities in Alderney (e.g. research opportunities and administration);</i> - <i>Alderney is only likely to capture a small part of the economic return, but the potential rewards are large, including the potential for licensing revenues;</i> - <i>Working with France on the project could develop new tourism markets;</i> - <i>By reducing electricity prices and improving ICT connectivity, FAB could increase Alderney's competitiveness as a business location."</i> <p>The States of Alderney has therefore set out its support for renewable energy, which includes tidal projects.</p> <p>In order to export tidal energy from projects in Alderney's waters a converter hall will be required. A converter hall is required to convert High Voltage Alternating Current (HVAC) to High Voltage Direct Current (HVDC). The need for the converter hall is therefore considered to have been demonstrated at a strategic level. In terms of the scale of the converter hall proposal, the Call for Sites submission includes an indicative site plan, locating the hall within Fort Albert. However, the submission does not provide dimensions for the proposed converter hall or evidence to suggest the structure could be accommodated within Fort Albert. Without this information, it is not possible to determine at this stage whether the proposed solution for meeting the need is appropriate or whether there are other alternative solutions or configurations which could be adopted.</p> <p>Further justification would be required as part of a planning application on the benefits the proposal would bring to the Island since the delivery of the FAB Link proposal does not guarantee tidal energy for Alderney nor improved ICT connectivity. Further details on the need and the associated benefits to Alderney of the converter hall would also need to be included in support of a planning application.</p> <p>The Call for Sites submission also sets out the rationale for the alternative spatial extent, stating that the route for the FAB Link interconnector proposed under submission PA/088 is <i>"extremely unpopular as it threatens two of our most beautiful beaches in spite of reassurances that they will be restored after the cable has been laid"</i>. The submission continues to state that the <i>"route continues over land owned by opponents of the scheme and legislation would inevitably ensue and delay the project"</i>. However, it should be noted that the submission referred to (PA/088) is in fact on land owned by the States of Alderney.</p> <p>The submission provides a rationale for an alternative route on the grounds that it would <i>"skirt Longis Beach on its least attractive side, emerging for landfall below the sewage works. From there [the route] would follow existing roads."</i> The submission goes on to state that <i>"the unmade road beside the Nunnery could be of archaeological interest and would need cooperative excavation" and "the route to Fort Albert, thereafter avoids most dwellings"</i>, while the <i>"old States houses at Whitegates are unoccupied"</i>. With regards to the converter hall, the Call for Sites submission contends that the use of Fort Albert would bring</p>
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Does the proposal accord with the Economic Development Strategy? (continued)	<p>an underutilised site back into active use. This suggestion is made under the assumption that the Fort could accommodate a building of the required scale.</p> <p>Since this submission has not been proposed by the promoters of the two schemes, no technical work has been submitted which assesses the reasonable alternatives for the route or converter hall or considers the relative suitability of land based (Alderney-based) options, non-Alderney-based onshore options or proximate and more remote marine-based options (as well as any other reasonable alternatives). In the absence of such information, it is not considered possible to determine at this stage whether the proposed location for the development is suitable relative to the other potential options. The scheme does however, accord with Recommendation 86 of the Economic Development Strategy which states that the Land Use Plan should provide further consideration to the range and mix of appropriate uses for the forts.</p> <p>Recommendation 27 of the Economic Development Strategy states that the Land Use Plan should support a range of types of tourism and corresponding range of tourism accommodation particularly supporting niche tourism markets. The proposed scheme may result in benefits to the tourism industry within Alderney around 'technical' tourism (which would need to be confirmed as part of a future planning application).</p>
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Does the proposal accord with the Natural Environment Strategy?	Partial	<p>The site (including the route alignment and the converter hall location) contains the following sites and habitats identified in the Natural Environment Strategy:</p> <ul style="list-style-type: none"> - Within close proximity of the proposed alignment at Longis Bay, there are eelgrass beds (H-17-SS.SMp.SSgr.Zmar and SS.SMP.SSgr.Zmar/LS.LSa.FiSa.Po) which fall under the international tier of the hierarchy of environmental designations (see Map F.4). Furthermore, there are a number of intertidal habitats which fall under the regional or local tier of the hierarchy of environmental designations (see Maps F.5 and F.6) including LR.MLR.BF.FspiB, LS.LCS.Sh.Barsh, LR.MLR.BF.PelB, LR.LLR.F.Asc.FS, LR.FLR.Lic.YG, IR.HIR.KFaR.LhypR; LR.HLR.FR.HimLR.MLR.BF.Fser.R; LR.LLR.F.Fserr.X; LR.FLR.Eph.EphX; LR.LLR.F.Fves.X; LR.FLR.Eph.Ent; LS.LSa.MoSa.BarSa. There are other intertidal habitats within Longis Bay which may be affected, including LR.HLR.FR.Him, LR.MLR.BF.Rho, LS.LSa.St.Tal, LR.HLR.FR.Osm, LR.HLR.MusB.Cht and LS.LSa.MuSa.MacAre. - The route alignment between Longis Bay and Fort Albert contains coastal grassland, neutral grassland-semi-improved, dune grassland and improved grassland which fall under the regional tier of the hierarchy of environmental designations (see Map F.5) and amenity grassland and bracken-continuous which fall under the local tier (see Map F.6). - To the west of the proposed route there is parkland and open space, which is a designated local site of biodiversity importance on Alderney (see Table C.1) and has the potential to be affected by the proposal. - Towards the northern end of the route there is an area of acid-grassland-semi-improved which fall under the international hierarchy of environmental importance (see Map F.4). - To the north of the proposed route alignment at Bibette Head, there are intertidal habitats which fall under the regional or local tier of the hierarchy of environmental designations (see Maps F.5 and F.6) including LR.FLR.Lic.YG, LR.FLR.Eph.Ent, LR.HLR.FR.Osm, LR.FLR.Rkp.G, LR.MLR.BF.FspiB, LR.MLR.BF.PelB, LR.HLR.MusB.Cht, LR.HLR.FR.Him, LR.FLR.Eph.BLitX, LR.MLR.BF.Fser.R, LR.FLR.Rkp.Cor.Bif. <p>The information accompanying the Call for Sites submission does not distinguish between the land required for the permanent infrastructure or temporary land take required; instead it provides an indicative alternative route alignment and site area for the converter hall. Therefore, it is not currently known whether works are proposed on or adjacent to these habitats and therefore the potential for harm. Should this proposal be brought forward, a detailed assessment of the impacts on biodiversity would be required including and mitigation measures required to address potential environmental impacts relating to the identified sites and habitats during both the construction and operational phases, as well as any monitoring which may be required.</p> <p>The Natural Environment Strategy recommends that the current extent of the Agricultural Zone should be reviewed to ensure that it reflects current uses (Recommendation 29). Part of the site is currently designated as Agricultural Zone, however it is not in use (see Map F.8) and therefore is likely to be removed from the Agricultural Zone in the emerging Land Use Plan.</p> <p>Through proposing an alternative route for the FAB Link interconnector (PA/088) and associated converter hall (PA/087), the Call for Sites submission supports the generation of electricity from renewable energy sources, through providing a potential 'route to market' for the tidal energy project. On this basis, the proposal accords with the Natural Environment Strategy's aspiration to reduce the impacts of climate change.</p>
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Does the proposal accord with the Built Environment and Heritage Strategy?	Partial	<p>The site falls within the Longis Common Conservation Area (C/004), which is the most archaeologically sensitive area of Alderney (p.35, Built Environment Heritage Strategy). The proposed route alignment is sited within close proximity to known areas of archaeological interest including Peat at Longis (MGU4254), Roman Burial at The Nunnery (MGU5686), Findspot at The Nunnery (MGU4253), Cemetery at Rue des Mielles (MGU4306) and Cist burial near Corblets (MGU4308). Longis Bay is also identified in the Built Environment Heritage Strategy as archaeologically sensitive.</p> <p>The alternative route would involve the siting of the converter hall within Fort Albert, which is identified on the Register of Historic Buildings and Ancient Monuments (B/140).</p> <p>The site also falls within and contributes to Areas of Landscape Value LV01 (The inner harbour, Commercial Quay, Maggie's Bay and Douglas Quay and across the bay to the west front of Fort Albert), Area of Landscape Value LV02 (North east corner of Albert, Bibette Head, Saye Beach, north-east of Lager Nordeney to the west front of Chateau a L'Etoc), Area of Landscape Value LV06 (Longis Common, south of Berry's Quarry, east of Workers' cemetery, and north of Longis Road), Area of Landscape Value LV07 (South-west of Les Boufresses, east of Longis Road down to the sea wall the German Wall of Longis Bay) and Area of Landscape Value LV08 (From the coastal lane to Essex Farm and Frying Pan Battery, south of Barrack Masters' Lane to the west end of the lane, south east to Le Tchue (Impot) and Essex Hill to the coast).</p> <p>The Built Environment and Heritage Strategy identified a considerable number of World War II constructions, which, where warranted, the Strategy recommended be added to the Register of Historic Buildings and Ancient Monuments. World War II constructions located within the site comprise the Nunnery (MH/013) and Fort Albert, the Arsenal & Store Establishment and Roselle Battery and German works (MH/009) which are already registered. Recommendation 15 of the Building Environment and Heritage Strategy states that the "Land Use Plan should set out the importance of sensitive conservation, preservation and re-use in forts and fortifications." Since the proposed converter hall would be located with Fort Albert, thereby bringing it into active use, the proposal supports Recommendation 15.</p> <p>Sites not currently registered but recommended for inclusion on the Register of Historic Buildings and Ancient Monuments include Batteries Elsass, Marcks & Strongpoint Schirrhof (MH/041), which is located within the site, and Flak Battery Hornigsheim & Riegel Ost (MH/035) and Strongpoint Graue Häuser (MH/040) which are located adjacent to the site. These sites will be provided interim policy protection through the Land Use Plan.</p> <p>Given this submission has not been made by either site promoter, technical details are not available with regards to the precise siting and construction methodology for the proposed route or converter hall. There is currently insufficient detail to confirm that the proposal would not result in harm to the sensitive receptors described in the Built Environment and Heritage Strategy. A future planning application would be required to demonstrate how the proposal would be developed to avoid impacts on the fabric of any identified heritage assets or their settings, both during operation and construction. Specifically, it would have to be demonstrated that the scale of converter hall required could be accommodated within Fort Albert and that the height of the structure did not protrude above the perimeter walls. With regards to archaeology, details would be required at application stage to demonstrate how identified assets would be accommodated during the construction programme and operation.</p>
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Assessment of Suitability, Availability and Achievability

Is the site suitable for the proposed purpose?	Yes, with mitigation	<p>The suitability of the two landfall options, route alignment and location for the converter hall need to be considered. The Call for Sites submission compares the spatial extents proposed in submission PA/123 with the preferred options set out in submissions PA/087 and PA/088.</p> <p>Given this submission has not been made by either site promoter, technical details are not available with regards to the rationale for the siting of the proposal, specifically the search criteria used.</p> <p>Given the lack of information with regard to those criteria used for identifying the site (both in terms of considerations not taken into account and the robustness of those criteria used), it is not considered possible to determine at this stage whether the proposed location for the development is suitable. In addition, the assessment of the proposal against the Natural Environment Strategy and Built Environment and Heritage Strategy indicates the sensitivity of the site; the proposal does not adequately address how such harm could be managed, mitigated or if necessary compensated or off-set.</p>
Is the site available for the proposed purpose?	Yes, with mitigation	<p>The land is owned by the States of Alderney and the submission was not made by the landowner. Therefore, the availability of the land for the proposal is unknown.</p> <p>Given the linear nature of the site, parts of the site are in different uses including areas for recreational activities (Longis Beach), a road, open land and Fort Albert. The current uses across the site would generally not require relocation as on completion of the proposed development of the underground interconnector, the land would be re-instated. However, the current uses at Fort Albert (including the rifle club and storage uses) would need to be vacated from the site in order to enable the construction and operation of the converter hall.</p>

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Is the site achievable for the proposed purpose?	Yes, with mitigation	Currently the Building and Development Control Committee is unable to grant a planning application for those parts of the development which are located in the Designated Area because this type of development because it is prohibited under Section 12 of the Building and Development Control (Alderney) Law, 2002. The Economic Development Strategy indicates that further consideration will be given to whether major energy projects should be permissible development in the Designated Area under Section 12 of the Building and Development Control (Alderney) Law, 2002. Amendments are proposed to Section 12 of the Law to enable the Building and Development Control Committee to permit developments of strategic importance.
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Any other comments	
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Conclusions

Does the proposal accord with the emerging Land Use Plan?	Yes, with mitigation	<p>Whilst the need for the scheme has been demonstrated, the justification for the proposed location for the development has not. It is therefore not possible to include a development specific zone for the proposal within the Land Use Plan. Any future planning application will therefore be assessed against the major projects policy (in accordance with Recommendation 79 of the Economic Development Strategy) and will need to demonstrate the rationale for the proposed location including the reasonable alternatives considered. It is expected that further information would be submitted as part of a future planning application setting out the full range of technical, economic, social and environmental matters which have been used to identify a suitable location for the proposed development.</p> <p>Should the technical work conclude that the location contained within the submission represents the most appropriate location which is available, the future planning application would need to justify how the design positively responds to the surrounding built and natural environment and how during the construction and operation phases of the development, the impacts on the ecological receptors, archaeology and heritage assets and their settings would be mitigated. This includes for the development on land and located within the intertidal area (to the Mean Low Water line).</p>
Indicative development capacity (if applicable)	N/A	