

Phase 2 Land Use Plan Review Call for Sites Assessment

Reference: PA/099

Site name: Gun Pits with associated bunkers of Battery Giffoine

AY Parcel(s): Various

Submission Type: Protection/enhancement

Source: Private



ARUP  **STATES OF ALDERNEY**



Proposals

Summary of respondent's proposal: Protection of the gunpits and associated bunkers at the western Battery Giffoine, 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: N/A

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	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.

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Does the proposal accord with the Natural Environment Strategy?	Yes	The site is within the sea cliffs and slopes (Giffoine) habitat, which falls under the regional tier of the hierarchy of environmental designations set out in the Natural Environment Strategy (see Map F.5 in the Natural Environment Strategy). Protection of the site for its heritage value would need to align with the protection of this habitat, 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 Batterie Annes / Wastbatteries (MH/023), and recommends that it is added to the Register. The site also includes known archaeological sites / areas of interest which, although not recommended for inclusion on the Register, should be afforded protection through the Land Use Plan (Recommendation 37).</p> <p>The Strategy does not make reference to the site's importance as a location of forced labour suffering. Recommendation 19 states that the Building and Development Control Committee should continue to engage with relevant stakeholders who hold research and other evidence to support an improved understanding of the importance of sites of war time relevance. 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 LV12 (Giffoine from the Coastal Battery to The Guns to the north boundary and the path leading to the Zig Zag west of Rose Farm including the coastal area and west to Fort Clonque).</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	<p>The Built Environment and Heritage Strategy states that the battery was a naval coastal artillery battery, with gun emplacements, ammunition bunkers, personnel shelters, a command post and a generator bunker which are all still extant. The battery was the most modern of the German artillery batteries in Alderney and has a number of important features. All the fortress standard bunkers have survived, and the gun pits with their annular passages, shell hoists and magazines are the only surviving group of four emplacements of this type in the Channel Islands. The ancillary bunkers all survive in good condition and there are remains of the 150cm searchlight positions. However, the command bunker was partially destroyed post-war when the observation domes and rangefinder were removed.</p> <p>Battery Giffoine was built by slave labour from Lager Sylt - the submission seeks to protect the structures for this significance.</p> <p>Given the historical importance of the site (in relation to both the role of forced labour and the wider occupation of the Island) and the good condition of the assets, 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 through the Land Use Plan.</p>
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Is the site available for the proposed purpose?	Yes, with mitigation	<p>Some of the site is in the ownership of the States of Alderney and some is currently in private ownership. The submission was not made on behalf of the landowners. Permission would need to be sought from the landowners 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 majority of the site is open. One of the bunkers is occasionally used during Alderney Week, although this use is informal and could be incorporated elsewhere on the Island. A small part of the site is currently used for agriculture, although the land is not currently designated for agriculture under the Land Use Plan 2016.</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> <p>Given that the assets remain in good condition, it is assumed that works to maintain or preserve the site are not required. However, if works are required then permission will need to be sought with landowner(s).</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 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, or any other access to the site, should be undertaken with regard to the important habitats present on the site and access arrangements.</p>
Indicative development capacity (if applicable)	N/A	