### Phase 2 Land Use Plan Review Call for Sites Assessment

Reference: PA/109

Site name: Longis Anti-Tank Wall and Bunkers

and Nunnery

AY Parcel(s): AY 1838, AY 1879

Submission Type:

Protection/enhancement

Source: Private







**Proposals** 

Summary of respondent's

proposal:

Protection of the Longis anti-tank wall and bunkers, and including the Nunnery, reflecting their 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:

#### Accordance with the Land Use Plan Evidence Base

Accordance with the Lai		
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 contains fixed coastal dunes with herbaceous vegetation, which falls under the EC Habitats Directive and so under the international tier of the hierarchy of designations set out in the Natural Environment Strategy (see map F.4 in the Natural Environment Strategy). Protection of the site for its heritage 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	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 Nunnery (MH/013) and Strongpoint Steinbruch and the eastern end of Longis Bay, including the anti-tank wall (MH/037), and recommends that they are added to the Register. The Nunnery is currently registered (B/102).  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.  The site also falls within, and contributes to, Area of Landscape Value LV07 (South-west of Les Boufresses, east of Longis Road down to the sea wall and the German wall of Longis Bay).  The proposed use therefore aligns with the recommendations of the Built Environment and Heritage Strategy.

#### Assessment of Suitability, Availability and Achievability

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	, <b>Availabil</b> Yes	The submission states that it is a site of mass loss of life, both in terms of the loss of life associated with the construction of the anti-tank wall, and executions at the wall (with bullet marks visible). The submission also states that there were probable mass graves on the beach in front of the Nunnery.  The anti-tank wall is a striking and visible mark of the occupation of the Island. At one end of the wall is a concrete decoration of an Edelweiss. There are a number of interesting features in the bunkers, including original wooden doors and a wooden machine gun stand.  The nunnery has much wider historical significance within and beyond the Occupation. As set out in the Built Environment and Heritage Strategy, it is believed to have Roman origins, and is the first evidence of military constructions in Alderney. The fort was used during the French Revolutionary and Napoleonic Wars as a barracks. It became German Resistance Nest Piratenschloss. It is a unique example of a German strongpoint located in an essentially Roman fort. The Type 631B bunker and the Type 501 personnel shelter are the only ones of its kind on the Island. The 'Edelweiss' bunker with its wooden mounting is a very rare remaining example. The hollowed-out Roman bastion for a machine gun is also particularly unusual.  Given the historical importance of the site, it is considered that protection of the site is justified. The building is currently on the Register of Historic Buildings and Ancient Monuments; no further protection is		
		therefore considered necessary. The description included in the Register should include reference to the importance of the site in relation to the suffering of forced labour.		

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Is the site available for the proposed purpose?	Yes	The site is in the ownership of the States of Alderney. 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.
Is the site achievable for the proposed purpose?	Yes, with mitigation	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).
Any other comments		
Conclusions		
Does the proposal accord with the emerging Land Use Plan?	Yes, with mitigation	Inclusion on the Register of Historic Buildings is subject to the consultation and publication processes serout 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.
Indicative development capacity (if applicable)		N/A