Phase 2 Land Use Plan Review

Call for Sit	es Assessment	the stand	
Reference:	PA/097	Toske 2	11
Site name:	The Nunnery	Constant of the second	
AY Parcel(s):	AY 1877, AY 1878, AY 1879, AY 1953		
Submission Type:	Protection/enhancement		
Source:	Private		

Summary of respondent's proposal:	Protection of the Nunnery to recognise its heritage and cultural value and reuse of the building for a mix of commercial activities. Designation of the site for the protection of flora species.
Planning history and other context:	The site overlaps with PA/098 which proposes the continued zoning of the land currently designated as Protected Zone.
	The site overlaps with PA/109 which proposes the 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; and proposes that protection should provide long term preservation and sensitive interpretation. Accordance with the Land Use Plan Evidence Base

Accordance with the La	nd Use Pla	In Evidence Base
Does the proposal accord with the Vision Statement?	Yes	The use of the Nunnery for tourism/recreational purposes to provide income for the protection of the building accords with the guiding principle of valuing and protecting Alderney's built and cultural environment. The protection of flora species also accords with the guiding principle of protecting and sustainably managing its land and marine environment and maintaining access to the Island's natural environment.
Does the proposal accord with the Housing Strategy?	Partial	The proposal includes the use of part of the site as a full time residence for a site manager. However, it does not clarify the quantum of existing and proposed residential floorspace for comparison. As such, the current proposal does not clarify whether there would be a loss of residential floorspace as a result of the development.
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 and corresponding range of tourism accommodation, particularly supporting niche tourism markets (Recommendation 27). Niche tourism includes heritage tourism, as proposed under this submission. Specifically, the proposal states that the designation of the site for heritage conservation also needs to consider the need for commercial use of the building to cover the costs for its upkeep, including the ability to use it for paying accommodation and as a heritage site with paying tours and activities. Therefore, the proposal accords with Recommendation 27 of the Economic Development Strategy.
		D130

Phase 2 Land Use Plan Review Call for Sites Assessment

Reference:PA/097Site name:The Nunnery

Does the proposal accord with the Natural Environment Strategy?	Yes	The submission states that the walls of the building site is one of the last known locations for the lichen opegrapha subelevata in the British Isles and should be designated to protected this species of conservation concern.
		The Natural Environment Strategy does not currently include opegrapha subelevata in the hierarchy of designations of the current and potential future habitats of biodiversity importance on Alderney.
		The Strategy identifies that due to resource constraints it had not been possible to review data relating to all known sites, habitats and species on the Island and that in parts of the Island insufficient survey work had been undertaken to determine potential sites, habitats and species which may require protection. The Natural Environment Strategy also states that given the emerging evidence base, the LUP should consider adopting a precautionary approach to ecological protection. This may mean that planning applications may need to demonstrate that they are no likely to have significant adverse effects on ecological receptors.
		The site does not currently contain any other sites of biodiversity importance or habitats listed in Tables C.1 or C.2 of Appendix C of the Natural Environment Strategy. The proposed use therefore accords with the Natural Environment Strategy, which seeks to protect the Island's natural assets.
Does the proposal accord with the Built Environment and Heritage Strategy?	Yes	The Nunnery is currently a registered building (B/102) and area of archaeological interest (MGU3539). The Built Environment and Heritage Strategy recommends that the site continues to be listed on the Register.
		The site also lies adjacent to 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). The sites areas of interest include Roman Burial (MGU5686), Peat at Longis (MGU4264) and Cists (MGU5683). Protection of the Nunnery would need to align with the protection of the heritage assets identified above, and may provide opportunities for joint protection and management.
		The submission does not include any external alterations to the buildings and therefore accords with the Built Environment and Heritage Strategy, which seeks to protect the Island's built assets. The intensity of the proposed use would need to be proportionate in order to prevent the degradation of a registered heritage asset.
		The site also falls within and contributes to Longis Common Conservation Area, as well as Area of Landscape Value LV 06 (Longis Common, south of Berry's Quarry, east of Workers' cemetery, and north of Longis Road). The site partially lies within LV 07 (South-west of Les Boufresses, east of Longis Road down to the sea wall an the German wall of Longis Bay) and LV 08 (From the coastal lane to Essex Farm and Frying Pan Battery, south of Barrack Masters' Lane to the west end of the lane, south west to Le Tchue (Impot) and Essex Hill to the coast).

Assessment of Suitability, Availability and Achievability

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Is the site suitable for the proposed purpose?	Yes, with mitigation	Given the Nunnery building and associated archaeological area is currently on the Register, the site is already considered suitable for protection on the basis of heritage conservation. Recommendation 2 of the Built Environment and Heritage Strategy recommends the update or inclusion of a policy in the LUP which recognises the importance of the Island's heritage and sets out the BDCC's approach to protecting it in accordance with Section 8 of the Building and Development Control Law, 2002.
		With regards to the need for commercial use of the building to cover the costs for its upkeep, the submission states that the site is already recognised and visited regularly by residents and visitors. On this basis, it is considered that the site is suitable for diversification, subject to the proposed uses according with the Built Environment and Heritage Strategy.
		With regards to the conservation of its flora, specifically the lichen opegrapha subelevata, it is recognised that this species has not been assessed directly within the Natural Environment Strategy. As such, the adoption of a precautionary approach is considered appropriate. Pending further review, interim policy protection will be afforded through the Land Use Plan.

Phase 2 Land Use Plan Review Call for Sites Assessment

Reference:PA/097Site name:The Nunnery

Is the site available for the proposed purpose?	Yes	The submission states that the site is available.
Is the site achievable for the proposed purpose?	Yes, with mitigation	The site is already protected through inclusion on the Register of Historic Buildings and Ancient Monuments. The lichen species proposed for designation could be protected under the hierarchy of designations set out in the Natural Environment Strategy, once their defined international, regional and local conservation designations have been assessed.

Any other comments		

Conclusions		
Does the proposal accord with the emerging Land Use Plan?	Yes, with mitigation	The building is currently on the Register of Historic Buildings and Ancient Monuments; no further protection from a heritage perspective is therefore considered necessary. The Land Use Plan will include policies relating to registered assets.
		Inclusion of the lichen species in the hierarchy of designations in the Natural Environment Strategy should be made on the basis of additional survey work being undertaken to confirm the importance of such species.
Indicative development capacity (if applicable)		N/A