

14 August 2024

Scottish Charity No. SC 010440

Dear Minister

**Formation of Trotting Track at Whins Of Milton, Bannockburn (Stirling Council Planning Authority Ref 23/00612/FUL; Scottish Government Planning Ref: NOD-390-001)**

We are writing to express our concern at the decision taken by Stirling Council to recommend approval for this scheme (as above) on the Bannockburn Battlefield to build a horse harness racing track with associated infrastructure, services and landscaping to accommodate competitors and up to two hundred spectators. The proposed development would be located within Greenbelt on the Inventory boundary of the battlefield in proximity to the National Trust for Scotland (NTS) Bannockburn Visitor Centre and listed buildings.

This area is of considerable contemporary significance as it provides one of the only remaining open views of the battlefield from the Category A Listed commemoration rotunda, flagpole and monument. The location has historical significance as a key location where the battle unfolded including action on the first day of the battle.

As a membership organisation, we are writing on behalf of our Fellows (members) who have urged us to object to this development and express their concern. We believe that there is significant local and national opposition to this proposal and agree with the NTS and others that this development and subsequent activity would have a detrimental impact on the battlefield and the experience of the hundreds of thousands of visitors to the site who view it from the NTS Visitor Centre. Indeed, Historic Environment Scotland (HES) state in their response that “Views to the south are integrated into the design of the Category A listed Rotunda and the landscaping and interpretation around it. They are important for our experience of the battlefield landscape and listed buildings that commemorate the battle. These open views allow visitors to connect relatively readily to the past and help create a space for commemoration on Monument Hill.”

We understand that NTS were not consulted by the applicant and Stirling Council failed to notify them prior to their first consideration of this proposal, and that NTS consider they were not given enough time to make a detailed assessment of the full impact of this development.

The location within the Battlefield Inventory boundary coupled with landscape and visual issues are relevant material considerations.

Policy 7 of Scotland’s National Planning Framework 4 states that: “Development proposals affecting nationally important Historic Battlefields will only be supported where they protect and, where appropriate, enhance their cultural significance, key landscape characteristics, physical remains and special qualities.” This development will not protect or enhance these precious remains, cultural significance and landscape.

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The Inventory of Historic Battlefields states that: “Battlefields ... are hugely important because of what they can tell us about the course of the battle, and the physical remains and artefacts they can contain. Battlefields are also places of remembrance, as sites where soldiers fought and died and may have been buried.” Bannockburn is one of the sites considered by HES to be nationally important.

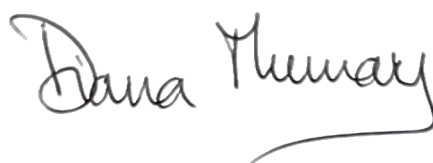
Stirling Council’s own Historic Environment Supplementary Guidance for Battlefields states that: “The sympathetic management of the battlefields in the Stirling Council area therefore needs to take into account overall landscape characteristics, key specific features and archaeological potential.” It goes further in relation to Bannockburn specifically, stating that: “This means that there are sufficient open areas and interconnecting views to allow the overall pattern of the battle to be understood and followed on the ground and the integrity of the battlefield to be preserved and enhanced...In addition, any undeveloped areas of the battlefield have the potential to contain either features or artefacts associated with the battle.” The same document states: “Finally it is anticipated that those features considered to be key components to the understanding of the battlefield should be excluded from development on archaeological grounds.” We understand that Professor Tony Pollard FSAScot has stated that “the fields host the positions taken by the Scottish army at the opening of the battle on 23 June 1314 and may also be the location where, famously, King Robert defeated English knight Henry de Bohun in single combat”.

Finally, the Stirling Council Panel Report only includes two brief paragraphs on the historic environment that relies on a Heritage Impact Statement that wrongly identifies the rotunda as scheduled throughout and has not assessed the landscape in detail against the Inventory of Historic Battlefield statement on Bannockburn Battlefield where this location is described as “location of the Scottish camp, the former New Park hunting park and the events of the first day of the battle” and described by HES in their response as “particularly sensitive” and that “Any currently buried archaeological remains which may survive could be disturbed, removed or destroyed during any ground-breaking works such as landscaping and building”.

This development is not consistent with the national policy or indeed Stirling’s own Supplementary Guidance, and calls into question the usefulness of an Inventory of Historic Battlefields which has the aim of helping protect these sensitive locations.

We are pleased that Scottish Ministers issued a notification direction and therefore now strongly urge the Scottish Government to call the proposal in for appropriate scrutiny and determination.

Yours sincerely,

A handwritten signature in black ink that reads "Diana Murray". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Diana Murray CBE HonFSAScot  
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