

Sharon Marklow
Planning and Building Standards
1-3 Port St
Stirling FK8 2EJ

17th May 2023

Dear Ms Marklow,

23/00612/FUL | Formation of Trotting Track (Class 11 Assembly and leisure), including associated drainage and erection of amenity facility for the provision of toilets and including a licensed bar and hot food and drink, all takeaway (Sui Generis) and also the formation of competitor and spectator vehicular/footway accesses and parking areas | Land West Of New Line Road And South Of Fairhill Road Whins Of Milton

The National Trust for Scotland wishes to **strongly object** to this planning application due to the adverse effect it would have on a heritage site of national and international importance: the nationally designated Battlefield of Bannockburn, along with the A-listed monuments on the site, and the visitor experience of the site.

Despite the close proximity to the National Trust for Scotland's Battle of Bannockburn visitor centre, the Trust has not been approached by the applicant, nor included in the Pre-Application Phase consultation.

We would therefore wish to pass our comments directly to the Planning Committee and request your forbearance on this.

The National Trust for Scotland has been managing the Bannockburn Battlefield since 1943, and we are tasked with its long-term protection and promotion. The Bannockburn visitor centre currently attracts thousands of national and international visitors, as well as dedicated school visits. The proposed development risks damaging not only internationally significant heritage, but fundamentally altering the experience of the site for current and future generations.

Our specific grounds for objection are:

Impact on the designated historic battlefield

The proposed development would destroy one of the few remaining undeveloped areas of the designated historic battlefield (first designated in 2012), including groundbreaking, access roads, track surfaces, concrete pads, and foundations.

We consider this level of loss at a nationally and internationally important battlefield to be unacceptable.

The proposals would also in our view contravene the National Planning Framework 4 (2023) which under Policy 7 Historic assets and places 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.”

The 2018 Stirling Council Local Development Plan states that Stirling aspires to be “a place with high quality environments: there is a high quality urban and built environment. Historic landmarks such as Stirling Castle, the Wallace Monument and Battlefields are protected and enhanced and sit alongside new development giving a unique sense of place.”

And that: “Development which would have a significant adverse effect upon the archaeology, landscape features, character and setting of sites listed in the Inventory of Historic Battlefields will not be supported unless it can be demonstrated that the overall integrity and character of the battlefield area will not be compromised. Where approved, proposals and developments affecting Inventory sites will require an appropriate level of mitigation, and measures (to be agreed with the Planning Authority) must be taken to conserve and enhance the essential characteristics, aesthetics, archaeological, historical value and setting of the battlefield.”

The proposed development does not meet these tests.

Visual impact

The proposal would see one of the last green wedges disappear from Stirling. Currently, the agricultural use of the land means the battlefield can be seen in context from the Rotunda, looking out to the fields and then hills. The proposed development would seal in the visitor centre, Rotunda, and monuments, greatly reducing the sense of place, and quality of experience.

As Historic Environment Scotland points out in their submission, the development would have a particular effect on the visitor experience, including flagpoles which could be confused with the battlefield site itself, and on the loss of views from the Rotunda, which currently “allows an appreciation and understanding of the Scots’ tactical choice to camp and draw up on higher ground, overlooking the English approach from the south. This is clearly communicated to visitors by the interpretation provided on Monument Hill. 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.”

There would therefore be a significant detriment to the visitor experience should this development be granted permission.

Transport impact

The application proposes to turn part of the designated battlefield into car parking, for over 200 cars. The creation of new accesses to serve the proposed site could cause issues for road users. The Drummond Black Consulting Road Safety Audit identifies a number of issues, including an elevated risk of collision on the main road. For the National Trust for Scotland, we would take issue with a development that could potentially put residents and visitors at risk.

Noise pollution

The proposal is for regular races to be run, using amplified public address systems, along with crowd noise, immediately adjacent to the historic battlefield. Bannockburn Battlefield is a place of pilgrimage for many, and a site where visitors seek to again experience the sense of place of this climatic battle. Noise disturbance from the racetrack during events will greatly detract from this experience.

Yours sincerely

Stuart Maxwell
Regional Director, Edinburgh & East
The National Trust for Scotland