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cc. planning.decisions@gov.scot

07 August 2024

Dear Minister

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 at Land West Of New Line Road And South Of, Fairhill Road, Whins Of Milton, Bannockburn

We are writing to you to express our considerable concern at the decision taken by Stirling Council to recommend approval for a 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 NTS Bannockburn Visitor Centre. This area is of considerable significance as it affords one of the only remaining open views of the battlefield from the Category A Listed rotunda, flagpole and monument, erected to commemorate and interpret how the battle unfolded including action on the first day of the battle.

There is significant local and national opposition to this proposal. NTS and others believe that the development and subsequent activity would have a very detrimental impact on the battlefield and the experience of the hundreds of thousands of visitors and school children who visit the site and view it from the NTS Visitor Centre.

We also have significant concerns around the process followed by Stirling Council in the consideration of this case. We believe the applicant should have been requested to submit a Landscape & Visual Impact Assessment (LVIA) to an appropriate standard.

As landscape is a key material consideration, it therefore follows that without having a LVA/LVIA, the Council have not adequately considered the nature of all likely landscape

and visual effects within their Panel Report. This is evidenced by the fact the Panel Report only includes three brief paragraphs on landscape and visual impact that relies on the very questionable findings of a Heritage Impact Statement. Landscape and visual issues are very relevant material considerations. Consequently, it is very apparent that the Council's decision is flawed.

In order to undertake a robust determination of the application in accordance with relevant material considerations, it is essential that the applicant be requested to provide a detailed LVA/LVIA, to be undertaken by a Chartered Member of the Landscape Institute (CMLI).

NTS were not consulted by the applicant and Stirling Council failed to notify us prior to their first consideration of this proposal. Although we were notified subsequently it gave us very little to time to make a detailed objection.

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 is in no way consistent with this policy and therefore the direction of Scottish Ministers in pursuance of the best interests of our nation.

We are grateful 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



Philip Long OBE FRSE
Chief Executive