



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

Ms Angela Heaney
Localities and infrastructure
Stirling Council
Teith House
Kerse Road
STIRLING
FK7 7QA

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Direct Line: 0131 668 8704
Switchboard: 0131 668 8600
virginia.sharp@hes.scot

Our ref: AMN/23/681
Our Case ID: 201602250
SEA Gateway ref: 01160

5 September 2016

Dear Ms Heaney

**Environmental Assessment (Scotland) Act 2005
Stirling City Development Framework draft Masterplan**

Thank you for your consultation which we received on 25 July regarding the above and its Environmental Report (ER). I have reviewed these documents on behalf of Historic Environment Scotland in relation to our main area of interest for the historic environment. The first part of this response relates to the draft Masterplan, with part two focusing upon its environmental assessment.

Part 1: Stirling City Development Framework draft Masterplan

The scope of the Masterplan is broad and ambitious, and offers many potential benefits for the rich historic environment of Stirling. These benefits include improved access and understanding, and the opportunities for historic townscape enhancement and sustainable, sensitive use and reuse of historic assets. There is also great potential for synergies between the Masterplan and Historic Environment Scotland's collaboration with Forth Valley College and our Engine Shed project. We are looking forward to working with Stirling to help to deliver some of the projects within the Masterplan, and welcome a continuing dialogue about how we can help to optimise positive outcomes for the historic environment through the Framework.

The accompanying Strategic Environmental Assessment has indicated at a generic level that there will also be adverse effects, in some cases at a significant level, on the historic environment. Significant adverse effects are likely to be centred around the City Park signature project. The project described in the draft Masterplan proposes considerable changes to the west of Stirling Castle, introducing a structured park landscape with a distinct urban edge and associated infrastructure elements, some of which would have direct impacts on designated heritage assets.

The ongoing development of the City Park proposals should be informed and guided by a full understanding of the nature and setting of key historic environment assets in the vicinity, particularly Stirling Castle and the Kings Knot. To minimise adverse effects, the adopted Masterplan will need to have the necessary flexibility to allow that understanding to effectively influence the proposals as they develop. This would include scope to make changes to location and nature of proposals, in addition to the small scale, detailed design changes which are currently proposed as mitigation.

Historic Environment Scotland is keen to engage in ongoing dialogue about those proposals where potential adverse effects have been identified, and particularly in relation to the City Park project. We have provided detailed comments on the potential effects on the historic environment in our response to the Environmental Report (below, Part Two). We have also included Historic Environment Scotland's assessment of the potential effects of the City Park proposals, at Annex 1.

Part 2: Environmental Report

Non Technical Summary

The non-technical provides a clear, concise and balanced summary of the findings of the ER.

Key findings for Cultural Heritage

The mitigation set out here suggests that the assessment has been based on a generic, high-level historic environment baseline, rather than an understanding of the heritage assets that may be affected. Given the spatially-specific and detailed nature of the Masterplan proposals, it would have been possible, and desirable, to have undertaken assessment informed by a detailed baseline. This would have been more effective at identifying significant effects and effective mitigation measures (which would be likely to include flexibility in the location / nature of some proposals within the Masterplan).

We welcome your transparent approach to explaining how far the SEA has embedded into plan making process and how it has influenced the plan. Given that the SEA has had limited opportunity to influence the Masterplan, it becomes even more important that mitigation measures to implemented as delivery of the Masterplan progresses are as specific as possible, and that it is clear how, when and by whom they will be taken forward.

Environmental baseline

Cultural assets – main issues

In addition to adverse impacts, this summary could have encompassed the potential for positive outcomes for heritage assets currently in a poor condition, with a degraded setting, or at risk through disuse / inappropriate use. This would have enhanced the ability of the assessment to identify and influence positive opportunities for the historic environment through the Masterplan.

This section suggests that the presence / absence and significance of affected historic environment assets is largely currently unknown. Whilst there is potential for unknown assets, the Masterplan project areas are rich in known assets, both designated and undesignated, and detailed assessment of these elements of the baseline would have been possible and should have informed the assessment.

Mitigation

Existing issues

The requirement for a detailed assessment of the historic environment within the Masterplan area is stated as an existing issue. It is not clear why this assessment did not form part of the SEA process. Additionally, it is not clear why this is considered an existing environmental issue; whilst there may be some unknown historic assets that will be affected, for the majority there is sufficient information available to have allowed such an assessment to take place.

Plan impact

It is suggested that the extent and detailed nature of the generic effects identified will be assessed by carrying out a desk based assessment (DBA). However, it is not clear how or when the DBA will be carried out, or how it will be embedded into development and delivery of the Masterplan. These details are essential to enabling the findings of the DBA to effectively influence the delivery of the Masterplan to mitigate effects on the historic environment.

Mitigation measures

Alteration of designs and exploration of planting and screening options are suggested as mitigation measures. Whilst this may be effective in mitigating smaller scale effects, it is unlikely to be able to mitigate larger scale effects in relation to location and general design. For the findings of a DBA to provide effective mitigation, there will need to be scope in the further development and delivery of the Masterplan to consider amendments in the location, scale and nature of projects / project elements, or even to consider omitting them entirely, rather than being restricted to amendments to detailed design. This is relevant to both direct (physical) and indirect (setting) effects.

In relation to direct (physical) effects, appropriate archaeological excavations and subsequent reporting take place prior to any groundwork are proposed as mitigation. This measure should be amended to acknowledge that in many cases, particularly in the case of designated assets, excavation and reporting is not an appropriate form of mitigation.

Cumulative assessment

There is no indication of a cumulative assessment having been undertaken in relation to the historic environment. Whilst the assessment of grouped proposals provided in Appendix E is useful in determining the effects of types of proposal, it does not provide a cumulative assessment of the effects of implementing all proposed elements of each signature plan project. This would have been particularly beneficial in the case of the City Park proposals, which cumulatively are likely to have significant adverse effects. Identification of these cumulative effects would have highlighted the potential need for more fundamental and / or strategic changes than could be achieved through changes to detailed design of individual projects in isolation. We recommend that the proposed DBA should include assessment of the cumulative effects of the signature plan projects.

Monitoring

Whilst we are content with the monitoring indicators suggested, we recommend that you could also consider including an indicator for the effectiveness with which the outcomes and mitigation resulting from the DBA, as implementation of these will be key to achieving effective mitigation of effects on the historic environment.

Appendix E

General comment

Given the detail to which the projects assessed in Appendix E are described in the Masterplan, we would have expected the scoring for the historic environment to have been supported with project specific comments discussing the likely effects. This in turn would have helped to identify specific mitigation measures rather than the generic ones proposed in most instances. We are broadly content that the scoring of effects is appropriate, subject to the detailed comments which follow.

Table E1 – Assessment of main construction / refurbishment projects

- A. Digital District: We are content that the score is appropriate here – there will be positive effects from the sustainable ongoing or new use of these historic buildings. However, there is potential for negative effects through inappropriate alterations, or through effects on the setting of historic assets from the proposed extension. We would welcome early discussion on the development of these projects for those elements within our statutory remit.

Table E2 – Assessment of Mercat Cross and City Centre Regeneration Proposals

- Construction and refurbishment, with some demolition: we are broadly content with the scoring of effects. The comments should recognise that demolition can have significant long-term as well as short term impacts. Where historic assets within our statutory remit are involved, we welcome early discussion of proposals.

Table E3 – Assessment of City Park Proposals

1. Active travel network: whilst we are broadly content with the scoring, we consider that active travel network infrastructure within the scheduled area of the Kings Knot has potential for a significant adverse effect. For information, works to the scheduled monument cannot take place without scheduled monument consent. We recommend early dialogue with Historic Environment Scotland's Heritage Management Directorate to discuss.
2. Green network: whilst we are broadly content with the scoring, we consider that green network planting proposals within the Kings Knot scheduled area has potential for a significant adverse effect. For information, works to the scheduled monument cannot take place without scheduled monument consent. We recommend early dialogue with Historic Environment Scotland's Heritage Management Directorate to discuss.
3. Public facilities: whilst we are broadly content that the scoring is appropriate, there is potential for significant negative effects on the setting of Stirling Castle and the Kings Knot, dependant on the scale, location and design of facilities and infrastructure.

General comment:

We consider that a cumulative assessment of proposals relating to the City Park, including the proposed realignment of the A811, would find a significant negative effect for the historic environment, based on the information provided in the draft Masterplan. We have

provided more information on this, and our own assessment of potential effects from the City Park proposals, in Annex 1 to this response.

Table E4 – Assessment of river proposals

6. Mooring and floating accommodation zone: some of the proposed mooring / berthing zones are in the vicinity of scheduled monuments (SM90055 - Cambuskenneth Abbey, SM8264 - Stirling, remains of former bridge to N of Stirling Old Bridge, and SM90290 - Stirling Old Bridge). We consider that there is potential for significant negative effects on the setting of these heritage assets, and that mitigation should be put in place to ensure that the mooring / berthing infrastructure will avoid such effects through location and design.

1. Access Plan: the assessment comment have not identified the potential for negative effects on the setting of Cambuskenneth Abbey as a result of the proposed active travel bridge. We consider that there is potential for significant negative effects from this proposal, and recommend that mitigation should be put in place to ensure that the mooring / berthing infrastructure will avoid such effects through location and design.

Table E5 – Assessment of enabling infrastructure

1. Transport: we agree that the proposed realignment of the A811 is likely to have significant negative effects on the historic environment, primarily on the setting of Stirling Castle. However, the comments section discusses only the landscape setting of Stirling Castle. To effectively mitigate these effects, it will be important to understand the effects on the setting in the context of the Castle as a historic environment asset.

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of Historic Environment Scotland's commitment to capacity-building in SEA.

Please feel welcome to contact me should you wish to discuss this response.

Yours sincerely

Virginia Sharp

Annex 1 - Historic Environment Scotland's assessment of potential impacts from City Park proposals, and associated infrastructure

The importance of the proposed development area to the setting of Stirling Castle

The setting of Stirling Castle is characterised on its western side by the connection of the elevated volcanic plug on which the castle sits sweeping down to the flat lands of the carse towards the hills. The views to the west and south west of the castle were an essential element in the amenity of its occupants and continue so for present day visitors. In the foreground of these views was land set aside for a royal hunting forest from the early twelfth century, while there were formal gardens immediately below the walls by the later middle ages. The distant vista is closed by the Touch Hills (where the medieval hunting forest of Dundaff and Strathcarron was located) and by the southern Highlands and Menteith, again important hunting grounds. These views were appreciated by contemporaries; a late 16th century account emphasised the magnificence of the 'palice' at Stirling and the pleasing views to the fields, the river, the Park and the nearest mountains.

The western and south western views from the castle remain important today. These views can be appreciated from the Ladies' Hole and the Queen Anne Garden. The interpretation in these locations encourages the visitor to appreciate the landscape before them and to understand better the castle's relationship to other sites (King's Knot and King's Park) and also certain historical events (Bannockburn etc) through understanding the landscape. The views to the south west of the castle take in the site of the Battle of Bannockburn. The view over to the battlefield from the western parts of the castle is likely to have always been seen as important.

Historic Environment Scotland's assessment of impact

The city park master plan proposes a new road leading towards the castle. Two water areas are proposed, underneath the castle on the northwest side. Orchard planting and paths are proposed on the scheduled area of the Kings Knot. Further west, sets of paths, roads and planting outline a formal set of gardens.

At the outset, the plans for an orchard and other works on the scheduled area will have a significant adverse impact on the remains of the upstanding elements and any associated archaeological remains of the royal park.

The creation of a park with a defined formal edge will break the visual link of the castle with the flat land of the carse to the west. The urban nature of the park amenities will visually tie the park with the golf course and northern residential areas, thus emphasising the divorce of the castle with the wider carse setting. The introduction of the motorway interchange with heavily embanked roads will have a significant visual impact when viewed from the castle.

Conclusion

We are supportive of the principle of linking of the castle with better amenity for the wider park, but have concerns that plans for the City Park as currently presented will have a cumulatively significant negative effect on the setting of Stirling Castle. We would encourage further discussion and engagement with Historic Environment Scotland to

identify ways in which the City Park project can embrace and complement the key elements of the relationship of the castle with its wider setting.

Proposals for direct works to the scheduled Kings Knot may have significant negative effects, and would require scheduled monument consent. We recommend early discussions with Historic Environment Scotland's Heritage Management Directorate about these elements of the City Park project.

Historic Environment Scotland
5 September 2016