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Holywood Church, Holywood, Dumfries, Dumfries and Galloway, DG2 0RH Tel +44 7543 443371 info@hiddenheritage.info www.hiddenheritage.info A campaign to recognise Scotland's hidden medieval heritage

Planning and Environmental Appeals Division (DPEA)

Ground Floor, Hadrian House, Callendar Business Park, Falkirk, FK1 IXR

For the Attention of whom it may concern Your Ref, LBE-170-2010 Planning Authority Reference 25/0090/LBGB

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## LISTED BUILDING ENFORCEMENT NOTICE APPEAL: HOLYWOOD CHURCH HOLYWOOD DUMFRIES DG2 0RH

We wish to make a public statement (to be broadcast and published on our website), following the Planning and Environmental Appeals Division's (DPEA) decision made on 01 October 2025, concerning our appeal against the local planning authority's enforcement notice, concerning our removal of two historic bells from Holywood Church.

It is DEPA's decision, made under specific terms and clauses, as considered under the appeal process, that the local authority's enforcement notice should stand, and the bells and stone plaques should be returned and reinstalled into the church, regardless of their evidenced unique Knights Templar provenance and associated historical and fiscal value, and without any regard to the immediate future of the building in which they were installed.

To confirm, DPEA disregards the bells' historical provenance within their decision making—the *only* reason the owners removed the bells in the first instance. The DPEA state their decision is based on:

- 'the status of the items is disputed and so *the level of risk based on the current listing designation* is not more than would be expected in any listed church building in Scotland.'
- 'the main focus of [the] appeal is the impact of the unauthorised removal of the bells and plaques on the listed building itself, *not the historic significance, importance, value or provenance of the artefacts* removed in themselves.'
- 'The bells and plaques clearly form an important and integral part of the currently B listed building complex, regardless of any separate action to change the status of the listing or amending the listing itself. The process for amending a listing designation via Historic Environment Scotland is separate from any enforcement appeal and its outcome.'
- 'The appellants have submitted a significant amount of information and historical research however the majority has not been material to my considerations in determining this Listed Building Enforcement Notice appeal.'

To clarify, 'the status of the items is disputed', refers only to the government's (Historic Environment Scotland) refusal to recognise and authoritatively authenticate the bells' extraordinary provenance. The evidence of the bells or the site's provenance is **not** in dispute. There is, and has been, no supportable presented counterargument to the discovery, either by the foremost internationally academic referred specialists nor the government's heritage agencies—only abstention has been offered without reason for that abstention. DPEA are aware of these circumstances and have the evidence in confirmation. With the evidence of the bell's provenance and the government's evasion of the discovery, published without any statement of disavowal, pragmatically the property as a building safeguarding the bells is at significant risk, regardless of the official property listing.

The DPEA have discounted the bells' extraordinary provenance as not material to its decision making under the appeals process. Thus, the DPEA's decision has been made on a point of procedure, in adherence to law as it interprets it, and not in any recognition or consideration of the logical reality of the situation. DPEA recognises the listing, maintained by HES, is in dispute, however it only considers the bells' identification as the current listing conditions their immediate consideration under the appeal. It follows, if this dispute was resolved with the bells' proven provenance officially recognised by the Scottish government *ie.*, authoritatively authenticated, the conditions surrounding the appeal and even the council's enforcement action or behaviour may have a different outcome, with we hope, more diligent and prudent behaviour towards safeguarding heritage and those responsible for it. As the listing is in dispute, any enforcement action, under that listing is also in dispute, until the matter is resolved. To enforce the listing, without consideration of its accuracy in terms of its special or extraordinary nature, is to deliberately produce unnecessary risk, financial deprivation and anxiety to the heritage in question, the owners and their property.

DPEA have chosen to close its eyes to the circumstances leading to the appeal against the enforcement action made by the local authority. However, the circumstances remain *entirely* material to the owners'

ongoing prudent protection of what should be regarded as a discovery of national importance but is, again, wilfully disregarded by the Scottish government, without offering any supportable reason for that contempt.

Although the following, does not relate directly to the DPEA's decision, we have to view the DPEA's involvement in wider context—as further recognition of the Scottish government's complicit behaviour, designed, not to assist and mentor two people protecting an undisputable and significant historical discovery, found in a mis-sold and misrepresented church, but to deny an important historical discovery for Scotland and foster serious threat to two members of the heritage-owning public—all for undisclosed motive.

We have what we have. 'Prove us wrong', but nobody has, so complete is our evidence. The Scottish government and its agencies have abundant resources and the remit to test our discovery and evidentially disavow or authenticate it if it chooses, as per its published remit. But it chooses to do neither. It cannot disavow our discovery, preferring to ignore it, as DPEA has done. But in doing so, its actions produce serious consequences for the integrity of Scotland's reputation with regards to its own historical understanding, protection and conservation.

We should not have to fight to circumvent ignorance, indifference and prejudice exhibited by the Scottish government, its agencies and academia with regards to fulfilling published remit of both its own Heritage Environment Policy and its agency's (HES) role and responsibilities, which in the context of the inclusive understanding of the site of Holywood is nothing but empty rhetoric.

We are constantly reminded antisemitism is a now an indisputable part of society along with anti-Christian sentiment. The bells are undisputable twelfth century Christian artefacts from a time of Christian potency in a world grossly impacted by religious ideology and colonisation. All strongly conditioned and influenced by events in the region regarded as the Holy Land, including Israel and Palestine. History has a knack of repeating itself, and ideology and colonisation are once again at the forefront of the public's fears.

History is often targeted by revisionists wanting to challenge the record of a nation's history and heritage to cancel it out to support prevailing political ideology—to objectify something as evil, rather than objectively consider it as purely testimony of the past. The bells and the site; a former Knights Templar preceptory, and its connection to the Crusades is a soft target for those who wish to protest such perceived ills against certain aspects of society and its heritage, particularly if it has the public's attention. We are currently promoting the history of Holywood through media broadcasting, so we are aware of the dangers that may lie ahead.

The government and its local authority may determine there is no current security risk to the owners and the site of Holywood Church, based purely on the current property listing, but we are not so imperceptive or dismissive of the very real threat posed, in what is increasingly an imminent break-down of societal cohesion, sponsored by political disharmony rather than respectful discord. We shall not put our property

and our lives in trust with a demonstrably incompetent authority, simply because it refuses to accept what is obvious to all but those with a deeply prejudiced mindset, ie., academia and bureaucracy, regardless how the law or the situation is interpreted by governance.

We are honour bound to protect these artefacts, for the sake of historical record, not for what they necessarily represent, but because it is public duty to do so for the generations to come. We will protect the site and the bells with our lives if necessary—a declaration not made in illusory drama, but in very real consideration of the very poignant religious attribution some members of the public will place and have already placed on these artefacts. We will not succumb to any action that puts the bells, the site or ourselves under needless threat, or seeks to deprive the public of *access* to the site's history. DPEA's action, regardless if it intentioned or not, exacerbates that threat by emboldening the local authority to enforce it.

We may choose to contest the DPEA's decision through the Court of Sessions, only if our legal advocates recommend it, and only if it brings value to furthering our cause and the truth of our discovery. We will however be taking further action to challenge HES's behaviour, to repeal the current listing that has caused such absurd circumstances, particularly as HES confirmed it position regarding the listing in a letter to the government's Directorate For Culture and External Affairs in April 2005;

'We [HES] may consider updating the listed building record if the bells are not returned to the building.'

We will ask, if the listing is designed to protect the inclusion of the bells as an integral architectural inclusion in a category B listed property, why are HES acquiescing to the bells' removal from the listing? Why did DPEA not test whether the listing was sound and enforceable? The letter from HES was in response to The Directorate for Culture and External Affairs request for the issues that prevented the owners' comprehension archaeological assessment of the provenance of the bells conditioning the property listing. HES did not give a direct response to the question.

This is not a dispute over planning; it is a campaign against the malignancy of the very agencies that are commissioned to protect heritage.

Yours Sincerely,



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