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Bruce Mann
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c/o Archaeology Service
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30th March, 2017

Dear Sir / Madam,

Places, people and planning: A consultation on the future of the Scottish planning system

Thank you for the opportunity to comment on these proposals for the future of the Scottish planning system.

The Association of Local Government Archaeological Officers

ALGAO: Scotland represents 27 of the 32 Local Authorities and National Park archaeological services in Scotland and is part of the UK-wide organisation, ALGAO: UK.

Its members' work primarily focuses on the protection and management of the historic environment within the development management process. This ranges from early pre-application advice to developers and planning officers, through ensuring that appropriate mitigation and design is in place during the application process, to facilitating the historic environment as a valuable contributor to local communities, whether it be a sense of place or an economic asset.

This response was drafted with the aid of ALGAO: Scotland's members in conjunction with other colleagues across the sector. Furthermore, ALGAO: Scotland is an associate member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment, and endorses its response to this consultation.

Places, people and planning: the future of the Scottish planning system

General

ALGAO: Scotland welcomes the Scottish Government's desire to put people at the heart of planning and for planning to *'be central to the delivery of great places'*.

However, within the key areas of change identified on page 3 of the consultation document and elaborated thereafter, there is not a sufficiently even-handed focus for revitalising Scotland's planning system.

In particular, the third proposed key area of change, *'Building more homes and delivering infrastructure'* provides a dominant theme and an unbalanced approach to the achievement of sustainable development. Indeed, consideration of sustainable development, the touchstone for a modern planning system receptive to the wider needs of the people it serves, is lacking throughout the consultation document. Of course, meeting housing and other needs is important, but this has to be balanced against environmental protection (including the historic environment with which ALGAO: Scotland is primarily concerned) and realising the positive opportunities that the historic environment offers to place-making and nation as a whole as expressed in Scottish Government's Historic Environment Strategy *'Our Place in Time'*. Currently the environmental aspect of sustainable development receives little or no attention in the proposals.

'Stronger leadership and smarter resourcing' (the fourth proposed key area of change) is an objective that ALGAO: Scotland endorses and there is much in this section of the consultation paper that we support. However, in practice implementing these changes would be more problematic if we lose sight of sustainability. Facilitating more development, more quickly and at less cost, presents real threats for the environment (including the historic environment). Although reducing unnecessary bureaucracy is to be encouraged, local planning authorities (and the archaeology and historic environment services which advise them) must be given adequate time and resources to ensure that sustainable development is delivered as effectively as possible.

Specific Questions

Section A

**A: Do you agree that our proposed package of reforms will improve development planning?
Please explain your answer.**

(i) On balance, yes. In particular, ALGAO: Scotland is pleased to see an endorsement of the plan-led system.

(ii) However, care needs to be taken to ensure that

- *'decisions on the future of a place, including where development should happen [are ultimately] made locally and local people should be involved'*. The National Planning Framework (NPF) and Scottish Planning Policy (SPP) have important roles to play but should not overshadow local development plans. We feel it is important that Local Development Plans should have clear policies on Archaeology and the Historic Environment based upon National Policies but reflecting local requirements e.g. along the lines of the newly adopted Edinburgh LDP (2016) rather than the cited East Ayrshire Community Plan. In terms of Archaeology it is also important that Planning Advice Note 02/2011 which underpins SPP is not lost, but rather updated and reviewed at regular intervals (5 years) to keep pace with the sector's changing policies and best practice.

- decisions in relation to development planning are made in the light of adequate information on the impact of proposals and policies upon the historic environment. There is a tension between making sure that the *'evidence base for local development plans is more streamlined and effective'* (paragraph 1.37) and ensuring that *'allocation of a site in a development plan gives more certainty that development will happen'* (paragraph 139). This tension would be most acute if any form of permission were to be automatically accorded to allocated sites (as discussed in paragraphs 1.42 to 1.43 of the consultation document) and ALGAO: Scotland strongly supports Scottish Government's reservations in this regard and its decision not to pursue such proposals (see further under question 6).

(iii) The consultation is couched very much in terms of new development rather than enhancing and sustaining the existing built environment. Planning needs to take a broad view of development, recognising its social, cultural and environmental dimensions rather than focusing exclusively on economic considerations. The proposals need to articulate more clearly the contribution that the planning system makes to Scottish Government outcomes set out in the National Performance Framework.

1. Do you agree that local development plans should be required to take account of community planning?

1.1 Yes, provided that any such requirement reflects the fact that community planning is not synonymous with land use planning. The need for community planners to have access to planning and related expertise (including archaeological and other historic environment expertise) would be increased by such a requirement. The proposals in the consultation document do offer opportunities to mainstream the historic environment through earlier engagement with spatial planning across a wider range of stakeholders (1.6) – this is welcome.

1.2 Subject to the above, a more coordinated approach to development planning which seeks to engagement communities at an early stage in the planning and development cycle is only to be encouraged and provides scope for wider consideration of the historic environment early in the process. Such consideration should embrace not only the consideration of the harmful impact of development upon historic assets but also the value of the historic environment in positively shaping places and promoting regeneration. Indeed, ALGAO: Scotland and the Chartered Institute for Archaeology use best practise is to seek opportunities to engage and promote the historic environment through the planning process.

2. Do you agree that strategic development plans should be replaced by improved regional partnership working?

2.1 Only if mechanisms can be introduced which facilitate and ensure effective partnership working and take sufficient account at an appropriate level of the need to manage and protect the historic environment. Further detail is sought on how agreement will be reached on regional priorities and spatial strategies.

3. Should the National Planning Framework (NPF), Scottish Planning Policy (SPP) or both be given more weight in decision making?

3.1 ALGAO: Scotland would support giving statutory weight to Scottish Planning Policy (SPP) alongside the National Planning Framework (NPF) as this would allow consequent parliamentary scrutiny. However development plans should reflect local circumstances and we are pleased to note the recognition in paragraph 1.27 that *'Local development plans could still include policies where they are required to identify departures from the Scottish Planning Policy (SPP) that are justified on the basis of distinctive local circumstances'*.

3(a) Do you agree with our proposals to update the way in which the National Planning Framework (NPF) is prepared?

3.2 Yes, provided that the *'provision for interim updates to be made where necessary'* is sufficiently flexible to allow any necessary revisions in the course of the extended review cycle.

4. Do you agree with our proposals to simplify the preparation of development plans?

4.1 No. In addition to the proposals in paragraph 1.29 there are proposals in paragraph 1.44 which relate to the preparation of development plans. A number of these proposals (such as setting out minimum levels of information needed to support allocations and submitting and appraising information on sites before allocation) are sensible at face value and could be helpful in ensuring that appropriate archaeological information is provided and considered before sites are allocated. However, references to a *'more streamlined'* evidence base at paragraph 1.37 and to a *'broader zoned approach'* at paragraph 1.44 suggest that less information might be required than is currently the case, with potentially serious implications for the historic environment. Even where the consultation document recognises that further information may be required (in the second bullet point of paragraph 1.44), it is economic and market appraisal information which is highlighted. Environmental information is never mentioned.

4.2 Moreover, the resource implications of front-loading the system acknowledged in the second bullet point of paragraph 1.44 raise significant issues for local authorities (including archaeological and historic environment services) which do not have the resources to undertake work hitherto carried out on behalf of developers upon an application for permission. The consultation envisages site proposers submitting information in relation to specific sites, but how would this work, for instance, with a broader, zoned approach?

4(a) Should the plan review cycle be lengthened to 10 years?

4.3 Yes, provided there are mechanisms to ensure sufficient flexibility.

4(b) Should there be scope to review the plan between review cycles?

4.4 Yes.

4(c) Should we remove supplementary guidance?

4.5 No. Removal of supplementary planning guidance altogether is a concern. While there is potential to remove significant duplication between SPP and Local Development Plan policies, there are enough remaining uses of supplementary guidance to argue for some retention, and which will only become more relevant with longer plan timescales. For instance the use of

masterplans, which include incorporating elements of the historic environment to the benefit of developments, can be successful when implemented as supplementary guidance. Furthermore any review of SPP should not lose sight of the key guidance given within the Planning Advice Notes (PANs), in particular from our perspective PAN 2/2011 '*Planning and Archaeology*'.

5. Do you agree that local development plan examinations should be retained?

5.1 Yes.

5(a) Should an early gatecheck be added to the process?

5.2 Yes. This should provide further focus to the process.

5(b) Who should be involved?

5.3 ALGAO: Scotland would expect to see that significant issues relating to the historic environment were addressed at this stage by those with archaeological or related expertise.

5(c) What matters should the gatecheck look at?

5.4 ALGAO: Scotland is particularly concerned to see the gatecheck assess whether appropriate environmental assessment (including an assessment of implications for the historic environment undertaken by an expert) has been carried out.

5(d) What matters should be the final examination look at?

5.5 ALGAO: Scotland is particularly concerned to see that the impacts of policies and proposals in the development plan upon the historic environment and specific historic assets are adequately assessed insofar as this has not already been dealt with at an earlier stage. What is adequate will depend upon the status of any allocation. If, for instance, permission in principle were to be conferred on allocated sites, more detailed assessment would be required before allocation (see below).

5(e) Could professional mediation support the process of allocating land?

5.6 Yes, provided there is a sufficiently rigorous appraisal of the implications of allocation for historic assets.

6. Do you agree that an allocated site in a local development plan should not be afforded planning permission in principle?

6.1 Yes.

6.2 ALGAO: Scotland strongly supports Scottish Government's stance in this regard. Although archaeological issues may be flagged in the development plan process, sites are routinely allocated in development plans in Scotland in the absence of all necessary archaeological assessment and evaluation which would be required on the submission of an application for permission to develop that site (see paragraph 20 of PAN 2/2011: '*Planning and Archaeology*').

6.3 Affording planning permission in principle to allocated sites would either require significantly more archaeological work to be done by site proposers prior to allocation or would prevent sites from being allocated in the plan. Either way, this would run contrary to Scottish Government's desire to simplify and add greater certainty to the development plan process.

7. Do you agree that plans could be strengthened by the following measures:

7(a) Setting out the information required to accompany proposed allocations

7.1 Yes, provided that the information required was adequately sufficient to assess the impact of development upon historic assets (see paragraphs 4.1 and 6.2 above).

7(b) Requiring information on the feasibility of the site to be provided

7.2 Yes, but this has to be accompanied by a wide range of other information (including information relating to the historic environment).

7(c) Increasing requirements for consultation for applications relating to non-allocated sites

7.3 Yes, but this question assumes that appropriate information has already been provided for allocated sites.

7(d) Working with the key agencies so that where they agree to a site being included in the plan, they do not object to the principle of an application

7.4 Yes, but preventing such agencies from objecting subsequently is another matter. An award of costs may be a more appropriate sanction to prevent unreasonable conduct on the part of key agencies.

8. Do you agree that stronger delivery programmes could be used to drive delivery of development?

8.1 Yes.

Section B

B: Do you agree that our proposed package of reforms will increase community involvement in planning?

(i) Yes, but that involvement needs to be supported and guided to provide a clear understanding of the community's involvement in the planning process. The opportunity for greater engagement of local communities with their own historic environment is particularly welcomed, but there remains a strategic question over the long-standing challenge of balancing speed of decision-making and community participation.

9. Should communities be given an opportunity to prepare their own local place plans?

9.1 Yes, provided that

- those plans are in general conformity with local and national policies

- there are appropriate mechanisms to ensure that the impact of policies and proposals in local place plans upon the historic environment are adequately addressed
- communities are given access to appropriate planning and related expertise (including expertise in relation to archaeology and the historic environment generally) to assist in the preparation of such plans
- communities receive other support training and guidance (as suggested in paragraph 2.16)

9(a) Should these plans inform, or be informed by, the development requirements specified in the statutory development plan?

9.2 The work carried out in the preparation of local place plans may help to inform the development requirements specified in the statutory development plan, but local place plans must ultimately be in conformity with local development plans.

9(b) Does Figure 1 cover all of the relevant considerations?

9.3 See paragraph 9.1 above.

10. Should local authorities be given a new duty to consult community councils on preparing the statutory development plan?

10.1 Yes, but mindful of the need to balance between speed of decision making and community involvement, and clarity over what form any consultation process would take.

10(a) Should local authorities be required to involve communities in the preparation of the Development Plan Scheme?

10.2 Yes, but mindful of the need to balance between speed of decision making and community involvement, and clarity over what form any consultation process would take.

11. How can we ensure more people are involved?

11(a) Should planning authorities be required to use methods to support children and young people in planning?

11.1 No comment.

12. Should requirements for pre-application consultation with communities be enhanced?

12(a) What would be the most effective means of improving this part of the process?

12(b) Are there procedural aspects relating to pre-application consultation (PAC) that should be clarified?

12(c) Are the circumstances in which PAC is required still appropriate?

12(d) Should the period from the serving of the Proposal of Application Notice for PAC to the submission of the application have a maximum time-limit?

12.1 No comment, save that any revision of pre-application consultation procedures should ensure that appropriate consideration is given to the impact of development upon the historic environment in this process.

13. Do you agree that the provision for a second planning application to be made at no cost following a refusal should be removed?

13.1 No comment, save that the removal of this provision might in practice create a disincentive to the negotiation of a scheme which overcomes all legitimate planning objections.

14. Should enforcement powers be strengthened by increasing penalties for non-compliance with enforcement action?

14.1 Yes. Effective enforcement is crucial not only to public confidence, but also to the efficient operation of the planning system. Increased penalties would provide a deterrent for those who flout or wilfully disregard planning requirements.

**15. Should current appeal and review arrangements be revised:
15(a) for more decisions to be made by local review bodies?**

15.1 Yes.

15(b) to introduce fees for appeals and reviews?

15.2 Yes.

15(c) for training of elected members involved in a planning committee or local review body to be mandatory?

15.3 Yes. This should include training in relation to archaeology and the historic environment. ALGAO: Scotland is happy to advise and participate in developing this.

15(d) Do you agree that Ministers, rather than reporters, should make decisions more often?

15.4 No comment.

16. What changes to the planning system are required to reflect the particular challenges and opportunities of island communities?

16.1 No comment.

Section C

**C: Will these proposals help to deliver more homes and the infrastructure we need?
Please explain your answer.**

(i) Possibly, but that is not necessarily the issue. The question should be whether these proposals will help to deliver more homes and infrastructure sustainably and the answer to that question, in some respects, is 'no' as indicated below.

(ii) We welcome the recognition that '*many factors are currently limiting the number of homes being built across Scotland*' and care needs to be taken not to dismantle a planning system

that has generally worked well in response to a complex series of issues, many of which are beyond the remit of land use planning. Key to a successful planning system is one which is holistic and geared towards achieving better place-making, rather than limited to one aspect of delivering 'numbers'.

17. Do you agree with the proposed improvements to defining how much housing land should be allocated in the development plan?

17.1 No comment, save that

- care has to be taken to ensure that level of allocation reflects need and not aspiration
- over-allocation can be just as harmful as under-allocation since, in practice, it often leads to the allocation of land which is more sensitive environmentally and which can in many cases be developed in preference to other, less sensitive, allocated land.

18. Should there be a requirement to provide evidence on the viability of major housing developments as part of information required to validate a planning application?

18.1 ALGAO: Scotland would not object to this, but it should not overshadow the need for other information (including information in relation to the historic environment) to support an application. Indeed, archaeological desk-based assessment and field evaluation in accordance with paragraph 20 of PAN 2/2011 can raise issues which affect the viability of a project.

19. Do you agree that planning can help to diversify the ways we deliver homes?

19(a) What practical tools can be used to achieve this?

19.1 No comment, save that Scottish Government should resist the temptation to relax planning regulation in an attempt to diversify delivery. The need for a planning application is key to the protection of archaeological interests since it enables appropriate archaeological desk-based assessment and field evaluation to be required prior to the granting of permission (ensuring that only sustainable development is permitted) and allows appropriate conditions to be imposed on sustainable development to avoid, mitigate or offset harm to historic assets.

19.1 Consequently, dispensing with the *'need for self-builders to go through the formal planning process'* in initiatives such as the self-build project in Maryhill, Glasgow (highlighted on page 32 of the consultation document) causes our membership some concern.

20. What are your views on greater use of zoning to support housing delivery?

20.1 ALGAO: Scotland has very significant concerns about the greater use of zoning to support housing delivery, given the desired short-circuiting of the planning application process and the implications for already hard-pressed local authorities and their archaeology and historic environment services. It is not clear how appropriate archaeological assessment and evaluation could be secured in respect of all potential sites in such zones and by whom it would be carried out. Without substantial additional resources it is unreasonable and unrealistic to expect local authorities to undertake or commission such work.

20.2 In the absence of appropriate safeguards this is likely to lead to the significant loss or damage of important historic assets, especially to the Nation's undesignated resource which accounts for circa 90% of our heritage. Although in many other cases development on a

specific site might be acceptable in principle in archaeological terms, without the ability to impose conditions or obligations tailored for that site, significant harm to historic assets and their significance is likely to ensue. The difficulties are compounded when dealing with buried remains where the nature and extent of the archaeological interest is at the outset often unknown.

20.3 For the reasons above ALGAO: Scotland is also concerned about the proposed removal of the blanket restriction for SPZs in conservation areas and its effect on the historic environment.

20(a) How can the procedures for Simplified Planning Zones be improved to allow for their wider use in Scotland?

20.4 There would need to be a much greater front-loading of the system than currently is the case, but (at least in relation to archaeology and the wider historic environment) it is difficult to see how this would be achieved in practice. The SPZs could be used to proactively flag historic environment assets at an early stage and incorporate them into the design process, but this can only work for known assets.

20(b) What needs to be done to help resource them?

20.5 If increased use of zoning is to be made practical in historic environment terms, then local authority archaeological and historic environment services would need very substantial increased resources properly to fulfil our crucial role in development planning and management.

21. Do you agree that rather than introducing a new infrastructure agency, improved national co-ordination of development and infrastructure delivery in the shorter term would be more effective?

21.1 No comment.

22. Would the proposed arrangements for regional partnership working support better infrastructure planning and delivery?

22(a) What actions or duties at this scale would help?

22.1 No comment.

23. Should the ability to modify or discharge Section 75 planning obligations (Section 75A) be restricted?

23.1 Yes, provided that some flexibility is retained to modify obligations where strictly necessary.

24. Do you agree that future legislation should include new powers for an infrastructure levy?

24.1 No comment, other than any such new levy could be used to benefit the legacy and public benefit element of the planning process for the historic environment.

25. Do you agree that Section 3F of the Town and Country Planning (Scotland) Act 1997, as introduced by Section 72 of the Climate Change (Scotland) Act 2009, should be removed?

25.1 No comment.

Section D

D: Do you agree the measures set out here will improve the way that the planning service is resourced?

(i) Yes, provided that there is a continuing will and support from Scottish Government to facilitate high quality, sustainable development rather than simply increased levels of development.

(ii) ALGAO: Scotland applauds the Scottish Government's timely recognition of *'the valuable role that planning plays in ensuring that the public good is considered in decisions about the future of our places'* (paragraph 4.3) and that *'The planning service must have the resources it needs to deliver the world-class service our communities deserve and our economy needs'* (paragraph 4.10).

(iii) Furthermore, we welcome the emphasis on skills and training (including the need for specialist skills) in paragraph 4.7.

(iv) However, proposals such as that to extend the use of permitted development rights under the banner of *'efficient decision making'* raise doubts as to whether *'smarter resourcing'* in reality means reduced expert oversight through continuing deregulation, which is likely to have a harmful impact upon the historic environment.

26. What measures can we take to improve leadership of the Scottish planning profession?

26.1 Scottish Government can provide a lead and a strong message about the value of planning *'as a visionary profession that creates great places for people.'* Similarly, Government needs to continue to stress the importance of the historic environment in place-making, regeneration and well-being.

26.2 Furthermore there is a need to strengthen the status of the planning system as a corporate function within local authorities, enabling it to lead in co-ordinating management systems within the authority to deliver development. Stronger leadership will require a change in culture. There is currently no obligation on elected members to heed the advice of planning officials. There is also a need to change perceptions around the role that planning plays in managing development; statutory development management is a small part of the development process but is often blamed as an impediment to progress.

27. What are the priorities for developing skills in the planning profession?

27.1 Retention of local authority resources, including access to specialist skills and expertise on the historic environment, is fundamental. We welcome recognition of this in the consultation document (4.7). There is a particular need for training in *'softer'* skills such as leadership and

facilitation, especially given the proposal for a more 'front-loaded' system with more meaningful public involvement.

28. Are there ways in which we can support stronger multidisciplinary working between built environment professions?

28.1 Yes, through collaborative projects and via cross sector training and awareness raising sessions facilitated by bodies such as the Built Environment Forum Scotland (BEFS) and its constituent members.

29. How can we better support planning authorities to improve their performance as well as the performance of others involved in the process?

29.1 In the case of archaeology, through increased funding and support for local government archaeology and historic environment services and a better understanding of the challenges which they face.

29.2 A significant step towards achieving this goal would be achieved by enacting a duty for local authorities to have or have access to an up-to-date Historic Environment Record (HER) maintained and supported by expert staff. (See, for example, sections 35 to 37 of the Historic Environment (Wales) Act 2016 which imposes such a duty on Welsh Ministers).

30. Do you agree that we should focus more on monitoring outcomes from planning (e.g. how places have changed)?

30.1 Yes, a stronger focus on outcomes and evaluation of how places have changed will help demonstrate the impact of the planning system 'on the ground'. This will require skills development in monitoring and evaluation. ALGAO: Scotland members are well placed to contribute to understanding development over time.

30(a) Do you have any ideas on how this could be achieved?

30.2 With regard to the historic environment, this would require the continuing engagement of local authority archaeology and historic environment services throughout the planning cycle.

31. Do you have any comments on our early proposals for restructuring of planning fees?

31.1 As a general principle, increasing planning fees more closely to align the cost to applicants with the service provided is supported. It is suggested that any fast tracking of applications be based on better quality outcomes (rather than bought for a higher fee). This would incentivise sensitivity to place, sustainable urbanism, good design, contribution to social well-being, greater community engagement, cultural provision etc.

32. What types of development would be suitable for extended permitted development rights?

32.1 With regard to the historic environment, it is not the type of development (however laudable) that is important, but the potential for harm to the historic environment which arises

where development is permitted without the need for an application for permission (for the reasons outlined in paragraph 19.1 above and elsewhere in this response).

32.2 ALGAO: Scotland continues to have grave concerns about the continuing extension of permitted development rights without any adequate consideration of the safeguarding of historic assets. In addition to development involving ground disturbance (with obvious implications for buried archaeological remains), there is also potential for harm to the historic environment from other permitted development (for instance, in relation to character and setting), both individually and cumulatively. It is essential therefore that the safeguard afforded by Article 4 Direction Orders are retained.

33. What targeted improvements should be made to further simplify and clarify development management procedures?

33.1 As outlined above, ALGAO: Scotland is concerned that simplification and clarification are not simply viewed as a means to deregulate, thereby lessening protection for the historic environment through the planning system. This concern is particularly significant, given the fact that the vast majority of the historic environment (over 90%) is undesignated and, for the most part, receives its only protection through consideration in the planning system.

33(a) Should we make provisions on the duration of planning permission in principle more flexible by introducing powers to amend the duration after permission has been granted? How can existing provisions be simplified?

33.2 No comment.

33(b) Currently developers can apply for a new planning permission with different conditions to those attached to an existing permission for the same development. Can these procedures be improved?

33.3 Conditions provide a key mechanism for securing public benefit in relation to the historic environment and safeguarding historic assets and their significance. Any changes in this regard should not in any way undermine, but should reinforce, the efficacy of such conditions.

33(c) What changes, if any, would you like to see to arrangements for public consultation of applications for approvals of detail required by a condition on a planning permission in principle?

33.4 No comment.

33(d) Do you have any views on the requirements for pre-determination hearings and determination of applications by full council?

33.5 No comment, save that, however applications are dealt with, they should ultimately be determined with the benefit of appropriate expert advice from local authority archaeological and historic environment services in relation to archaeological or other historic environment issues.

34. What scope is there for digitally enabling the transformation of the planning service around the user need?

34.1 There is great scope for using three-dimensional visualisations and other digital technology to engage communities in the management and protection of the historic environment through the planning system.

35. Do you think any of the proposals set out in this consultation will have an impact, positive or negative, on equalities as set out above? If so, what impact do you think that will be?

35.1 No comment.

36. What implications (including potential costs) will there be for business and public sector delivery organisations from these proposals?

36.1 The costs of front-loading the system would be significant if proposals such as those relating to the greater use of zoning and allocations are pursued.

37. Do you think any of these proposals will have an impact, positive or negative, on children's rights? If so, what impact do you think that will be?

37.1 No comment.

38. Do you have any early views on whether these proposals will generate significant environmental effects? Please explain your answer.

38.1 Yes. A number of the proposals are likely to cause significant harm to the historic environment as outlined above.

Should you have any questions regarding the above then please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Mann', with a long horizontal line extending to the right.

Bruce Mann MA MIFA FSA Scot
Archaeologist Aberdeenshire, Moray, Angus, Aberdeen City Councils
Chair of ALGAO: Scotland