

Cairngorms National Park Local Development Plan 2020

Statement of Conformity with Participation Statement



Cairngorms
NATIONAL PARK



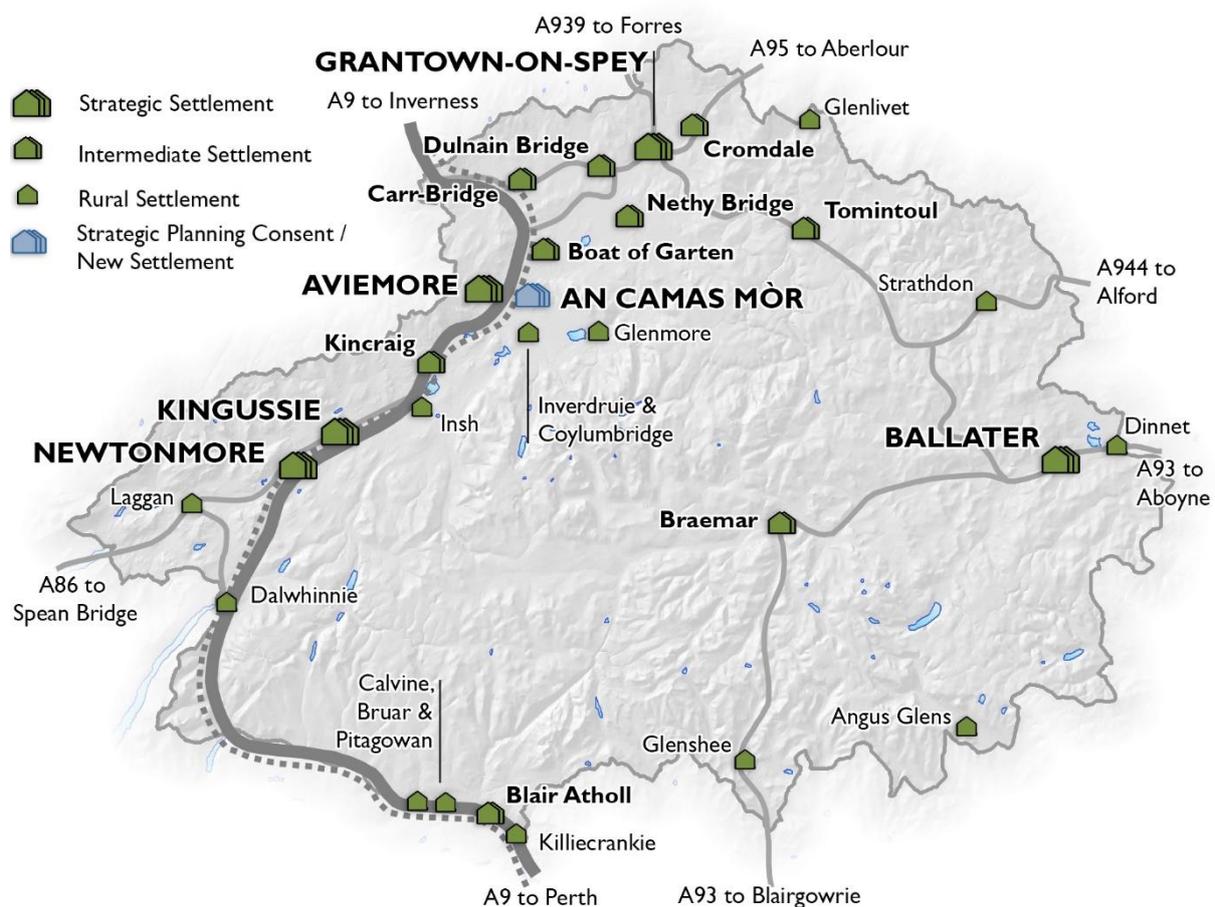
August 2019

Introduction

The Statement of Conformity is one of a suite of documents which accompanies the submission of the Proposed Local Development Plan (Proposed LDP) to Scottish Ministers.

The Statement of Conformity has been prepared to meet the terms of Part 2 Section 18(4)(a)(i) and Section 19(4) of the Planning etc (Scotland) Act 2006. This requires authorities to submit a report outlining the extent to which they have consulted with and involved the wider public in preparing the Proposed LDP; and how this consultation conforms with the intentions outlined in the current participation statement.

The participation statement sets out the principles for community engagement, who would be consulted, and how they would be consulted, during each stage of the plan process. The relevant participation statement is the version current when the Proposed LDP was published on 25th January 2019. This participation statement was contained in the Development Plan Scheme dated April 2018 approved by the Cairngorms National Park Authority on 20th April 2018.



Strategic Diagram for the Cairngorms National Park Proposed Local Development Plan.

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Conformity with Participation Statement

The CNPA has been committed to encouraging participation and this input has been vital to inform the preparation and implementation of the Local Development Plan 2020 (LDP2). We have placed a strong emphasis on actively engaging with communities within the National Park in an open and transparent way and have outlined our commitment to involving communities, members of the public, developers, landowners and stakeholders in the preparation of LDP2 in the participation statement.

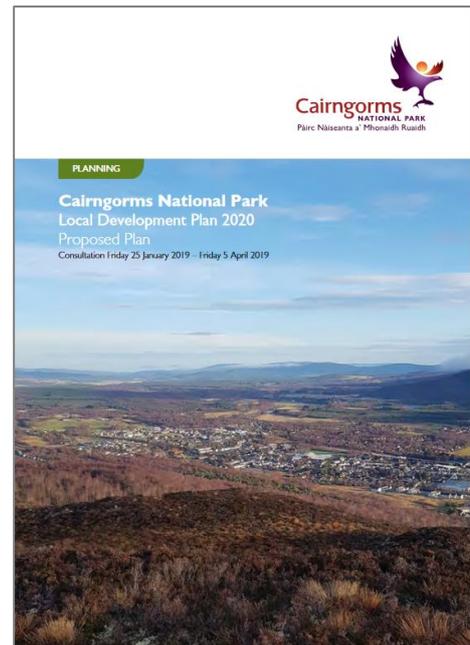
CNPA's participation statement for LDP2 sets out four key objectives, which are outlined below:

- Objective 1: Ensure people and communities are aware of the process and the opportunities to comment at key stages in the production of LDP2. We will distribute consultation information to council offices, National Park Authority offices and will also disseminate information through Community Councils, our community liaison officers, and community planning networks.
- Objective 2: Widely encourage involvement using a range of methods. We will publish information on the CNPA website and publicise the consultation processes through the media, newspaper adverts and articles.
- Objective 3: Produce documents which are accessible, transparent and written in jargon-free language which avoids technical terms.
- Objective 4: Publish an updated Development Plan Scheme every year, setting out how and when people can get involved in the preparation process.

How we have achieved this:

Objective 1: Ensure people and communities are aware of the process and the opportunities to comment at key stages in the production of LDP2. We will distribute consultation information to council offices, National Park Authority offices and will also disseminate information through Community Councils, our community liaison officers, and community planning networks.

CNPA have sought to ensure that the Proposed LDP consultation was promoted as widely as possible across the National Park. Significant effort was made to disseminate information to different locations and groups to encourage them to get involved and respond to the consultation.



Libraries

Copies of the Proposed LDP, Action Programme and response forms were distributed to all Council offices, libraries and CNPA offices within and on the edge of the National Park.



Copies were displayed at the following locations:

- CNPA Office, Grantown-on-Spey
- CNPA Office, Ballater
- Aviemore Library
- Tomintoul Library
- Highland Council Service Point, Grantown-on-Spey
- Badenoch Centre Library, Kingussie
- Kirriemuir Library
- Angus Council, Kirriemuir
- Aberdeenshire Council, Braemar
- Blairgowrie Library
- Pitlochry Library

This enabled people to view printed copies of the Proposed LDP and respond in writing to enable those who are not as active.

Neighbour notifications

Prior to the start of the consultation, as required by legislation, we posted out in the region of 1,000 neighbour notification letters to inform all households within 20 metres of allocated sites about the Proposed LDP. This generated a lot of queries from people across the National Park and enabled the planning team

Working with Community Development Organisations

The CNPA already works closely with communities in the National Park which is supported by our Community Support Manager and local Community Development organisations – Voluntary Action Badenoch and Strathspey (VABS) and the Marr Area Partnership (MAP). In order to promote the consultation more widely and directly to communities, we liaised with both organisations about the Proposed LDP and they circulated and publicised the information through their networks, including through social media channels. These organisations also promoted the consultation events and provided support to communities to understand what the consultation means and how they can get involved.

Planning Representatives Network

CNPA also utilised the Planning Representatives Network (PRN) which is led by CNPA. The PRN is a network - comprising representatives from community councils and where there isn't one, community development trusts across the National Park – which seeks to inform and engage communities in current planning issues and helps to maintain ongoing interaction between planning and communities. Meetings are held twice a year provides updates about current planning related news, projects and consultations in the National Park as well as discussions around current planning issues. This platform has been used throughout the preparation of the Local Development Plan to communicate with community councils/trusts and engage them in the process.

In order to publicise the consultation amongst local community groups, the PRN meetings were used to inform them about the Proposed LDP consultation and LDP process. In addition, printed copies of the Proposed LDP and Action Programme were posted to all Community Councils in the National Park or where there isn't one, Community Development Trusts/Company. Posters were also produced and posted out with the Proposed LDP for community councils to put up around their areas to inform local people about the consultation and encourage them to attend the events. We also emailed the Chair, Secretary and planning contact of all community councils and community organisations to notify them of the start of the consultation, events and inform them that copies were being posted to them.

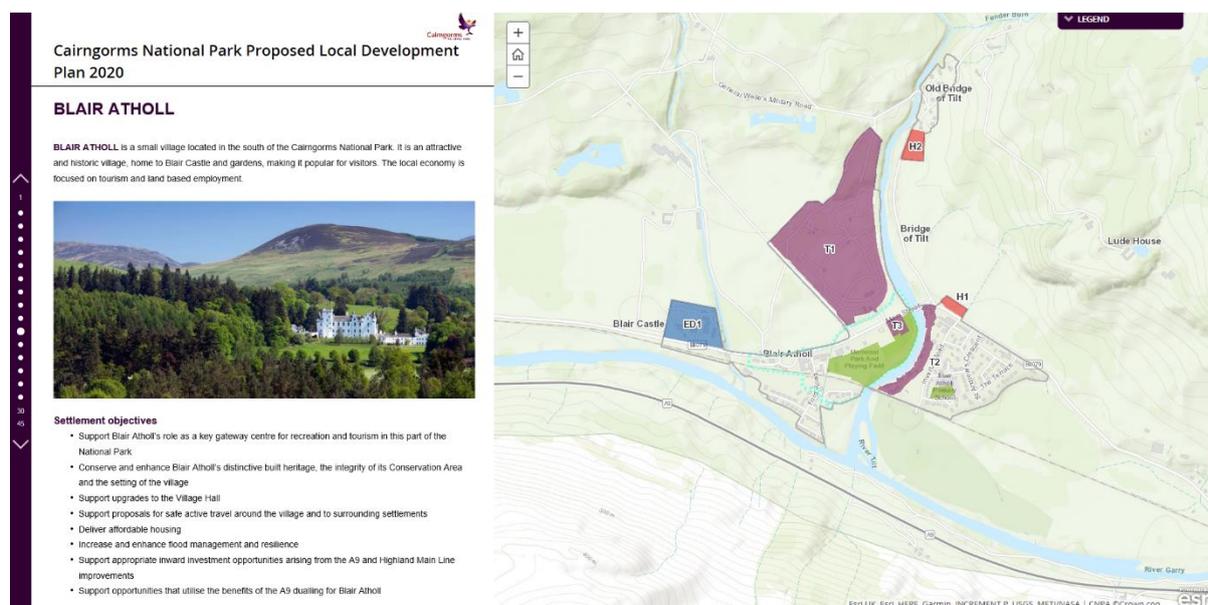
Community Councils and Associations

All Community Councils and Associations within and overlapping the National Park boundary were provided with copies of the Proposed LDP. Furthermore, officers visited all those organisations who requested it. Officers also spoke at Badenoch and Strathspey

Community Councils Forum, which covers all Community Councils within the Highland Council area of the National Park.

Website

CNPA's website was a key method used to promote the consultation, provide information and was the main portal for receiving responses. The consultation was promoted on the main landing page for the website and through various press releases and newsletters.



Extract from the Story Map of the LDP made available of the CNPA website.

The consultation webpages, which includes numerous supporting pages, attracted 11,271 page views. Making the Plan itself accessible was also considered important and therefore, alongside the statutory locations in which paper copies of the Plan were deposited, the website provided the Plan in two forms, a traditional pdf and an interactive [StoryMap](#). The StoryMap version of the Plan was viewed a total of 1,113 times.

Objective 2: Widely encourage involvement using a range of methods. We will publish information on the CNPA website and publicise the consultation processes through the media, newspaper adverts and articles.

CNPA sought to encourage people to engage with the consultation and attend events using a range of methods. As highlighted above, the consultation was promoted through CNPA's website which contained the Proposed LDP and extensive supporting information to inform people about how to get involved and respond to the consultation and the purpose of the Proposed LDP itself.

Press releases about the consultation were also prepared and published in three newspapers - The Strathspey Herald, the Press and Journal and the Perthshire Courier – at the start of the consultation. These papers cover all of the National Park.

Social Media Campaign

In order to publicise the consultation and encourage people to get involved, significant effort was put into promoting the consultation through social media. A key part of our approach was to learn from previous consultations carried out by the CNPA, including the Main Issues Report (MIR) consultation that took place in 2017/18. In particular, we wanted to make sure that we reached audiences that don't usually engage in the process, and to a large extent, these groups fall within the 16 and under and working-age cohorts of the population. Different platforms were used including Facebook, Twitter and Instagram which proved highly successful.



Example a Tweet used to publicise the Proposed Local Development Plan consultation.

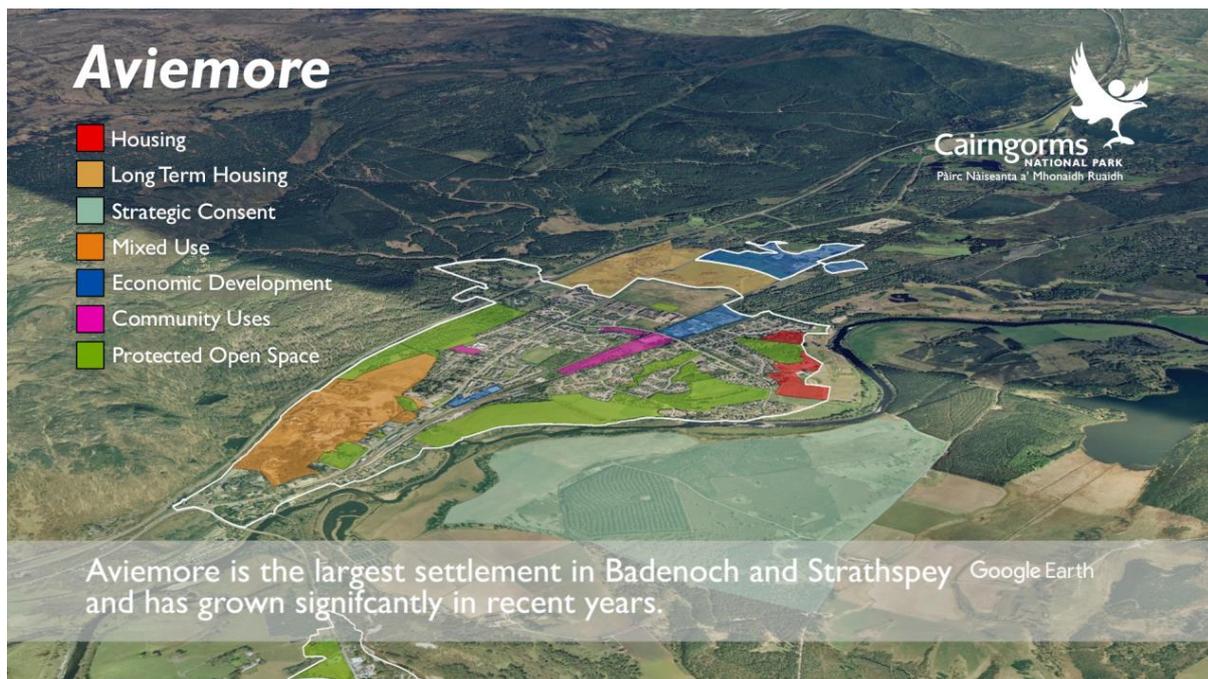
Video has proved to be the most effective form of social media content. Short videos allow the viewer to easily and quickly digest information. Furthermore, research suggests that viewers are much more able to understand and retain information presented in video form, which is a challenge when it comes to presenting the complex information contained within LDPs. On a more technical level, we needed to consider how our audience accesses

information. In particular, the use of mobile devices, such as phones or tablets, have become an incredibly significant medium for accessing information, with around 43% of the CNPA's website users using such devices. Video is easier to access on these devices than imagery or text and therefore is more likely to be engaged with by this audience. Research also suggests that video encourages social sharing and therefore is more likely to reach a wider audience. Finally, video builds trust and gives the Planning team and the National Park Authority as a whole a more 'human' and approachable persona. This forms part of a broader strategy of engaging with the public on a more personal level.



Video content took the form of two main forms. Firstly, we released a [brief overview](#) of what the Proposed LDP was and how people could get involved. This was presented by officers who had worked on the Plan and who would be attending engagement events.

Secondly, we produced a series of videos using Google Earth Studio, Google's recently released browser-based animation tool for Google Earth's 3D and satellite imagery. This is the first time the tool has been used for spatial planning. These took the form of a [fly-over](#) of all the Proposed LDP's settlements as well as shorter Settlement specific videos, which provided information on the nature of proposals within each settlement within the Plan's hierarchy. These videos enabled people to view proposals without having to look through the documents. These videos attracted a lot of attention and sought to engage and inform people in a more innovative way.



An example of a video made with Google Earth Studio that was used for the consultation

Alongside the videos we also posted a series of supporting information. This included 3D models of the Plan’s Strategic Settlements and thematic policy specific information. One of the key areas we wanted to explore was housing and the rationale behind the Plan’s housing proposals. For this we used [Infogram](#) to create and share an [interactive infographic](#) on some of the key elements of the evidence base that underlie of the Plan’s housing policy. Like video, research suggests that interactive content, particularly where the aim is to share data, is one of the most effective ways of engaging with an audience. To increase participation, the content produced for the Proposed LDP was optimised for both mobile and desktop devices.

As a result of the videos and promotion through the social media campaign, a record number of people engaged in the process to achieve the following:

- During the campaign we published 94 posts to Facebook, Twitter and Instagram and uploaded 22 different videos to YouTube and Facebook.
- Collectively these posts made 153,782 impressions across the 3 networks (Facebook, Twitter, Instagram).
- The videos received 30,169 views across all 4 networks (includes YouTube).
- Posts were engaged with (liked, clicked, shared) 10,067 times – resulting in an overall engagement rate of 7% for non-video based posts.
- Engagement with all campaign content, include video, resulted in an engagement rate of 26%. *Engagement Rate – is the metric that measures the level of engagement that a piece or group of created content receives*
- Our campaign content was shared 189 times on Facebook and Twitter and we received 64 comments.

The digital campaign (including engagement through the website) achieved the following:

- The consultation web page and the four supporting MIR and LDP web pages attracted **11,271 page views** during the consultation period – 31% of these page views were for the Proposed Local Development Plan consultation page. This accounted for 2% of all the traffic to cairngorms.co.uk website and was the 8th most visited part of the website in this time period.
- A third of all people who visited the consultation website page used the Interactive Report.
- A third of all people who saw a consultation related post on Facebook or Instagram either engaged with the post or watched the video related to the post.
- Just over 10% of people who saw a consultation related post on Twitter engaged with that tweet.

Events

Seven drop-in consultation events were held to provide an opportunity for people to discuss the proposals and find out more about how to get involved in the consultation. The events were held across the National Park and were attended by over 200 individuals. They were publicised on the CNPA website as well as promoted widely through CNPA's social media channels as well as VABS, MAP and community pages. Videos were used to promote the events through all social media channels and videos were also posted from the events again to promote and publicise the consultation.



Events were held in:

Event Location	Date (All held 3-7pm)	Number of attendees
Braemar Village Hall	7 th February	45
Tomintoul Richmond Hall	11 th February	8
Eleven41 Gallery, High Street, Kingussie	12 th February	24
The Hub, Aviemore	18 th February	25
Ballater Station, VIC/ Library	19 th February	60+
Blair Atholl Village Hall	21 st February	16
CNPA office, Grantown-on-Spey	25 th February	40+

Engagement at the drop in events was high as they provided an opportunity for people to come and discuss the Proposed LDP with planners directly on a one to one basis. CNPA planners were available over a 4 hour period to explain the proposals to members of the local community and provide clarification and guidance on how to respond. We also incorporated some of the digital material into these events, including the Google Earth Studio videos and 3D models of settlements for attendees to watch and obtain further information about the proposals in their area.

In addition to the main consultation events, CNPA officers attended a range of meetings during the consultation period, including with Community Councils and other stakeholders, such as the Cairngorms Business Partnership. The Proposed LDP was also featured in three National Park e-bulletins that were sent out to a subscriber list of 1,270 people. 13% of people who opened a CNPA e-bulletin during the consultation period clicked on a link to the consultation.

In total 207 responses were received to the Proposed LDP consultation.

Objective 3: Produce documents which are accessible, transparent and written in jargon-free language which avoids technical terms.

CNPA has put extensive effort into delivering a more accessible and clear Local Development Plan. The Proposed LDP is much more visual, using photographs to support policies as well as using aerial imagery for the settlement maps and bright colours to highlight different allocations. This is intended to make the information clearer and more transparent.

POLICY 6: THE SITING AND DESIGN OF DIGITAL COMMUNICATIONS EQUIPMENT

Proposals for new telecommunications or other digital communications equipment will only be permitted provided that all of the following criteria are met:

- a) details of the siting, design and appearance of the proposed apparatus and associated structures demonstrate that the impact on the visual amenity, character and appearance of the surrounding area is minimised;
- b) in sensitive areas detailed evidence demonstrates that the proposals would not lead to unacceptable effects on areas of particular ecological interest or landscape importance; archaeological and other cultural heritage sites; conservation areas; or buildings of architectural or historic interest;
- c) opportunities for mast and site sharing as well as installation possibilities on buildings or other existing structures have all been fully considered and such opportunities taken wherever appropriate and practicable;
- d) the choice of equipment to be installed is the smallest possible that is commensurate with the technological requirements;
- e) every effort has been made to conceal, camouflage or otherwise disguise masts, other equipment installations and associated building structures as well as cabling;
- f) proposed landscaping and screen planting, where appropriate, would appropriately mitigate the impact of the development;
- g) details demonstrate that the proposal best meets operational needs and fits into the wider network, having explored alternative options and having had regard to the local context and the cumulative impacts that would arise; and
- h) a written declaration confirms that the equipment and related installations are all designed to be in full compliance with the appropriate industry guidelines and regulations applicable at the time – such as the ICNIRP guidelines for public exposure to radiation frequency.

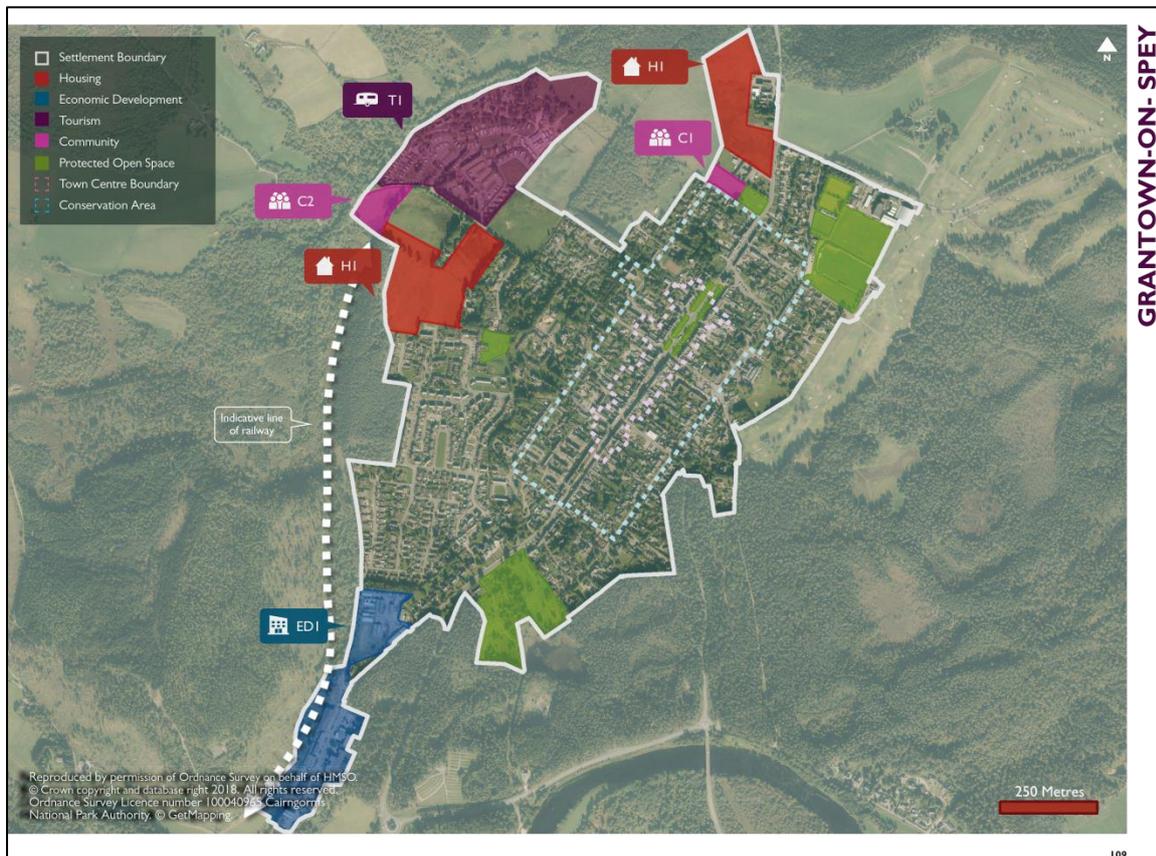


What the policy aims to do

- 4.83 The Plan outlines policy requirements that apply to all new built developments within the National Park. Nevertheless, there is also a need to set out additional, more specific policy principles and requirements for new digital infrastructure installations. The policy underlines the Scottish Government's commitment in this regard, as set out in Scottish Planning Policy.
- 4.84 Accordingly, the policy is intended to support world class digital technology through the provision of the most up to date networks to serve homes and business premises whilst ensuring that all such infrastructure installations are sited and designed to keep environmental impacts to a minimum.

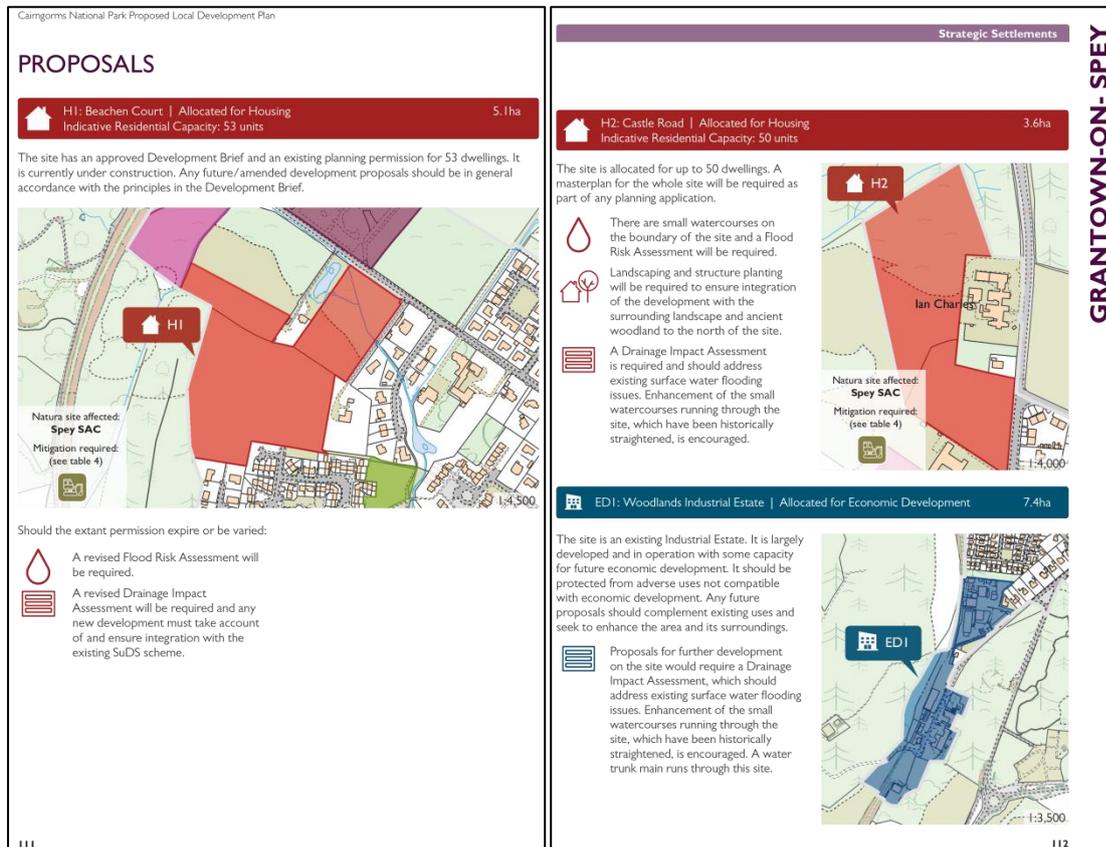


Example of policy layout incorporating images



Example of settlement map using aerial imagery and bold colouring for allocations

In addition site specific information has been provided for each allocation using clear and visual maps along with key bullet point information setting out the requirements and constraints for each site to help interested parties and developers to understand any issues that must be addressed as part of a planning application.



Example of site specific information pages using OS Maps and bulleted information

Overall, CNPA believe that the Proposed LDP presents a significant improvement from the current Local Development Plan 2015. Significant effort has been put into making the Proposed LDP clearer and more accessible for all users. Settlement information particularly has been greatly enhanced and is available not only in a standard pdf document version, but also been made into a [Story Map](#) available on the CNPA website which enables users to navigate through the Plan content easily and more interactively.

Objective 4: Publish an updated Development Plan Scheme every year, setting out how and when people can get involved in the preparation process.

CNPA publish a Development Plan Scheme annually setting out the timeframe for the preparation of the Local Development Plan. Whilst this has been done every year in Spring/Summer, it has been delayed to August this year to ensure that the timeframe for the submission of the Proposed LDP for Examination is met. CNPA acknowledge this is a key

document for keeping people up to date about the anticipated delivery of the Local Development Plan and this has been achieved.

Development Plan Scheme

April 2018

The next Local Development Plan for 2020

Having adopted the first Cairngorms National Park Local Development Plan (LDP) on 27 March 2015, the Cairngorms National Park Authority (CNPA) is now preparing the Local Development Plan that will follow from 2020. The National Park Partnership Plan 2017-2022 was published in June 2017, and this sets the strategic context for the 2020 LDP.

We'll refer to the 2020 LDP as LDP2 for the remainder of this document, which sets out the timetable for preparing LDP2 and how you can get involved.

How to get involved

It is essential that people who live, work and have an interest in the National Park get involved in the preparation of the next LDP. The more people who are involved in the process, the more likely it is that LDP2 will deliver the right developments in the right places to meet communities' needs.

The CNPA is committed to encouraging participation and believes that this input will be vital to inform the preparation and implementation of LDP2. We place a strong emphasis on actively engaging with communities within the National Park in an open and transparent way.

This began with the Main Issues Report, which was published for consultation in November 2017, and will be followed by an additional consultation on the Proposed Plan in late 2018. The last stages include an Examination of the Plan carried out by a Reporter appointed by the Scottish Government, after which the LDP may be adopted. CNPA will invite the public and interested parties to comment on LDP2 at every possible stage in the process.



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Cairngorms
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Pàirc Nàiseanta a' Mhònaidh Ruaidh

The Participation Statement below outlines our commitment to involving you in the preparation of LDP2. The CNPA will:

1. Ensure people and communities are aware of the process and the opportunities to comment at key stages in the production of LDP2. We will distribute consultation information to council offices, National Park Authority offices and will also disseminate information through Community Councils, our community liaison officers, and community planning networks.
2. Widely encourage involvement using a range of methods. We will publish information on the CNPA website and publicise the consultation processes through the media, newspaper adverts and articles.
3. Produce documents which are accessible, transparent and written in jargon-free language which avoids technical terms.
4. Publish an updated Development Plan Scheme every year, setting out how and when people can get involved in the preparation process.

Development Plan Scheme 2018

The CNPA board has agreed to standards which are based on the National Standards for Community Engagement. This means we are committed to involving communities in all stages of the LDP process. The CNPA website is the best place to start when thinking about getting involved: www.cairngorms.co.uk

Key stages

It takes several years to produce an LDP and there are a number of stages in the process. The main stages are shown in the diagram below, and the following sections provide an outline of when those stages are expected to happen and how you can get involved in them.

A detailed project plan is in place to make sure we keep to the timetable and deliver LDP2 on time. We have included a summarised version of the project plan at the end of this document for information.

Main stages of Local Development Plan



What's happened so far?

Main Issues Report
When?
November 2017 – March 2018
What was it?
Based on evidence gathered from a Monitoring Statement and other relevant sources, the Main Issues Report outlined the main planning issues for the National Park, setting out policy and site allocation options for addressing them.

How were people involved?
The CNPA held a public consultation on the Main Issues Report and invited the public and stakeholders to tell us which options best addressed the National Park's main issues. The responses to the Main Issues Report consultation will be analysed and used to guide the drafting of the Proposed Plan, and respondents informed.

What's next?

Proposed Plan
When?
November 2018
What is it?
This is the draft LDP for the Cairngorms National Park and will set out policies and allocations to guide development throughout the area. It will also include a Vision Statement, Spatial Strategy and Proposals Maps.
How to participate?
An Action Programme will be published alongside the Proposed LDP to set out how the policies and proposals in the Proposed LDP will be implemented.
How to participate?
The CNPA will hold a public consultation on the Proposed LDP and will ask the public and stakeholders to express their opinion on it.
The responses to the consultation will be analysed and may be used to inform changes to the Proposed LDP before it is submitted for Examination.

Submission and Examination
When?
Submission – June 2019 Examination – Summer/Autumn 2019
What is it?
As this stage the Proposed LDP is submitted to the Scottish Government who will appoint a Reporter to carry out an Examination into any unresolved issues. The Reporter will check that the CNPA has consulted properly before the main part of the Examination looks to resolve any outstanding objections to the Proposed LDP.

Extract of DPS (April 2018)

Conclusion

Overall, the CNPA believe that it has achieved all of the objectives set out within the Participation Statement and that the consultation on the Proposed LDP was effective. Notably, CNPA significantly increased its reach and engaged with a far wider range of people than previous. While it is noted that the total number of responses was lower than the Main Issues Report, this is largely because no petition style responses were submitted to the Proposed LDP consultation (unlike during the MIR consultation). In addition, The CNPA believe the consultation successfully provided clearer information and clarification, which helped people to better understand the proposals and remit of the LDP and resulted in a greater number of people deciding that they did not need to respond. Therefore, while the CNPA were able to engage with record numbers of people, the number of responses suggests that the majority of those we engaged with do not object to the Proposed LDP.

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