

There are aspects of MNP that we consider to be positive improvements to the current LDNPA Core Strategy, such as the attention given to Broadband (MNP 6) and the 'generational transition' question re Housing on Farms (MNP 5). Other aspects of the scheme are relatively innocuous, such as the provisions relating to general Environmental and Heritage issues (MNP 9 & 10), and would be acceptable with greater detail. There is a rationale for considering the topics such as Employee Housing (MNP 4) and Holiday Parks (MNP 8), even if we are not in agreement with some of the conclusions reached. But when MNP 1, 2, 3, 7 & 11 are considered, we believe the plan to be an overwhelmingly unsatisfactory blueprint for local development.

The policies laid out in MNP 1 (Housing Provision), MNP 2 (Location of Local Needs Housing), MNP 3 (New Build Affordable Housing), and MNP 7 (Live & Work) each represent a direct challenge to the Core Strategy, whilst MNP 11 (Parish Council role) attempts to give undue weight to a small number of local residents in the final decision making process. Both MNP and the Basic Conditions Statement are completely infused with a view that seeks to undermine the role of strategic planning at every possible turn. We believe it is important to consider the evidence in respect of each of these policies.

MNP 1 makes reference to a "latent demand for housing", yet no Housing Needs Survey has been undertaken to verify this statement. The previous Survey of 2009/10 identified a need for 5 new houses. When dwellings are placed for sale in the parish, it often takes quite some time for them to be sold. Whilst recognising that the target of 25 would be 'needs led', this target uses up 40% of the Eastern area allowance of 63 dwellings, although that area includes five other settlement centres (the Rural Service area of Glenridding/Patterdale and Villages such as Pooley Bridge, Askham, Penruddock, and Bampton). CS02 does not allow anything like this level of development in the open countryside, detailing a clear set of 'special circumstances'. As Matterdale is not considered a Cluster, it is wrong to use the 30% Cluster development allowance in support of MNP 1 target figure.

MNP 2 attempts to ignore the spatial strategic planning model of the Core Strategy, thus putting it in conflict both with CS02 and with NPPF 55. Earlier drafts of MNP identified the Parish as a sixth Cluster within the Eastern area (see Public Questionnaire booklet under 6.3 Quantity of Housing) but with the geography of both Matterdale and Watermillock wards being dominated by a pattern of isolated dwellings in open countryside (as detailed in MNP under section 38, preceding MNP 9), this approach was then dropped in favour of arguing simply for a sixth development area based on population.

When examining the locational strategy of MNP, it is interesting to note that, in response to Question 4 of the Public Consultation Questionnaire, there were only 33 responses from a total of 104 who wanted all of Matterdale Parish to be defined as a Cluster Community. There were 53 responses which did not endorse the idea of even part of the Parish being a Cluster. Despite these reservations expressed by electors, the locational aspects of MNP 2 have remained unchanged. The inclusion of ruins (List A, bullet 1) would clearly force new build in the open countryside and the reuse of redundant traditional buildings (List A, bullet 3) would probably have the same consequences; and when List A is considered in the light of the renewable energy requirements (List B, bullet 3), new build would clearly be the norm in most local housing provision. MNP does not provide any evidence as to why such development in the open countryside is needed, whether through listing special circumstances or specific locations.

MNP 3 also falls foul of CS02 and NPPF55 because of locational aspects. Whilst no evidence of Affordable Housing need has been presented, it is also clear that the Parish has a limited number of smaller dwellings. MNP 3 ignores the former buildings of Matterdale School, which are soon to pass to the trusteeship of the Parish Council from Cumbria County Council. This site has been suggested as an ideal location for affordable housing, given the existing buildings and the proximity to A5091, but has been ignored by the Parish Council due to the determination of some councillors to convert it into a village hall. There is sufficient space to erect 6-10 units, which would then make the proposal attractive to Housing Associations.

MNP 7 has similar flaws to MNP 2 and 3 in relation to open countryside locations and to reuse criteria forcing new build development. There is no evidence presented of needs within the Parish for additional live/work developments. We believe this particular provision stems largely from the recent planning applications for Denton Hill (PINS 2211345), where permission was refused because of location in the open countryside and because of the lack of sustainable transport.

Transport questions are largely ignored in the Neighbourhood Plan, with no mention of the 108 public bus service that passes through part of Watermillock ward or the two main roads A592 and A5091. CS11 and CS14 are faithfully included in much of the MNP public documentation but no notice is taken of them whatsoever. We believe that the Parish Council should attempt to capitalise on the tourism developments at Aira Force/Aira Point by working proactively with local bus operators towards the reinstatement of a bus service through Dockray. There need not be a Taylor Review 'sustainability trap' in Matterdale Parish.

MNP 11 is an attempt to wrestle as much power as possible away from the National Park as the ultimate decision maker and, when referring to Neighbourhood Development Orders (Basic Conditions Statement, section 75), is a rather frightening proposal. The assumed logic (that the Parish Council embodies 'the will of the people') can easily be challenged by referring to the MNP consultation process, where, despite 104 responses, no significant modifications have been made to the plan. Indeed, apathy is now the response of most electors, with only seven responses from the public to the final draft.

There is a concern that too much power could be vested in a small number of individuals, none of whom are professionally qualified in the planning field, and that decisions could be unduly influenced by the network of relationships within the community.

We believe that the existing decision making process allocates the correct weight to local opinion and that a high level of responsibility should be retained at the Strategic level to both avoid the problems identified above and to ensure a consistency of decision making across the National Park.

Having considered the available evidence, MNP is in conflict with the planning policies of the National Park in many respects, and as such, we would suggest that it does not pass the test of "general strategic conformity".

We would like to see development within Matterdale Parish when identified needs arise to take place in accordance with the Core Strategies; and for planning policies to be updated to take note of recent developments such as Broadband.