

Statement to the inspector following verbal contributions made on Friday 09.08.19 1400 pm session
Implementation and Delivery Matter I

Issue 1 Implementation and Delivery

“The PLP is unsound as the mechanism to deliver housing rests with the commercial decisions of private sector builders. Such builders are only likely to build for an adequate return. Given the uncertainty associated with the economy, no strong reliance can be placed on the ability of the private sector to build houses. Housebuilders are not going to build houses at a loss.

The foundations of the PLP rest on weak grounds. There is no guarantee that the number of houses identified will ever be built.

In addition there are two issues contributing to the unsoundness of the PLP

First affordable housing. The subsidy to facilitate affordable housing comes from the viability and returns to private housing built for the market. Given the uncertainty of the economy and the inherent reliance on the private sector to build, the number of affordable houses may not be realised simply because the private sector has not built sufficient market houses.

The residents of Purbeck expect that the PLP will deliver affordable housing especially for young persons on low incomes. These residents will be disappointed because the uncertainty facing the economy may not lead to housebuilding and hence the generation of the subsidy to fund affordable housing.

Furthermore there is no evidence that building more houses will address affordability. Building more houses in Purbeck will not lead to lower house prices, and hence improved affordability as these house prices will be out of the reach of local residents and only accessible by those from outside the Purbeck district including those who wish to acquire second homes and holiday lets.

Second economic growth. The PLP does not give adequate consideration to the factors leading to economic growth-labour supply and technical progress. The level of economic analysis is low and goes no way to show how well paid employment opportunities can be created. Such employment opportunities are critical for local residents to be able to access housing.

House building does not always contribute towards economic growth. Where there are unemployed resources then drawing them into the house building process may contribute towards economic growth (Gross Domestic Product measured in money yearly). Housebuilding creates economic activity (transactions etc) yet not necessarily economic growth. The appearance of “New” houses may well be a diversion of house building from another area. Such diversionary effects also apply to business activity.

The Dorset Innovation Park appears to have some “new” businesses yet in fact these may well be businesses that have relocated in order to access financial inducements. Diversionary activities frequently brings in non -local workers to the area does little to promote employment for local residents. National Audit Office reports have stated that Enterprise Zones like Dorset Innovation Park have diverted employment rather than created employment

Issue 2 Monitoring

The approach to quality assurance from Natural England is unreliable. Occasional monitoring activities on the heathlands and on SANGS are no substitute for rigorous quality assurance processes whereby what is sampled and seen on one day is the same as what is seen on another day.

Ad Hoc monitoring should be rejected and replaced with a systematic assessment process of comparing like with like, using trained assessors whose work is monitored by a trained verifier and subject to external verification from a third party financially independent of Natural England. It is only this approach that will inspire confidence in the assessment of harm to designated sites, and the use of SANGS.

The result of relying upon ad hoc monitoring is to endorse approaches that lack validity and reliability.

The above considerations make the PLP unsound.

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