

North Hertfordshire District Council's Response to Save Rural Codicote comparison SA Housing Distribution Options Table.

Mr Bamber, Representing Save Rural Codicote for Matter 1 of the NHDC Local Plan Examination Hearing, has prepared his own table (Bruce Bamber Summary of SAH Housing Options) which purports to be a comparison of Housing Distribution options, taken from page 122-132 of Appendix 3 of the Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan, CAG Consultants, September 2016.

The Council has sought the view of their consultant, CAG consultants, in relation to the accuracy of this table who has provided the following response:

CAG Consultants do not accept that this is an accurate summary of the pages in the SA that Mr Bamber refers to. The reason for this is that Mr Bamber has not simply shown the results of the appraisal of each of the 5 strategic options for housing distribution. He has added an additional element which is methodologically wrong, and misrepresents the results of the assessment of these options.

This additional element is that Mr Bamber has assigned numerical scores to each of the individual assessments in the matrix (e.g. he has assigned a score of 4 to a matrix assessment of "major significant positive effect" of an option on a particular SA objective). He has added these scores together to produce an overall score for each of the options (as seen in the bottom right hand corner of his paper).

There are two reasons this is not acceptable as good SA practice. Firstly, the purpose of the SA is not to balance different impacts in order to identify an overall impact. Rather it provides information to the decision makers about the separate impacts on each of the different objectives. Any presentation of an overall score would distort the decision making process by moving attention from the fine grain of the differences between options.

Secondly to assign scores in this way implies that you can compare and offset entirely different impacts that bear little relationship to each other; for example the process he uses implies that a positive impact on housing is the opposite of a negative impact on say heritage. It is highly misleading to imply in the way that he does that you can "add up" such a range of completely different impacts.

We would be happy for Mr Bamber to produce a table using the same notation as we used, comparing the impacts of the different options on each of the SA objectives, without any numerical scoring.

It is a matter for the inspector whether he accepts Mr Bamber's document into the examination, however if he does it is important that this document is also admitted into the examination as a response to Mr Bamber's document.