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**Memorandum**

**To:** Lucy Harding **From:** Bryn Jones **Ext:** 4699  
**CC:** Nat Belderson **Date:** 16<sup>th</sup> May 2018  
Sarah Nelson

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**Subject: Stedham with Iping Neighbourhood Plan – Regulation 14 Submission consultation**

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Thank you for the opportunity to comment on the above Neighbourhood Plan. Please see comments below:

**Page 18-19: SINDP8 – Land west of West Lodge, Stedham**

- The “Land West of West Lodge” is an exception site and CDC Housing Delivery Team would support such a scheme. However, exception sites cannot be allocated in plans.
- The neighbourhood plan can allocate an affordable housing scheme. In this case, the local connection in perpetuity clause included, would have to be removed. This is because CDC manages the Chichester Housing Partnership Register on behalf of Registered Provider partners with specific notations for rural and exception site allocations.
- The Council’s adopted “Allocation Scheme” includes a “Rural Allocations Policy”. When an existing affordable home within a rural area becomes available for re-let, preference will be given to households that:
  1. Are able to demonstrate (to the reasonable satisfaction of the council) a local connection to the parish in which the property is located, and;
  2. Have “reasonable preference” on the housing register (i.e. those households that are in bands A-C).

N.B All other eligibility requirements for the property (e.g. bedroom need) must be met. If no eligible households bid, the property will be allocated to households that has the greatest assessed housing need, regardless of local connection to the parish.

- CDC’s Rural Allocations policy was devised to ensure that local priorities are given “reason preference” but “not absolute priority over everyone else”, as the House of Lords made clear in the case of R (on application of Ahmad) v. Newham LBC [2009]. S.166A(3) only requires that people encompassed within that section are given “reasonable preference”. It “does not require that they should be given absolute priority over everyone else”. This means that an allocation scheme may provide for other

factors than those set out in s.166A(3) to be taken into account in determining which applicants are to be given preference under a scheme, provided that:

- They do not dominate the scheme , and
  - Overall, the scheme operates to give reasonable preference to those in the statutory reasonable preference categories over those who are not
- Local connection allocation policies for exception sites can be included, provided they are in line with the exception site allocations policy set out within the CDC Adopted Allocations Policy.

**Page 20: SINDP9- Unallocated Residential Developments**

- Developments on exception sites should follow the rural exception site criteria set out within the SDNP draft policy SD29 (or equivalent after adoption) as supplement to draft SINDP9 policy. It is recommended that the SDNP draft policy SD29 Exception site criteria be included.

I would be grateful if you could include my comments in your response. If you wish to discuss further please contact me.

Kind regards

Bryn Jones  
Assistant Housing Enabling Officer  
Chichester District Council