



# Public Document Pack

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Committee Manager Carrie O'Connor (Ext 37614)

5 December 2019

## **PLANNING POLICY SUB-COMMITTEE**

A meeting of the Planning Policy Sub-Committee will be held in **at Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF on Tuesday 17 December 2019 at 6.00 pm** and you are requested to attend.

Members: Councillors Mrs Yeates (Chairman), Jones (Vice-Chair), Bower, Charles, Mrs Daniells, Dixon, Elkins, Huntley, Lury, Northeast, Oppler, Mrs Pendleton, Ms Thurston, Dr Walsh and Mrs Worne

## **AGENDA**

### **9. COMMUNITY INFRASTRUCTURE LEVY (CIL) UPDATE (Pages 1 - 10)**

This report provides an update on the Arun CIL Examination which took place on 18 October 2019. It also provides a summary of the Examiner's Report, which is due to be issued to the Council during the week commencing 2 December 2019 and, as a result, it will be provided under separate cover to enable the Examiner's recommendations to be taken account of.

The Examiner's report may include specified modifications to the Charging Schedule that are required to be made to the Charging Schedule. A list of these modifications, and the reasons for them will be reported to the Sub-Committee. The final Charging Schedule and a schedule of the recommended modifications will be appended to the report.

The report will also include further details regarding the CIL charging process such as "Bringing CIL into Effect" and a "Next Steps" section which will explain the tasks that are required to implement and govern the CIL processes.

Finally, the report will ask the Subcommittee to recommend to

Full Council that the Arun CIL Charging Schedule be approved to come into effect on 1 April 2020.

10. **AUTHORITY MONITORING REPORT 2018/19**

(Pages 11 - 16)

This report presents the headlines of the Arun Local Planning Authority's Monitoring Report 2018/19. The full report is provided as Background Paper 1. As part of the AMR, the 5-year housing land supply has been updated and this shows currently, there is a 3.7 year supply. This has policy and decision-making implications which under national policy, provides that the 'presumption in favour of sustainable development will now apply to planning applications.

Note : Reports are attached for all Members of the Sub-Committee only and the press (excluding exempt items). Copies of reports can be obtained on request from the Committee Manager.

Note : Members are reminded that if they have any detailed questions would they please inform the Chairman and/or relevant Director in advance of the meeting.

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE on 17 DECEMBER 2019

#### PART A : REPORT

**SUBJECT: Community Infrastructure Levy (CIL) Draft Charging Schedule Update and Proposal to Approve and bring CIL into effect**

**REPORT AUTHOR:** Nicki Faulkner, Principal Planner

**DATE: EXTN:** x 37645

**PORTFOLIO AREA:** Planning

#### EXECUTIVE SUMMARY:

This report provides an update on the Arun Community Infrastructure Levy (CIL) Examination which took place on 18 October 2019. It also provides a summary of the Examiner's Report, which was issued to the Council on 3 December 2019. A link to the report is provided as Background Paper 1.

The Examiner's report concluded that the draft Arun District Council CIL Charging Schedule is an appropriate basis for the collection of a CIL levy in the area providing sufficient evidence that the rates would not undermine the deliverability of the Local Plan. Subject to making two modifications, the draft CIL Charging Schedule satisfies the drafting requirements and the Examiner therefore, recommends that the draft Charging Schedule be approved. A table setting out the Examiner's modifications, the reasons for them and the way they have been incorporated into the Arun Charging Schedule is provided in Background Paper 2.

A link to the final version of the Arun CIL Charging Schedule is provided in Background Paper 3. This report explains how the final Charging Schedule has been prepared and recommends that it is approved and that it shall come into effect on 1 April 2020.

The report also includes further details regarding the CIL charging process.

#### RECOMMENDATIONS:

The Planning Policy Sub-Committee recommends to Full Council that:

1. the Arun CIL Charging Schedule, which includes the Examiner's modifications and minor modifications as set out in Background Paper 2; and any further non-material changes which may be included and agreed with the Group Head of Planning in consultation with the Chairman of the Planning Policy Sub-Committee and Cabinet Member for planning, is approved in accordance with section 213 of the Planning Act 2008; and
2. that the Arun CIL Charging Schedule, and the Instalments Policy (set out within the Charging Schedule) will come into effect in Arun District (outside of the South Downs National Park Authority Area) on 1 April 2020.

## 1. BACKGROUND:

1.1 The CIL Examination took place on 18 October 2019 and the Examiner's report was received on 3 December 2019 (see Background Paper 1).

1.2 The Examiner's report concluded that the draft Arun District Council (ADC) CIL Charging Schedule (CS) satisfies the drafting requirements, subject to making two modifications as follows (for a schedule of the modifications, and how they have been incorporated into the Arun Charging Schedule, please see Background Paper 2):

Examiner Modification (EM)	Report page no./ other reference	Modification
EM1	Page 6	Delete Part 10 and Appendix 2 of the CS and replace them with an interim Infrastructure Funding Statement, to the extent that it clarifies the relationship between CIL and S106 & Section 278 (highway) legal agreements and sets out an infrastructure list.
EM2	Page 8	Include a larger scale map at 1:30,000 scale with OS grid reference lines and numbers showing the residential charging zones and the boundaries between them to accompany the schedule when adopted, with reference to larger scale versions showing more detailed boundaries that are available online.

1.3 Section 213 of Planning Act 2008 requires that the Council may approve the charging schedule only if it does so with the modifications that are sufficient and necessary to remedy any non-compliance with the drafting requirements. Therefore, the modifications, as recommended by the Examiner, have been incorporated into the final Arun CIL Charging Schedule, which is provided in Background Paper 3<sup>1</sup>. Please note that the Arun CIL Charging Schedule also includes an Instalments Policy. It is intended that this would be approved and come into effect at the same time as the Charging Schedule.

1.4 It is proposed that, subject to the approval of the Arun CIL Charging Schedule, the CIL Charging Schedule will come into effect on 1 April 2020. This date is proposed because it will allow officers time to set up and test CIL charging systems before they go live. Also this timetable will ensure that the introduction of CIL can be publicised and understood by anyone considering submitting planning applications.

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<sup>1</sup> The Arun CIL Charging Schedule currently has a "Draft" watermark. This will be removed, subject to approval.

## **2. Next Steps**

- 2.1 The CIL Regulations require that upon approval, the Charging Authority must publish the Charging Schedule alongside the modifications report (in Background Paper 1) on the Council's website. The documents will also be made available for inspection at all libraries within Arun District (outside the South Downs National Park Authority) and at Bognor Regis Town Hall and Arun Civic Centre, Littlehampton. A notification letter will be sent to all those who indicated a preference to be informed of approval.
- 2.2 As mentioned above, the Council will bring CIL into effect on 1<sup>st</sup> April 2020. This means that any planning application which has not received planning permission by that date may be liable to pay CIL. Further information regarding liability to pay CIL will be distributed widely, to ensure that prospective developers/applicants understand that CIL will soon be applicable in Arun District.
- 2.3 A Communications Strategy to raise awareness will be prepared and will include detailed updates to the ADC website [www.arun.gov.uk/cil](http://www.arun.gov.uk/cil) (providing useful links and a FAQ document), adding CIL to the agenda for pre-application meetings, social media updates to raise awareness and including a CIL information banner on all planning correspondence to spread the word about CIL.
- 2.4 Officers will now be working on setting up proposed CIL Governance and spending arrangements, for consideration by the Council. This proposed process will be brought to the next Planning Policy Sub-Committee, subject to resource availability. In addition, CIL and s.106 monitoring processes will be set up to ensure that the Council can prepare its annual Infrastructure Funding Statement (IFS) in accordance with the CIL Regulations 2010 (as amended). It is anticipated that a proposed IFS will be brought to Planning Policy Sub-Committee by late summer 2020.

## **3.0 Conclusion**

- 3.1 Following the CIL Examination on 18 October 2019, the Examiner recommended that, subject to two modifications, the draft Arun CIL Charging Schedule should be approved as a basis for collecting a CIL levy and this will not undermine delivery of the Local Plan.
- 3.2 The draft Arun CIL Charging Schedule has been updated to include the Examiner's modifications, as well as some additional minor modifications as set out in Background Paper 2. The Charging Schedule can be found in Background Paper 3.
- 3.3 This report recommends that the Arun CIL Charging Schedule is approved and comes into effect on 1 April 2020.
- 3.4 The Next steps for implementing CIL are briefly set out in this report. Further details will be brought to Planning Policy Sub-Committee for consideration at a later date.

## **2. PROPOSAL(S):**

To approve the Arun CIL Charging Schedule and for it to come into effect on 1 April 2020.

**3. OPTIONS:**

- To approve the Arun CIL Charging Schedule and bring it into effect on 1 April 2020.
- Not to approve the Arun CIL Charging Schedule and not to bring it into effect on 1 April 2020.

**4. CONSULTATION:**

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council	X	
Relevant District Ward Councillors	X	
Other groups/persons (please specify)	X	
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial	X	
Legal	X	
Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		X
Sustainability		X
Asset Management/Property/Land	X	
Technology	X	
Other – Officer Resources		

**6. IMPLICATIONS:**

The introduction of CIL in Arun will have financial implications for the Council. It is forecasted that CIL receipts could total approximately £30million by 2031. This will be used to deliver infrastructure projects to support planned development. There will also be financial implications of introducing CIL in terms of setting up finance systems that support the CIL charging process.

The appeal and enforcement elements of the CIL Regulations may have implications for the Council’s Legal department. Furthermore, there may be an increase in the number of s.106 agreements to be signed off before CIL comes into effect. This is because, planning permission, subject to s.106, is only formally granted once the s.106 is signed. Therefore, any outstanding s.106 obligations must be signed off completely before 1 April 2020.

Updates to the Council’s planning Information Technology (IT) systems will need to be made to incorporate CIL functionality.

Property/Land/Asset Management will need to be aware of CIL if the Council is planning on making any planning application. CIL will also need to be taken into consideration in any land valuation.

CIL will have resource implications within the Planning Department. The Council is currently advertising for a CIL Officer post to join the Planning Policy Team, to undertake specific duties related to setting CIL processes up. This will include collection of CIL receipts and governance/spending processes.

**7. REASON FOR THE DECISION:**

To ensure that Arun has an approved CIL Charging Schedule which will come into effect on 1 April 2020. The CIL receipts received by the Council will be used to deliver infrastructure projects to support planned development in the district.

**8. EFFECTIVE DATE OF THE DECISION: *Committee Services to insert***

**9. BACKGROUND PAPERS:**

**Background Paper 1:** CIL Examiner's Report can be read using this link:

<http://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n14664.pdf&ver=15015>

**Background Paper 2:** Schedule of Examiner's Modification and additional minor modifications

**Background Paper 3:** The Arun District Council CIL Charging Schedule 2020

<https://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n14676.pdf&ver=15027>

The accompanying Arun District Council CIL Zone Map1 can be accessed here:-

<https://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n14675.pdf&ver=15026>

An interactive CIL zone map can be accessed using this link:

<https://www1.arun.gov.uk/webapps/wml/Map.aspx?MapName=CIL2019>

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## Background Paper 2 - Arun District Council Community Infrastructure Levy Draft Charging Schedule Examination

### CIL Examiner's Modifications Report December 2019

1. On 3 December 2019, the Council received the CIL Examiner's report. In the report, the examiner concluded that the draft Arun District Council Community Infrastructure Levy Charging Schedule, subject to making of the two modifications set out in EM1 and EM2, satisfies the drafting requirements and therefore recommends that the draft Charging Schedule be approved.
2. Therefore, in order for the Council to approve the CIL Charging Schedule, in accordance with section 213 of the Planning Act, 2008, it must have regard to the examiner's recommendations and reasons for them, and approve the CIL Charging Schedule which includes modifications that are sufficient and necessary to remedy any non-compliance with the drafting requirements of the CIL Regulations.
3. Table 1 below sets out the two modifications, to be made to the Arun Draft Charging Schedule (Submission Version), as recommended by the CIL Examiner in his report. The table provides the reasons for the modifications being recommended and explains how the modification will be incorporated into the Charging Schedule.
4. Table 2 sets out the minor modifications which will be made to the Arun Draft Charging Schedule (Submission Version). As set out in paragraph 44 of the Examiner's report, these are helpful and useful clarifications endorsed by the Examiner, but do not require a formal recommendation (this means that the Charging Schedule could still be approved without these minor modifications).
5. Table 3 sets out additional information that the Examiner has considered would be useful for the Council to explain, either within the Charging Schedule or on the Council's website/in a Frequently Asked Questions (FAQ) Document.

**Table 1 – Two modifications necessary to meet the drafting requirements of the Community Infrastructure Levy 2010 (as amended).**

<b>Examiner Modification Reference</b>	<b>Modification – To Remedy Non-Compliance with CIL Regulations 2010 (as amended)</b>	<b>Reason for Modification</b>	<b>Modification made</b>
EM1	Delete Part 10 and Appendix 2 of the CS and replace them with an interim Infrastructure Funding Statement, to the extent that it clarifies the relationship between CIL and S106 & Section 278 (highway) legal agreements and sets out an infrastructure list.	For the purposes of viability and clarity/certainty	Rewrite Part 10- Annual Monitoring to make reference to the Annual Infrastructure Funding Statement and Replace Appendix 2 – Regulation 123 List with Appendix 2 – Interim Infrastructure Funding Statement Delete all reference to Regulation 123 of the CIL Regulations 2010 (as amended), in particular within paragraph 4.7.

Examiner Modification Reference	Modification – To Remedy Non-Compliance with CIL Regulations 2010 (as amended)	Reason for Modification	Modification made
EM2	Include a larger scale map at 1:30,000 scale with OS grid reference lines and numbers showing the residential charging zones and the boundaries between them to accompany the schedule when adopted, with reference to larger scale versions showing more detailed boundaries that are available online.	For the purposes of clarity/certainty	Replace the map in Appendix 1 of the CIL Draft Charging Schedule with a 1:30,000 scale map with OS grid reference. This district wide map, along with three inset maps at this scale will also be made available on the ADC website: <a href="http://www.arun.gov.uk/cil">www.arun.gov.uk/cil</a> alongside an interactive GIS mapping system.

**Table 2 – Minor Modifications to be made to the Draft Charging Schedule**

Minor Modification	Action – to provide clarification.
Provide clarifications on the definitions of older peoples housing when compared to those definitions provided within the updated Planning Practice Guidance.	<p>Add in the following paragraph under paragraph 7.5:</p> <p>For the purpose of clarity, the following definitions of older people’s housing, as defined in the Planning Practice Guidance Paragraph: 010 Reference ID: 63-010-20190626, relate to the definitions used in the LPVU, 2017 report as follows:</p> <p><b>Age-restricted general market housing:</b> This is between unrestricted housing and the definition of sheltered housing used in the viability evidence. Housing that falls within this definition will be taken to be Sheltered Housing for the purpose of CIL.</p> <p><b>Retirement living or sheltered housing:</b> This is similar to the definition of Sheltered Housing used in the viability evidence. Housing that falls within this definition will be taken to be Sheltered Housing for the purpose of CIL.</p> <p><b>Extra care housing or housing-with-care:</b> This is similar to the definition of Extracare Housing used in the viability evidence. Housing that falls within this definition will be taken to be Extracare Housing for the purpose of CIL.</p> <p><b>Residential care homes and nursing homes:</b></p>

	Are not C3 housing (rather being C2 institutional accommodation). Development that falls within this definition will be taken to be All Other Development (so subject to the zero rate) for the purpose of CIL.
To provide clarification on the definition of 'residential' in relation to static caravans.	Add the following text, shown in <b>bold</b> , to the end of paragraph 7.4 of the Draft Charging Schedule (submission version):  “ [1] Residential does not include residential institutions including purpose built student accommodation. Neither does it include development which is covered by a condition that limits it to holiday use only. Where this condition has not been applied to static caravan holiday units or holiday rental units, these should be considered to be in residential use, or have the potential to be used for residential use <b>provided that the static caravan is, on the facts, properly regarded as a structure or building in conventional planning terms.</b> ”
Include a definition of Gross Internal Area (GIA), along the lines produced by Spelthorne Borough Council	Include a definition of GIA in the Charging Schedule and also signpost to more details regarding floorspace measurement guidelines on the ADC website and Frequently Asked Questions (FAQ) document.

**Table 3 – Additional points of clarification**

<b>Paragraph number</b>	<b>Examiner's Comment</b>	<b>Action</b>
<b>38</b>	It would provide certainty for the council to confirm the specific date on which the CS will first apply and how valid planning applications submitted before that date and thus “in the pipeline” at that point would be treated in relation to any CIL liability.	The date from which CIL will come into effect in Arun will be set out clearly in the Arun CIL Charging Schedule, which will be recommended for approval. Details regarding how “in the pipeline” applications will be treated will be included in the Charging Schedule, by reference to the Arun District Council website and FAQ Document.

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB COMMITTEE ON 17 DECEMBER 2019

#### PART A : REPORT

<b>SUBJECT: Authority Monitoring Report 2018/19</b>
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<b>REPORT AUTHOR:</b>	Kevin Owen, Planning Policy Team Leader
<b>DATE:</b>	18 November 2019
<b>EXTN:</b>	37853
<b>PORTFOLIO AREA:</b>	Planning

#### EXECUTIVE SUMMARY:

This report presents the headlines of the Arun Local Planning Authority's Monitoring Report 2018/19. The full report is provided as Background Paper 1. As part of the AMR, the 5-year housing land supply has been updated and this shows currently, there is a 3.7 year supply.

This has policy and decision-making implications which under national policy, provides that the 'presumption in favour of sustainable development will not apply to planning applications.

#### RECOMMENDATIONS:

That the Planning Policy Sub Committee: -

1. Notes the Authority Monitoring Report 2018/19.

#### 1. BACKGROUND:

- 1.1 The preparation of an Authorities Monitoring Report (AMR) is a requirement under Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Data is presented for the previous monitoring year from the date of publication. The AMR is updated on an annual basis. The current AMR 2018/19 therefore, covers the year 1 April 2018- 31 March 2019
- 1.2 The AMR monitors progress on; plan making (i.e. Development Plan Documents) identified within the local planning authority's Local Development Scheme; and comments on the use of planning policies; and the update the annual housing land supply (HLS) figures for the planning authority area (i.e. excluding the South Downs National Park).
- 1.3 The AMR 2018/19 will be published as a background paper on the council's web site as part of the agenda for the meeting Planning Policy Committee on the 17 December 2019. The AMR includes a range of updates and progress reports, including the following: -

- Progress on the Local Plan and Development Plan Documents against the timetable set out in the Arun Local Development Scheme 2016/17
- Neighbourhood Plan Update
- Duty to Cooperate Update
- 5-year HLS
- Local Plan Policy Usage
- Housing Delivery
- Commercial Land Delivery
- Traveller Sites
- Sussex Biodiversity Annual Monitoring Report

1.4 In particular, the AMR includes a 5-year HLS section, an update on Local Plan and Neighbourhood Plan progress and housing delivery.

- With the adoption of the Arun Local Plan Arun (July 2018) Arun had a 5.1-year HLS (based on monitoring in 2016/17);
- However, the AMR 2017/18 established that there was 4.7-year HLS for the period 2018-2023 because of several issues identified with housing delivery;
- The current AMR 2018/19 now identifies a 5-year HLS of 3.7 years for the period 2019 - 2024 following a call for sites and updated HELAA data collection process to reflect the new definition of Deliverable sites (set out within the National Planning Policy Framework (Appendix 2: Glossary);
- The number of permissions on strategic allocations has improved;
- However, despite progress with the amount of planning applications on Strategic Allocations approved and the supply of promoter's specific site deliverability evidence, (e.g. site housing trajectories) on all of the sites which make up the supply, there is an over optimistic or unrealistic perspective of scheme progress from pre application, planning permission to reserved matters, discharge of conditions and start on site by the development sector;
- The number of annual completions is lower in 2019 than in 2018. Housing delivery performance is still not in accordance with the housing trajectory – housing Implementation strategy.

1.5 It should be noted that the supply of 'deliverable' and developable HELAA sites (as prescribed by the NPPF 2019) provides a significant part of the evidence base for the housing land supply, together with monitoring of commitments (planning permissions) and completions for the plan period (since 1 April 2011). The following headlines can be reported: -

- There were 603 completions for the monitoring year 1 April 2018 - 31 March 2019 which is a decline compared to 704 dwelling units completed in 2017/18.
- There have been substantive further planning permissions on the Strategic Allocations.
- The Council issued a Call for Sites in May 2018 and requested further site housing trajectory evidence to be supplied by promoters responding to updated HELAA forms (following a developer workshop in June 2019) – this has resulted in 16 additional HELAA sites of which 5 are assessed as 'deliverable'.
- However, there have also been a number of HELAA sites where the Deliverable

or Developable status has changed.

- 1.6 It should be emphasised that the Government has again yet to publish Arun's Housing Delivery Test (HDT) result for November 2019. This is a key piece of evidence to determine the 5-year housing and supply position because the HDT level of performance determines the appropriate housing % buffer to be added to the 5-year requirement. The HDT result for 2018 was 91% requiring a 5% buffer.
- 1.7 In the absence of a published HDT result and based on the expected step increase in required housing delivery established in the authority's housing trajectory (against a very difficult housing delivery performance in 2019) a 20% buffer has been applied (which assumes the authority's performance will fall below the 85% pass mark required by the HDT).
- 1.8 The authority has published its Action Plan in response to last year's HDT result. The Action Plan sets out an analysis of the authority's housing performance against the Adopted Local Plan Housing Target as well as the housing trajectory - updated within the AMR each year. The Action Plan was approved by Full Council for publication on the councils' web site following the Council meeting on 13 November 2019.
- 1.9 The consequence of having a 5-year HLS means that the authority continues to fail two of the national tests measuring housing performance. This will mean that paragraph 11.d of the NPPF 2019 will continue to be triggered (i.e. the application of the 'presumption' for Development Management decisions). It is also likely that Arun will see speculative applications on sites that are less sustainable. There is a significant risk that refusal decisions are also likely to go to appeal and succeed.
- 1.10 Arun is progressing the Non-strategic Sites Development Plan Document (DPD) via an Issues & Options paper to be agreed in the Spring 2020 with a view to a public consultation.

#### Next Steps

- 1.11 The AMR and HLS following agreement of this sub-committee will be published on the Councils web site.

## **2. PROPOSAL(S):**

- 2.1 That the AMR be agreed as the monitoring evidence base for plan making and policy performance for the period 1st April 2018 - 31st March 2019.

## **3. OPTIONS:**

The following options are available: -

- To publish the AMR and 5-year HLS update 2019 as the Councils position – showing a 3.7 year 5 year HLS.
- Not to publish the AMR and 3.7 year 5-year HLS. This may risk further challenge by the development industry because the Council's position is uncertain on housing land supply.

<b>4. CONSULTATION:</b>		
This is a technical document that does not require consultation. The AMR provides an evidence base against which to monitor plan making progress and performance in ordered that policy formulation and decision making is effective in delivering sustainable development of the planning authority area.		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>		
Financial		x
Legal		x
Human Rights/Equality Impact Assessment	x	
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
The AMR provides key published data across a range of policy performance indicators for the Council and other stakeholders in the community including the development industry not least including housing delivery performance which may materially affect the Councils decision making for Development Management purposes.		

**7. REASON FOR THE DECISION:**

To ensure that progress is maintained on housing delivery and creation of sustainable communities within Arun.

**8. BACKGROUND PAPERS:**

1. The AMR 2018/19 can be accessed on the Council's Web Site: <https://www.arun.gov.uk/authority-monitoring-report>



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