

## **DOCUMENT 2**

### **Middleton On Sea PC**

- 1) We are concerned that this proposed strategy has been rushed through without giving Parish Councils a suitable amount of time to review the proposals and to take into account the need that any proposed strategy meets the needs of local residents
- 2) We understand that Arun DC Planning has a shortage of staff and this has been the position now for some time. If this proposed strategy is to take away the need for additional staff and to place the onus back on Parish Councils/local residents to carry out the reporting of planning breaches then we would suggest that Arun DC state what they plan to do with regard to planning enforcement staff numbers in the immediate future
- 3) With regard to the reporting of planning breaches that the public feel are necessary to report the information required by people who are not experts in this planning issue is extensive and may not in all cases be available and will therefore make the reporting of the breach outside of the rules and will not be investigated. Will there be some form of assistance so that those reported breaches that are not investigated will inform the complainant of what additional information is needed.
- 4) Reporting a breach – complaints from members of the public will only be accepted on the online form via email. What about the members of the public who do not have access to or use a computer?
- 5) Presumption that minor breaches will not be dealt with – how can residents talk through their problems?
- 6) Advise residents to contact their Parish Council for advice on whether there is a breach or not and how it should be reported.
- 7) Provide the Parish Council with Permitted Development Planning Approvals within their parish to enable both Parish Councils and local residents to be aware of these approvals that do not go through the usual advice to Parish Councils
- 8) If Arun DC Enforcement Officers do not have time to discuss problems, the problem does not go away residents need answers. Residents will feel that this service is not fit for purpose
- 9) Diversity, Equal Opportunities and being inclusive – this proposed strategy does not cover these principles and will exclude a large number of people who have issues with planning breaches and are not able to meet the requirements laid down in this report.

### **Felpham PC**

1. An updated Planning Compliance Strategy was presented to the ADC Planning Committee on the 25th May. This had not previously been seen by stakeholders such as Parish Councils. This appears contradictory to the aspirations of National Government, which is to encourage greater involvement at a local level. We would welcome any comments on this.
2. The introductory heading sheet does not make it clear as to what has precipitated this review. The external review of the Planning department was circa 3 years ago, pre pandemic although this was mentioned in the introductory

sheet. Again, the introductory sheet does state that the department should have a full complement of 5 enforcement officers. However currently it only has 1 part time officer. It does NOT state however that this is the reason for this updated strategy. Thus, it does not make it clear whether this is a temporary strategy to overcome a shortage of staff or is indeed the future permanent strategy going forward. There is no mention in either document as to what has caused the shortfall of staff, over what period or indeed what steps have been taken to recruit and eliminate/reduce the shortfall of staff. Neither does either paper describe whether this updated strategy would be required in there were a full complement of staff or whether a full complement of staff would still require the introduction of this revised strategy. Could we ask for an update on how ADC are progressing on resolving the recommendations made during the review 3 years ago please? Yet the purpose of planning enforcement is to investigate alleged breaches of planning control, taking enforcement action where appropriate. If the breach affects the private interests of one person, it can still be a breach.

3. The accompanying introduction does not include a timetable of the ongoing process, recruitment process or any target dates for implementation if the updated strategy is approved.
4. Neither paper states a review process or period if the updated strategy is approved. The emphasis on "significant" is open to interpretation and gives a potential green light to planning breaches and environmental damage
5. Neither paper states that the Planning department will report back to the ADC Planning Committee on the performance of enforcements against the targets post introduction. We feel, as a matter of public interest there should be a detailed list/table of performance, indicating the statistics relating to how many requests/actions/conclusions associated with enforcement take place.
6. The introductory paper does not detail any definitions against which the decisions on enforcement are progressed or not. Who will make these decisions?
7. Neither paper states who will decide the definitions against which enforcements are judged.
8. The introductory paper mentions the Hannaby Planning Solutions Ltd review but does not state what recommendations from that review are being introduced and against what timetable.

#### Main Paper

9. In the main paper section 4 there is no definition of "**Significant**" nor is there a name/position of the person who will determine the scale of "**Significant**". We feel this needs to be set down in a standard and NOT based on an individual's determination. To do so brings a level of personal opinion which will almost certainly not understand or be aware of any local or specific issues associated with any application.
10. In the main paper section 4 there is a statement "Where resources permit"- who will determine how this is defined against what criteria? As above
11. In the main paper section 5 there is no definition of "**proportionate**" nor is there a name/position of the person who will determine the scale of "**proportionate**"  
As above.

12. In section 6 who will monitor and enforce enforcement notices? Against what timescale?
13. In section 6 who will monitor and enforce Temporary Stop notices? Against what timescales? It is known that currently temporary stop notices are not monitored and do lapse.
14. Section 6 page 4 - bullet point 7 - how is "reasonable time" defined and by whom?
15. Section 6 page 4 - bullet point 9 - how is "proportionate" defined and by whom?
16. Section 6 page 4 - bullet point 9 - how is "the Council" defined - position/committee?
17. Section 7 page 6 - bullet point 3 - how is "Significantly" defined and by whom?
18. Section 7 page 6 - paragraph 1 - how is "acceptable" defined and by whom?  
All of the above place a high dependency on someone being available to make these decisions. Given one of the key drivers for this proposal is lack of resources how can there be any confidence that any resources will be available routinely to make these decisions. It is simply adding another workload on the same department, or more worryingly these decisions could be made by someone who is not fully conversant with any particular situation or competent to make such a decision. This in itself opens up ADC to criticism and challenge.
19. Section 8 page 6 - How will any complainant know which priority group a particular case will be in and thus how a complaint might be made?
20. Section 8 page 6 - the criteria and amount of information required for a complaint to be registered is too onerous, technical and detailed for a member of the public to effectively and appropriately make a complaint. For example -
  - Estimated or real measurements - how can this be achieved especially if the breach is on private property.
  - Name, address, and phone numbers - maybe impossible for a member of the public to know or secure however this is stated as a minimum requirement.
  - The precise location - might be impossible to secure especially on private land but again stated as a minimum requirement.

The above and 8 other criteria are stated in bold **"Failure to supply all the above information may result in your report being returned without investigation"** yet this fails to recognise that general members of the public might find ALL this information difficult or indeed impossible to obtain. All of the above make it very difficult to apply.

21. Section 8-page 7 3rd line - how is "expedient" defined and by whom? See point 18 comments.
22. Section 10 page 7 - how will a potential complainant know the priority classifications and who will determine the priority each case be placed?
23. Section 11 page 9 - who will monitor the performance of enforcements against the targets, where will this performance be reported to. Will the performance targets be reviewed? See point 5 comments.
24. Section 12 page 10 - 2nd criteria - who will determine "expedient" and against what criteria? See point 18 comments.

## **Conclusion**

The strategy does leave too many terms, on which decisions are based, as undefined and open to interpretation which may vary from officer to officer leading to inconsistent decisions. Additionally, there does appear to be much onus placed on the complainant to gather information, that they may not be able to and almost certainly will not be expert in this field, before a complaint is even registered.

There is a great danger we feel that this strategy has the potential of being a charter for making potential complaints very onerous and is defensive in its nature. It also has the potential, we feel, of being a charter to prevent complaints and for no action to become the norm. The resourcing issues needs to be addressed and the targets for enforcement need to be more challenging to ensure that the priority will be on compliance with Planning law and regulations and not a focus on resourcing which should be incidental rather than the main focus.

Enforcement should always be the last resort however it should be appropriately used, when necessary, without the fear of lack of resources being a driving concern or outside constraints. FPC believe that the Planning department should be a fair service to all residents of Arun, be impartial and adequately resourced to be an exemplar service that ADC can be proud of.

Other councillor concerns and comments received:

The strategy puts forward to reorganise the planning dept without the staff to deal with it. This must be the priority with named persons to deal with the different levels of breach.

Previously the list of these staff was sent to councils so that we could direct residents to the correct section of ADC.

Recently we have advised them to go direct re the golf club applications and this meant that ADC had to cope with more than our detailed objections.

Given that this made ADC look more closely especially since Southern Water had not been consulted.

Given the lack of staff who will be available to deal and sort out the different levels of complaint issues on breaches and who will be there to deal with this together with enforcement?

Given that parish councils are the most knowledgeable re local conditions why were they not consulted first?

ADC needs to create a hub where all interested parties can put the best way forward. Without these, developers could benefit and can go ahead without the infrastructure being in place to assure residents that Felpham is a pleasant place to live.

- **2 The purpose of planning enforcement**

“They cannot be used to protect the private interests of one person against the activities of another”

Yet the purpose of planning enforcement is to investigate alleged breaches of planning control, taking enforcement action where appropriate. If the breach affects the private interests of one person, it can still be a breach.

- **4 Planning enforcement objectives**

“To remedy **significant** harm caused by unauthorised development.”  
The emphasis on “significant” is open to interpretation and gives a green light to planning breaches and environmental damage.

- **6 General Principles**

“The use of enforcement powers is discretionary and carrying out development without planning permission, although unauthorised, is not illegal.”

This again gives a green light to unauthorised development and fails on environmental protection. For example under the National Planning Policy Framework : Habitats and biodiversity 179, it states: *To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity<sup>61</sup>; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation<sup>62</sup>; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

A recent example of this is unauthorised change of use of land is east of Heath Place, Bognor Regis which adjoins the rife and where the land was rich in habitat and protected species and was completely cleared with heavy earth moving vehicles in 2022. When a complainant rang ADC Planning they were told by phone: “Due to resignations, there were no enforcement officers, and no one could look at it for two months.”

- **Page 4 (part 6) : Anonymous complaints will not be investigated**

This is wrong as there will be cases of serious breaches of planning control where a person will not want their name mentioned. These must be investigated even if they come to nothing. There may also be other issues that come to light from anonymous sources reporting planning breaches which should also be referred to the appropriate authority, such as police, health and safety or Environment Agency by any responsible planning authority.

- **7 What is a breach of planning control**

“Felling a tree not within a conservation area or protected by a TPO”  
Some areas of land within Arun have many trees that are not protected by

TPOs. However, felling and clearance could indicate change of land use or destruction of protected species.

Such reports should be investigated and not dismissed out of hand.

- **8 Reporting a breach**

Reports can “only be made using the on-line form.”

“Emails and phone calls may be accepted for priority 1 cases only”

This is all wrong as many elderly people or those without internet access could then be excluded from reporting planning breaches, as are those with limited time. Priority 2 which includes “serious harm to the environment” can therefore be ignored.

- **Reported breach must include (as a minimum)**

This then lists a huge number of demands with the threat that “failure to supply all the information may result in the report being returned without investigation.”

This is all wrong and is clearly a way out of investigating planning breaches.

- **11 Investigating a breach of planning control**

Priority 2 and 3 cases are 15 and 20 days to investigate, respectively. This is too long. Particularly as 2 is “serious harm to the environment.”

Further, reporting of outcome to the complainant and site owner is 90 days. This could mean over 5 months?

- **12 Possible outcomes of Council’s planning investigations**

**Development is immune from action** “development has been in use for a period of time.” This ‘time’ should be explained as a well-used ruse by unscrupulous developers is to claim continuous use.

- **13 Monitoring of developments for compliance** .....”it is not possible to monitor all development”. Therefore, “The LPA will continue to rely on the knowledge of local people, Ward members and Town and Parish Councillors to identify matters of non-compliance.” However, see 8: Reporting a breach. Here it states emails and phone calls will be ignored, and even if the on-line form is filled out, unless “all” of a huge list of information fields are completed, “the report may be returned without investigation.”

## **Littlehampton TC**

Thank you for providing the opportunity for the Town Council to comment upon the revised Strategy. Members reviewed the revised document at the Planning and Transportation Committee on Monday 20<sup>th</sup> June 2022 and discussion focussed on the prioritisation of cases and the reporting mechanism.

Members are of the strong view that every breach, however minor should be recorded. As with crime and antisocial behaviour, Members considered it imperative that residents had confidence in the system and are encouraged to report breaches, however minor. There is concern that if minor breaches are not registered, important evidence will be lost that could prevent a minor issue becoming a major breach. This also goes against the District Council's objective relying "on the knowledge of local people, Ward members and Town and Parish councils to identify non-compliance matters of the Strategy" – Section 13 of the Strategy. It is also thought that this could severely limit the District Council's ability to respond meaningfully to Freedom of Information requests.

Members are very concerned to see that houses in multiple occupation are classed as a minor breach. The Committee is firmly convinced that this should be categorised as a major breach.

Observing the minimum detail requested to report a breach, Members also consider it important that the Strategy reflect that these investigations should be undertaken taking into account specific times of breaches. This will reassure residents that a complaint has been both understood and thoroughly investigated.

Finally, emphasising that the Strategy is only effective if it is properly enforced, Members considered it important to highlight that this area of the District Council's work urgently needs to be better resourced with both staff and an effective reporting mechanism.

Overall, it is considered that in streamlining the Strategy, some of the changes may not be in the best interests of residents and do not accurately reflect issues that are commonly raised with and by Councillors.

We hope that the District Council will take these points into consideration when finalising the Strategy.

### **Kingston PC**

Council agrees in principle to the change in Strategy whilst there is a shortage of staff, but Council considers compliance an essential service if there is to be fair play for residents across the District. Whilst the majority will observe planning regulations there are sadly a good few who will push the rules to get what they want, and this should be prevented.

### **Bersted PC**

Members discussed the strategy and agreed to make the following comments:  
The Compliance Strategy appears contradictory to the aspirations of National Government, which is to encourage greater involvement at a local level, and it is noted that the last paragraph from the current 2019 document about relying on local people and towns/parishes has been removed.

It is noted that there are no changes to what does and does not constitute a breach of planning control, and some areas have been given clearer explanations. However, will

the priorities numbered 1 to 4 be fully understood by members of the public wishing to report a possible breach?

New online reporting form that must be completed with all the relevant information otherwise it will be returned without investigation. Members feel this will obstruct those that do not have access to a computer or smart phone, would a paper form be available to complete? Also, concerns that if some information is missing from the form and cannot be found the possible breach will not be looked at.

Concerns about what constitutes a significant breach as mentioned at paragraph 4 and in the same paragraph "where resources allow, be proactive regarding monitoring of large-scale strategic sites. What happens if resources don't allow, which is currently the case, and other smaller developments not classed as strategic site have breaches?

In conclusion Bersted Parish Council feel that current situation regarding a lack of enforcement officers needs to be rectified as soon as possible otherwise the proposed Planning Compliance Strategy has no backbone to bring it forward.

### **Ferring PC**

Staff in a number of roles within the organisation. We also acknowledge that there is an impact on the ability of ADC to currently meet its expected response and performance objectives.

In respect of the Compliance Strategy review, Ferring residents have encountered the longer-term consequences of the failure of the Local Planning Authority to act in a timely and resolute manner in what may be deemed relatively low impact contraventions of planning compliance, resulting in established use claims, for example. Such claims have been particularly detrimental to areas such as the Angmering / Worthing gap with the creeping industrialisation of previously agricultural land on the slopes of Highdown Hill.

As development intensity increases, contraventions of approved planning applications which may, on a desktop review, be considered 'minor' but only serve to encourage further violations which may cause distress to other householders and have a very real and tangible impact on their lives. There is a reasonable impression by residents and the P.C. that this is becoming increasingly common. There is an established process for NMA's which should be upheld and where the variation is material, appropriate planning consent should continue to be sought.

Planning policies and the considerable investment in Neighbourhood and Local Development Plans need to be seen to be upheld without which dissatisfaction levels with the Planning Authority will continue to rise. As contraventions are increasingly known to not be pursued, the number of cases is likely to increase as a direct result.

The strategy review does suggest some initiatives, which officers recommend, to improve the effectiveness of the compliance operations and clearly there is a need to prioritise the most harmful with the most experienced officers in a timely manner. However, section 4.0 OPTIONS implies that eliminating categories of complaints from



the record would serve to reduce customer dissatisfaction figures. While that may be reflected in the figures, it does not reduce the dissatisfaction of the residents. Manipulating the basis of the statistics will not resolve the issues being faced by ADC or residents and is unlikely to lead to a true reduction in dissatisfaction.

If the figures reflect the challenges the Local Authority is experiencing, the authority should be presenting them alongside a strategy improvement plan, not seeking to change the basis the stats. If the data reflects the truth then that is what should be reported so that the community has a true picture and understanding of the situation, issues should not be hidden.

Whilst acknowledging that it is not within the remit of Parish and District Councilors to be actively involved in planning enforcement; it does not appear that consideration has been given to the potential for parishes to support their District Councilors in providing the background to specific planning aspects,

We would therefore urge ADC to engage with District Councillors and Parish/Town Councils to explore avenues by which an appropriate level of support could be provided at a local level, particularly whilst the short-term staffing issues prevail.

### **Rustington PC**

I have to say that my Council is very concerned regarding the current strength of the District Council's Enforcement Team and the deterioration that has occurred during the last year or so. To an outsider it would appear that it has been mismanaged by not flagging up the serious position at a much earlier stage. It is imperative, in my Council's opinion, that all avenues must be pursued urgently to raise the strength at the earliest opportunity. If developers or household applicants become aware of the current minimal strength, it would not be surprising to find that contentious issues are left out of proposals in the hope that they could be quietly introduced during the development.

Obviously, the existing Compliance Strategy has been amended so that less action will be expected when breaches have been recognised or reported. However, the commitments stated in the new Strategy bear little resemblance to the current strength of one part-time member of personnel. The timing of introduction could, therefore, be questioned as it relates to an increased workforce.

It is stated that the purpose of the amended Strategy is to streamline the approach so that only breaches that are harmful are given priority. My Council would argue that breaches in Priority 3 or 4, as raised by the public, are also 'harmful' and that it is important to give positive feedback otherwise total dissatisfaction will occur. It may be viewed as a minor breach but to a member of the public it could be far more important. If someone can take the trouble to complete an online form with a minimum of eleven headings, and also supply a photograph, then a response is surely justified.

This Council has already experienced embarrassment regarding the eyesore structure at 66 The Street, Rustington, which was raised with it by two neighbouring residents, but the complaint was simply filed as there were no personnel to deal with it.

The wording on the amended Strategy is, therefore, questionable as an on-going document. It is also of concern as to whether it should be introduced at this present moment. If it is decided to go ahead, then my Council believes a review date of say six months ahead should be set.

### **Aldwick PC**

The document is woolly and open to subjective interpretation and Members fear that lack of proper enforcement resulting from this lack of definition will lead to a diminution of the amenity value of Aldwick.

Is this a genuine consultation, given that only an 'informal consultation' with parish councils is referred to (*Report To and Decision of Planning Committee on 25 May 2022*)?

Is this document the result of a lack of planning officers and if so, should this be remediated rather than changing the planning enforcement protocol?

#### **Specific Points:**

- Planning Enforcement Objectives (p.2) What constitutes 'significant' harm? Too subjective.
- General Principles (p3) The use of enforcement is discretionary – again, very woolly.

*What is a Breach of Planning Control ? (p4)*

The following are classified as NOT being breaches and we have queries on them:

- (p 5) Running a business from home where the residential use remains the primary use of the development – How is this proved? It seems subjective and open to abuse.
- Parking of caravans on residential driveways .....as long as they are incidental to the enjoyment of the property. Again, entirely subjective and open to abuse.

*Minor Breaches of planning control that may not be investigated:*

- Fences that are not harmful to amenity – entirely subjective again.
- Untidy land unless significantly detrimental to amenity – subjective again.

Case priority

- How will you meet priority 1 cases with only 1 part time member of staff.

We would add that you have a compliance case ongoing ENF/356/18 - 79 Lincoln Avenue first reported to Compliance June 2019 – this has not been concluded and is causing significant harm to the surrounding properties – we would like you to put this to the Planning Committee for their feedback and conclusions - and how your Planning Compliance Strategy would provide a better service than the appalling one we and the properties in Lincoln Ave have so far received.

Finally we request that our comments are relayed to the planning committee and that their response be made known to us before these changes are formally enacted.

### **Bognor Regis TC**

Members considered the changes proposed in ADC's Planning Compliance Strategy (May 2022) and discussed in some detail the full contents of the updated document.

In reference to the ways in which breaches could be reported, as outlined in Section 8, concern was expressed by Members that only allowing for priority 1 cases to be reported by email or telephone would be putting hurdles in the way of reporting breaches falling within priorities 2-4. Insisting that breaches of lesser priority be reported using an online form was seen as prohibitive to those without access to the internet.

With Members of the Committee aware of the frequent public objection to planning applications involving HMOs in Bognor Regis, it was felt that breaches in relation to these types of properties should be in priority 2, rather than 4 as proposed in the Strategy.

Members noted that under 3.3 of the report to ADC's Planning Committee on 25<sup>th</sup> May 2022 it was stated that, due to difficulties in recruiting, instead of a full complement of 5 enforcement officers there is currently only one part time officer. As a result of this, the Council are unable to deal with the number of enforcement cases that they continue to receive. It is understood that this has led to the revised Strategy with a view to streamlining the process.

As an alternative to updating the Planning Compliance Strategy, the report suggests that the Strategy could remain the same but that this comes with the danger that customers will be given unrealistic levels of service that will mean that more unsustainable levels of complaints will be received with an increase in customer dissatisfaction.

Members agreed to submit the comments above in relation to reporting breaches and HMOs, as detailed in the proposed updates, to ADC. However, in responding to the consultation, Members also agreed to inform ADC that the Town Council would prefer for Arun to stick with the current Planning Compliance Strategy and focus instead on recruitment to address the lack of enforcement officers.

Please ensure that the views of Bognor Regis Town Council are presented to the next available Committee.

### **Clymping PC**

Clymping Parish Council raise a number of concerns in relation to the updated planning compliance strategy as Council feels it will not be of value to the community. The 'strategy' feels rather like planned retreat for our coastline and reclassifying criminal offences to non-offences to reduce crime figures.

The strategy is that ADC will not act on all breaches of Planning Control only those regarded by the officers as "significant". Whilst Council accepts that action is discretionary and that in some cases as non-material technical breaches can occur, the definition of "significant" will prove far from transparent.

This will leave the community exposed to the vagaries of the Planning Department thinking and to the developers who will work the system. It will also lead to an increase in calls for Councillors to intervene on residents' behalf.

ADC seems unable to manage, to hold, or recruit for the planning department which perhaps suggests something about the culture of this failing department. Downgrading problems to non-problems, or downgrading responsibilities so there aren't any is not the service the community deserves. This is a matter the district councillors need to get a grip on urgently. It would be advantageous to understand how other similar authorities recruit and hold their personnel.

### **Pagham PC**

- The problem is not the Strategy, it's the lack of staff to apply it. No mention is made of what is being done to address the reason for the lack of officers. Simply recruiting isn't sufficient if retention is the issue. Why do staff members leave? Why is it hard to recruit in the first place? Funding the posts at market rate should not be difficult given the fact that fees can be charged for planning applications. What is being done to address this wider issue? Enquiries were made (and ignored) about this in April 2022.
- Real concern that proper effective monitoring and enforcement for the huge number of houses to be built in Pagham will be compromised. Hook Lane developers have already commenced development without satisfying all the relevant pre-commencement conditions. Others will do similar if investigation may take 15 working days. Summer Lane has experienced continuous problems and required investigation and monitoring since outset including the use of a temporary stop notice. At the development behind the Inglenook Hotel, issues which (in the opinion of members of ADC's own Planning Committee) should have been subject to a temporary stop notice were allowed to continue resulting in development which residents do not consider to be suitable. Issues persist with unlawful development involving agricultural works accommodation. This is just in Pagham, and watering down the response available will not stop the problems we are experiencing.
- If residents don't feel their concerns are being listened to as enforcement issues, they will resort to making formal complaints which will also need to be dealt with by ADC, with the original breach still unresolved.
  - What is the plan to deal with the backlog of current cases?
  - Proposed Strategy dilutes the effectiveness of planning system controls.
  - Will reduce public faith in the process as developers go unchallenged quickly and efficiently. This is summed up by the removal of the phrase "ensure credibility of the planning system is protected not undermined".
  - All the recent cases raised for strategic or large sites in Pagham would have been treated as Priority 2 and 15 working days is too long to wait potentially for a site visit. Damage is done by this point or plans ruined – see Jubilee weekend complaints over Hook Lane.
  - Proactive monitoring of strategic sites where resource allows will lead to a free for all for developers who will face no material consequences for breaches. Residents will suffer as a result, particularly those living near the strategic sites.

- Move to online only reporting unacceptable as many elderly residents of Pagham do not use the internet.
- Removal of duty planning officer only likely to increase caseload elsewhere as simple queries are not addressed.
- Watering down of potential responses from ADC – use of temporary stop notice downgraded from “will” to “may”.
- Information required to report a suspected breach is too onerous. Level of detail required is too technical in some cases. Returning cases uninvestigated is not appropriate – better guidance on missing information should be offered.
- Not recording priority 4 cases will falsely give the impression that the number of breaches is decreasing.

For these reasons, Pagham Parish Council asks Arun District Council to think again and solve the crisis in the Enforcement team in a different. Ultimately residents will suffer as a result if this new Strategy is implemented.

### **Barnham and Eastergate PC**

Barnham and Eastergate Parish Council are concerned that there is no clear enforcement strategy for issues other than significant harm. The signal that this sends to the public and bigger developers is that there are no restrictions and that they can essentially “do what they like” with little or no repercussions.

### **Yapton PC**

The Committee noted receipt of an e-mail dated 10th June 2022 from Juan Baeza of the Planning Department at Arun District Council. The e-mail stated that the Arun Planning Committee held on the 25th May 2022 considered a report setting out a proposed Updated Planning Compliance Strategy. The e-mail with the attachments were circulated to all Parish Councillors on the 12th June 2022.

The Members of the Arun Planning Committee resolved to defer considering further the updated strategy until the views of all the Parish and Town Councils were sought. Once their views were gathered, they would be presented to the next available Committee for a formal resolution to be agreed.

As a result, the District Council was now seeking the views of the Parish Council on the report and updated compliance strategy. The Parish Council was asked if it could provide any comments by no later than 8th July 2022.

The Planning Committee **resolved** not to send any detailed comments on the updated compliance strategy but to ask the District Council to bear in mind any neighbouring parishes when considering what action it might take.