

My name is Dan Griffiths and I am a Transport Planning Director at Stantec. I have 18 years of experience in transport planning. I am here on behalf of Barwood Strategic Land LLP, and their interest and planning permission at Arkall Farm, Tamworth (1,000 homes, consented in 2018). I have worked for Barwood on this development since 2013. I am also present on behalf of my colleague Michael Parkinson.

However, I am not here to talk about the consented development at Arkall Farm, but the Summix scheme in front of this inquiry.

Inspector, you will be aware that representations sent to PINS on 10 May, made by Mrs E Marjoram on behalf of our client. The representations outlined that the development impacts have not been assessed in accordance with EIA criteria, as only 300 of the 1,000 homes at the consented development at Arkall Farm and its associated highway improvements have been assessed.

Therefore, I am speaking here as if I were the transport planning consultant advising and assessing the transport impact for Summix.

I would like to make the point from my highways perspective this is not the correct technical approach to Transport Assessment.

If I had been so instructed I would have considered and included the transport impacts of the Arkall Farm extant and implemented permission for 1,000 new homes, and I would have recommended that the impact of the development be assessed on that basis. It would then be possible to establish whether that mitigation definitely sufficed to allow for the additional Summix development or whether additional mitigation must be proposed. This is consistent with the consideration of consented development that has been implemented and the assessment of cumulative environmental effects.

Evidence has been submitted to the LPA and Staffordshire County Council to confirm the proposed mitigation that is required for the full 1,000 homes, and is currently being determined. I would note that it may well be possible that the proposed mitigation for Arkall Farm once completed, is sufficient to also accommodate the development traffic from this appeal site without any severe impacts in accordance with NPPF and PPG. However, it has not been demonstrated that this is the case.

My client discovered on Friday evening via the local planning authority that Staffordshire County Council (as the Highways Authority) has verbally indicated that if this appeal is allowed then it would remain their position that it should become the responsibility of

my client to assess and identify if /what additional mitigation may be required to support both developments (and thereafter deliver any additional mitigation required). This reinforces the fact that Staffordshire County Council Highways does not have sufficient evidence before you to approve this appeal and to know that it will not prejudice the delivery of an already committed and allocated site.

I do not consider it correct for the County Council to state that it is for the approved development at Arkall Farm to prove that it can still be delivered in full if the Summix development is subsequently consented. Arkall Farm has consent for 1,000 dwellings and it was agreed by the SoS (and the Inspector) that the full development could come forward with mitigation defined as appropriate - i.e. there is no reason to suggest that 1,000 units could not be delivered at Arkall farm. This position is also contrary to the Statement of Common Ground at the Arkall Farm appeal, where it was agreed by all parties and as noted at paragraph 4.3.3 of the Inspectors report that:

“Importantly it is accepted that should permission be granted then the 1,000 dwellings would be treated as a commitment and any subsequent development proposals would have to allow for the full quantum of development at Arkall Farm”

If that remains the County Council’s position at the Summix appeal, we are concerned that this could lead the Inspector into error. Given that highways was not a Reason for Refusal, and given that evidence has not been submitted if this remains an issue for this appeal we would like the opportunity for my colleague Michael Parkinson to submit a technical note to the Inspector before the inquiry is closed. Michael would need two weeks to prepare and submit the note.