

From: [REDACTED]
To: [West Midlands Interchange](#)
Subject: FORMAL OBJECTION TO APPLICATION 26/00671/WMI
Date: 11 September 2026 16:39:28

FORMAL OBJECTION TO APPLICATION 26/00671/WMI

West Midlands Rail Freight Interchange — Proposed Amendment No. 3

I wish to formally object to the proposed amendment to the West Midlands Rail Freight Interchange Development Consent Order, particularly the proposed changes to the requirements governing delivery of the rail terminal.

I do not believe this proposed amendment should be treated as a minor or merely technical change. The original examination documents make clear that the rail requirements were deliberately incorporated into the Development Consent Order because of the “central nature” of those requirements to the NSIP development.

The applicant’s own documentation established safeguards linking occupation of the warehousing to delivery of the rail terminal. The existing arrangements restrict occupation and provide a six-year long-stop following occupation of more than 47,000 sq m of warehousing. These provisions were specifically intended to ensure that the development actually delivered the rail infrastructure which justified its status as a Strategic Rail Freight Interchange.

Application 26/00671/WMI proposes increasing the relevant threshold from 47,000 sq m to 150,000 sq m. This is not a minor alteration. It would allow a further 103,000 sq m of warehousing to be occupied before the existing six-year period would even begin. In practical terms, substantially more of WMI could therefore become operational before the rail terminal is required. That is precisely the opposite direction from the safeguards incorporated into the original DCO.

The possibility of delay was not overlooked when WMI was originally examined. The Examining Authority considered whether the rail terminal could be delayed and concluded that the final requirements provided an important incentive for the applicant to deliver it. The existing mechanism therefore represents the outcome of the original examination process. It should not now simply be weakened because circumstances have changed.

If the applicant is experiencing difficulties delivering the terminal, that does not automatically justify transferring the consequences of that delay onto the local community.

The Secretary of State subsequently granted the DCO in May 2020. The strategic transport benefits of WMI included its contribution to the network of Strategic Rail Freight Interchanges and the opportunity to facilitate a modal shift of freight from road to rail. Those benefits formed an important part of the planning balance which allowed this very substantial development to proceed.

WMI was not consented simply as another large warehouse and distribution estate. It was consented as a Strategic Rail Freight Interchange. The rail terminal is therefore not an optional enhancement which can simply be postponed while the warehousing proceeds.

This is particularly important for the communities surrounding the WMI site. Every additional warehouse occupied before the rail terminal is operational has the potential to generate additional HGV movements. Those vehicles will inevitably use the surrounding highway network, including routes connecting the development with the A449, A5 and M6 Junction 12, as well as the local roads serving communities around the interchange.

The original planning balance was supposed to provide a strategic rail freight facility capable of moving a significant proportion of freight by rail. If the warehousing is allowed to progress substantially ahead of the rail terminal, the local community could experience the road traffic impacts of the development before receiving the principal transport benefit which was used to justify it.

That is not a satisfactory planning outcome. The local road network should not effectively become the first phase of the interchange while the rail terminal is pushed further into the future. The applicant has already secured consent for the development on the basis of the existing DCO. The safeguards relating to the rail terminal were put there for a reason. If anything, the progress of the development should now mean that the applicant is moving towards delivery of the terminal — not seeking permission to occupy substantially more warehousing before that obligation bites.

I therefore strongly disagree with the principle of changing the trigger from 47,000 sq m to 150,000 sq m.

The answer to delay in delivering the rail terminal should not be to move the goalposts.

If the development is genuinely a Strategic Rail Freight Interchange, then the strategic rail infrastructure should be delivered alongside the growth of the warehousing, rather than being deferred while road-based freight activity increases.

I respectfully request that the Secretary of State refuse Application 26/00671/WMI insofar as it seeks to weaken the existing rail-terminal delivery requirements.

In particular, I ask that the existing 47,000 sq m trigger is retained, the existing six-year long-stop is retained, the applicant is required to proceed with delivery of the rail terminal under the existing DCO requirements, no amendment should permit substantially greater occupation of warehousing before the rail terminal is completed, and the potential consequences for HGV traffic on the A449, A5, M6 Junction 12 and surrounding local roads are properly considered before any relaxation of the existing safeguards is permitted.

The rail terminal was a fundamental part of the development for which consent was granted. The examination process specifically identified the need for safeguards to ensure its timely delivery. The strategic benefits of WMI were assessed on the basis that it would function as a rail freight interchange and contribute to modal shift from road to rail.

Local residents should not be expected to accept increasing numbers of warehouses and HGV movements while the infrastructure intended to provide the strategic rail benefit is delayed.

The rail terminal should be delivered next — not the planning requirement for it moved further into the future.

I therefore strongly object to the proposed amendment.

Paul Geoghegan

