

13th September 2026

Glen Hickman

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Planning Inspectorate

c/o Quadient

69 Buckingham Avenue

Slough

SL1 4PN

WMI – Amended Consultees for Amendments to Article 44, and Requirements 25, 34 and 35(b) NMC Application

I strongly object to the proposed amendments to Requirements 35(b) and 25 of the West Midlands Rail Freight Interchange Order 2020. The fundamental justification for granting consent for this development was that it would function as a Strategic Rail Freight Interchange, transferring freight from road to rail and thereby reducing pressure on the local and strategic highway network.

The rail terminal was the reason this scheme was presented as a Strategic Rail Freight Interchange rather than simply a logistics park. Any amendment that reduces the certainty of rail delivery undermines the very basis on which consent was granted."

Local people accepted the impacts because of promised rail benefits and cost inflation and market conditions should not override transport and environmental commitments.

The applicant is now seeking to substantially relax the trigger that links warehouse occupation to delivery of the rail freight terminal. Under the existing requirement, the rail terminal must be completed within six years of occupation exceeding 47,000 square metres. The proposed amendment would increase this threshold to 150,000 square metres before the countdown begins.

While the applicant states that the overall cap of 186,000 square metres remains unchanged, the practical effect is to allow a significantly greater amount of warehousing to be occupied before there is any meaningful obligation to complete the rail terminal.

This raises a fundamental concern that the development is gradually becoming a warehousing scheme first and a rail freight interchange second. The rail terminal was not an optional element of the original proposal. It was central to the case for development consent because of the claimed environmental and transport benefits arising from modal shift from road to rail. We were told repeatedly that there should be a fundamental shift from road to rail to ease congestion from our roads.

The applicant cites commercial pressures, slower than anticipated take-up of warehouse space, rising construction costs and uncertainty over the rail terminal delivery programme as reasons for the amendment. However, these are commercial risks that should not be used to dilute essential infrastructure commitments that formed part of the original consent. **This low take up also clearly demonstrates that there is very little commercial appetite for such large warehousing.**

There is a real risk that if this amendment is approved, substantial warehousing could be built and occupied while delivery of the rail terminal continues to be postponed. The document itself acknowledges that a firm programme for the rail terminal cannot be finalised until the end of 2027. This creates legitimate concern about whether the rail infrastructure will ever be delivered in the timescales originally envisaged.

Local communities were repeatedly assured that this development would reduce reliance on road freight by providing direct rail freight facilities. If warehouse occupation is allowed to advance substantially ahead of rail infrastructure, the immediate consequence will be additional HGV traffic on local roads and the strategic highway network. The claimed future rail benefits become increasingly uncertain whilst the traffic impacts are experienced immediately by local residents.

The scheme is one of a number of new strategic rail freight interchanges aimed at shifting goods by rail rather than road, following the then Coalition Government's policy of expanding their use. Rail freight produces 70 per cent lower carbon dioxide emissions than HGV transportation.

While the aim is to reduce emissions, the developers also stress the good road links of the site, which is within a four-hour drive from 88% of the country.

Plans for one of the other strategic rail freight interchanges, in Oxfordshire, were put on hold earlier this year by developer Mountpark Logistics who said it needed to review its plans due to "the scale and complexity of the emerging highways infrastructure works and associated transport measures" involved.

(ref new Civil Engineer

I therefore question whether the proposed amendment is truly non-material. The timing and certainty of delivery of the rail terminal were matters of significant public interest during the

original examination process, as acknowledged by the applicant. Any change that weakens the mechanism securing that infrastructure goes to the heart of the project's purpose and public benefits.

The Secretary of State should refuse the proposed amendment unless there is a legally binding and enforceable programme guaranteeing delivery of the rail terminal and associated infrastructure. Without such safeguards, there is a serious risk that the development will operate primarily as a large road-based warehousing complex rather than the Strategic Rail Freight Interchange that formed the basis of the original approval.

Regards

Glen Hickman