

Economy, Infrastructure & Skills

1 Staffordshire Place
Stafford
Staffordshire
ST16 2DH

National Infrastructure Planning
The Planning Inspectorate
c/o Quadient
69 Buckingham Avenue
Slough
SL1 4PN

25 September 2026

Your Ref: TR050005-001571

Dear Sir/Madam,

West Midlands Interchange - Application Statement for Proposed Non-Material Change

Thank you for consulting Staffordshire County Council on the proposed non-material change application for West Midlands Interchange. In relation to the three proposed changes we have the following comments:

1. Proposed 'Hillside' Text

We note the proposed changes required to Article 44 in relation to the 'Hillside' ruling.

2. Proposed Change to the Rail Terminal Works Completion Trigger in Requirement 35 (b)

The delivery of the Rail Freight Terminal (RFT) is the key element of the Development Consent and without it logistics development in this location would not have been acceptable.

During the Examination of the DCO the timing of the delivery of the RFT was the subject of debate, as set out in section 5.6 of the Examining Authority's Report. Part (b) of Requirement 35 was included to address concerns over the surety of delivery of the RFT.

The original Transport Assessment for the development assumed for the interim scenario testing that the RFT and A449/A5 link road were not in situ at 186,000sqm, and concluded the operation of the Highway network was acceptable. As that position remains unchanged there are no technical implications with the proposed alteration of Requirement 35(b) from a Highway Authority perspective.

However, recognising the issue of surety of delivery we would ask that the Secretary of State is satisfied that the development will continue to progress past the proposed trigger points such that the RFT is delivered in making their determination.

3. Proposed Updates to Highways Triggers defined in Requirement 25 of the Order

Requirement 25 of the Order sets out the trigger points for the delivery of the highway infrastructure works associated with the development. The relevant section for Staffordshire County Council is row (ii) of the table in Figure 3.3. The proposed change is similar to that for the RFT in seeking to alter the 47,000sqm trigger setting a requirement to complete the link road within 5 years to 150,000sqm, mirroring that for the RFT. This element of Requirement 25 was included, as per the RFT, to provide surety over delivery, it was not requested by the Highway Authority as mitigation. As above the assessment of impact of the development on the highway network found that up to 186,000sqm of floor space could be occupied before the A449/A5 link road is required. As the delivery of the Link Road remains within the 186,000sqm threshold there are no new technical highway issues with the proposed change. However, as noted earlier these elements of the DCO were included to provide surety of delivery. Therefore, we ask that the Secretary of State satisfies herself on this matter.

Your Sincerely

Principal Planning Policy Officer