

From: [REDACTED]
To: [West Midlands Interchange](#)
Cc: [REDACTED]
Subject: URGENT – WMI Amendment No.3 – Supplementary Residents' Representation and Request for Acknowledgement – TR050005 / RXA12356
Date: 08 October 2026 09:03:07
Attachments: [REDACTED]

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Dear West Midlands Interchange Case Team,

West Midlands Rail Freight Interchange – Proposed Non-Material Amendment No.3
Planning Inspectorate reference: TR050005

Correspondence reference: RXA12356

Supplementary information to Joint Residents' Representation dated 2 October 2026

I am writing on behalf of the four neighbouring households associated with Pool House, The Old Vicarage, White Farm and Lakeview House, immediately affected by traffic using Vicarage Road and the A5/Vicarage Road junction.

On **2 October 2026**, we submitted a joint residents' representation by email and recorded delivery, (attached for reference) requesting that our concerns be placed before the Secretary of State's decision-maker before determination of Amendment No.3.

Since submitting that representation, we have undertaken further detailed examination of the applicant's supporting transport and environmental documentation, particularly WSP's Technical Notes 16, 18 and 28.

This has identified additional technical questions which we believe are directly relevant to whether the proposed changes can properly be regarded as non-material.

We respectfully request that the following supplementary information be considered alongside our original representation.

1. Potential omission of the highest HGV-generating hour: 06:00–07:00

WSP's Technical Note 28 provides hourly trip-generation rates for the initial warehousing development.

Of particular concern is the HGV trip rate for **06:00–07:00 of 0.090 movements per 100 m²**.

Applied to the approximately 187,000 m² assessed under the revised Vicarage Road arrangement, this produces an indicative figure of approximately **168 HGV movements during that single hour**.

By comparison, the HGV rate used for the conventional 08:00–09:00 AM peak is 0.037 movements per 100 m², equivalent to approximately 69 HGV movements.

The 06:00–07:00 rate therefore indicates approximately 2.4 times the HGV movements predicted for 08:00–09:00.

We recognise that these are calculations derived from WSP's trip-generation rates, not published turning-movement forecasts for the A5 junction. We also recognise that the

06:00–07:00 TRICS evidence is based on a limited comparator sample.

Nevertheless, the distinction is important.

Under the original interim development arrangement, approximately 46,500–47,000 m² of warehousing would have been served via Vicarage Road, compared with approximately 186,000 m² under the revised arrangement.

Applying the same hourly HGV rate gives an indicative comparison of approximately **42 versus 167–168 HGV movements per hour generated by the warehousing allocated to the Vicarage Road access.**

We have not identified a corresponding 06:00–07:00 assessment of the revised traffic distribution or its effects on the A5/Vicarage Road junction.

We therefore ask whether this period has been specifically assessed and, if not, why the hour with the highest HGV trip-generation rate in the available data was not examined, particularly given the potential consequences for residential noise and disturbance.

2. Distinction between the Vicarage Road roundabout and the A5/Vicarage Road traffic signals

WSP's Technical Note 16 reports that the revised 187,000 m² scenario would produce no material queues or delays.

However, our examination indicates that the detailed revised junction-capacity modelling supporting that conclusion relates to the **proposed roundabout (now complete) serving the WMI site from Vicarage Road**, rather than the existing signal-controlled junction between Vicarage Road and the A5, adjacent to where we all live.

The original DCO transport assessment used the South Staffordshire VISSIM Model to examine the wider network, including the A5/Vicarage Road junction.

We have not identified equivalent revised signal-operational modelling for the proposed all-Vicarage Road interim arrangement.

We therefore request clarification of whether the revised scenario has been assessed at the existing A5/Vicarage Road traffic signals, including turning movements, signal stages, queue lengths, delays and the frequency of vehicle stopping.

If such modelling has been undertaken, we ask that the relevant results be identified and made available.

3. Additional right-turning traffic and its effects on existing A5 traffic

Technical Note 16 identifies the largest AM-peak change at the A5/Vicarage Road junction as approximately **81 vehicles per hour**, predominantly associated with increased right-turn movements arriving from the west.

For the PM peak, it identifies approximately **71 vehicles per hour**, predominantly associated with increased left-turn movements towards the west.

We understand these figures represent differences between the original and revised WMI access arrangements, rather than the total additional traffic generated by WMI compared

with the without-development baseline.

Our concern is that the consequences of additional turning traffic may extend well beyond the vehicles directly associated with WMI.

The A5/Vicarage Road junction is signal-controlled, with turning movements capable of interrupting traffic travelling along the A5.

If additional WMI vehicles increase demand for a protected right-turn stage, they may also increase the frequency or duration of red signals affecting existing A5 traffic.

This could cause additional braking, queuing, idling and acceleration by vehicles that are **not themselves travelling to or from WMI**.

The resulting environmental effects could therefore extend beyond the direct contribution of WMI traffic to the daily traffic totals.

We ask whether the revised assessment has considered these secondary effects on existing A5 traffic and whether the junction's signal-control arrangements have been examined to determine the likely consequences of the additional turning demand.

We do not suggest that such effects have necessarily been established; our concern is that the supporting documentation does not clearly demonstrate whether they have been quantified.

4. Noise and air-quality implications for nearby residential properties

The distinction between highway capacity and environmental effects is particularly important for homes immediately beside the A5/Vicarage Road traffic signals.

A junction may operate within acceptable highway-capacity limits while still exposing nearby residents to repeated braking, engine noise, acceleration, queuing and associated emissions.

The original WMI noise assessment used the Calculation of Road Traffic Noise methodology, and during the original examination it was acknowledged that speed changes at junctions are ignored when applying that methodology.

We have not identified a revised receptor-specific noise assessment addressing the effects of the altered interim routing on Pool House, White Farm and The Old Vicarage.

Similarly, the original air-quality assessment specifically recognised the importance of junction congestion and the combined influence of road links near sensitive receptors.

We ask whether the revised traffic flows and any changes in signal operation, congestion and vehicle speeds have been incorporated into updated receptor-specific assessments of NO₂, PM₁₀ and PM_{2.5}.

This is especially relevant given WSP's prediction in Technical Note 18 of an increase in HGV movements on Vicarage Road from 423 to 2,020 per day in its 2036 sensitivity scenario.

Our original representation also identified the apparent inconsistency between the classification of the affected links as having no nearby receptors and the original Environmental Statement's identification of residential properties adjoining those roads.

We respectfully ask that this issue, together with the newly identified junction-operational questions, be resolved before determination.

5. Highway authority consultation responses and supporting evidence

We have received correspondence from Michael Brown, Strategic Projects Assistant Team Manager at South Staffordshire Council, advising that neither **National Highways** nor **Staffordshire County Council** has objected to the proposed amendment.

We acknowledge that position.

However, an absence of objection does not, in itself, establish which technical matters were examined by the respective highway authorities or whether the particular concerns outlined above were considered.

In light of the further issues we have identified, we respectfully request copies of the consultation responses submitted by:

- National Highways, as the authority responsible for the A5 trunk road; and
- Staffordshire County Council, as the local highway authority responsible for Vicarage Road.

We would also appreciate copies of, or directions to, any accompanying technical assessments, correspondence or modelling reviews relied upon by those authorities in reaching their positions, insofar as these are held and available for disclosure.

In particular, we wish to establish whether the revised A5/Vicarage Road signal operation, early-morning HGV movements, and potential effects on existing A5 traffic were examined.

If these documents are already publicly available, please provide the relevant links or document references.

6. Request for acknowledgement and consideration before determination

Finally, we would be grateful for written confirmation of the following:

1. That our original joint residents' representation, submitted on **2 October 2026 by email and recorded delivery**, has been received.
2. Whether that representation has been accepted for consideration notwithstanding its submission after the formal consultation deadline.
3. That this supplementary information has been received and will be considered alongside the original representation.
4. That both documents will be brought to the attention of the Secretary of State's decision-maker before any determination of Amendment No.3.

We recognise that the formal consultation period has closed. However, the additional matters raised in this letter have emerged from our subsequent examination of the applicant's own technical evidence and are directly relevant to the environmental

consequences of the proposed amendment.

We respectfully request that the Secretary of State does not determine Amendment No.3 until these outstanding technical questions have been adequately examined and the decision-maker has had the opportunity to consider the implications for immediately affected residential properties.

We are not alleging that the applicant or highway authorities have acted improperly. Our concern is that the evidence currently available to us does not clearly demonstrate that these particular effects have been assessed under the revised interim access arrangement.

Thank you for your attention to this supplementary submission. We would appreciate an acknowledgement at your earliest convenience, given the possibility that a decision may be approaching.

Yours faithfully,

Glen Elmy

Pool House

On behalf of the residents associated with Pool House, The Old Vicarage, White Farm and Lakeview House

References: WSP Technical Notes 16, 18 and 28, contained within the applicant's supporting documentation for Amendment No.3; original WMI Environmental Statement and Transport Assessment; Joint Residents' Representation dated 2 October 2026.

JOINT RESIDENTS' REPRESENTATION

West Midlands Rail Freight Interchange - Amendment No. 3

Planning Inspectorate reference: TR050005 | Correspondence case: #RXA12356

Date: 2 October 2026

For the urgent attention of: The West Midlands Rail Freight Interchange Case Team / Decision-maker The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol

BS1 6PN

URGENT: REQUEST THAT THIS JOINT LATE REPRESENTATION BE PLACED BEFORE THE DECISION-MAKER BEFORE ANY DETERMINATION OF AMENDMENT NO. 3

We, the undersigned residents of properties immediately affected by traffic using Vicarage Road and the A5/Vicarage Road junction, submit this joint representation concerning Four Ashes Limited's application for Amendment No. 3 to the West Midlands Rail Freight Interchange Development Consent Order as a NonMaterial Change (NMC).

This representation follows earlier correspondence from Glen Elmy of Pool House, for which the Planning Inspectorate has provided correspondence case reference #RXA12356. It reflects further investigation of the application documents and discussions with the residents of the immediately affected properties after the formal consultation period had closed.

1. Our central concern

We do not consider the consequences of the proposed amendment for residents around Vicarage Road and the A5/Vicarage Road junction to be non-material. The amendment would substantially alter how much occupied warehousing may be served through Vicarage Road before the permanent A5-A449 Link Road safeguard becomes operative, and it would substantially postpone the point at which the five-year longstop for delivery of that road begins to run.

The practical consequences are potentially prolonged exposure of nearby homes to substantially greater WMI HGV and general traffic using Vicarage Road and the signal-controlled A5 junction, including additional queuing, braking, stopping, idling and acceleration. We believe those receptor-specific effects require materially greater scrutiny before the Secretary of State determines the application.

2. The Link Road safeguards - what changes

The distinction between the existing and proposed safeguards is important:

Safeguard	Existing position	Amendment No. 3 proposal
Interim access / occupation ceiling	Approximately 140,000 m ² served via the A5 plus approximately 47,000 m ² served via Vicarage Road before the Link Road requirement bites.	Up to approximately 186,000 m ² could potentially be served through Vicarage Road before the Link Road becomes the absolute occupation constraint.
Five-year longstop clock	Five-year period begins after occupation exceeds 47,000 m ² .	Five-year period would begin only after occupation exceeds 150,000 m ² .
Absolute ceiling	Link Road required before the applicable occupation ceiling is exceeded.	Link Road required before occupation exceeds 186,000 m ² , or within five years after occupation exceeds 150,000 m ² , whichever occurs first.

This means that the five-year Link Road clock would move from 47,000 m² to 150,000 m² of occupation - more than three times the existing trigger - while 186,000 m² would operate as the hard ceiling.

In our view, postponing this safeguard is not a merely administrative alteration. It changes when infrastructure intended to protect the surrounding highway network and communities must be delivered.

3. The applicant's own traffic modelling shows the scale of the issue

WSP's sensitivity assessment for approximately 187,000 m² being served through Vicarage Road predicts the following changes compared with its modelled 2036 Do-Minimum baseline:

- **HGV movements on Vicarage Road between the WMI access and the A5: 423 to 2,020 per day - an additional 1,597 HGV movements, approximately +378%.**
- **HGV movements on the A5 between Vicarage Road and M6 Junction 12: 2,881 to 4,324 per day - an additional 1,443 HGV movements, approximately +50%.**

We recognise that these are modelled comparisons with WSP's future 2036 Do-Minimum baseline, not measured increases over present-day traffic. Nevertheless, they demonstrate the magnitude of the traffic redistribution contemplated by the amendment.

4. Apparent inconsistency concerning sensitive residential receptors

The supporting traffic/environmental material states, in relation to the relevant A5 link, that it was not previously identified as being close to sensitive receptors and that there has been no change in circumstances.

That statement appears factually inconsistent with the original WMI environmental evidence.

Pool House is immediately alongside the A5 and directly beside the signal-controlled A5/Vicarage Road junction. Pool House was specifically identified and modelled as a residential noise receptor in the original WMI Environmental Statement. Other homes are situated immediately around and close to the same junction and affected route.

We are therefore concerned that the Secretary of State may be asked to determine whether Amendment No. 3 is non-material on the basis of information which gives an incorrect or materially incomplete impression of the existence of sensitive residential receptors on the affected road network. We request that this apparent inconsistency is investigated and resolved before determination.

5. Noise, congestion and junction-specific effects

The A5/Vicarage Road junction is already a busy signal-controlled junction. A substantial increase in WMI traffic using Vicarage Road raises obvious questions about queuing and congestion and, in turn, the frequency of HGV braking, stopping, idling and acceleration immediately beside residential properties.

The original WMI road-traffic noise assessment used the CRTN methodology. During the original DCO examination it was acknowledged that speed changes at junctions are ignored when applying that methodology. In our view, reliance on broad traffic/noise envelopes does not by itself demonstrate that the effects of concentrating substantially more WMI traffic through this particular signal-controlled junction have been adequately assessed.

We ask for specific consideration of residential exposure to individual HGV events, maximum noise levels, low-frequency HGV noise, evening/night-time disturbance, queuing and idling, and the duration for which this interim routing arrangement could persist.

6. Immediately affected residents were unaware of Amendment No. 3

The households joining this representation are associated with Pool House, The Old Vicarage, White Farm and Lakeview House. Following enquiries made after the amendment was discovered, none of these immediately affected households had been aware of Amendment No. 3 before the formal consultation period closed.

We recognise that statutory publicity was undertaken and we do not allege that no formal consultation process occurred. Our concern is that the residents most directly exposed to the proposed redistribution of traffic did not in practice know that the amendment was being proposed and therefore did not have the opportunity to make timely representations about its effects on their homes.

7. Commercial or delivery difficulties should not displace the original safeguards

We understand from the applicant's case that delivery sequencing, occupier requirements and programme/commercial considerations form part of the rationale for seeking greater flexibility. We also understand locally that there may be challenges associated with securing occupiers for development being brought forward. We do not rely on that local understanding as an established fact.

Our position is straightforward: commercial or programme difficulties experienced by the developer should not be resolved by transferring the resulting traffic and environmental consequences onto neighbouring residents. The highway safeguards were secured through the original DCO process for a reason. If the development programme now makes those safeguards commercially inconvenient, that does not of itself demonstrate that weakening or postponing them is non-material.

The permanent Link Road is the infrastructure intended to accommodate this development. We consider that the appropriate course is to deliver the necessary infrastructure in accordance with the protections secured through the DCO process, rather than substantially postpone the safeguard while concentrating additional WMI traffic through Vicarage Road.

8. What we ask the decision-maker to do

We respectfully request that this document is accepted as a joint late representation and placed before the Secretary of State / decision-maker before any determination of Amendment No. 3. In particular, we ask that no decision is made until the following matters have been addressed:

1. The apparent inconsistency between the current supporting evidence concerning sensitive receptors and the original Environmental Statement's identification and assessment of Pool House as a residential noise receptor.
2. The receptor-specific traffic and noise consequences of potentially serving approximately 186,000 m² of occupied development through Vicarage Road.
3. The significance of moving the five-year Link Road longstop trigger from occupation exceeding 47,000 m² to occupation exceeding 150,000 m².
4. The implications of WSP's own modelled HGV changes for Vicarage Road and the adjoining A5, including queuing, idling, braking and acceleration at the signal-controlled junction.
5. The fact that the immediately affected households joining this representation were unaware of the amendment before the consultation period closed.
6. Whether changes of this scale and consequence can properly be regarded as non-material, and whether the existing highway safeguards should instead remain in force pending delivery of the Link Road.

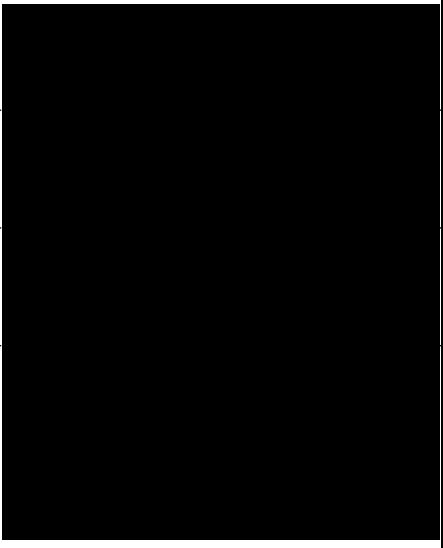
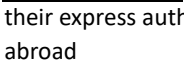
We are not alleging deliberate wrongdoing by the applicant or its consultants. Our concern is that a potentially significant factual inconsistency appears to exist concerning sensitive residential receptors, while safeguards secured through the original DCO are proposed to be substantially altered through the Non-Material Change process.

Given the stage reached by the application, we ask for written confirmation that this joint representation has been received, associated with TR050005 and correspondence case #RXA12356, and placed before the decision-maker before any decision is taken.

Signatures of affected residents

The signatories below support the contents of this joint representation. Where a signature is made on behalf of an absent resident, this is expressly identified and is made with that resident's authority.

Property / resident(s)	Signature	Date
------------------------	-----------	------

Pool House Glen Elmy and [co-owner/resident name if signing]		
The Old Vicarage [Resident name(s)]		
White Farm [Resident name(s)]		
Lakeview House   on their behalf with their express authority while they are abroad		

Evidence relied upon

- The West Midlands Rail Freight Interchange Order 2020, including Requirement 25 highway safeguards.
- Amendment No. 3 application documents and proposed amended Requirement 25.
- WSP traffic sensitivity assessment / Technical Note addressing approximately 187,000 m² served via Vicarage Road.
- Original WMI Environmental Statement, Noise and Vibration Chapter 13, including identification and modelling of Pool House as a residential noise receptor.
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JOINT RESIDENTS' REPRESENTATION

West Midlands Rail Freight Interchange - Amendment No. 3

Planning Inspectorate reference: TR050005 | Correspondence case: #RXA12356

Date: 2 October 2026

For the urgent attention of: The West Midlands Rail Freight Interchange Case Team / Decision-maker
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

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We recognise that statutory publicity was undertaken and we do not allege that no formal consultation process occurred. Our concern is that the residents most directly exposed to the proposed redistribution of traffic did not in practice know that the amendment was being proposed and therefore did not have the opportunity to make timely representations about its effects on their homes.

7. Commercial or delivery difficulties should not displace the original safeguards

We understand from the applicant's case that delivery sequencing, occupier requirements and programme/commercial considerations form part of the rationale for seeking greater flexibility. We also understand locally that there may be challenges associated with securing occupiers for development being brought forward. We do not rely on that local understanding as an established fact.

Our position is straightforward: commercial or programme difficulties experienced by the developer should not be resolved by transferring the resulting traffic and environmental consequences onto neighbouring residents. The highway safeguards were secured through the original DCO process for a reason. If the development programme now makes those safeguards commercially inconvenient, that does not of itself demonstrate that weakening or postponing them is non-material.

The permanent Link Road is the infrastructure intended to accommodate this development. We consider that the appropriate course is to deliver the necessary infrastructure in accordance with the protections secured through the DCO process, rather than substantially postpone the safeguard while concentrating additional WMI traffic through Vicarage Road.

8. What we ask the decision-maker to do

We respectfully request that this document is accepted as a joint late representation and placed before the Secretary of State / decision-maker before any determination of Amendment No. 3. In particular, we ask that no decision is made until the following matters have been addressed:

1. The apparent inconsistency between the current supporting evidence concerning sensitive receptors and the original Environmental Statement's identification and assessment of Pool House as a residential noise receptor.
2. The receptor-specific traffic and noise consequences of potentially serving approximately 186,000 m² of occupied development through Vicarage Road.
3. The significance of moving the five-year Link Road longstop trigger from occupation exceeding 47,000 m² to occupation exceeding 150,000 m².
4. The implications of WSP's own modelled HGV changes for Vicarage Road and the adjoining A5, including queuing, idling, braking and acceleration at the signal-controlled junction.
5. The fact that the immediately affected households joining this representation were unaware of the amendment before the consultation period closed.
6. Whether changes of this scale and consequence can properly be regarded as non-material, and whether the existing highway safeguards should instead remain in force pending delivery of the Link Road.

We are not alleging deliberate wrongdoing by the applicant or its consultants. Our concern is that a potentially significant factual inconsistency appears to exist concerning sensitive residential receptors, while safeguards secured through the original DCO are proposed to be substantially altered through the Non-Material Change process.

Given the stage reached by the application, we ask for written confirmation that this joint representation has been received, associated with TR050005 and correspondence case #RXA12356, and placed before the decision-maker before any decision is taken.

In our view, postponing this safeguard is not a merely administrative alteration. It changes when infrastructure intended to protect the surrounding highway network and communities must be delivered.

3. The applicant's own traffic modelling shows the scale of the issue

WSP's sensitivity assessment for approximately 187,000 m² being served through Vicarage Road predicts the following changes compared with its modelled 2036 Do-Minimum baseline:

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We recognise that these are modelled comparisons with WSP's future 2036 Do-Minimum baseline, not measured increases over present-day traffic. Nevertheless, they demonstrate the magnitude of the traffic redistribution contemplated by the amendment.

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We are therefore concerned that the Secretary of State may be asked to determine whether Amendment No. 3 is non-material on the basis of information which gives an incorrect or materially incomplete impression of the existence of sensitive residential receptors on the affected road network. We request that this apparent inconsistency is investigated and resolved before determination.

5. Noise, congestion and junction-specific effects

The A5/Vicarage Road junction is already a busy signal-controlled junction. A substantial increase in WMI traffic using Vicarage Road raises obvious questions about queuing and congestion and, in turn, the frequency of HGV braking, stopping, idling and acceleration immediately beside residential properties.

The original WMI road-traffic noise assessment used the CRTN methodology. During the original DCO examination it was acknowledged that speed changes at junctions are ignored when applying that methodology. In our view, reliance on broad traffic/noise envelopes does not by itself demonstrate that the effects of concentrating substantially more WMI traffic through this particular signal-controlled junction have been adequately assessed.

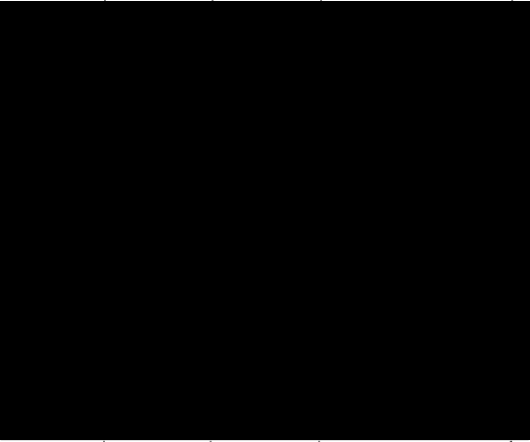
We ask for specific consideration of residential exposure to individual HGV events, maximum noise levels, low-frequency HGV noise, evening/night-time disturbance, queuing and idling, and the duration for which this interim routing arrangement could persist.

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The households joining this representation are associated with Pool House, The Old Vicarage, White Farm and Lakeview House. Following enquiries made after the amendment was discovered, none of these immediately affected households had been aware of Amendment No. 3 before the formal consultation period closed.

Signatures of affected residents

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Property / resident(s)	Signature	Date
Pool House Glen Elmy and [co-owner/resident name if signing]		2-10-26
The Old Vicarage [Resident name(s)]		2-10-26
White Farm [Resident name(s)]		2-10-26
Lakeview House Ramji [surname] and Namita [surname] Glen Elmy signing on their behalf with their express authority while they are abroad		2-10-26

Evidence relied upon

- The West Midlands Rail Freight Interchange Order 2020, including Requirement 25 highway safeguards.
- Amendment No. 3 application documents and proposed amended Requirement 25.
- WSP traffic sensitivity assessment / Technical Note addressing approximately 187,000 m² served via Vicarage Road.
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- Original DCO examination material concerning the treatment of speed changes at junctions under CRTN.
- South Staffordshire Council's representations on Amendment No. 3.

Contact for correspondence:



From: [REDACTED]
To: [West Midlands Interchange](#)
Cc: [REDACTED]
Subject: URGENT – West Midlands Interchange Amendment No. 3 (TR050005) – Request to defer determination pending examination of material traffic and environmental concerns
Date: 16 October 2026 05:32:55

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Dear Sir or Madam,

Re: West Midlands Interchange – Proposed Amendment No. 3 to the Development Consent Order (TR050005)

Urgent supplementary representation and request for deferral of determination

I am writing as a resident of Pool House, situated immediately beside the A5/Vicarage Road signal-controlled junction at Gailey, and therefore directly affected by the traffic associated with West Midlands Interchange (WMI).

I respectfully request that **no decision be made on Amendment No. 3 until a number of potentially material issues concerning the October 2025 Requirement 25 agreement, the supporting traffic and environmental assessments, and the treatment of residents' representations have been properly examined.**

I appreciate that the statutory consultation period has closed. Nevertheless, I ask that this letter be accepted as an urgent supplementary representation, particularly as some of the matters described below have only recently come to my attention.

I should emphasise at the outset that I am not a transport consultant, planning professional or legal expert. I am a local resident who has spent considerable time examining the publicly available documentation and comparing its conclusions with the circumstances experienced by residents living alongside the affected roads.

I do not suggest that I have established wrongdoing by WMI or the public authorities. However, my investigations have identified discrepancies and unanswered questions which I believe are sufficiently serious to warrant examination before the Secretary of State determines the current application.

1. The October 2025 Requirement 25 agreement

My principal concern arises from an agreement reached in October 2025 under Requirement 25 of the Development Consent Order.

My understanding of the original arrangements is that, before completion of the A5–A449 Link Road, approximately 47,000 m² of warehousing could be served through Vicarage Road, with approximately 139,000 m² served through the separate A5 access.

The October 2025 agreement appears to have changed this arrangement to permit approximately **186,000 m² of occupied warehousing to be served entirely through Vicarage Road**, before the Link Road becomes operational.

This is a substantial redistribution of interim traffic onto an existing local road and its junction with the A5.

The applicant's own WSP Technical Note 18 indicates an increase in HGV movements on

Vicarage Road from approximately 423 to 2,020 per day, an increase of around **377%** compared with the previously assessed arrangement.

I recognise that these figures represent a comparison between modelled scenarios, rather than a measured increase over existing traffic. Nevertheless, they demonstrate the scale of the proposed redistribution.

The October 2025 agreement is separate from Amendment No. 3, but the two are closely connected. The Secretary of State is now being asked to approve further changes to infrastructure delivery triggers against a background in which the interim highway arrangements have already been substantially altered.

I respectfully ask whether the combined consequences of these arrangements have been fully assessed.

2. The existing A5/Vicarage Road signal-controlled junction

A particularly significant concern is the apparent lack of a clearly identifiable assessment of the existing A5/Vicarage Road traffic-light junction under the revised interim routing arrangements.

The February 2025 WMI Community Liaison Group minutes record questions about traffic queues and the operation of these signals.

WMI's response acknowledged that earlier modelling had predicted greater queues without the Link Road, stated that the junction was being reviewed as part of the project design, and undertook to bring a technical overview of its findings to a future Community Liaison Group meeting.

I have examined the subsequent CLG material available to me and have not identified a presentation of that promised technical review.

At a meeting with WMI representatives on Wednesday 14 October 2026, I raised this issue directly. My recollection is that the transport consultant initially indicated that the junction had not been specifically assessed, but subsequently said that he would need to check the position.

I do not wish to misrepresent that exchange, and I welcome written clarification from WMI.

The concern is that the existing signal-controlled junction may have substantially different capacity constraints from the new Vicarage Road roundabout, which appears to have received considerable attention in the applicant's assessments.

In particular, the effect of increased HGV right-turning movements, signal timings, queue lengths, peak-hour concentrations and disruption to existing A5 traffic requires examination.

I do not believe that a comparison of overall traffic volumes with those forecast for the completed development in 2036 necessarily answers these junction-specific questions.

3. Residential receptors and environmental assessment

I have also identified apparent discrepancies in the identification of nearby residential receptors within the traffic assessment material.

Certain road links are identified as having no nearby residential receptors, despite occupied residential properties being present along or immediately adjacent to the affected routes.

At our meeting on 14 October, I raised this with WMI's transport consultant. My recollection is that he acknowledged the presence of sensitive residential receptors but was unable immediately to explain the classification used in the documentation.

I ask that this discrepancy be investigated and that the Secretary of State be provided with a clear explanation of whether these properties were appropriately considered in the assessment of traffic-related noise, disturbance and other environmental effects.

The A5/Vicarage Road junction already experiences considerable HGV traffic, acceleration, braking, queuing and associated noise. These impacts are especially relevant to properties immediately beside the junction, including my own.

4. Cumulative construction and operational traffic

A further matter emerged during our meeting with WMI.

I asked whether construction traffic associated with additional warehouses would continue to use Vicarage Road while the initial occupied warehouses were operating and before the Link Road was completed.

My recollection is that [REDACTED] confirmed that this continuing construction traffic would also be routed through Vicarage Road.

If correct, this raises an important question about the scope of the traffic assessment.

Has the modelling accounted for the simultaneous effects of operational HGV movements, construction traffic associated with further development, existing background traffic and their combined impact on the A5/Vicarage Road junction?

I am particularly concerned about the concentration of HGV movements during certain periods of the day, including around 6–7 am, and the resulting potential for increased queuing, noise and disruption.

I ask that the applicant identify precisely where these cumulative movements and junction effects have been assessed.

5. Scope of Requirement 25 and Article 43

I understand that Requirement 25 provides flexibility for agreeing changes to certain highway infrastructure delivery arrangements.

However, my concern is that the October 2025 agreement may have consequences extending beyond the timing of infrastructure delivery, because it also permits a substantial redistribution of interim traffic onto Vicarage Road.

I further understand that Article 43 of the DCO places restrictions on approvals or agreements that would give rise to materially new or materially different significant environmental effects that have not been assessed.

I am not asserting that the October 2025 agreement was unlawful. I am asking for scrutiny of the evidence and reasoning relied upon by Staffordshire County Council and National

Highways when agreeing the revised arrangements.

In particular, I ask how the relevant authorities satisfied themselves that the altered routing, including its implications for the existing signal-controlled junction and nearby residential properties, would not result in materially new or different significant environmental effects requiring further assessment.

6. Public disclosure and Community Liaison Group records

I have examined the available Community Liaison Group minutes and presentations covering the period during which the revised interim routing arrangements were being developed.

In February 2025, WMI advised the CLG that the A5 was the designated principal entrance and that signage would primarily direct WMI traffic to remain on the A5.

The June 2025 records subsequently referred to changes in development priorities and the bringing forward of works on Vicarage Road.

However, I have not identified a clear explanation to the CLG of the proposal to serve the full interim 186,000 m² of warehousing through Vicarage Road, nor of the October 2025 agreement itself.

This does not establish that no notification or consultation took place. I therefore ask WMI to identify when and how this significant change was communicated to directly affected residents and the wider community.

7. Infrastructure funding and delivery safeguards

At our meeting, WMI representatives also discussed the substantial costs associated with the Link Road and rail freight terminal and the commercial considerations affecting their delivery.

I appreciate that infrastructure costs and funding arrangements can legitimately influence development phasing.

Nevertheless, the scale of the investment described at the meeting raises a reasonable question about the certainty and enforceability of the infrastructure delivery programme.

I am concerned that arrangements presented as temporary could remain in operation for a prolonged period if delivery of the Link Road or rail terminal is delayed.

I therefore ask that the Secretary of State consider whether the existing and proposed requirements provide adequate safeguards to ensure delivery of the essential infrastructure and prevent an unintended long-term reliance on Vicarage Road.

8. WMI's ongoing investigation of the matters raised

The meeting on 14 October was constructive, and WMI representatives agreed to investigate the information and concerns I presented.

██████████ suggested a further meeting in approximately four weeks to allow WMI to respond.

I welcome that commitment and wish to continue engaging constructively with the applicant.

However, the timing presents an obvious difficulty. The Secretary of State could determine Amendment No. 3 before WMI has completed its investigation or the follow-up meeting has taken place.

During the meeting, I asked whether WMI would consider notifying the Planning Inspectorate of the outstanding issues and requesting time for further investigation.

My recollection is that [REDACTED] declined to do so. I also then sought clarification about whether any subsequently identified material inaccuracies would be brought to the attention of the decision-makers. I understood his response to be negative, although I would welcome clarification of WMI's position.

I include this account not as an allegation of misconduct, but to explain why I feel compelled to approach the Planning Inspectorate directly rather than wait for the agreed meeting.

9. Previous representations not visible on the public register

I have separately written to the Planning Inspectorate concerning four representations submitted by email on:

- 30 September 2026 at 10:01 am;
- 1 October 2026 at 9:51 am;
- 3 October 2026 at 5:51 am; and
- 8 October 2026 at 9:01 am.

I have been unable to locate these representations on the publicly accessible project register.

A jointly signed representation from affected residents was also sent by tracked Royal Mail delivery, and I have not identified that document on the register either.

I recognise that absence from the public website does not necessarily mean that a representation has not been received or considered. I also recognise that my four emails were submitted after the published consultation deadline.

Nevertheless, representations from neighbouring residents appear on the register, some bearing later publication dates. I understand that another resident has also raised a publication omission which the Inspectorate reportedly acknowledged.

I therefore respectfully request written confirmation that each of my submissions, together with the joint residents' representation, has been received and whether it has been accepted for consideration and placed before the relevant decision-making team.

If any submission has not been accepted, I ask to be informed of the reason and whether it can now be considered as supplementary material.

10. Request for urgent action

In light of the matters above, I respectfully request that the Planning Inspectorate:

1. **Urgently place this representation before the Secretary of State for Transport and the relevant decision-making officials**, notwithstanding the closure of the published consultation period.
2. **Request that determination of Amendment No. 3 be deferred** until the material questions concerning the October 2025 Requirement 25 agreement, revised traffic routing, junction modelling, residential receptors and cumulative construction traffic have been satisfactorily examined.
3. Seek clarification from WMI, Staffordshire County Council and National Highways as to the evidence supporting the October 2025 agreement and the application of Article 43 of the DCO.
4. Obtain an explanation of how the October 2025 agreement and its environmental implications were communicated to affected residents and the Community Liaison Group.
5. Confirm the receipt, registration and consideration status of my previous representations and the jointly signed residents' letter.
6. Confirm whether a decision on Amendment No. 3 is imminent and whether the matters raised in this letter will be considered before that decision is made.

I am not asking the Secretary of State to cancel the West Midlands Interchange development or disregard its potential economic benefits.

I am asking that the environmental and highway safeguards contained within the original Development Consent Order are properly maintained, and that subsequent agreements and amendments do not unintentionally undermine the protections originally afforded to affected residents.

I am particularly concerned that a decision could be made before the applicant has responded to issues which it has itself agreed to investigate.

I believe that a short, proportionate deferral to establish the relevant facts would be reasonable and in the public interest.

I apologise for the length of this representation, but the matters involved are complex and potentially consequential for residents living immediately alongside the affected highway network and the surrounding area.

I would be grateful for urgent acknowledgement and confirmation that this letter has been referred to the appropriate decision-making officials.

Yours faithfully,

Glen Elmy

[Redacted signature]

[Redacted address line 1]

[Redacted address line 2]