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

[redacted]

Principal Planning Policy Officer

Robin Hall
Cabinet Member for Economy & Skills
Councillor for South Burntwood
Staffordshire County Council
1 Staffordshire Place
Tipping Street, Stafford ST16 2DH
Telephone: [redacted]
E-mail: [redacted]
Website: www.staffordshire.gov.uk

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

My Ref: RH006 / TW

Your Ref: TR050005-001571 Date: 25 September 2026

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 (WMI). My Officer's detailed technical response to the application are enclosed and this covering letter should be read alongside it and form part of the Council's representation.

Whilst the WMI has the potential to bring significant economic benefits to Staffordshire, I am mindful of the local community concerns raised at the time of the initial examination of WMI in relation to the rational for the scheme and associated assurances over the delivery of critical infrastructure. In summary, the applicant advocated that there was a strong need for new rail freight capacity and this was the only site suitable in the sub-region and therefore met the exceptional case for development on land covered by the greenbelt policy designation.

Furthermore, I understand that the delivery of the Rail Freight Terminal is essential for the development to comply with the Development Consent Order (DCO) and the National Policy Statement under which it was granted, with the A5/A449 link road being a key part of the highway mitigation for the development.

Even though this is a proposed non-material change amendment, the Planning Inspectorate and Secretary of State need to ensure that the scheme remains as a genuine rail freight interchange and not at undue risk of being diluted to a road-based warehousing/logistics type development. The delivery of the Rail Freight Terminal and A449/A5 Link Road needs to carefully conditioned in the DCO to ensure they come forward at the appropriate time.

I understand that the proposed change to the DCO is largely being brought about by changing economic circumstances and investment decisions that alter the phasing for the delivery of the site. It is hoped that the site progresses as planned and the upper limit floor space limit is the trigger that defines when the terminal and link road are actually constructed, without needing to rely on the secondary time-based trigger.

However, I must emphasise that I will not support the rail terminal or link road being delayed indefinitely. I see the 186,000sqm floorspace trigger as being the upper limit on development ahead of the Rail Terminal and A449/A5 link road being completed and will ask my Officer's to ensure this limit is enforced.

I appreciate that the proposed DCO as amended will still include constraints on build out until infrastructure is provided but it would be beneficial to seek assurances on a more binding delivery programme.

Yours faithfully

[redacted]

Cabinet Member for Economy & Skills
Councillor for Burntwood South

Enc: Technical aspects of the Councils representation.