



LOCAL ACCESS FORUM

Planning Appeal Inquiry: 6005613 (BCC) and 6005614 (NWBC)

IM Properties Developments Ltd – Thrive, Land West Junction 9 of the M42 and M6 Toll

30 June 2026

Sir

Thank you for allowing me to address the Inquiry this morning on behalf of the Warwickshire Solihull and Coventry Local Access Forum, a statutory advisory body made by the Countryside and Rights of Way Act 2000, of whom I am the Planning Representative.

The circa 330-acre parcel of best and most versatile productive agricultural land in full UK food production, the subject of this Inquiry, is undeniably ancient Green Belt land which meets four of the five qualifying NPPF purposes and the great importance of maintaining its complete openness and permanence.

BMV land is defined in the NPPF Glossary, Annexe 2, as, land in grades 1, 2 and 3a of the Agricultural Land Classification. **NOT** 3a – Sub-Grade as constantly referred to in the Thrive Planning Statement. You cannot make material what is clearly not.

The land is considered an ancient **Heritage Asset**, defined in the NPPF Glossary 2 '*as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions.*

The above, combined with its role as a *Historic Environment* (NPPF Glossary 2) '*resulting from interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried, submerged, landscaped and planted or managed flora*' reinforces its irreplaceable value in active agricultural production since the medieval period.

The land was farmed under traditional open-fields, ridge and furrow system from at least the 13th century. The Domesday book of (1086) records both Wishaw and Curdworth parishes as actively supporting agricultural populations. Today's landscape, includes survival of historic hedgerows, trees and traces of historic agricultural features, such as lynchets and ridge and furrow, which confirm centuries of continuous farming.

Extensive archaeological evaluations prior to the construction of the M6 Toll revealed a diverse array of ancient remains on farmland in the area, including Mesolithic flints and hunting camps. Cropmarks and trial trenches

revealed Iron Age enclosures and pit alignments. Evidence of a Roman settlement was uncovered during excavations at Wishaw Hall Farm.

A planned medieval settlement, complete with complex water-management networks including fishponds and breeding stews, also thrived in the vicinity.

(Ref: Warwickshire Historic Environment Record and Our Warwickshire archives).

In addition, land between Over Green, Wishaw and Curdwoth includes designated Local Wildlife Sites, mature hedgerows and is designated as important Green Belt land which provides habitats for protected species such as bats, amphibians and farmland birds. Local Wildlife Sites include, Wishaw Meadows and the Curdwoth Canal (Birmingham and Fazeley Canal constructed in 1783) which forms an important southern boundary to the ancient rural block. The canal banks act as crucial local wildlife corridors described as sensitive ecological assets. The area contains irreplaceable ancient woodland patches, established hedgerows, ancient trees and ponds all vitally important stepping stones between habitats and diverse species populations which enables wildlife to successfully breed and thrive.

The proposed site is situated within the Arden Landscape with its diverse ancient habitats, eco-systems, ecology and diversity of protected species:

Irreplaceable Habitats are described in the NPPF Glossary 2 as:

‘Habitats which would be technically very difficult, or take a significant time, to restore, recreate or replace once destroyed. Taking into account their age, uniqueness, species diversity or rarity, including designated sites of importance for biodiversity, SSSI’s, locally designated sites including Local Wildlife Sites’. In the wider area, wildlife connectivity between a diverse set of habitats and species biodiversity is essential for species health and preservation.

At the heart of this Inquiry is a fertile 330-acre swathe of ancient Arden Landscape supporting the best and most versatile irreplaceable prime productive agricultural land that has continually provided market garden crops to local produce markets while supporting a virtually net-zero footprint.

The area covering Curdworth, Wishaw and Over Green retains an intimate, historic character, featuring winding country lanes, irregular field systems, and veteran trees providing vital ecological buffers with the soil and crops irreplaceable in providing natural carbon sequestration and water permeability protecting against the intensification of severe weather events due to the climate emergency whilst aiding natural flood prevention in the area.

It is disappointing the appellant has chosen the questionable 'Grey Belt' route attempting to discredit the powerful ancient designation of circa 330-acres of prime BMV productive agricultural Green Belt land in full UK food production which has NEVER been previously developed.

Argument for Grey Belt designation based on a lack of visual or physical barriers between Birmingham and Sutton Coldfield, an historic Town, fails spectacularly as far as preventable additional costs, incurred at this Inquiry, are concerned.

The Thrive project remains a financially speculative concept which continues to fail to provide compelling evidence to discredit the importance of protecting the openness and permanence of this active 330-acre Green Belt, productive agricultural BMV land in full UK food production, together with its specific environmental and wildlife designations which override any Grey Belt claims. The BMV land has NEVER been previously developed.

**No Very Special or Exceptional Circumstances have been
Demonstrated**

which outweigh the substantial weight given to harm to the Green Belt including harm to its openness and permanence. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances which will not exist unless the potential

harm to the Green Belt, by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other circumstances.

The considerable 'financial land and property investment' entered into by the appellant during the circa 11 years development of the Thrive Project, combined with ongoing highly preventable costs, should not be given any weight during the decision-making process. The proposal remains largely a financially speculative concept.

Perceptions of a predetermined expectation of planning approval to be granted, within the supporting documents, are unmistakeable.

The unwelcome cumulative visual, spatial and overall mass dominance of the proposed Thrive development is unacceptable in every possible way it is judged.

Of the nine 'Development Zones', Height Parameters, (m Above Ordinance Datum) - converted into feet and inches and rounded up or down;

D1 and D2 are circa 379 feet high

S and C are circa 371 feet high

A1 is circa 356 feet high

E1 is circa 354 feet high

A2, A3 are circa 351 feet high

E2 is circa 347 feet high

The total floorspace of the 9 units is circa 3.5 million square feet with the largest warehouse 1 million square feet.

- **The site will be active - 24/7 days a week – 365 days of the year.**
- Overnight parking and overspill for HGV including a 'Welfare' Hub is to be constructed giving on-site security concerns (sui generis) which should require a full planning application.
- 7 ancient Public Rights of Way will be diverted or made permissive and at the mercy of the land owner. The 8th - the ancient Blind Pit Lane to be permanently closed.
- Major Energy Infrastructure/Sub Station/Battery Storage will be constructed which should require a new planning application?
- Will the failing National Grid Infrastructure be able to provide timely capacity and guaranteed connection?
- 5 access routes to access and egress the site:

Dunton Lane

Church Lane

Ryefield Lane

Curdworth Lane

Wishaw Lane

- Questionable provision of sustainable public transport lacks reality and, veracity.
- The dangers of promoting 'Active Travel', walking and cycling, on ALL local roads and lanes is all too obvious.
- Driving behaviours cannot be changed at will; convenience will always win.
- An inability to resolve or mitigate exponential increases in HGV and associate site and local traffic across the road networks signifies increased very real dangers for ALL road and highway users.

The Thrive Project demonstrates MAJOR SIGNIFICANT HARM in terms of Visual and Mass Dominance over local rural communities and significant harm to the natural landscape, environment, ecology and biodiversity.

The entire project remains a concept based primarily on assumption, desk-based study and modelling with little recognition of fact or reality.

The comments quoted below from the Thrive Planning Statement are disappointing and perplexing.

We paraphrase:

'The Thrive Project will deliver a 'legacy', setting new standards for natural capital and community benefits for the wellbeing of 'surrounding communities' creating an exceptional environment and provide a range of community assets (including allotments and orchards) and a site creating 'lively space for gathering and community interactions' with a potential to host events, markets and making it a destination in its own right'.

The dictionary definition of 'a legacy' is a gift, heirloom, inheritance, birthright, heritage or endowment. There cannot be a more unpalatable use of the word by Thrive. Preserving the natural environment, its ecosystems, ecology and biodiversity for future generations is a legacy.

Offering community benefits, unrelated to mitigating the direct impacts of the scheme, as an inducement to help secure planning approval is unlawful. The fundamental principle of the planning system is that 'planning permission cannot be bought or sold'. Decision-making must be based solely on proper planning purposes and established 'material planning considerations not as an 'ulterior aim' to attempt to manipulate decision-making.

The lack of meaningful professional recognition of the massive negative impacts, the proposal will have on the daily lives of local residents and communities, including the loss of local character, natural landscape and the surrounding rural environment, is unprecedented. The loss of amenity and

effects on the health, safety and wellbeing of local residents and communities necessarily going about their daily lives in such close proximity to the visually and spatially overwhelming dominance of the Thrive Project, is unconscionable. The failure, to openly and transparently acknowledge the cumulative adverse impacts on the day-to-day lives of ALL affected residents necessarily moving between rural villages, wider communities and essential social infrastructure, combined with the dangerous effects on road safety, congestion and gridlocking caused by the exponential increases in numbers of HGV and other traffic using the strategic and local highway networks, combined with local traffic ADDS to the existing 10,000 HGV movements each day moving through the local wider network.

Sir, with the utmost respect, the Warwickshire Solihull and Coventry Local Access Forum in exercising its statutory advisory role and function, ask you to DISMISS the appeal for all the reasons as stated above and within our previous OBJECTION REQUEST correspondence.

A handwritten signature in dark ink, reading 'Sheila Cooper'. The signature is fluid and cursive, with a long horizontal flourish extending from the bottom of the name.

Sheila Cooper

30 June 2026

Planning Representative the Warwickshire Solihull and Coventry Local Access Forum

