

CHAPTER 11: MINERALS

INTRODUCTION

Objections to First Deposit

1275/145 – CPRE; 1382/353 – Lafarge Aggregates Ltd;
1403/1094 – RMC Aggregates (Western) Ltd.

Objections to Revised Deposit

There were no objections to the Revised Deposit draft

Key issues

- *Does the Introduction and Chapter 11 provide an appropriate context to minerals planning and relate the need to work minerals to wider needs and policies, including the need for restoration, particularly in the critical Meriden Gap Green Belt;*
- *Does the reference in para 11.0.4 to mineral extraction in the Green Belt adequately reflect the guidance in PPG2.*

Inspector's reasoning and conclusions

- 11.1 The Introduction to this chapter confirms that significant deposits of sand and gravel exist within the Borough in the Meriden Sands area, where sand and gravel extraction has continued over the past 10 years and is expected to continue for at least another 10 years. Rev 11/1 (¶ 11.0.4) makes specific reference to the Green Belt, summarising national policy on mineral working in such areas. It also refers to RPG11 (Policy M1 & ¶ 8.59), which confirms that the identification of minerals sites should be consistent with Green Belt objectives.
- 11.2 In my view, this provides sufficient reference to the Green Belt issue, and the following policies in this chapter indicate the wider needs and policies against which proposals for mineral working should be considered. It is also important to note that minerals can only be worked where they occur. Provided that sites are well restored, the long-term impact of mineral working on sensitive areas of the Green Belt like the *Meriden Gap* may be limited. Moreover, I consider it would be unrealistic and inflexible to include a presumption in favour of restoring mineral workings to the original landscape and land-use, rather than lakes, given the lack of waste and need for farmland, and other possible suitable uses for the land.
- 11.3 PPG2 (¶ 3.11) confirms that mineral extraction need not be inappropriate in the Green Belt, provided that high environmental standards are maintained and the site is well restored. Rev 11/1 reflects this guidance and no further amendments are needed in response to these objections.

Recommendation

11.4 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.

POLICY M1: SEARCH FOR NEW MINERALS

Objections to First Deposit 1126/288 – Hampton-in-Arden Society; 1275/146 – CPRE; 1403/1097 – RMC Aggregates (Western) Ltd.

Objections to Revised Deposit 1275/123/R, 357/R – CPRE.

Key issues

- *Is Policy M1 necessary and does it conflict with provisions in the GPDO;*
- *Should Solihull be included within Warwickshire for minerals planning purposes;*
- *Should an Area of Search be shown on the Proposals Map, within which Marsh Farm should be included;*
- *Do Rev 11/2 & 11/4 render the Area of Search and Minerals Consultation Area redundant.*

Inspector's reasoning and conclusions

- 11.5 Policy M1 addresses the search for new minerals, including exploration, but confirms that subsequent mineral extraction would only be permitted if the criteria in Policy M4 are met. Policy M1 is not intended to repeat, affect or override the provisions in Part 22 of the GPDO in terms of permitted development for mineral exploration, but deals with proposals which fall outside these terms. The environmental impact of mineral exploration would be considered under Policy M1 and other policies in Chapter 6 of the Plan. I therefore cannot see that the Policy would prevent the refusal of planning permission or hinder enforcing planning control where the environmental impact was unacceptable. Similarly, Policy M1 would not prevent the use of Article 7 Directions where necessary. SMBC confirms that Policy M1 would apply to all minerals, including coal, and that the final sentence of the policy is added for clarification, reflecting the last sentence of para 11.1.1. I also understand that there is a similar policy in the Warwickshire MLP. Consequently, I am satisfied that Policy M1 provides an appropriate basis for considering proposals for mineral exploration which are not permitted under the GPDO.
- 11.6 I deal with the question of including Solihull within Warwickshire for mineral planning and aggregates provision under Policy M3 (see below).
- 11.7 The reference to an Area of Search in the First Deposit version has been deleted (Rev 11/2 & 11/4) in favour of a site-specific proposal for sand and gravel working at Park Farm/Meriden Quarry (Proposal M3/1 – Rev 11/11). These revisions make sufficient provision for sand and gravel working within the Plan period without identifying an Area of Search. In any event, Marsh Farm has some acknowledged constraints, including nature conservation interests, amenity issues and the existence of a gas pipeline. This site is already included within the Minerals Consultation Area, and I consider this provides sufficient protection for the known mineral resources at this site.
- 11.8 Rev 11/2 & 11/4 delete all references to a proposed Area of Search, originally proposed in the First Deposit version of the Review. This proposal is therefore redundant, being replaced by a specific proposal in Proposal M3/1. Policy M2 addresses the Mineral Consultation Area and is unaffected by these revisions.

Recommendation

11.9 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.

POLICY M2: PROTECTION OF SAND AND GRAVEL DEPOSITS

Objections to First Deposit 1069/1054 – GO-WM; 1275/147 – CPRE.

Objections to Revised Deposit 1126/520/R – Hampton-in-Arden Society

Key issues

- *Is it appropriate to have a Minerals Consultation Area in Solihull;*
- *Should “reserves” be replaced with “resources” in Policy M2.*

Inspector’s reasoning and conclusions

- 11.10 Policy M2 confirms that sand and gravel resources in the Borough will be safeguarded by identifying a Mineral Consultation Area within which proposals for surface development will be restricted. MPG1 (¶ 36-39) confirms that the purpose of defining a Minerals Consultation Area is to safeguard mineral deposits from unnecessary sterilisation by surface development. Since minerals are known to exist within Solihull, it is wholly appropriate for the SUDPR to include such a policy. The Policy does not intend to restrict the search for minerals, nor does it indicate that planning permission will necessarily be granted to extract such minerals prior to any development. As drafted, Policy M2 generally accords with national guidance and is soundly based. Issues about the precise extent of the boundary of the MCA are best dealt with under Proposal M2/1, which deals with the areas defined as a MCA.
- 11.11 At the inquiry, there was some discussion about whether a MCA is actually needed in Solihull, since SMBC is itself the Mineral Planning Authority. I understand that the MCA evolved from the former WMCC Structure Plan and was included in the adopted UDP [CD111]. MPG1 (¶ 37/A1) suggests that MCAs may not be needed in unitary authorities, whilst MPG6 (¶ 67) emphasises the need to safeguard mineral resources from development that could hinder extraction. In the absence of any changed circumstances since the adoption of the current UDP, the deletion of the MCA could send out the wrong message to the minerals industry and the community, and could be misleading. Since Policy M2 fully reflects national guidance in MPG1 & MPG6, identifies where minerals exist, and does not directly cause blight or harm, I consider it should be retained in the SUDPR.
- 11.12 In the first sentence of Policy M2, the word *reserves* has been replaced with *resources* (Rev 11/5), meeting GO-WM’s objection. Section 11.2 and Policy M2 are also proposed to be retitled: *Protection of Sand & Gravel Resources* [CD175], along with *mineral resources* in para 11.2.2. This term is used consistently in MPG1 (¶ 36-39) & MPG6 (¶ 67-68) and would provide a consistent approach and avoid any confusion. The term *mineral deposits*, suggested by HIAS, would cover both reserves and resources, and would not accord with the purpose of the Policy or national guidance.

Recommendation

- 11.13 I RECOMMEND** that the Plan is **modified** by:
- (i) amending the title of Section 11.2 and Policy M2 to Protection of Sand and Gravel Resources, and
 - (ii) amending paragraph 11.2.2 to refer to mineral resources, as indicated in CD175.

PROPOSAL M2/1: DEFINING A MINERALS CONSULTATION AREA**Objections to First Deposit** 1275/144 – CPRE**Objections to Revised Deposit** 1126/504/R – Hampton-in-Arden Society**Key issues**

- *Should the boundary of the MCA be extended west of the A452 and west of the River Blythe.*

Inspector's reasoning and conclusions

11.14 Proposal M2/1 confirms that a MCA is defined in the *Meriden Sands* area to protect important mineral resources from surface development. Rev 11/17 proposes to extend the MCA to cover land to the west of the A452, while a PIC [CD156] proposes a further small extension to the MCA on the north-western side of the River Blythe, west of the A452. I understand that these changes have been made at the request of Packington Estates (1002/66; 1003/72) who have submitted borehole information which demonstrates that minerals exist within these areas, reflecting the BGS information. Safeguarding these areas would accord with the guidance in MPG6 (¶ 36-39), and SMBC's minerals consultant (Warwickshire CC) is prepared to accept these extensions.

11.15 CPRE & HIAS do not seriously challenge the borehole information on technical grounds, although they question the amount and quality of recoverable reserves. They are more concerned about the possible impact on the River Blythe, particularly the SSSI, and flooding/drainage/water resource issues, vehicular access, highway safety, traffic, and the impact on the setting of Hampton-in-Arden and on the sensitive *Meriden Gap*. However, these matters would be fully considered under Policy M4, if and when mineral extraction ever took place. In this context, it is relevant to note that the disputed areas both lie in the Green Belt where planning permission is only given for inappropriate development (such as buildings) in very special circumstances. The chances of mineral extraction being required would therefore be relatively rare. Nevertheless, since these areas have been shown to contain viable sand and gravel reserves, it is wholly appropriate that the MCA boundary should be extended to incorporate both of these areas.

Recommendation

11.16 I RECOMMEND that the Plan is **modified** by amending the extent of the Minerals Consultation Area on the Proposals Map, including land to the west of the A452 and north-west of the River Blythe, as shown on Revised Map 29 [Rev 11/17] appended to CD156.

POLICY M3: SUPPLY OF AGGREGATES**Objections to First Deposit** 1275/148 – CPRE; 1305/250 – Berkswell Society.**Objections to Revised Deposit** 1275/122/R, 124/R, 209/R, 345/R, 352/R, 367/R – CPRE; 1403/11/R, 12/R, 13/R, 380/R – RMC Aggregates (Western) Ltd; 1499/63/R, 64/R – Quarry Products Association.**Key issues**

- *Should Solihull be included with Warwickshire for mineral planning and aggregates provision purposes;*
- *Should the text be updated to reflect the latest revised guidelines on aggregates provision;*
- *Should the Plan provide for the full sub-regional apportionment of 4.6mt, rather than the small shortfall proposed;*
- *Should the extent of sand and gravel within Park Farm be reduced to 3.2mt.*

Inspector's reasoning and conclusions

- 11.17 Policy M3 sets out the basis for considering proposals for sand and gravel working within the identified sites. Para 11.2.3 confirms that Solihull forms part of the West Midlands County area for the purposes of calculating a sand and gravel landbank and making provision for sand and gravel based on the areas used for sub-regional apportionment. These issues are dealt with by the WMRAWP on behalf of the WM Regional Assembly.
- 11.18 The established system includes Solihull within the West Midlands county and the definition of sub-regions is not directly within SMBC's control. The possibility of including Solihull within Warwickshire for landbank and aggregates provision purposes would have to be decided by the Regional Assembly. Although Solihull members may have raised this issue in their past meetings, it has not been discussed recently by the WMRAWP. The sub-regional apportionment of aggregates provision is based on the existence of sand and gravel resources within the Borough, and Solihull makes a substantial contribution (91%) to the production of sand and gravel in the West Midlands county. A different sub-regional breakdown, including Solihull within Warwickshire, might give greater flexibility, but it would not necessarily result in a lower requirement for Solihull.
- 11.19 I recognise that MPG1 (¶ 27-32) refers to the possibility of joint and cross-boundary working in urban areas, and I understand that officers in Warwickshire CC currently provide the minerals expertise for SMBC, acting as advisers. However, on the basis of the limited information before me, I cannot see that the type of exceptional circumstances exist which might suggest that Solihull is not an *appropriate local area* for maintaining a sand and gravel landbank in terms of MPG6 (¶ 63). In any event, the SUDPR cannot alter the established system of minerals planning in the West Midlands region, which is the responsibility of the WMRAWP. It would also be contrary to MPG6 & RPG11 (Policy M2) for the SUDPR to reduce or fail to provide for the Borough's contribution to the regional aggregates requirement. Consequently, CPRE & Berkswell Society's concerns are wrongly directed to the SUDPR.
- 11.20 SMBC intends to update the sand and gravel requirement figures in para 11.2.3, in response to GO-WM's letter of 22/07/03 and to reflect publication of the final guidelines on aggregates provision [CD41/61; CD146 (¶ 5.7-5.8); CD156/175]. These revised figures marginally increase the requirement for Solihull to 4.6mt, but indicate that any marginal shortfall can be addressed through a review of the Plan. These amendments would helpfully update the text accompanying Policy M3 and provide a sounder basis for considering future proposals for sand and gravel working.
- 11.21 The revised sub-regional apportionment amounts to 4.6mt of sand and gravel for the period up to 2011 and to maintain the necessary 7-year landbank. Provision in Proposal M3/1 amounts to 4.7mt, but this is based on an incorrect figure for Park Farm, and should be reduced to 4.53mt to reflect the most recent planning application (see below). This revised provision would represent a marginal shortfall of 1.52% in terms of the required provision. However, MPG6 makes it clear that the apportionment figures should not be seen as inflexible. Since the Borough only makes a relatively small contribution to aggregate supply in regional terms, any marginal shortfall would be unlikely to have a significant impact on regional provision.
- 11.22 More particularly, the identification of a further new site or an extension to an existing site could result in a substantial over-provision of sand and gravel in a sensitive area of Green Belt, where extraction is only justified on the grounds of need. It could also undermine national policy to encourage the use of alternatives to primary aggregates, although I note that if the assumptions on secondary and recycled materials are not met, the guideline figure for sand

and gravel may have to be revised. In these circumstances, and bearing in mind that the Revised Guidelines on aggregates provision will be subject to review, I share SMBC's view that any marginal shortfall would be better addressed as part of an early review of the SUDPR, which in any event, will be required soon under the new development plan system.

- 11.23 Rev 11/10 (¶ 11.2.3) states that Park Farm should provide *about 3.4 million tonnes*, based on previous information from the objector (1403/1092). However, the recent planning application indicates that this site would provide only 3.23mt of saleable material. SMBC recognises that this figure may vary as the scheme progresses, but it seems to me that the Plan should use the most up-to-date figure based on the latest information. Since this latest figure would be used in calculating landbanks and supply, it should be the figure quoted in the text. This may have knock-on effects for Proposal M3/1, which refers to a total of 4.7mt for the two proposed sites. The revised figure should be 4.53mt [CD146; ¶ 6.1].

Recommendation

11.24 I RECOMMEND that the Plan is **modified** by amending paragraph 11.2.3:

- (i) to update the aggregate requirement figures for Solihull, in accordance with CD156/175;
- (ii) to update the estimated provision from Park Farm to **3.23 million tonnes**, with consequential changes to Proposal M3/1, amending the total figure to **4.53 million tonnes**.

PROPOSAL M3/1: IDENTIFICATION OF LAND FOR POSSIBLE FUTURE SAND AND GRAVEL WORKING

Objections to First Deposit

There were no objections to the First Deposit draft.

Objections to Revised Deposit

1305/55/R – Berkswell Society;

Key issues

- *Is Proposal M3/1 too definite, resulting in nature conservation and environmental concerns.*

Inspector's reasoning and conclusions

- 11.25 Proposal M3/1 identifies land for future sand and gravel working at Park Farm and Meriden Quarry, in line with national guidance in MPG1 & MPG6. SMBC has now adopted the approach of identifying specific sites, rather than Preferred Areas or Areas of Search. I understand that one of the sites is subject to a planning application, whilst a proposal for the other site is expected shortly, and SMBC is satisfied the principle of mineral extraction is acceptable in both cases. Concerns about the impact on the SSSI and nature conservation interests could be considered under Policy M4 and other policies in the Environment chapter of the Plan, as confirmed in para 11.2.3. Apart from the amendment outlined in my previous recommendation (see ¶ 11.21 above), updating the total provision from these two sites, no further amendments are needed in response to this objection.

Recommendation

11.26 I RECOMMEND that the Plan is **modified** by amending Proposal M3/1 by replacing 4.7 million tonnes with **4.53 million tonnes**.

POLICY M4: MINERAL EXTRACTION, RESTORATION AND AFTERCARE

Objections to First Deposit

1037/693 – Network Rail Infrastructure Ltd; 1069/1055 – GO-WM; 1275/149 – CPRE; 1382/355 – Lafarge Aggregates Ltd; 1389/1146 – Meriden Parish Council; 1403/1091 – RMC Aggregates (Western) Ltd.

Objections to Revised Deposit

1305/56/R – Berkswell Society; 1481/431/R, 432/R – English Heritage.

Key issues

- *Should Policy M4 promote the transport of minerals by rail;*
- *Should Policy M4 refer to the need for aftercare and restoration of mineral workings, including guidance on locations appropriate for recycling waste materials;*
- *Should Solihull be included within Warwickshire for minerals planning purposes;*
- *Does Policy M4 recognise that mineral workings can have a positive effect on the landscape, enabling the restoration of existing exhausted or unviable workings;*
- *Should Policy M4 apply greater control over the restoration of mineral workings and provide a strategic and longer-term plan for the Meriden Sands area;*
- *Do criteria (iv) & (viii) reflect guidance in PPG7 about non-statutory nature conservation designations and refer to best and most versatile agricultural land;*
- *Does amended clause (ii) and the preference given to extensions to existing workings weaken protection for residents;*
- *Should Policy M4 and accompanying text also refer to the potential impact on the historic environment and archaeology.*

Inspector's reasoning and conclusions

- 11.27 Policy M4 sets out the criteria for proposals involving mineral extraction. PPG13 (¶ 45) promotes the transport of freight by rail and water. Policy M4(v) requires proposals to include measures for the satisfactory transport of material, with preference given to rail, in accordance with this guidance.
- 11.28 Rev 11/12 to criterion (iii) of Policy M4 makes reference to the need for restoration and aftercare of mineral workings, with further details in para 11.3.2 (Rev 11/14). Criterion (vi) and para 11.3.5 (Rev 11/16) provides guidance on the types of location where recycling of waste materials may be appropriate. This meets GO-WM's objection.
- 11.29 I have dealt with the question of including Solihull within Warwickshire for mineral planning and aggregates provision under Policy M3 (see above).
- 11.30 Policy M4 does not preclude new mineral working which enables the restoration of existing exhausted or economically unviable workings. The preference given to extensions to existing workings, provided that previous workings have been restored, will assist in this regard, as will the importance given to restoration schemes in criterion (iii). However, there is no reference in Policy M4 or the accompanying text to impact of mineral working on the landscape. This should be rectified by the addition of the word *landscape* in the list in criterion (ii) of the Policy.
- 11.31 Policy M4(iii) (as amended by Rev 11/12) covers the restoration and after-care of mineral workings, and para 11.3.2 confirms these are key elements of any new proposal. Proposal M4/1 sets out a commitment to prepare a strategy for the future use of the Meriden Sands area. I am satisfied that these policies and proposals provide an appropriate basis to consider restoration schemes and guide the future use of the Meriden Sands area.
- 11.32 Rev 11/12 to criteria (iv) & (viii) of Policy M4, along with the amendments to the accompanying text (Rev 11/13-14), satisfactorily address nature

conservation and agricultural land concerns by clarifying the approach to nature conservation sites and correctly referring to *best and most versatile* agricultural land. Criterion (iv) now reflects the guidance in PPG9 (¶ 17-18) & MPG6 (¶ 72-74), whilst criterion (viii) accords with the guidance in PPG7 (¶ 2.16-2.20) (*now PPS7 (¶ 28)*) & MPG6 (¶ 77). The accompanying text also helpfully cross-refers to Policies ENV11 & C4.

- 11.33 By requiring the impact on local residents' amenity to be *acceptable* ensures that any impact is reduced to an acceptable level. *Minimising* this impact may not reduce it to an acceptable level. Extensions to existing workings are preferable in most instances, especially in Solihull where a concentration of workings is unavoidable given the distribution of reserves, and this approach accords with the guidance in MPG6. Criterion (ii) would ensure that the impact on local residents is properly examined when detailed proposals are put forward.
- 11.34 SMBC proposes to add references to *built heritage and archaeology* in criterion (ii) of Policy M4 and to the accompanying text in para 11.3.1 [CD156/175]. These additions would satisfactorily address English Heritage's points.

Recommendation

11.35 I RECOMMEND that the Plan is **modified** by amending criterion (ii) of Policy M4 by adding the word "**landscape**" after "environment" and adding the words "**built heritage and archaeology**" before "nature conservation interests".

PROPOSAL M4/1: FUTURE USE OF THE MERIDEN SANDS AREA

Objections to First Deposit 1275/150 – CPRE; 1413/100 – Solihull Youth Council.

Objections to Revised Deposit 1305/57/R – Berkswell Society.

Key issues

- Does Proposal M4/1 provide an appropriate basis for considering the future use of the Meriden Sands area, particularly in terms of involving local residents and other organisations;
- Does Proposal M4/1 address the loss of Green Belt and the restoration of mineral workings;
- Should para 11.3.4 address the problem of over-intensification and the cumulative environmental impact of new mineral workings.

Inspector's reasoning and conclusions

- 11.36 Proposal M4/1 confirms that SMBC will prepare a strategy for the future use of the *Meriden Sands* area, which I understand stems from concerns about the restoration of mineral workings in this area. Although a Working Group was established in 1998, it has rarely met and has not considered restoration issues. Proposal M4/1 does not relate to the extension of existing mineral workings, but focuses on the future use of worked out extraction areas. The reference in the Proposal and para 11.3.3 to the *future use* and *after-use* of the area would include the nature, form and use of former mineral workings, including any restoration. However it would be helpful if the text confirms the restoration element, which could help to address CPRE's concerns about the creation of lakes along the Blythe valley.
- 11.37 I have already concluded that a presumption in favour of restoration to the original land form and use would be inappropriate (see ¶ 11.2 above). Further reasons are outlined in para 11.3.2 of the Plan. At the inquiry, SMBC

confirmed its policy to consult and involve local residents and organisations, including any SPG that may arise from Proposal M4/1. The Working Group includes a representative of the local parish councils and has agreed to invite the CPRE. Consequently, apart from the addition of the word *restoration* in para 11.3.3, I cannot see the need for any further clarification to this proposal.

- 11.38 Rev 11/1 (¶ 11.0.4) specifically refers to mineral extraction in the Green Belt, whilst Policy M4 covers restoration and after-care of mineral working sites. These should cover SYC's concerns.
- 11.39 The issues of over-intensification and the cumulative environmental impact of new mineral workings were originally included in para 11.3.4, but were deleted at Revised Deposit stage (Rev 11/15). Given the location of mineral workings in Solihull and the preference for extensions to existing workings, a concentration of mineral workings is almost inevitable. However, I am satisfied that the terms of Policy M4 would enable the environmental impact of mineral working to be fully assessed. At the inquiry, SMBC suggested that para 11.3.4-11.3.5 would be better placed before Proposal M4/1, since the text does not relate to this proposal, but to Policy M4. I agree that it would be more logical to place para 11.3.4-11.3.5 after para 11.3.2, and for para 11.3.3 to follow Proposal M4/1. I recommend accordingly.

Recommendation

- 11.40 I RECOMMEND** that the Plan is **modified** by:
- (i) *transferring paragraphs 11.3.4 & 11.3.5 to follow paragraph 11.3.2, and transferring paragraph 11.3.3 to follow Proposal M4/1;*
 - (ii) *adding the words “restoration and” before the word “after use” in paragraph 11.3.3.*

POLICY OMISSIONS

- Objections to First Deposit** 1403/1092; 1403/1098 – RMC Aggregates (Western) Ltd.
- Objections to Revised Deposit** There were no objections to the Revised Deposit draft.

Key issues

- *Does the Plan make sufficient provision for sand and gravel extraction during the Plan period;*
- *Should the Plan include Preferred Areas for Mineral Extraction;*
- *Should the Plan include a Preferred Area for mineral working at Patrick Farm and Park Farm, along with an Area of Search at Marsh Farm.*

Inspector's reasoning and conclusions

- 11.41 These objections are related to Policies M1 & M3 and the overall level of sand and gravel provision to be made within the Plan period. I have addressed most of these issues under Policies M1 & M3. At Revised Deposit stage, the text accompanying Policy M3 has been amended significantly, updating the figures on sand and gravel requirements and provision (Rev 11/6-11/11). I am satisfied that the marginal shortfall (1.52%) in terms of the 7-year landbank is unlikely to have a significant impact in terms of wider regional provision and the overall apportionment figure. Even though the identification or allocation of a further new site could provide a continuity of supply beyond the current Plan period, it could lead to potential over-supply within the current Plan period. This could be difficult to justify in a Green Belt location where mineral working is only justified by the need for minerals.
- 11.42 MPG1 (A3-A5) & MPG6 (¶ 59) advise that provision for aggregates can be made in several ways, through specific sites, preferred areas or areas of

search. The Revised Deposit draft proposes specific sites at Park Farm and Meriden Quarry (Proposal M3/1), rather than identifying areas of search (as in the First Deposit version) or preferred areas. In view of current and future proposed provision of sand and gravel within Solihull Borough, I am satisfied that this approach is soundly based.

- 11.43 Park Farm is now a specific proposal for future sand and gravel working under Proposal M3/1. Patrick Farm lies to the east of Hampton-in-Arden, not far from residents in Diddington Lane, and could be difficult to screen from view in view of the presence of the River Blythe between the site and the village. On the basis of the limited information available, I am satisfied that this site is not appropriate for identification as a Preferred Area at this time. Marsh Farm has some constraints in terms of an Area of Search, including nature conservation interests, amenity issues and the existence of a gas pipeline, which RMC acknowledges. This site is already included within the Minerals Consultation Area, and I consider this provides sufficient protection for the known mineral resources at this site.

Recommendation

11.44 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.
