

Erewash Core Strategy Review
Inspector's Matters, Issues and Questions
Joint Statement on Behalf of the Derby Housing Market
Area Local Planning Authorities
Matter 4: Green Belt



Erewash Core Strategy Review

Joint Statement on Behalf of the Derby Housing Market Area Authorities

1 Introduction

- 1.1 This statement is submitted on behalf of the Derby Housing Market Area (HMA) Authorities, namely Amber Valley Borough Council, Derby City Council, Derbyshire County Council and South Derbyshire District Council.
- 1.2 The statement sets out the joint position of the Derby HMA authorities on matters relating to the Green Belt, which are set out in the Submission Erewash Core Strategy Review (ECSR). The statement particularly focusses on the Inspector's Matters, Issues and Questions, which were published on 5th October 2023, particularly relating to Matter 4 as set out below:

Matter 4: The Green Belt

Issue: Whether the approach to the alteration of the Green Belt and development within it is justified and consistent with national policy. Please Note: This matter concerns the principle and overall approach to the Green Belt. Detailed matters relating to individual site allocations and the specific implications for the Green Belt are dealt with in Matter 6.

Green Belt Review

- 8. The Council has produced Green Belt Technical Paper (EBC05). Was the Council's approach to assessing Green Belt appropriate? What are your reasons for this view?*
- 9. How has the assessment of Green Belt land informed the Core Strategy Review and specifically proposals to alter the Green Belt to accommodate development needs?*
- 10. How has the Council assessed the suitability of land parcels and their contribution towards the purposes of including land in the Green Belt?*
- 1.3 The Derby HMA authorities are concerned that the policy approach to Green Belt set out in the ECSR, particularly the release of significant areas of Green Belt land to accommodate a number of large urban extensions that adjoin the administrative area of Amber Valley Borough and Derby City, has not been informed or underpinned by sufficient evidence. Three of those areas of Green Belt proposed for development at Acorn Way and Land North of Spondon on the edge of Derby and Land North of Cotmanhay adjoining Amber Valley Borough raise significant implications for the wider areas of Green Belt within which they are located as set out in more detail below.
- 1.4 The HMA authorities have previously raised the issue of the absence of a comprehensive Green Belt Review by the Borough Council in previous consultation responses on the emerging Erewash Core Strategy and the authorities continue to believe that an update of the previous Green Belt studies (as detailed below) is needed to help make strategic decisions for growth,

especially in an area such as Erewash Borough where Green Belt issues are so central to the overall growth and development strategy. At the very least, the authorities consider that a more robust appraisal of growth options against the existing Green Belt studies is needed. The statement below sets out more detail to support the HMA authorities' position.

- 1.5 On a point of principle, it is understood that Erewash Borough Council's position on Green Belt matters is that Green Belt is not a strategic matter that requires cross-boundary cooperation with neighbouring local planning authorities. However, Erewash Borough shares a common Green Belt boundary with each of the local authority administrative areas in the Derby HMA in Amber Valley Borough, Derby City and South Derbyshire District. The Derby HMA authorities would, therefore, contend that Green Belt is a strategic matter on which the HMA authorities have a legitimate interest through the ECSR.

2 National Planning Policy for Green Belts

- 2.1 National planning policy for Green Belt is set out in the National Planning Policy Framework. Paragraphs 137, 138 and 140 are of particular relevance to Matter 4 in the Inspector's Matters, Issues and Questions as follows:

137. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

138. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

- 2.2 In the context of paragraph 140 of the Framework above, it is understood that Erewash Borough Council's position is that there is no requirement in national planning policy or planning guidance for a Green Belt Review to be carried out by local authorities to inform their Local Plan preparation. The Borough Council considers that there was a requirement in national policy to locate housing in the most sustainable locations and that the Borough Council had done this by assessing the strategic growth options, starting with urban capacity and major

brownfield site options, followed by an edge of city, then edge of town approach. Green Belt constraints had then been assessed on a site-by-site basis.

- 2.3 It is the position of the Derby HMA authorities that, although paragraph 140 of the NPPF does not explicitly make reference to the need for local planning authorities to carry out a 'Green Belt Review' to inform their decisions on the release of Green Belt land, paragraph 140 does require that Green Belt boundaries should only be altered where exceptional circumstances are '**fully evidenced and justified**'. The Derby HMA authorities consider that an up-to-date Green Belt Review or Green Belt Assessment for the Borough would constitute the necessary evidence base to underpin decisions in the Core Strategy on Green Belt release to facilitate new large-scale housing growth. Such a Green Belt Review or Green Belt Assessment would be likely to identify those areas of the Nottingham – Derby Green Belt (land parcels) within Erewash Borough, which performed well against the five main Green Belt purposes set out in paragraph 138 of the NPPF and those that performed less well or poorly against those purposes, and which would be potentially more suitable locations for Green Belt Release. Such an approach would then enable a more informed assessment and comparison to be undertaken by the Borough Council of the proposed housing development sites that have been promoted through the Core Strategy located within the Green Belt
- 2.4 At the very least, the Derby HMA authorities consider that a more robust appraisal of options against the existing Green Belt studies is needed, namely the Nottingham-Derby Green Belt Review and the Derby Principal Urban Area Green Belt Review, details of which are set out below.
- 2.5 The approach taken to Green Belt release by the Borough Council in the Core Strategy has been to assess each proposed allocation site on its individual merits based on an assessment of the potential impacts of each site on the five Green Belt purposes. The Derby HMA authorities consider that a strategic Green Belt Review of the Borough or update of previous Green Belt studies, should have been a pre-cursor or starting point to consider options for where Green Belt release may have been appropriate to accommodate growth within the Borough.

3 Background to the Origins of Green Belt in Erewash Borough

- 3.1 In order to appreciate the strategic importance of the Nottingham-Derby Green Belt within Erewash Borough, it is important to understand the history and origins of the designation of the Green Belt in the area.
- 3.2 The origin of Green Belts generally in Derbyshire dates back to the late 1950s, when three Green Belts were provisionally defined in the areas of the County adjoining Manchester (North West Derbyshire Green Belt) and Sheffield (North East Derbyshire Green Belt) and in the area between Derby and Nottingham (South East Derbyshire Green Belt)
- 3.3 The 1980 Derbyshire Structure Plan reaffirmed the need for Green Belts in these three areas and included proposals for a fourth Green Belt in South

Derbyshire. In approving the 1980 Structure Plan, the Secretary of State designated a new South Derbyshire Green Belt to cover the open countryside between Swadlincote and Burton-upon-Trent.

- 3.4 The 1980 Derbyshire Structure Plan emphasised the importance of maintaining the Green Belts. In its review of Green Belt policies, the Plan concluded that without strong planning controls there was still a danger of a major conurbation emerging between Derby, Nottingham and the towns of the Erewash Valley. The Structure Plan, therefore, reaffirmed the need for Green Belt in the area covered by the Provisional South East Derbyshire Green Belt and proposed that it should be extended between Derby and Belper, and between Belper and the Derby/Kilburn area.
- 3.5 Green Belt local plans were subsequently prepared and adopted by Derbyshire County Council for South and South East Derbyshire, North East Derbyshire and North West Derbyshire.
- 3.6 The South and South East Derbyshire Green Belts Local Plan was adopted in April 1983. The Green Belt was defined between Derby and Nottingham and northwards up the Erewash Valley, around Long Eaton, Ilkeston, Heanor and Ripley. The Plan sought to establish Green Belt boundaries with a reasonable degree of permanence and so in some areas, the boundaries were defined to accommodate anticipated urban development needs. The Plan identified that, whilst Green Belts established a generally restrictive attitude to urban development in the countryside, some new development in the form of homes, schools, industries, shops and recreational facilities would be essential in the future, particularly around the larger towns such as Derby, Ripley, Heanor, Belper, Ilkeston, Long Eaton and Swadlincote. Consequently, in these areas the Green Belt boundaries were defined so as to make an adequate allowance for urban development needs established in the Structure Plan and, where necessary, looked beyond the Structure Plan period.
- 3.7 The Green Belts Local Plan indicated that the small towns and villages of various sizes were divided into two categories. The larger settlements with a generally built-up character where some development was anticipated in the future were generally excluded from the Green Belt in 'envelopes'. The smaller villages and settlements where development would be strictly controlled were 'washed over' or wholly included within the Green Belt.
- 3.8 The Green Belts Local Plan drew attention to the fact that the South East Derbyshire Green Belt had been matched since the mid -1950s by a similar Green Belt in Nottinghamshire. The two Green Belts shared a common boundary along the River Erewash for a distance of some 20 miles from Pye Bridge in the north, to Long Eaton and the River Trent in the south.
- 3.9 The Local Plan emphasised that, in preparing the proposals for the Green Belt boundary on the eastern boundary with Nottinghamshire, care had been taken to ensure that the boundary was properly related to the corresponding

Nottinghamshire Green Belt, which was incorporated in the 1980 Nottinghamshire Structure Plan.

3.10 The Green Belts Local Plan defined the extent and purpose of the Green Belt in the following locations.

- The North-West Boundary – Quarndon to Pye Bridge
- The Eastern Boundary with Nottinghamshire and Leicestershire
- **The Southern Boundary – Long Eaton to Chellaston**
- Derby
- The Amber Valley Towns – Belper, Ripley and Heanor
- **The Erewash Towns – Ilkeston and Long Eaton**
- Amber Valley Villages
- **The Erewash Villages**
- The South Derbyshire Villages

3.11 The general location and extent of the Green Belt in south and south-east Derbyshire remained largely unchanged from that defined in the Green Belts Local Plan in subsequent adopted versions of the Derbyshire Structure Plan in 1990, and Derby and Derbyshire Joint Structure Plan in 2001.

3.12 Furthermore, the general extent of the Green Belt in Erewash Borough and around Derby has remained largely unchanged since 2001 as more detailed Green Belt boundaries have been defined in the City and district local plans covering the area. Generally, however, only minor amendments to Green Belt boundaries in these plans have been made where specific developments have occurred.

3.13 Overall, therefore, the defining feature of the Green Belt in Erewash Borough and around Derby since the early 1980s has been its permanence in framing growth, in much the same way that has been envisaged in successive versions of national planning policy on Green Belts over the years.

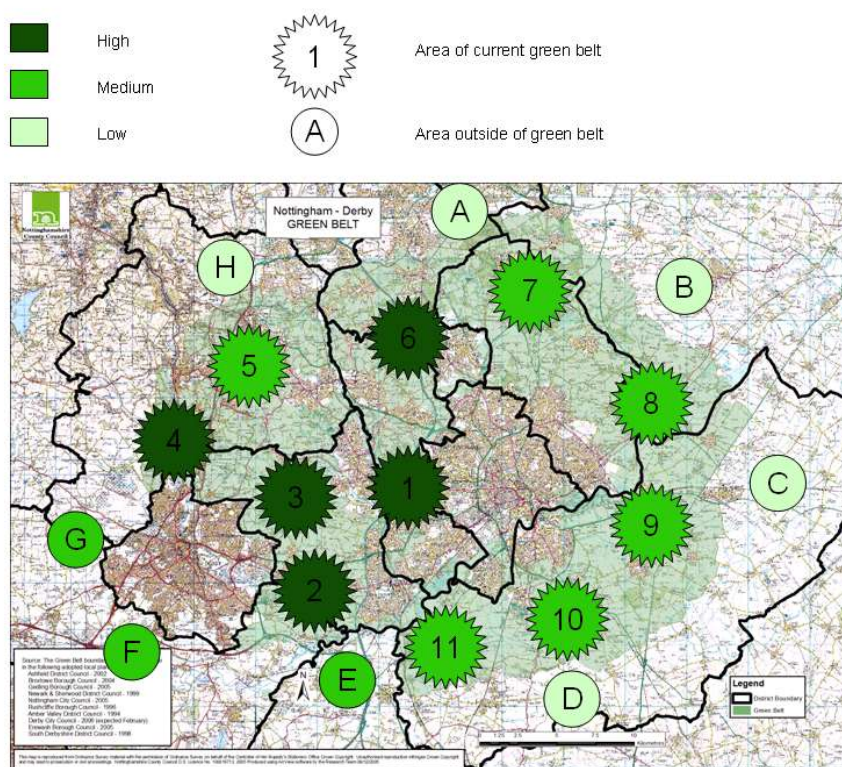
4 East Midlands Regional Plan

4.1 The East Midlands Regional Plan (EMRP) was prepared by the (then) East Midlands Regional Assembly and was adopted in March 2009. As part of the preparation of the Plan, a Review of the Nottingham – Derby Green Belt was undertaken in 2006/2007 to provide the evidence base to inform the growth strategy in the Plan for the Three Cities Sub-Area, comprising Derby, Nottingham and Leicester. The Review provided a background context to consider strategic growth issues relating to the area of the Nottingham – Derby Green Belt. It provided an historical context for the definition of the Green Belt and outlined key issues affecting the Green Belt in structure and local plans. The review provided the context to assess the overall extent of the Green Belt

in terms of its inner and outer boundaries. It assessed the potential to amend the inner boundaries to accommodate future growth needs and the case for adding new areas of land to the Green Belt.

- 4.2 In particular, the Review incorporated an assessment of the purposes and role of 11 broad locations within the existing Green Belt (see Figure 1 below). These areas were assessed against the five Green Belt purposes set in Planning Policy Guidance Note 2, which was the relevant national planning policy on Green Belts at the time. It also assessed a number of broad areas with potential to extend the Green Belt and again assessed the role and purpose that these areas might perform, if designated as new Green Belt. The areas of existing and potential new Green Belt were ranked against each of the Green Belt purposes and given a score from 1 to 5 depending on how well each area performed against each Green Belt purpose, with 1 being of low importance and 5 being of high importance. A summary of the conclusions is set out below for those areas of Green Belt of relevance to the Erewash Core Strategy.

Figure 1: Broad Areas of Green Belt Assessed in the Nottingham - Derby Green Belt Review



Area 2: Derby to Long Eaton

- 4.3 This area consisted of the Green Belt in South Derbyshire District and part of that in Erewash Borough. The area encompassed the Green Belt around the

villages of Borrowash, Ockbrook, Draycott and Breaston. Small areas of Green Belt south of Long Eaton and north of Sandiacre were also in this area.

- 4.4 The Green Belt in this location was considered to be important in maintaining a wide area of countryside between Derby and Long Eaton (albeit interspersed by a number of villages). The Green Belt prevented the spread of Derby to the east, particularly Spondon towards the settlements of Borrowash and Ockbrook. Additionally, the Green Belt helped protect the separate identities of settlements and protect the open character of the countryside. Tight Green Belt boundaries ensured that there was no possibility of villages growing to the extent that Derby and Long Eaton might be seen to be merging.
- 4.5 Overall, this broad area was ranked as being of high importance in meeting the Green Belt purposes, scoring very highly in terms of checking the unrestricted sprawl of large built-up areas, and assisting in safeguarding the countryside from encroachment. The area also scored highly in preventing neighbouring towns from merging into one another and assisting in urban regeneration by encouraging the recycling of derelict and other urban land.

Area 3: Derby to Ilkeston

- 4.6 This area consisted of the Green Belt between Derby and Ilkeston and contained the village of West Hallam and a number of smaller settlements. It was noted that there was no Green Belt separating Ilkeston from Kirk Hallam and from Stanton Ironworks, although there were recreational routes separating these.
- 4.7 It was concluded that the Green Belt in this area performed an important role in preventing the coalescence of Ilkeston with other nearby settlements such as Shipley and Heanor to the north-east, Eastwood to the north, Aysworth to the north-east, Trowell to the east and Sandiacre to the south. To the north-east, west, south-west and east of Ilkeston and West Hallam there were areas of open countryside and therefore the Green Belt performed another important role in helping to prevent encroachment of the urban area into the countryside.
- 4.8 It was considered that the tight boundaries of the Green Belt encouraged the redevelopment of derelict and brownfield land within Ilkeston town centre and would be likely to encourage redevelopment on other large sites such as at Stanton Ironworks.
- 4.9 Overall, the area was ranked as being of high importance in meeting Green Belt purposes, scoring very highly for checking the unrestricted sprawl of large built-up areas and highly in preventing neighbouring towns from merging into one another; assisting in safeguarding the countryside from encroachment; and assisting in urban regeneration.

Area 4: Immediate North of Derby

- 4.10 This area of Green Belt is located immediately north and north-east of Derby in Amber Valley Borough and Erewash Borough, in addition to a small area within Derby City's boundary.

- 4.11 It was considered that the main purpose of the Green Belt in this area was to prevent the unrestricted spread of the urban area to the north of the City, particularly around Allestree and Oakwood and their coalescence with the villages of Breadsall, Little Eaton, Quarndon, Duffield and Milford and the larger settlement of Belper beyond. It was noted that the open gap between Allestree, Little Eaton and Duffield was fairly narrow. Separation was considered important due to the high quality of the landscape and the character of the individual villages. A Special Landscape Area was defined (at that time) to the north of Duffield and west of Belper. The Derwent Valley Mills World Heritage Site and Heritage Site Buffer Zone were located directly to the north of Allestree. North of the City the Green Belt therefore helped to protect the landscape and countryside from encroachment and also helped to reinforce conservation and enhancement policies.
- 4.12 Overall, this area of Green Belt was ranked as being of high importance in meeting Green Belt purposes, scoring equally highly in checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns from merging into one another; assisting in safeguarding the countryside from encroachment; and preserving the setting and special character of historic towns.
- 4.13 Overall, the Green Belt Review concluded that the area between Nottingham and Derby was overall the most important area of the Green Belt. Areas north of Nottingham and Derby were also important, while areas to the south and east of Nottingham were of lesser importance. The policy approach in Policy Three Cities SRS2 in the EMRP, identifies that the area of Green Belt within the Nottingham Core HMA and around Hucknall, was the only area for which a comprehensive review of the Green Belt would be required to accommodate future growth needs in the area and where amendment to Green Belt boundaries may be necessary.

Derby Principal Urban Area Green Belt Review

- 4.14 The Derby Principal Urban Area Green Belt Review (DPUAGBR), was undertaken jointly by Derbyshire County Council, Amber Valley Borough Council, Derby City Council, Erewash Borough Council and South Derbyshire District Council in 2012 to inform the preparation of each local planning authorities' Core Strategy / Local Plans at that time.
- 4.15 The study built on previous work undertaken in the Nottingham – Derby Green Belt Review (as above), which assessed the five Green Belt purposes of very broad areas of the whole of the Nottingham – Derby Green Belt. The DPUAGBR assessed the five Green Belt purposes, as set out in the NPPF, in more detail and specifically for five broad areas on the periphery of Derby (see Figure 2 below). These five broad areas were jointly agreed and defined by officers of the four authorities. These broad areas included

Direction A: Derby North West;

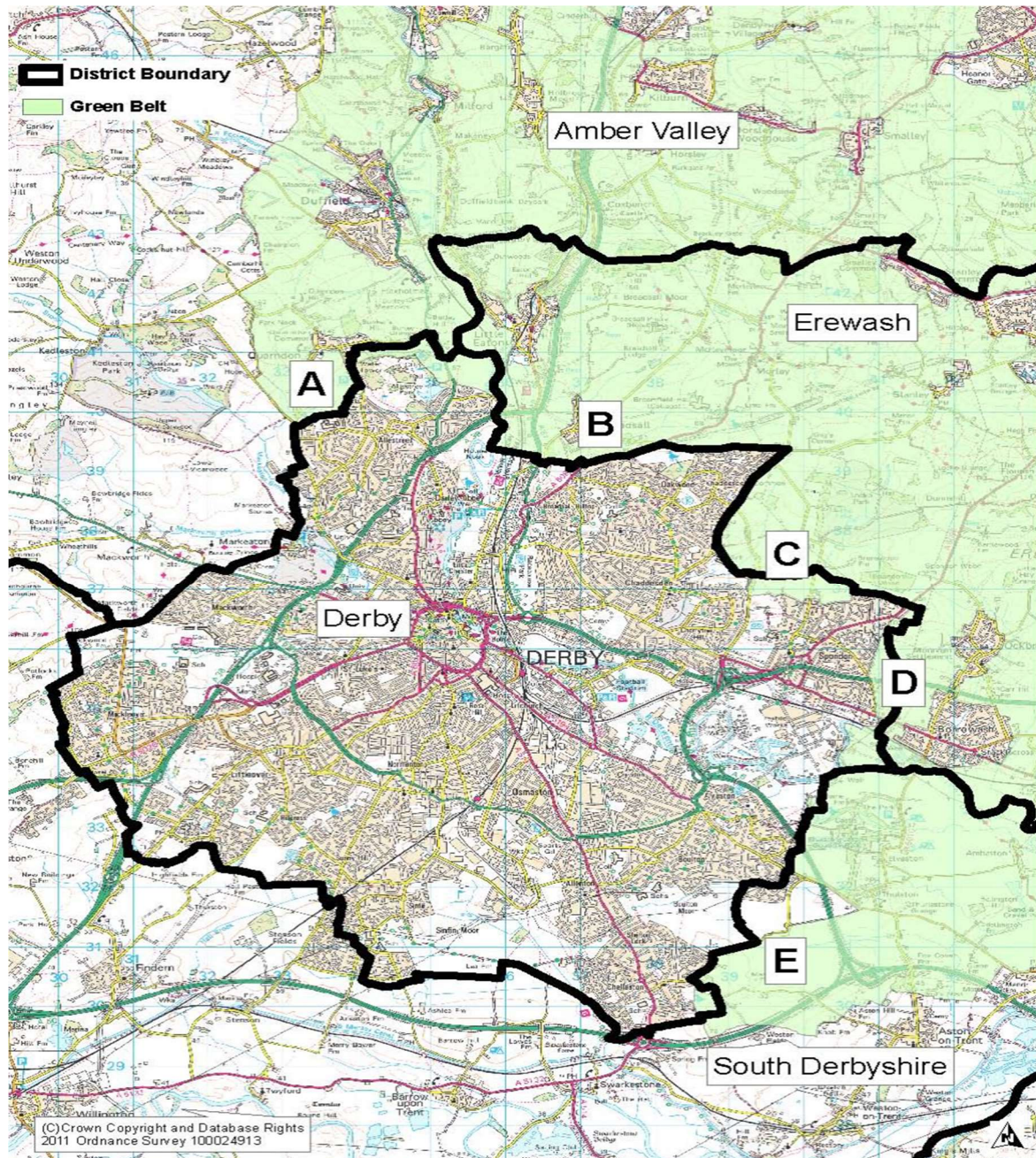
Direction B: Derby North;

Direction C: Derby North East;

Direction D: Derby East;

Direction E: Derby South East

- 4.16 Three broad areas covered part of Erewash Borough including Area B: Derby North; Area C: Derby North East; and Area D: Derby East. The conclusions of the assessment relating to these two broad areas was as follows:



Area B: Derby North

- 4.17 This broad area comprised an area of Green Belt located to the north of the north-eastern extent of the urban area of the City around Oakwood. The Green Belt in this location is entirely within the Borough of Erewash adjoining the City boundary. It included land to the east of the built-up area of Allestree in Derby. It includes the settlements of Breadsall and Little Eaton, which are located to the north of the City boundary and are excluded from the Green Belt. Two locally defined Green Wedges penetrate the City from this broad area of Green Belt.
- 4.18 The study considered that the Green Belt's function in this location in constraining the northward sprawl of the City was very important in a sensitive area. It formed an open area, which prevented the merging of the northern suburbs of the City, particularly around Oakwood with the smaller settlements of Little Eaton and Breadsall to the north, which was set out as one of the main purposes of the Green Belt in the original South and South East Derbyshire Green Belts Local Plan. The open gaps between the urban area of the City and Breadsall and Breadsall and Little Eaton were noted as being very narrow in this location and so the Green Belt was considered to be essential to prevent the merging of the City with these settlements and merging of the settlements with each other.
- 4.19 The study indicated that the Green Belt in this location helped to define the suburbs of the City and to preserve their settings, while protecting the open countryside from encroachment. This location contained a number of wildlife designations, which contributed to the countryside setting outside the urban area of Derby. The Green Belt assisted in preventing these wildlife designations from being impacted upon by new development. It also assisted in preserving the setting of the World Heritage Site and the historical assets, which lie within it.
- 4.20 As with all other areas of Green Belt on the periphery of Derby, the study indicated that this broad area assisted in directing development to more sustainable regeneration and brownfield sites within the City and other urban areas by restricting development in less sustainable peripheral greenfield locations.
- 4.21 Overall, the study concluded that the Green Belt in this location performed well against the Green Belt purposes set out in the NPPF.

Area C: Derby North East

- 4.22 This broad area comprised land east of the built-up area of Oakwood, north-east of the built-up area of Chaddesden and north of the built-up area of Spondon, including land within both Derby City and Erewash Borough. The area included Locko Park Historic Park and Garden and beyond it the villages of Stanley and Dale Abbey. North-west of Spondon, it was noted that the Green Belt forms the mouth of a locally defined Green Wedge in Derby.

- 4.23 The study concluded that the Green Belt in this location helped define the eastern edge of the City. Its function in constraining the eastward sprawl of the City and preventing the coalescence of the cities of Nottingham and Derby was considered very important. The Green Belt in this location also assisted in maintaining an open, undeveloped area between Derby and the town of Ilkeston in Erewash Borough and the smaller settlements in between. It was considered that any urban sprawl in this location would have potentially detrimental impacts on the open countryside, the setting of Locko Park and the wildlife interests and natural environment interests.
- 4.24 The study considered that the Green Belt helped define the suburbs of the City around Oakwood, Chaddesden and Spondon and to preserve their settings. It protected the open countryside from encroachment and the setting of Locko Park, together with other wildlife and natural interests. As with all other areas of Green Belt on the periphery of Derby, this broad area assisted in directing development to more sustainable regeneration and brownfield sites within the City and other urban areas by restricting development in less sustainable peripheral greenfield locations
- 4.25 Overall, it was concluded that the Green Belt in this location performed very well against the Green Belt purposes as set out in the NPPF.

Area D: Derby East

- 4.26 This broad area of Green Belt comprised land located to the east of the built-up area of Spondon, including land in Derby City and in Erewash Borough. The Green Belt encircles the settlements of Ockbrook and Borrowash, which are both separate from the City and within the Borough of Erewash.
- 4.27 Overall, the Green Belt in this location was considered to perform very well against the Green Belt purposes set out in the NPPF. The primary function of the Green Belt was to prevent the coalescence of the cities of Derby and Nottingham and this location was the most sensitive area on the periphery of Derby in terms of fulfilling this function.
- 4.28 The Green Belt's function in constraining the eastward sprawl of Derby City and preventing the coalescence of the cities of Derby and Nottingham and the settlements in between, particularly Ockbrook and Borrowash, was considered as being extremely important. Any urban sprawl in this direction could have a detrimental impact on the setting, character and identity of the free-standing settlements of Ockbrook and Borrowash.
- 4.29 The Green Belt in this location helped to define the suburbs of the City, particularly around Spondon and to preserve their settings, while protecting the open countryside from encroachment. It was noted that there were no historic towns or significant heritage features in this area, so the Green Belt performed a limited function in this respect.
- 4.30 However, as with all other areas of Green Belt on the periphery of Derby, this broad area assisted in directing development to more sustainable regeneration

and brownfield sites within the City and other urban areas by restricting development in less sustainable peripheral greenfield locations.

- 4.31 Overall, the study concluded that all five broad areas continued to fulfil the main purposes of Green Belts. However, Area E: Derby South East had seen the construction of the A6 Spur and A50 roads since its designation, which presented new physical features in the landscape. In this context, the study recommended that the local authorities consider, through their local plan reviews, whether there is a need to 'safeguard' Green Belt land for the longer term and whether these new physical features could represent appropriate new Green Belt boundaries. The study considered that there was no justification for amendment to Green Belt boundaries elsewhere around the PUA.

Implications for the Erewash Core Strategy Review

- 4.32 Both of the strategic Green Belt Reviews above, highlight the strategic importance of the whole of the Green Belt covering Erewash Borough. Although they were carried out in 2006 and 2012, these two studies remain the most recent strategic Green Belt studies covering the whole or part of the Green Belt in Erewash Borough.
- 4.33 The HMA authorities note that neither the Erewash Core Strategy Review Submission document nor the Borough Council's Green Belt Technical Paper make any reference to the two strategic Green Belt studies, which is disappointing. Reference to these two studies would have provided an appropriate background strategic context to inform the Borough Council's approach to Green Belt release in the Core Strategy.

5 Derby HMA Joint Advisory Board – Joint Response to Erewash Draft Core Strategy (9th May 2022)

- 5.1 The Derby HMA Joint Advisory Board (JAB) submitted a joint response to the Erewash Draft Core Strategy on 9th May 2022, on behalf of the four HMA authorities. In respect of Green Belt matters the response was as follows:

The Derby HMA authorities remain concerned that parts of the plan have been drawn up without sufficient evidence. We have previously raised the issue of the absence of a comprehensive Green Belt Review in previous consultations and continue to believe that an update of the previous studies (2006 & 2012 partial review) is needed to help make strategic decisions, especially in an area such as Erewash where Green Belt issues are so central to the strategy. At the very least, we consider that a more robust appraisal of options against the existing Green Belt studies is needed.

It is not clear exactly how sites were initially chosen, as the assessment accompanying the initial draft was fairly rudimentary. Indeed, your most recent SA for the plan indicates that there are more sustainable locations further to the east at West Hallam and Draycott. You advised at our JAB meeting on the 26th April 2022 that these sites weren't chosen because they were too large and would provide more land than is needed for the current plan period. However,

in the absence of an up-to-date Green Belt study, it is not clear how much weight should be attached to the conclusions of the further SA. In any event, the size of the sites should not necessarily matter as they could be partially allocated in the current plan and residual land safeguarded for consideration as part of a future plan.

- 5.2 Since the submission of the JAB's joint response above, the HMA authorities note that Erewash Borough Council has published a Green Belt Technical Paper to support its approach to Green Belt matters at the EIP. The HMA authorities consider, however, that the Technical Paper does not address the concerns expressed by the JAB in its joint response and those concerns are, therefore, reaffirmed.