

Department for Environment, Food and Rural Affairs

European Union Review of Less Favoured Areas (to be called Areas facing Natural Constraints) - Response form

Please use this form to provide feedback by answering the questions below. The closing date for the submission of responses is **27 March 2013**.

Responses can be returned by email (preferable) or post.

By Email: anc@defra.gsi.gov.uk

or by Post:

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Your response will help inform the next iteration of the mapping exercise and a wider consultation on the Rural Development regulations later in the year.

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NB: on the form below, please leave the response box blank for any questions that you do not wish to answer. All boxes may be expanded as required.

1. Does the map broadly capture the right areas as Areas facing Natural Constraints ?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Not sure (Please explain below)	<input type="checkbox"/>

The current draft map (v4.1.1 dated 31/01/2013) includes most of the land we would expect to see within the ANC in terms of the English National Parks. The notable exception is Dartmoor & Exmoor where there are significant areas facing natural constraint that have been omitted from the draft area.

ENPAA's preference is for civil parish boundaries to be used as the principle Land Administration Units (LAUs) for the mapping . The parish boundaries tend to be better known and understood by farmers/land managers, they are also less prone to change than electoral wards.

2. What areas captured as Areas facing Natural Constraints should be excluded? Please explain why.

Significant areas of mid and north west Devon are included that currently lie outside the Severely Disadvantaged Areas (SDA). Farming in these areas does not face the natural constraints or the restricted options farmers face within the SDA. Additionally the array of public benefits provided by hill farming is not generally found on the non-SDA land.

Prior to potentially fine tuning out new areas, we believe that it is correct to assess on a case-by case basis whether their inclusion is appropriate by consultation with local farm businesses and organisations and evaluation of the criteria triggering designation

3. What areas not captured should be included as Areas facing Natural Constraints. Please explain why.

In south west England the principal omissions are areas of land to the southwest, west and east of Dartmoor that currently are within the SDA. These areas appear to qualify but are excluded entirely because the parish or ward they lie within contain significant areas of higher quality land away from the hills. This land is subject to natural constraints and are contiguous with land that is included in the proposed ANC. A number of farms which are currently within the SDA /DA have been excluded from the proposed ANC in the Timberscombe area on Exmoor. There is concern that these farmers may be unfairly discriminated against under future support for upland areas. It is hoped that subsequent "fine tuning" will include the option to designate additional areas such as Timberscombe as ANC as they are subject to "other specific constraints"

4. What areas or boundaries should we use to capture land under Article 33(4)?

ENPAA supports the use of article 33(4) to further fine tune the boundaries and suggests that National Park boundaries are considered where necessary. We understand that such boundaries are World Trade Organisation compliant.

5. What criteria we could use to capture land under Article 33(4)?

It is the shape or area of the LAU that has caused some areas that meet the selection criteria to be excluded. In such cases the selection criteria should remain consistent as for other parts of the ANC and the boundary amended by Article 33 part 4. If National Park boundaries are used then the criteria for selecting such Protected Landscapes should be considered.