

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"/>

Only "Very Broadly". This is due to the limitations of the methodology using wards or parishes which misses a lot of constrained land because of the requirement of 60% of the administrative unit to be constrained.

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

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

Using wards and parishes, some areas within the Cotswolds have been identified as ANC. However, the proposed EU methodology, which requires designation only if more than 60% of an administrative unit's agricultural land is subject to one or more constraints, militates against accurate designation. This is particularly so on the Cotswolds where the geomorphology of the area cuts across parish and ward boundaries. For example, the Cotswold scarp extends to 133 square km but cuts across 45 parishes. Consequently, the Cotswolds Scarp and incised valleys are largely undefined by this methodology.

Using the definition of ANC in article 33 2(b):

'At a lower altitude, the presence over the greater part of the area in question of slopes too steep for the use of machinery or requiring the use of very expensive special equipment, or a combination of these two factors, where the constraints resulting from each taken separately is less acute but the combination of the two gives rise to an equivalent constraints.'

would identify much of the Cotswold escarpment and the slopes of the incised valleys around Stroud and Bath. These areas typically have steep slopes with thin calcareous soils. Because of these natural constraints, the slopes are generally no longer used effectively and some sections virtually abandoned as part of the farm

These areas also comply with Article 33(4): Where land management should be continued in order to conserve or improve the environment, maintain the countryside and preserve the tourist potential of the area or in order to protect the coastline.

The Cotswolds is one of the best known landscapes in England attracting some 23 million visits annually. The scarp and incised valleys are a particular draw due to the viewpoints, grasslands and the Cotswold Way National Trail. The steep slopes surrounding Bath also provide the backdrop to the Bath World Heritage Site.

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

Wards and/or parishes, beyond large blocks of upland areas such as Dartmoor and the North Pennines, are too coarse grained. Agricultural Land Classification, as suggested in the background information document, along with topography would provide a method of fine tuning.

Ultimately if no boundary other than ward or parish can be used, parish is the preferred approach.

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

Article 33(4): Where land management should be continued in order to conserve or improve the environment, maintain the countryside and preserve the tourist potential of the area or in order to protect the coastline, describes the Cotswolds perfectly. See response to Q3 above.

It is not clear how the new ANC designation will be implemented. Our recommended approach is a 'pillar 1' top-up to the basic single payment in return for a continued or reintroduced minimum level of farming practice.