

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

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

It seems unlikely that areas of central England are actually facing more Natural Constraints than the Shropshire Hills uplands.

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

The current proposals would disadvantage farmers with genuine need in the Less Favoured Areas in and adjoining the Shropshire Hills Area of Outstanding Beauty (AONB).

The map excludes many of the upland areas that were previously included in the LFA. It appears to be one of the few areas in England where this is the case. This will penalise a wide range of farmers and could be a threat to habitat quality and biodiversity if farmers have to intensify to compensate for lower agri-environment payments.

The needs facing farmers in the LFA has been highlighted through the Shropshire Hills Farming Project. 200 farmers and their families have been targeted through a two year project funded by Leader and Big Lottery Reaching Communities. The project has reinforced the need for further intervention because of the challenges facing these upland farms. An interim report about the project is available on request.

The area excluded if parish boundaries are used includes moorland across the Stiperstones,

Stapeley and the Clee Hills, all of which are commons and are over 500m above sea level. Using the wards as the defining unit would be entirely inaccurate for this area as it would completely exclude the Long Mynd, the Stiperstones NNR and the Clee Hills- All SSSIs and in management agreements due to the high quality of the moorland habitat. These areas are all Grade 4 or 5 under the Agricultural Land Classification.

The Shropshire Hills AONB is characterised by varied geology and therefore varied habitat over a small area. Parish and ward boundaries tend to include uplands and the valleys and over small areas this may mean that the threshold of 60% of each parish or ward facing natural constraint is not reached. For example five parishes meet on Titterstone Clee summit, which faces considerable natural constraint, and the area is therefore excluded in the ANC designation.

Previous investment in these areas has not overcome the natural constraints.

Land management in these areas is important to conserve and improve the environment, maintain the countryside and preserve the tourist potential.

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

They current Less Favoured Area boundaries much better address the needs of farmers in this area.

Agricultural Land Classification- Grades 4 and 5 are much more accurate and should be used in preference to the current ANC mapping methods.

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

This would need further thought. This is a serious issue and we would welcome further discussions with Defra to find ways of addressing it.