

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.

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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"/>

English Heritage is the Government's statutory adviser on the historic environment. Officially known as the Historic Buildings and Monuments Commission for England, we are an executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport. Our principal powers and responsibilities are set out in the National Heritage Act (1983).

Our locus on the issue of the proposed ANCs relates to the fact that upland and less-favoured areas (LFA) of England contain very important historic environment assets, including designated assets such as scheduled monuments and listed buildings, and non-designated assets including traditional buildings, boundaries, historic landscapes and archaeological remains. Some of these latter non-designated assets are of national importance. The uplands and LFAs retain the best survival of land use and settlement dating from the Neolithic and Bronze Age periods in England, often outstanding in a European context. They also retain the highest densities of traditional farmsteads, and the highest levels of such farmsteads in agricultural use in England. Research by us has highlighted the low proportion (often under 20%) of farmsteads that have designated (listed) houses or working buildings, and the important contribution made by the vast majority to landscape character and local economies. The Upland ELS condition 'do not remove boulders and rock outcrops', presents a helpful level of protection to archaeological remains, some of which - though not designated - will be of national significance.

There is a considerable degree of correlation between the new draft ANC maps and the current Severely Disadvantaged Areas (SDA) maps. There is a better fit between the new ANC maps and the existing mapping when the Parish data is used rather than the Ward data, and we would prefer the Parish data set to be used for this reason. The latter has a more accurate fit to upland landscapes and historic areas of small-scale and common-edge farming. For example:

- West Penwith, where parish level mapping extends beyond Towednack into the moorlands around Morvah
- The Black Mountains (omitted from ward/ LAU2level mapping), west of the Golden Valley and where moorland is intermixed with ancient enclosure with small-scale farmsteads
- The Clee Hills, omitted from ward/ LAU2level mapping
- A larger area of the northern part of the New Forest, significant for its common-edge agriculture, in parish level mapping.

Whilst the ward/ LAU2 level mapping includes more fragments of Lancashire mossland than the parish level mapping, the latter includes more substantial area long the Fylde coast.

Some areas appear to benefit from the proposed changes - for example, we are pleased to see that the proposed ANC designation in North Northumberland would include gaps between previously isolated areas of LFA, and extensions in other places. Another such area is the eastern edge of the Pennines in North and West Yorkshire, where in some areas eg south of Masham, a number of scheduled monuments would now be included in the ANC and eligible for the additional Upland ELS options.

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

None - English Heritage is content with the areas captured as ANC.

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

The following areas are significant omissions:

- The remaining moorland areas in West Penwith, Cornwall, as these are farmed as commons and have exceptionally high archaeological value and potential – for land use and settlement dating from the 1st millennium and before, and for the remains of the ore industry recognised through World Heritage Site designation (the Cornwall and West Devon Mining Landscape WHS, which is comprised of a number of large land parcels and is the most extensive UK WHS)
- The Oswestry Hills, specifically the western upland part of the National Character Area (NCA) bordering Wales, an upland landscape which shares many characteristics with those of the Welsh borders – a high survival of traditional farmsteads, with a markedly poor to deteriorating condition compared to those in the eastern part of the NCA, and rich archaeological value and potential conserved by current land management.
- The Isles of Scilly (particularly if the “Ward option” is used), which are extremely rich in archaeological remains of many periods, particularly the Neolithic and Bronze Age.

Additionally:

- In the Pennines, one particular area containing half a dozen scheduled monuments is in the LFA but not within the proposed ANC. This is Hawksworth Moor at the eastern end of Rombalds Moor, in the Leeds unitary authority area. It is not at all clear why this area has

been excluded – the land to the north of the B road which crosses this area is moorland, with a mix of bog, heather, rough grass and bracken. The vegetation has remained similar to the rest of the adjacent upland moorland of Rombalds Moor (including Burley Moor and Ilkley Moor). For the reasons listed above we think this part of Hawksworth Moor should go into ANC. Any form of land improvement in this area is likely to have a negative impact of the scheduled monuments and their settings.

- There are some clusters of scheduled monuments in the North East of England (details can be provided if needed) which were previously in LFAs but are now outside the proposed ANCs. These include areas near Ford; Doddington North Moor; the area between Longframlington and Alnwick; and the area above Titlington (if the “parish option” is used). We do not think this will present a particular problem, as many of these monuments are currently in Higher Level Schemes. However, we feel that the changes may adversely impact on undesignated archaeological remains in these areas. Another such area is between Crook and Esh Winning in County Durham.
- There are likely to be other such cases around the country and we would be happy to continue to work with you to “fine-tune” the proposed ANCs.

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

It is difficult to set these out in detail in this consultation; we are working with colleagues in other agencies using an integrated approach to the environmental management of the whole landscape, including the historic environment. This approach underpins Natural England's revision of National Character Areas and the Ecosystem Services approach. Although we could suggest using boundaries of assets such as those of scheduled monuments, listed buildings, battlefields, registered parks and gardens, world heritage sites and so on, we believe that an integrated approach works better, which takes these historic environment assets into account as well as other natural and habitat criteria, and additionally includes other non-designated historic environment assets. Using this integrated approach, we might suggest using the boundaries of

- areas of heathland and unimproved grassland, with high habitat and archaeological potential (this would capture the The Isles of Scilly, coastal rough ground etc)

We would be happy to work with you to develop this further in relation to ANCs.

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

English Heritage wishes to contribute to multi-objective criteria that use an understanding of historic character as a framework to enhance landscape and sense of place, and which guide change that contributes to sustainable development, including the management of habitats and the historic environment, and which attracts inward investment to these areas.

We would be happy to work with you on developing these criteria; one issue which seems to have arisen through looking at these draft maps is that well-preserved, undesignated archaeological landscapes are not always captured by the draft ANC maps - this might form one such criterion.

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