

## **Summary of Responses to the Consultation on Designation of Areas of Natural Constraint**

In total 15 responses were received. Of these 12 were received from organisations and three from individuals. A list of those who responded to the consultation is attached at Appendix 1.

The majority of respondents agreed with the use of Gross Value Added (GVA) as the preferred economic indicator for fine tuning, that designation should be carried out at ward level and a fine tuning threshold of 90% GVA.

UFU and YFCU stated that they were concerned that the maps the Department had proposed would not be suitable for targeting funding to those areas which were naturally constrained and that significant parcels of SDA land had been left out of the draft maps, while some areas of DA/lowland were included. UFU and YFCU felt that it would not be feasible for any of the relevant stakeholders to support any of the draft maps and insisted that the Department did everything in its power to ensure that the new designation acutely reflected the current SDA.

## **Question 1**

**Do you agree that Gross Value Added should be used as the preferred economic indicator for fine tuning purposes?**

**Please explain the reason for your answer. If you are answering no, please state your preferred economic indicator along with objective reasons as to why it should be used.**

There were 12 responses to this question, ten responses from organisations and two from individuals. A total of six organisations (the Board of Belfast Hills Partnership, Belfast Hills Farmers Group, NSA, GAA, LINI and UUP) and one individual agreed with the proposal. Four organisations (UFU, YFCU, National Trust and RSPB) and one individual disagreed with the proposal. A further two organisations (CNCC and Newry Mourne and Down District Council) made comments but did not provide a direct response to the question.

NSA agreed with the use of GVA stating that the organisation wanted to see as little change as possible from the original LFA. Belfast Hills Farmers Group supported using GVA but felt it was still not a good indicator of natural constraints or representative of land type output. GAA agreed with the use of GVA, noting that it is a sound economic indicator as it takes into account the costs of farming. LINI, whilst supportive of the use of GVA, believed that none of the measures outlined considered any additional value offered by Areas of Natural Constraints beyond basic farm income and that ANC should be considered as a resource offering wider benefits. Newry, Mourne and Down District Council did not state a direct response to the question but believed that an indicator should be used for fine tuning purposes which would mean that current farmers could benefit. The Board of Belfast Hills Partnership, UUP and one individual stated a preference for GVA but made no further comment. UFU and YFCU felt that the maps the Department had proposed would not be suitable for targeting funding to those farmers who are genuinely naturally constrained.

RSPB stated that it did not believe that GVA was an appropriate indicator for fine tuning, adding that more must be done to understand the role of ANC in sustaining High Nature Value (HNV) farming land. National Trust preferred to see greater use of the concept of natural capital/ecosystem services, which in its opinion took a broader more sustainable approach. CNCC, while not directly responding to the question, considered that there was not an economic indicator that captured the full value of SDA land to society.

## **Question 2**

**Taking into account that fine tuning is not feasible at townland level, do you agree that ANC designation should be carried out at ward level?**

There were seven responses to this question, four responses from organisations and three individual responses. Four organisations (the Board of Belfast Hills Partnership, Belfast Hills Farmers Group, NSA and GAA) and two individuals agreed with the proposal. Four organisations (UFU, YFCU, UUP, Newry, Mourne and Down

District Council) made comments but did not provide a direct response to the question.

Belfast Hills Farmers Group and the Board of Belfast Hills Partnership both felt that ward level was the 'less bad' option. Belfast Hills Farmers Group believed that use of either ward or townland level led to anomalies and the Board of Belfast Hills Partnership considered that use of the old SDA boundaries would give a much better reflection of true disadvantage. GAA agreed that ward level was a fair and practical model. NSA and two individuals stated a preference for ward level but did not give any further detail.

UFU and YFCU did not provide a direct response to the question but believed that it was not feasible to support any of the draft maps proposed as significant parcels of severely disadvantaged land had been left out, while some areas of DA/lowland had been included. These organisations believed that the current severely disadvantaged areas map should hold equivalence with the local administrative units. UUP felt that townlands provided a more appropriate administrative unit and believed that all options must be fully explored to ensure that the final map accurately reflects the reality facing Northern Ireland's farmers on the ground in relation to natural constraint.

Newry Mourne and Down District Council also did not directly respond to the question but felt that the ANC designation should be carried out at a level which ensures that as much of the current LFA land is covered as possible.

### **Question 3**

**In your view, does a fine tuning threshold of 80%, or a fine tuning threshold of 90% of Gross Value Added represent a better indicator of significant constraint in a Northern Ireland context? Please explain the objective reasons for your choice.**

There were seven responses to this question, six responses from organisations and one individual response. Five organisations (the Board of Belfast Hills Partnership, Belfast Hills Farmers Group, NSA, GAA and UUP) opted for a threshold of 90%. Newry, Mourne and Down District Council stated that neither option was suitable. Three further organisations (CNCC, UFU and YFCU) made comments but did not provide a direct response to the question.

The Board of Belfast Hills Partnership supported a fine tuning threshold of 90% of GVA stating that this better reflected conditions on the ground. Belfast Hills Farmers Group believed that a 90% threshold was a better (although less than ideal) option as it gave a closer and slightly more objective reflection of land output and avoided slightly more unfair exclusions and inclusions. NSA felt that there were certain situations created by the ward level scheme (e.g. a farm yard in one ward and the farm land in the next) which were unfair and a 90% threshold would help dilute the problem. GAA felt that a 90% threshold was a better indicator of the constraints faced by rural farmers and that operating at 80% would omit large swathes of the most severely disadvantaged areas. UUP also felt that a 90% threshold represented a better indicator of significant constraint.

UFU and YFCU did not support any of the draft maps presented and strongly promoted the use of a designation which reflects the current severely disadvantaged areas.

CNCC did not give a preference but noted that it would seem difficult to justify the 90% threshold.

Newry Mourne and Down District Council believed that as much of the current LFA land should be retained as possible and felt that this would not be achieved by either 80% or 90% GVA fine tuning.

#### **Question 4**

##### **Are there any further comments that you would like to add?**

Seven organisations and two individuals made further comments on the consultation.

The Board of Belfast Hills Partnership maintained that loss of major support for any upland area would have substantial negative impacts and that a maximum retention of ANC support should be sought. Belfast Hills Farmers Group put forward the option of using the current SDA areas instead of townland or ward, stating its belief that virtually no deserving farm business would be excluded if GVA was applied solely on the SDA. The organisation felt that the SDA was a highly accurate reflection of the biophysical criteria and the reality of farming these areas. UFU and YFCU urged the Department to have a designation which accurately reflected the current severely disadvantaged areas. UFU and YFCU furthermore felt that it was not appropriate for the Commission to set regulations which take a one size fits all approach, particularly due to the differences in severely disadvantaged land in the UK and RoI compared with other parts of Europe.

UUP raised concerns about the draft maps, stating that they excluded some areas of agriculturally constrained land currently within the LFA designation and included some non-LFA land. UFU and YFCU agreed with this view, believing it to be wrong that sizeable areas of current DA/lowland become eligible for support, while a significant number of producers farming what is currently severely disadvantaged land would not. UUP urged the Department to fully make use of any flexibility that existed for Member States and regions with all options discussed with the European Commission and noted its opinion that there may be an opportunity for further refinement of the designation before finalised maps must be submitted.

LINI promoted its goal of a vision for the countryside, which would mainstream sustainable farming and see desired outcomes being delivered through Whole Farm Plans.

## **Appendix 1**

### **List of Respondents to the Consultation on Designation of Areas of Natural Constraint**

#### Organisations

- Belfast Hills Farmers Group
- Board of Belfast Hills Partnership
- Council for Nature Conservation and the Countryside (CNCC)
- Landscape Institute Northern Ireland (LINI)
- National Trust
- Newry Mourne and Down District Council
- National Sheep Association (NSA)
- Royal Society for the Protection of Birds Northern Ireland (RSPB)
- Ulster Farmers' Union (UFU)
- Ulster Gaelic Athletic Association (GAA)
- Ulster Unionist Party (UUP)
- Young Farmers' Clubs of Ulster (YFCU)

#### Individuals

- Vincent McAlinden
- Michael McPolin
- Murtagh Walls