



In 2007 we lodged objections to the Finalised Draft of the Glasgow City Plan 2 and proposed changes to the draft plan in 2008 on behalf of **Scottish Allotments and Gardens Society**. We were heard by the Reporter at the Public inquiry in Autumn 2008.

At the beginning of the consultation in 2007 we were very fortunate in that Councillor Martha Wardrop guided us together with Betty Stewart who wrote objections on behalf of the Glasgow Allotments Forum, through the Draft and advised us on how to proceed.

We have just received the summary of the modifications that will be made to the City Plan following the SAGS recommendations and the Reporters comments. We are extremely heartened at the whole consultation process, it was non-adversarial and non-dismissive. The changes show how community groups can have an influence in this new system.

To give a flavour of the input and the arguments we have summarized the changes in three areas (with our comments in green) and included the detailed arguments leading to a revision in ENV2 in the fourth area.

The full report of the modifications to the City Plan can be seen on

<http://www.glasgow.gov.uk/en/Business/City+Plan/reportofmodsaug2009>.

### **Summary of the Changes agreed by City Council**

#### **1. DES 4: Protecting and Enhancing the City's Natural Environment**

Amend second sentence of the Policy Justification section of policy DES 4 by inserting the text, " including individual or communal gardens," after the words "The landscaping elements of new development".

*This enshrines cultivated land (gardens and allotments) as an environmental consideration.*

#### **2. ENV 9: Allotments**

Amend policy ENV 9 by deleting the last sentence of the policy and replacing it with a new sentence to read "policy ENV 2: civil and open space Provision requires developments, of more than 10 dwellings, to contribute to allotment/community garden provision".

*This important as few developments get up to the original requirement of 100 dwellings*

#### **3. Greenspace, gardening and allotments**

Amend policy STRAT 1: Design, point 5, by inserting the text ",allotments" after "green spaces".

Amend paragraph 3.55, last sentence, by deleting the text "(including allotments)" and replacing it with ", allotments".

Amend paragraph 5.30, bullet point (vi), by inserting the text", gardening" after the word "play".

Delete the last sentence of paragraph 5.54 and replace with: "The Council intends to prepare an allotment strategy and will seek new allotment provision as part of the open space obligation for larger developments."

*This has finally recognised allotments an integral part of Greenspace.*

### **Arguments for and against and the Reporters conclusions, and resultant modifications (in italics)**

*This part shows how much work SAGS and GAF need to do to contribute to the council's Open Space Strategy so that it is strong enough to produce the growth in allotments needed.*

#### **ENV 2: Civic and Open Space Provision and DG/ENV 2: Open Space and Public Realm Provision**

##### **Summary of objection(s)**

- Objects to the different requirement for allotment/community gardens provision for Class 1 Residential flatted development (0.05ha) and Class 9 Residential non flatted development (0.1 ha) on the grounds that most new development in the City is flatted and the waiting list for allotments is currently very long. The requirement for allotment/community gardens provision for Class 9 Residential flatted development should be raised from 0.05 ha to 0.1 ha (as it is for non flatted development).

##### **Summary of Council's response(s)**

- The requirements are based on a standard of provision per 1,000 people. In view of the higher population densities that are associated with flatted development compared to non-flatted development, applying the same standard would result in flatted development being required to make provision for more space for allotments than non flatted development. Note that policy ENV 2 has been revised in response to the publication of SPP 1 1.

##### **Reporter's conclusions**

- At the hearing, the council explained that its approach reflects the practical difficulties of providing sufficient land within a high density flatted development. I understand that there is high demand for allotments and I appreciate the view that flatted developments are likely to create more demand than houses with private gardens. At the hearing, objector 32 proposed that the overall requirement for open space could continue to make allowance for high density development but the relative proportion to be delivered as allotments or community garden could be increased to 0.1 hectares.

- In coming to my conclusions on this matter, I have considered the justification for the standards which are applied. Policy ENV 2 is supported by the detailed guidance set out in DG/ENV 2. This states that whilst the policy standards for public realm are taken from the draft of SPP 11, the standards applied to residential development are derived from City Plan 1. Draft SPP 11 applied no distinction between flats and houses in terms of open space provision. Whilst it refers to allotments it did not set a specific target for this. In any event, as explained in paragraph 8.36.37, I consider that reliance on

draft standards which are not included in the finalised SPP 11, is less than ideal. SPP 11 does not contain open space standards, stating that these should be locally justified in the context of an open space strategy.

- For residential development the council has continued to rely on the open space standards established through Policy RES 1 of City Plan 1, which does not specifically refer to allotments. However, the allotment policy of City Plan 1 clarifies that the standard of 0.05 hectares per 1000 population is based on the areas then given over to that use. I find that I have insufficient evidence to justify increasing the standard of allotment provision above 0.05 hectares or to explain why this would be any more or less appropriate in a Glasgow context.

Whilst increasing the standard to 0.1 hectares would make it consistent with that applied to houses, I share the council's concerns about the practical limitations of delivering allotments (or community gardens) in the context of high density flatted developments. I would also be concerned that application of a higher standard would increase pressure for the consideration of a commuted payment to the detriment of the priority given to on site provision. However I do have sympathy with the objectors' views and consider that there is a clear requirement, in the context of SPP 11, for the open space standards in table 2 to be reviewed in the context of the council's open space strategy (see paragraph 8.36.48). This should ensure that consistent and locally justified standards are applied. Once complete it will be a material consideration and will inform any future review of the plan. The council's allotment strategy will also be relevant to inform any future standard for allotment provision.

### **Modifications to ENV 2: OPEN SPACE AND PUBLIC REALM PROVISION**

New residential development (including conversions) is required to provide access to good quality recreational open space. This includes provision for children's play areas, amenity open space/parkland, outdoor sport facilities, allotments and community gardens, in accordance with the standards set out in Table 1 below. *These are interim requirements subject to review, through the council's open space strategy, which is being prepared in accordance with SPP 11. Once complete the open space strategy will be a material consideration and will inform any future review of the plan.*

Where a relative shortage (either in quantity or quality) of any of the open space categories set out in the policy has been identified through an audit (having regard to the distance threshold set out in DG/ENV 2), or where the proposed development could lead to such a shortage, the developer will be *expected to meet the policy's entire requirement for those categories within the development site. If it is demonstrated (to the satisfaction of the council) that this is not feasible, then part (or in exceptional circumstances all) of the requirement may be met by an equivalent financial contribution.*