

To sppconsultation@scotland.gsi.gov.uk

Response to Scottish Planning Policy Consultative Draft April 2009

From: Scottish Allotments and Gardens Society

The Scottish Allotments and Gardens Society (SAGS) represents the interest of the allotment associations across Scotland. In 2007 our audit 'Finding Scotland's Allotments' found 211 active allotment sites and over 6,300 plots. Since then 23 new allotment sites have been created, of which 16 are private initiatives, and over 60 new groups have formed and are looking for land. People are increasingly aware of the contribution allotments can make to health and well being, food security and climate change mitigation and adaptation. Given this rising demand, SAGS believes a target of 1 plot per 300 people by 2018 which requires 17,000 plots and one plot per 100 people or 50,000 plots in 2028 is reasonable. This is still lower than the wartime figure of around 90,000 plots. (1 plot is 200 m²)

We would like to make the following comments to the Scottish Planning Policy Consultative Draft April 2009.

COMMUNITY ENGAGEMENT

Q4; Does this paragraph provide a clear overview of the expectations for community engagement in the modernised planning system?

The allotments movement is anxious to engage in the planning process. This requires clear, identified channels of communication from the planning authorities to nascent groups.

SUBJECT POLICIES

Q6 Is the role of the planning system in assisting climate change mitigation and adaptation clearly highlighted throughout this SPP?

Enabling all those who wish to garden to have access to spaces for cultivation would assist in climate change mitigation and adaptation. That is why we are asking for allotments, community gardens and orchards to be explicitly mentioned in the Sections on Economic Growth, Housing, Rural Development, Historic Environment, Open Space and Physical Activity and Waste Management.

Economic growth

Q7. Is the contribution of the planning system to sustainable economic growth, as explained in this section, clear and easy to understand?

40 ADD

- integrate spaces for local food production in market gardens, allotments, community gardens and orchards in the layout and design of housing developments

43 INSERT *Authorities should therefore adopt a proactive approach to encouraging the reuse of buildings and previously developed land, making use of land assembly, compulsory purchase powers and new techniques such as moveable allotments (based on raised beds) to enable redevelopment opportunities.....*

Housing

Q9. Have the main areas of national planning policy relating to housing been included and are they clearly explained?

ADDITIONAL PARAGRAPH in *other housing needs* after paragraph 68

The increasing call for local food production should be addressed in housing developments. The needs of local people for appropriate spaces for cultivation must be considered through the housing need and demand assessment and local housing strategy. Under the 1892 Allotment Act (Scotland) local authorities have a duty to provide allotments if there is an identified need. Planning authorities should provide spaces for cultivation for those communities in their area who wish to grow some of their own food.

Rural development

Q10. Have the main areas of national planning policy relating to rural development been included and are they clearly explained?

71 INSERT *Planning authorities should encourage economic activity and diversification in all small towns and rural areas, including development linked to tourism, farm diversification and local food production, whilst ensuring*

72 INSERT. *The requirement for development plans to allocate a generous supply of land to meet housing requirements, including for affordable housing (which must have greenspaces for community cultivation) applies equally to rural and urban areas. Planning authorities should support more opportunities for small scale housing development in all rural areas including clusters and groups in close proximity to settlements, replacement housing, plots on which to build individually designed houses, holiday homes and new build or conversion housing linked to rural businesses. All such developments should include land for local food production.*

Historic Environment

Q14. Have the main elements of national planning policy relating to the historic environment been included and are they clearly explained?

91 INSERT. *Planning authorities have a role in protecting and enhancing gardens (including community gardens and allotments) and designed landscapes included in the current Inventory. The effect of a proposed development on a garden, allotment, orchard or designed landscape can be a material consideration in decisions on planning applications.*

Open Space and Physical Activity

Q17. Have the main elements of national planning policy relating to open space been included and are they clearly explained?

111.INSERT *Access to good quality open spaces and opportunities for sport, recreation and gardening makes an important contribution to a healthier Scotland*

COMMENT: although allotment gardening can be regarded as a recreation in the current economic climate and taking climate change into consideration it is becoming a necessity not just a recreation.

NEW SECTION:

INSERT NEW PARAGRAPH AFTER 118.

Under the Allotment Scotland Act (1892) local authorities have a statutory duty to provide allotments where there is a proven demand. Local authorities should demonstrate how they will meet this obligation through their open space audits and open space strategies. The local development plan should identify sites where they can be located within or close to residential areas so all residents will have access to gardening opportunities within half a mile of their dwellings.

COMMENT: Government Legislation clearly states:

"Local authorities are obliged to provide allotments if there is a proven need through land it owns and can also acquire land for purposes of the Allotments Acts by purchase agreement or compulsory purchase, lease, temporary use and adaptation of land.

<http://www.scottishcorpus.ac.uk/corpus/search/document.php?documentid=1250>

Waste Management

Q24. Have the main elements of national planning policy relating to waste management been included and are they clearly explained?

163.INSERT *Residential, commercial and industrial properties should be designed to provide for waste separation and collection taking into account the availability and likely future availability of treatment capacity. As part of tackling climate change, every council should have composting facilities that are local with the compost returned to local groups to enhance the soil for local food production.*

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