



Scottish Allotments and Gardens Society

Response to the draft SCOTTISH PLANNING POLICY 11 – Physical Activity and Open Space. From the Scottish Allotments and Gardens Society (www.sags.org.uk)

1. The Scottish Allotments and Gardens Society was pleased with the specific inclusion of allotments in the draft consultation document. In particular paragraph 6:

“ Areas for horticulture, such as allotments, can be of great value to the local community and offer benefits for the environment. They create an opportunity for local food production, encourage physical activity and healthy eating, offer a place to relax and to learn, and contribute to local biodiversity.”

2. Gardening is more than a recreation. Through their gardening activities, gardeners actively contribute to the well –being of their local community and environment. We ask that ‘accessible gardens’ such as allotments, community gardens and orchards, that offer opportunities to garden to all members of the public are considered separately to other open space and sporting facilities.

Suggested Addenda and changes:

(i) Paragraph 14 • To provide guidance on planning for new sports, recreational facilities **and development of opportunities for accessible gardening such as allotments and community orchards.**

(ii) Paragraph 22: Change ‘local authorities should assess...’ to ‘local authorities **must** assess...’

(iii) Paragraph 23: While we applaud the recommendation in paragraph 23 we would like this strengthened to: For example, in **all** urban and rural areas it **is** appropriate to introduce a separate category to include allotments and other plots such as community gardens, community orchards, city farms and school gardens.

Note: In rural areas there are many people without access to land for growing vegetables and fruit. It can be hard to source affordable healthy food so an assessment of the availability of allotments is appropriate in rural as well as urban areas.

(iv) Paragraph 27: Add: Local authorities also prepare strategies ...outdoor access, **allotments** core paths...’

(v) Paragraph 43: *Note In areas where people do not have access to gardens, allotments, community gardens and orchards should have a high priority.*

(vi) Paragraph 46: Change ‘planning authorities should work with developers...’ to ‘planning authorities should work with developers **and local groups such as allotment associations...**’

(vii) Paragraph 49: Add to ...new developments for sports, recreation **and accessible gardens such as allotments and community orchards...**’

(viii) after Paragraph 52: **insert Paragraph 52b ‘Planning authorities should take cognisance of the value of allotments and community orchards and follow the recommendations that citizens should have access to gardening opportunities within 10 minutes walk of their dwellings’**

(ix) Paragraph 63: Add ‘ ...management of open spaces, recreational areas, playing fields **and accessible gardens such as allotments and community orchards...**’

(x) Paragraph 64: add ‘ where the need for particular types of new sports, recreational facilities **or accessible gardens ...**’

(xi) Paragraph 67: Add ‘...communities’ needs for open space **and accessible gardening opportunities**’

3. Consultation Questions:

(i) *We propose that the audit and strategy should be updated at least every 5 years to inform the review of the development plan. Comments are invited on this proposed timescale for updating of the audit and strategy. Do you consider that there is a need for annual monitoring of changes in local provision of green/open space?*

In the changing dynamic of the urban environment and in particular the acceptance of visionary challenges to conventional approaches to brownfield and greenfield development as propounded in "Shaping neighbourhoods - a guide for health, sustainability and vitality"¹ we believe that an annual monitoring of greenspace and an update of the current vision of future requirements is necessary.

(ii) *Do you agree that the SPP should include a model development plan policy for protection of open space, such as: "Development on areas of open space shown on the Proposals Map, including playing fields and green networks, will not be permitted unless the area has been identified as surplus to the community's current and future requirements through the Council's open space strategy. Where, exceptionally, development affecting an area of designated open space is permitted, the effects on openness will be minimised and the area will be improved and managed for its recreational, educational and natural heritage values in the long term. The planning authority may use conditions or agreements to achieve the objectives of this policy."*

The protection of open spaces should be strengthened. Increasingly with measures to reduce the environmental foot-print it will be necessary for citizens to satisfy most of their recreational, leisure and culinary requirements within walking distance of their dwellings. A model development plan policy should allow such scenarios to be promoted.

(iii) *For development proposals likely to affect other types of open space not included in the remit of **sportscotland**, is there a need for further consultation arrangements, for example with Scottish Natural Heritage or Greenspace Scotland?*

Gardens and gardening have not received the same level of support and funding as sports and sports facilities. It is essential that consultation is held with bodies representing other types of greenspace. At the present moment these are SNH and Greenspace Scotland. Scottish Community Diet project is involved with healthy eating and BTCV run green gyms to encourage healthy exercise so both groups would also have an interest in this area. In the long term we believe that a national body **gardenscotland** should be established for gardening development in Scotland This would have the same role and responsibilities for gardening and gardeners as **sportscotland** fulfills for Sports. It would bring together the separate organisations involved with all forms of participatory gardening activities and would be responsible for the protection, promotion and development of accessible gardening for the people of Scotland. We believe that gardening presents similar recreational benefits for the individual as Sports, improves the local ecology, encourages healthy eating and in the case of allotments, has great community benefit. **Gardenscotland** would ensure that peoples gardens such as allotments, school gardens, orchards and city farms receive the same protection and consultation in the planning process as that afforded to **sportscotland**.

*(iv) Should controls extend to demolition of facilities, to avoid the potential for removal of sports facilities without consultation with **sportscotland**?*

¹: Barton, Grant and Guise 2003. Published under the auspices of the World Health Organisation – Healthy Cities Movement

We agree that such protection should be afforded to sports facilities. In addition such controls should extend to the demolition of gardening and commercial horticultural facilities to avoid the potential of removal of accessible gardening opportunities and provision without consultation with a relevant body.

□(v) These standards are derived from the research into Minimum Standards for Open Space. *Do you consider the proposed standards and thresholds to be appropriate? Are there other types of development that you consider should be included in the standards?*

We would like to see minimum standards that apply to accessible gardening opportunities to ensure that everyone has the opportunity to garden. Barton et al (op cit) recommend:

‘ Allotments should be close enough to homes to permit easy access by foot, carrying tools, organic wastes or produce. The guideline maximum distance suggested is 200 m, taken as a feasible wheelbarrow or bucket-carrying distance.... Local Plans could require all new brownfield housing development over a certain net density to include community garden space and appropriate management mechanisms’

We recommend that Councils assess the demand for accessible gardens and ensure that all those who wish have access to gardening opportunities and an accepted size of plots is 200m² which is comparable in area to an average suburban garden.

The Allotments (Scotland) Act 1892 states that ‘ on a representation in writing to the local authority of any burgh or [parish] by any six registered parliamentary electors or ratepayers resident.. [in a burgh or parish]... the local authority shall take such representations into consideration. If the local authority of any burgh [parish] are of the opinion either after inquiry made in consequence of such representation or otherwise that there is a demand for allotments ...the local authority, subject to the provisions of this Act, shall by purchase or leasing acquire any suitable land which may be available whether within or without said burgh or the said parish, adequate to provide a sufficient number of allotments.’

This seems a fairly clear mandate but local authorities question it and many are not fulfilling their obligation under the Act. Therefore SAGS suggest that a planning note clarifying the duties and responsibilities of Councils in regard to requests from a group of residents is urgently required. This should include a model allotment development plan with ways that the demand for allotments and accessible gardening should be assessed and minimum standards for provision and maintenance.

□(vi) These standards are intended as minimum standards, with local authorities adopting their own more stringent standards where appropriate. *Should there be a different set of minimum standards for the quantity of open space required in developments in rural areas? Do you have views on appropriate thresholds and quantities?*

Rural areas have a need for gardening opportunities. For example, many small mining towns have allotment sites that are central to the environmental and social fabric of the community. Other rural townships have a need for standards of accessible gardens. The Chair of the Strategic Policy Committee, Argyll and Bute Council states that ‘Taking data from the 2001 Census there is approximately 25% of the population who are unlikely to have direct access to a garden.’²

We recommend that rural Councils are also asked to assess the demand for gardening opportunities and ensure that all those who wish have access to plots in community gardening developments.

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² Communication to the Dunoon and District Allotment Association Sept 14th 2006