Firstly, thank you for taking allotments and allotment provision out to consultation once again, and for asking us as an organisation to answer questions as part of that process. As you will have understood allotments are an emotive subject, with passionate people at all levels behind the scenes making growing on a small scale possible.

It will be clear from the evidence presented there is a lack of clarity over who’s duty it is to provide allotments and that the legislation is possibly outdated and not tight enough to encourage some Local Authorities in Wales to do more.

This written paper will specifically look at some of the options for allotment provision that currently exist, it will provide some thoughts as to why these differences occur. The details in this paper are taken from my own direct involvement (through my work with Cultivate & Open Newtown) and also through my years of work supporting community food growing across Wales with Social Farms & Gardens. This means the content is factual, current and is seen from both sides.

A fairly standard model of delivery would be that of provision through a Local Authority or the larger City Councils. This is where land is acquired for the specific use of allotments. I think it’s fair to say most of the allotment sites operating under this model have been around for a long time, and many date back to the after war years. There is little evidence of local authorities or City Councils providing land for new allotment sites (although some are providing new sites in order to attempt to close an existing facility). These sites are quite clearly ‘Statutory Provision’ sites so benefit from some state protection. The options for managing these sites varies – some LA’s & City Councils will employ allotment officers whose role it is to manage the comings and goings of tenants and to deal with the host of issues that allotment sites throw up from time to time. Other sites (particularly those where sites are geographically spread across a large area – particularly LA’s) may opt for two other types of management. Devolved management is where full responsibility for the site is devolved to a local ‘Allotment Association’ and they would deal with all issues including rent and the changing of tenants, and most if not all of this money stays within the site for future needs. The other half way house is where responsibility for a particular site is given to an individual or a group of individuals, they may collect the rent on behalf of the council and deal with the day to day oversite,
but management and maintenance would be at the Council level. Often a proportion of the rent would be retained by the site, the remainder going back to the Council.

Powys County Council could be seen as a casing point for the later. It’s a large County with only one officer that has responsibility for allotments (along with his other large workload). The county has somewhere in the region of 40 different allotment sites but only two of these are directly managed by the Council. Whilst Cardiff City Council employs 2 members of staff for allotments and these staff help to manage the majority of the sites across Cardiff.

There are also some Town and Community Councils that provide allotment sites under their powers and in some cases, there is a direct duplication of services to a greater or lesser extent. Using Machynlleth as an example Machynlleth has a Powys County Council provided allotment site and a separate Town Council provided site – with the addition of a very active community food group (Mach Methleon). Machynlleth is a small rural town with a population of just 2,500 yet has 2 forms of allotment provision with the addition of a community group that has been trying to access land for more allotments for several years with almost complete failure despite large interest in their Incredible Edible style growing spaces that have accessible beds outside the library, town hall, sports centre, train station and other public spaces.

Powys County Council has interestingly assisted in the last 10 years to create at least two new sites but working out if they could be classed as ‘statutory’ sites is an interesting question to ask. In the community of Forden several acres of land were shaved off a council owned tenanted farm, £30,000 was invested in site infrastructure (sheds, water butts, paths, communal bays for compost & manure delivery) & grounds preparation. I’m not totally sure of the ownership now but all the management of the site is done by a local group of residents formed to take on the administration of the land. To my knowledge no money flows back to the Local Authority from this site. They have created a wetland / biodiversity area, have a school plot and generally the plots are full even though the community is small and rural. The other site is in Caersws where a similar approach has been taken without the benefit of infrastructure at the time of creation, so plot holders are left to their own devises (within their tenancy) to build suitable structures. The interesting additional features are creation of an orchard on the site and 5 plots are designated as Organic only.

Community Gardens and Community Food groups have been providing allotment spaces for many years across Wales, helping to meet the lack of provision (or accessibility of sites) in some areas. The management of these varies greatly and is almost unique to each individual site. There is a perceived ‘risk’ with these sites as they do not benefit from any statutory protection, and it could be argued Local Authority governance (i.e. the group decide how they are run for the benefit of users).
A few examples of the types of sites are given below:

**Ffarm Moelyci** – Wales’s first community owned farm near Bethesda in North Wales. Moelyci has an active 60 plot allotment site within its farm holding, the allotments are run by a small group of volunteers from the allotment site and have recently secured their own tenancy by purchasing the underlying land the allotments sit on (with room for expansion). This group administer all the management of the site. The site has no running water, poor soil in some cases and restrictions on structures but despite those ‘barriers’ the site is full most of the time.

**Cultivate**, Newtown. Cultivates small community garden on the outskirts of Newtown provides Powys’s largest (in number) of allotments. Cultivate provides ‘Micro’ allotments seen as supportive start up plots, where tools are freely accessible on site, there is access to free compost, free seeds, plugs and the like. Perhaps more importantly Cultivate has some very skilled & knowledgeable growers volunteering at the site so questions can be asked and support given to individuals trying growing for the first time. Plots are rented at £10 a year and the garden supports 42 plots and this year is the first year since their creation there is not a waiting list. Organisations and other community groups are allowed to rent plots at the same price and the likes of probation service, young carers and local schools have all had plots in the past.

**Ashfield Community Enterprise** is another example of a long established community garden providing ‘private’ allotment plots on their site just outside Howey. There site is right next door to an outdoor based childs nursery provision.

**Borth Community Garden** also houses a thriving community owned allotment site, privately rented from a local land owner and supporting over 40 families to grow their own.

Then there are a couple of other greyer areas for allotment provision – I’m aware of some, lets say, completely privately owned and managed sites where in one case (outside of Welshpool) a farmer has provided private plots for growing at a reasonable rent. This is a farmer meeting a demand and diversifying their income and one that is likely to be substantially more than the £150 an acre he may get for a grass keep let. However, there is no oversite, no regulation and little or no protection for the plot holders and I would argue little security of tenure.

Some of the **barriers** that allotment sites encounter (established, new & future sites) have been aired during the consultation, but are worth noting again:

**Planning** – Many authorities take different approaches to planning where allotments and community gardens are concerned. Some are very restrictive even requesting planning permission for raised beds in some cases! Borth Community Allotment site was
challenged by Ceredigion CC for failing to obtain change of use for their site – the case against them was eventually dropped after 18 months of worry when a Minister stepped in to provide guidance to the Local Authority Enforcement team. Cultivates community garden had to go through a lengthy change of use and planning for simple infrastructure (polytunnels and a compost toilet & roundhouse – all essential for the development of an inclusive & supportive site). Planning took so long (over 18 months) that retrospective planning permission was eventually granted.

Transparency of waiting lists, in Newtown for instance, I’m told by Powys County Council there is a five year waiting list for their statutory allotment plots, but no one know who is on the list and where they are on it as the day to day comings and goings of plot holders is left to a local person on the ground. This highlights the other concern muted during the panel discussion that if demand is their provision should be met – but the legislation is too weak to force local authorities to provide provision (they have an unlimited timescale to meet any demand). Newtown only has provision of 25% of the current recommended guidance for its population, yet Open Newtown put in a planning application to create 30 new ones and this received multiple concerns from NRW (due to its proximity to the river) and over 100 letters of complaints from residents close to the site in question.

We know that having facilities on sites aids the uptake and commitment to establishing flourishing plots. Many sites don’t have even the most basic toilet facilities. We know that communal pollytunnles or greenhouses can really give plot holders a head start on raising plants, things such as communal compost and manure bays give large cost savings to plot holders. Communal tool sheds can help to remove the poverty barrier but also allow people to walk, cycle to their plot reducing the need to own a car to access a plot.

If you wanted to know Social Farms & Gardens priorities for allotment provision across Wales they would be:

- A review of the previous consultation recommendations and actions on the points that are still pertinent.
- Gaining a far better understanding of the current provision of allotments across Wales.
- Transparency of waiting lists – possibly with WG / WA oversite of this element.
- A review of allotment law and legislation to highlight the one or two areas that could be changed to allow greater provision.
- Promoting allotment provision through Town and Community Councils, enabling far more reactive bodies to meet demand.
- Some dedicated planning guidance for allotment sites.
• Some detailed guidance on pricing structures for allotments sites so some consistency can be achieved.