

## Log of Responses to WG22211

Respondent	Comments
<b>Q1 Do you agree with the goal of the Welsh Government for allotments and community grown food?</b>	
Cheow-Lay Wee	Yes -This is a vital role, especially with the scientific research showing organic food has benefits for people.
Cyrenians Cymru	Yes Allotments are about far more than growing food, and contribute in all kinds of ways to community cohesion.
Capita	<p>Yes - I sit on the CLAS Cymru steering group and am actively assisting them with locating suitable sites for community growing, this is a voluntary role. I have suggested meeting with the NFU and YFCA to get their help with the engagement of the farming community.</p> <p>I also act for the Land Trust in Wales who are more involved in managing sites on behalf of communities.</p>
Cwmni Nod Glas Cyf.	Ydw <input checked="" type="checkbox"/>
Owen Jenkins	Yes <input checked="" type="checkbox"/> A community garden can only enhance the well-being of an area. No negatives except for the possible eye-sore that can often happen with an abundance of garden sheds and the odd unkept patch.
Gill Wislocka	Yes <input checked="" type="checkbox"/>
Bleddyn Williams	<p>Yes <input checked="" type="checkbox"/> The question is How do you assess needs/demand .you cannot do it by looking at waiting lists. Evidence presented at the previous 2010 exercise indicated that there is a massive latent demand. People do not apply to a waiting list for sites that are not accessible. Examine areas where there are sites within walking distance of all the population. Measure the demand there.it could be as much as 1 in 10 households. Assume then that this could be the latent demand/need in all communities and aim to provide for this.</p>
City and	Yes <input checked="" type="checkbox"/> We agree that community food sites must meet local needs more effectively. Greater participation from

## Log of Responses to WG22211

County of Swansea	the local community, together with a more flexible attitude towards the short and long term use of land will allow landlords to facilitate community growing. The Housing Service is actively encouraging the use of communal land for food growing. We appreciate that traditional allotments can be inflexible and so, we are trying to be open to requests that seek to share a growing space.
Isle of Anglesey County Council	Yes <input checked="" type="checkbox"/>
Delegates to Welsh Region of NSALG	<p>Yes <input checked="" type="checkbox"/></p> <p>We already Self Manage 11 allotment sites for the Bridgend County Borough Council we cater for the minority groups ;- drug awareness groups, and Disabled groups, we would also welcome onto our sites any Community Gardeners and City Farm Groups if we had the land available our Allotments at the moment are all full with waiting lists. At the moment it's not a level playing field as all the funding seems to go for Community Gardens. Allotments are covered by legislation yet receive little or no funding in Wales.</p>
Sully Terrace Allotments Association	<p>Yes <input checked="" type="checkbox"/></p> <p>STAA believe that there is strong evidence of health, nutritional, economic, social and environmental benefits to individuals and groups of growing.</p> <p>Other benefits include improved community cohesion and biodiversity.</p> <p>STAA believe that people should have same opportunity to share these benefits regardless of where they live or of their capacity and capability</p>
Denbighshire County	<p>Yes <input checked="" type="checkbox"/></p> <p>Yes I agree with the goal that the Welsh Government is attempting to achieve, but the public need to be fully</p>

## Log of Responses to WG22211

Council	committed to the same goals
Llandough Community Council	N/A
One Voice Wales	Yes <input checked="" type="checkbox"/> In general, this is a worthy goal, and one that our sector would support.
Federation of City Farms and Community Gardens	<p>Yes <input checked="" type="checkbox"/></p> <p>The Federation of City Farm and Community Gardens (FCFCG) was established in 1980, and has operated with a staff team in Wales since 2005.</p> <p>FCFCG has a long association and interest in allotments and the interface between them and community gardens.</p> <p>In 2000 we were part of the LGA / DCLG's task force which resulted in the publication of Growing in the Community, and we were subsequently involved in its revision in 2008.</p> <p>From 2002 – 2012 we project-managed the Allotments Regeneration Initiative in partnership with the National Society of Allotments and Leisure Gardeners (now known as the National Allotments Society) and their counterparts the Scottish Allotment Gardeners Society (SAGS).</p> <p>Our staff team have extensive knowledge of all aspects of community gardening and a deep commitment to allotments.</p> <p>The Community Land Advisory Service (CLAS) was established in Wales in 2013, and is part of FCFCG's service delivery across Wales.</p> <p>We are encouraged to see Welsh Government acting on the Wales Rural Observatory report on the barriers</p>

## Log of Responses to WG22211

	<p>to community growing and supporting the Community Grown Food Action Plan (2010) placing high priority on the social, environmental, health and economic benefits of community grown food. The consultation document is thorough and detailed and presents a real opportunity to shape our communities for the better.</p> <p>We suggest the outcome of this consultation will be of interest to others involved in allotments and community gardening in other parts of the UK and beyond.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	<p>Yes <input checked="" type="checkbox"/></p> <p>No further comment</p>
Mick Antoniwm AM	<p>I strongly agree. Community grown food supports the Welsh Government's sustainability agenda. There are also clear well-being benefits from physical activity, opportunity for social-interaction and the presence of more 'green space' that allotments provide. In my view allotments increase social cohesion by providing opportunities for different generations to interact, offering educational opportunities and promoting inclusion by helping to integrate certain groups (e.g. disabled groups) into the community.</p>
Bridgend County Allotment Association	<p>Yes <input checked="" type="checkbox"/></p> <p>I agree that the Welsh Government should be looking at ways to provide more growing spaces for the people of Wales.</p>

## Log of Responses to WG22211

<p>Food Cardiff</p> <p>This is an endorsement of the FCFCG response with the additional comments in question 1 and 15</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>Food Cardiff, as part of the Sustainable Food Cities movement, feels that it is vital to see growth in the availability and accessibility of land for allotments and community growing. The FCFCG is a member of the Food Cardiff Council and we endorse its consultation response as below making the addition of the comment under Question 15.</p> <p>We are encouraged to see Welsh Government acting on the Wales Rural Observatory report on the barriers to community growing and supporting the Community Grown Food Action Plan (2010) placing high priority on the social, environmental, health and economic benefits of community grown food. The consultation document is thorough and detailed and presents a real opportunity to shape our communities for the better.</p> <p>We suggest the outcome of this consultation will be of interest to others involved in allotments and community gardening in other parts of the UK and beyond.</p>
<p>Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.</p>	<p>Yes <input checked="" type="checkbox"/></p>
<p>Growing Green Teens Project</p>	<p>Yes <input checked="" type="checkbox"/></p>
<p>Natural Resources Wales</p>	<p>We agree strongly with the expressed desire of the Welsh Government to increase provision of and opportunities for community food growing in Wales. As part of this initiative, it would be useful to highlight and support opportunities for all scales of community food production – from</p>

## Log of Responses to WG22211

	<p>local allotments to community supported agriculture and social enterprise development and supply chains – linking in with strategies across the Welsh Government. Links can also be made to promote greater understanding of food production, improved diets and nutrition and cooking with fresh produce. These are crucial issues for the Welsh Government’s tackling poverty agenda and improving quality of life.</p>
National Botanic Garden of Wales	<p>Yes <input checked="" type="checkbox"/></p> <ul style="list-style-type: none"> <li>- Better awareness of what is available for the public</li> <li>- Good facilities are important e.g. access to water, parking, toilets</li> </ul>
Gelligaer Community Council	<p>Yes <input checked="" type="checkbox"/></p>
Cornelly Community Council	<p>Yes <input checked="" type="checkbox"/></p> <p>The availability of land is limited, would it not be better to build new homes with gardens, to allow people to utilise them for growing purposes.</p>
National Society of Allotment & Leisure Gardeners Limited	<p>Yes <input checked="" type="checkbox"/></p> <p>The NAS welcomes this goal. However, we do question the phrasing, repeated throughout this consultation, of “allotments and community grown food”, which reflects outdated assumptions about what allotments are about. Allotments are inherently a form of community food growing, though not one necessitating collective cultivation, or with the problems of organization, commitment and accountability that collectivization entails. The demand for allotments has been outstripping demand in communities across Wales, and the goal reflects what is already legally required of local authorities.</p> <p>In the consultation document there are references to the “historical model” of a “traditional allotment”. Contemporary allotment gardening has moved on from the traditional model of alienated individuals under remote local authority management, to full devolution of management to democratically accountable allotment</p>

## Log of Responses to WG22211

	associations. Policy development is best served by a comparison of good practice in alternative models of food production, without reliance on a dated conception rooted in the 1970s at best.
Penarth Town Council	Yes <input checked="" type="checkbox"/>
FlintShare	<p>Yes <input checked="" type="checkbox"/></p> <p>We strongly support the goal and are pleased that community gardens are recognised as a distinct extension of the more traditional model of allotments as a means for people to produce their own food. However, community gardens are just one type of community supported agriculture (CSA), and other approaches do, in our view, merit inclusion in the overall government strategy because they offer other opportunities for communities to access healthy, locally produced products. For example, some CSA schemes employ a professional horticulturist to provide some or all of the labour. This can help the participation of members of the community who, for one reason or another are unable to contribute their labour. Other CSA schemes link a commercial market gardener with a committed client base in the locality. Several other models are described in the information sheet 'Different models of community growing' published by the Federation of City farms and Community Gardens (<a href="https://www.farmgarden.org.uk/farms-gardens/your-region/wales/1028-welsh-resources-new">https://www.farmgarden.org.uk/farms-gardens/your-region/wales/1028-welsh-resources-new</a>).</p> <p>There is a very limited supply of allotments and community gardens in Flintshire. For the whole Local Authority area there are only 81 individual allotment plots, distributed over 6 sites, (see <a href="http://www.flintshire.gov.uk/en/PDFFiles/Residents/Allotments/Allotments.pdf">http://www.flintshire.gov.uk/en/PDFFiles/Residents/Allotments/Allotments.pdf</a>). The County Council do not even provide any allotments in the county town of Mold. At present in Flintshire the only Community Garden group is FlintShare and there is one CSA scheme linking a professional market gardener to a community of clients.</p>
St Dogmaels Allotment	Yes <input checked="" type="checkbox"/>

## Log of Responses to WG22211

Association	
Egg Seeds	<p>Yes <input checked="" type="checkbox"/></p> <p>I complete this form as a member of Food Cardiff Council, my own business Egg Seeds and Riverside Community Garden.</p> <p>I am an allotmentee of 10yrs; allotment committee member for 5yrs; organic and permaculture grower for 20yrs; poultry keeper 17yrs; Outdoor educator focused on green community development 4 years – hosting community payback team creating and supporting 11 community gardens; Riverside Community Garden manager ( a 10yr old community garden on an allotment site in Cardiff) for 28 months</p> <p>“voted best community growing project in Wales 214, Tidy Wales awards”;</p> <p>Running own business EggSeeds – Self-employed environmental outdoor educator across South Wales representing FACE – farming and countryside education in South Wales, developing with schools or community groups sustainable edible gardens, delivering hatching projects of poultry and waterfowl across all ages 2-18, creating school farms, project manager of community mapping project Root Planner with University of South Wales – First Campus team working with secondary school classes in 4 schools across the region to identify map and suggest uses for potential food, biodiversity or animal keeping sites in their neighbourhoods; horticultural and animal husbandry trainer for National Botanical Gardens of Wales “Grow the future project”, developing community growing spaces with the community, community first teams, as part of RenewWales projects, and direct with council which led to liaison with LA for taking on lease for a derelict patch of land.</p> <p>As a volunteer I am part of Farm Cardiff, a community mapping project, getting neighbourhoods to look at their areas for potential food growing spaces and help them see the potentials through educating about different techniques to grow and rear animals and creating online community map.</p> <p>I sat on the task force that helped create and launch Cardiff Food Charter which has now evolved into a</p>



## Log of Responses to WG22211

	<p>sustainable food council called Food Cardiff run by Katie Palmer who is sustainable food cities coordinator for Cardiff.</p> <p>Over the last 2 years I have also won green volunteer of the year, group volunteer of the year, Inspire Wales volunteer mentor of the year and also Inspire Wales overall tutor of the year.</p> <p>I am happy to expand on any of my suggestions and recommendations if you wish to contact me please do so directly (email address provided).</p> <p>I very much support the goal to see supply of community grown food sites including allotments meet the local need more effectively and I suggest that this idea be taken further to suggest that its goal also meets regional need more effectively ( across local authority (LA) boundaries). Cardiff cannot feed itself. It relies on its neighbouring regions to support demand of its population for a sustainable healthy supply of fresh local produce. It would be a shame to allow or support LA to act in silos. Operating effectively may require a collaborative approach developing local and regional strategies alongside national strategies. This would better utilise resources and support a national database for allotments and community projects as opposed to numerous incompatible non public local databases.</p>
Confidential	<p>Yes <input checked="" type="checkbox"/></p> <p>We rely too much on imports and community grown food is fresher and it helps the environment because it means there won't be so much concrete around and paved gardens which helps wildlife and insects especially bees.</p>
Jocelyn Kynch	<p>Yes <input checked="" type="checkbox"/></p>
Allan Evans	<p>Yes <input checked="" type="checkbox"/></p> <p>The concept is clearly one that needs to be revitalised otherwise skills and experiences will be lost for the next generation. Passing on local growing skills and techniques are vital if allotment holders are to become successful in producing organically grown vegetables that can in turn be used to supply families and</p>

## Log of Responses to WG22211

	vulnerable community members. It provides health gains for individuals as well as providing learning opportunities for children and their families.
Bay of Colwyn Town Council	In general this council supports the goals of the Welsh Government, however, much of the provision are already covered by previous allotment Acts of 1908 1922 1925 and 1950.
Radyr & Morganstown Community Council	<p>Yes <input checked="" type="checkbox"/></p> <p>Loss of allotment sites in the past has made it harder for people without large gardens to grow their own food. New housing developments in our area have not allocated land for community growing, increasing local demand for limited allotment plots. We are not confident that the proposed huge increase in housing in Cardiff's LDP will include sufficient community growing sites.</p>
Lisvane Community Council	<p>Yes <input checked="" type="checkbox"/></p> <p>Lisvane Community Council supports in principle proposals to improve the availability of land for allotments, to protect land for allotments and improve opportunities for community growing, as set out in the consultation paper.</p> <p>There have always been problems when providing land for allotments and community growing. Reducing the waiting lists for those wanting a plot is indeed a major challenge. Many people can have their names on local authority waiting lists for a number of years before a plot is allocated. There are a number of contributing factors, which include the long tenure of allotments by gardeners, unmanaged waiting lists, or absent registers.</p> <p>Registers are needed to record accurate details on types of land, land owners, users and produce grown. The land registers should include:</p> <p>Allotment sites</p>

## Log of Responses to WG22211

	<p>Communal land</p> <p>Areas of farmland rented to growers</p> <p>Areas for schools</p> <p>Through this process there is also an opportunity to recognise and value the benefits that people get from engagement with other people and participation in outdoor activities.</p> <p>While the Community Council is strongly supportive of this initiative, we do not have allotments or community growing within our area and therefore do not have the background knowledge to answer all of the specific questions of the consultation. We would, however, like to be involved in future discussions on the topic.</p>
Cardiff Council	<p>Yes <input checked="" type="checkbox"/></p> <p>Growing has a wealth of benefits for both physical good health and mental well-being. To deliver this there is a pressing need to consider a more flexible approach to the creation of opportunities for community growing, ranging from statutory allotment provision to non-allotment sites, in order to extend the range of options available and encourage more people into local food production.</p> <p>There is general understanding as to what an 'allotment' is, although formal allotment tenancy is not always the most suitable option for those wanting to grow their own food. However, the broader term 'community growing' is less well understood means different things to different people and needs to be properly defined in the context of this exercise.</p>
PLANED	<p>Yes <input checked="" type="checkbox"/></p> <p>Government has to appreciate that there is a need for a flexible approach. Not all community groups or projects will have the same experience, issues, needs or expertise, so appreciating that groups will have different requirements is a good start</p>

## Log of Responses to WG22211

RTPI Cymru	Yes - The planning system has a strong role to play to support this goal - see further comments below.
Cwm Harry Land Trust	<p>Yes <input checked="" type="checkbox"/></p> <p>There is a huge need for this to be pushed from a central agenda. Local authority provision is weak at best, but failing most of the time</p>
CLA Cymru	<p>Yes <input checked="" type="checkbox"/></p> <p>In recent years, the emerging power of the supermarkets has resulted in a decline in people's understanding and appreciation of food. The provision of allotments and community grown food is in our opinion likely to result in a grater connection between people and their food. Apart from the health benefits from the physical work required by either venture, society at large should gain from the wider socio economic benefits fostered by pursuit of shared goals.</p>
Vale of Glamorgan Council	<p>Yes <input checked="" type="checkbox"/> The Vale of Glamorgan has considered allotments and a Draft Allotment Strategy have been approved.</p> <p><a href="http://www.valeofglamorgan.gov.uk/en/enjoying/parks_and_gardens/allotments/allotment_strategy.aspx">http://www.valeofglamorgan.gov.uk/en/enjoying/parks_and_gardens/allotments/allotment_strategy.aspx</a></p>
The Landscape Institute	<p>Yes <input checked="" type="checkbox"/></p> <p>The Landscape Institute's position statement on Green Infrastructure</p> <p>HYPERLINK</p> <p>"<a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf">http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf</a>"<a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf">http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf</a> specifically supports 'Allotments, Small Holdings and Orchards' as places which provide space to restore locally-sourced food production and to connect urban populations with the rural economy. They also offer opportunities to learn about, and gain apprenticeships, in gardening, vegetable and fruit-growing, bee-keeping and horticulture, as well as providing for outdoor places and activities that help to bring communities together and provide an active lifestyle.</p>

## Log of Responses to WG22211

	<p>The Landscape Institute's position statement on Public Health states:</p> <p>HYPERLINK  <a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/PublicHealthandLandscape_FINAL_singlepage.pdf">"http://www.landscapeinstitute.co.uk/PDF/Contribute/PublicHealthandLandscape_FINAL_singlepage.pdf"</a> \n  blank<a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/PublicHealthandLandscape_FINAL_singlepage.pdf">http://www.landscapeinstitute.co.uk/PDF/Contribute/PublicHealthandLandscape_FINAL_singlepage.pdf</a></p> <p>“There has been increasing participation in local food production in recent years. There is much discussion of the benefits, which are often assumed to be obvious. Although causal links between improvements in public health and growing food can be hard to establish, the benefits to wellbeing and community cohesion are accepted. An evidence review for Community Food and Health (Scotland) found that involvement in growing food is linked to improved mental health and wellbeing in a number of ways. These include the development of new skills, increased physical activity and relaxation<sup>54</sup>. An ongoing research study into allotments in Newcastle upon Tyne has produced similar results.”</p>
Torfaen County Borough Council	Agree.
Cardigan Allotments ceredigion	<p>Yes <input checked="" type="checkbox"/></p> <p>Yes I agree- more encouragement of community growing , learning and access to allotments and further guidance and direction to county councils to be supportive of the groups of people who value this activity. Councils offering land in good time to those interested. ( our county said they wanted a large plot of land for yet another rugby field there's 3 already, when we were asking about land for a community forest garden. we spent one year pursuing this only to run out of steam, we now have a forest garden on private land with no charge.</p>
Cwmcarn and Abercarn Allotment	Yes <input checked="" type="checkbox"/>

## Log of Responses to WG22211

Association	
Greener Aberystwyth Group	<p>Yes <input checked="" type="checkbox"/></p> <p>Ceredigion CC is unable to meet demand at present following this consultation rapid progress must be ensured to achieve results on the ground</p>
Llanhilleth Family Allotments Project	<p>Yes – i am passionate about home grown food/fruit and veg and wish to encourage others in my community to have a healthier lifestyle</p>
Watton Allotment Association	<p>Yes – point 17 (p5) is essential to present a piecemeal approach.</p> <p>Waiting lists, providing the site is large enough to support a committee must remain the responsibility of the association</p> <p>Our waiting list is strictly controlled by the committee. Plots are allocated strictly in accordance with it.</p>
<b>Q2. What are the key issues and priorities in Wales for achieving this goal?</b>	
Cheow-Lay Wee	<p>There are too few allotments at present and the waiting lists are so long, that you are literally waiting a lifetime to get an allotment. There is so much unoccupied land in Wales, there should be a mechanism for converting unoccupied land into allotments. Community grown food is also important but there needs to be agreement on areas to be turned into community land. Even ex-industrial land which has not been contaminated can be turned into community areas.</p>
Confidential	<p>Having a decent, quick system of ensuring that current unused allotment space is offered to people who want to grow.</p> <p>Unused public land should be made available on a meanwhile use basis. Even getting data about what land is</p>

## Log of Responses to WG22211

	available is very hard.
Cyrenians Cymru	<p>Authorities should plan for community growing as a central theme. Vetch Veg, Swansea, shows the benefit of town centre schemes of this kind.</p> <p>The Welsh government should make available land for community organisations; third sector etc. to promote community growing among disadvantaged / disengaged groups.</p>
Capita	<p>Getting Clas Cymru access to all publically owned land and encouraging local authorities to release land in their ownership.</p> <p>Promoting different models to conventional allotments, fruit trees can be planted in alongside cycle ways or in hedge rows,</p>
Cwmni Nod Glas Cyf.	Bod tiroedd yn cael eu cynnig i grwpiau cymunedol i'w defnyddio ac i dderbyn canllawiau sut i wneud hyn ym mhob cymuned
Owen Jenkins	The key priority is to enable communities to work together to achieve their goal.
Gill Wislocka	<p>Local Authorities need to understand the law and any guidance.</p> <p>In 2011 Ceredigion CC insisted that to create allotments on agricultural land for our village (St Dogmaels) we needed planning permission. Despite us providing Ceredigion with the law, the case law and recent guidance from the Decisions Division of the Planning Dept. of the Welsh Government they were implacable.</p> <p>The impasse was only solved when Jane Davidson spoke to the Head of Ceredigion County Council.</p> <p>If we had not been so determined that our interpretation of the law was correct we would have given up.</p> <p>I was concerned that the relevant council official told me that all the other allotments in Ceredigion had had to obtain planning permission.</p>

## Log of Responses to WG22211

	I told this officer that if that was the case and the land was originally agricultural land, then the Ombudsman may be interested in this failure to implement the law correctly.
Bleddyn Williams	<p>THE KEY ISSUE TO ACHIEVE THE GOVERNMENT'S GOAL IS TO PROVIDE MORE LAND WITHIN WALKING DISTANCE OF PEOPLE'S HOMES. WITHOUT RECOGNIZING THIS FACT THEN THE REST OF THE STRATEGY IS DOOMED TO FAILURE. THE EMPHASIS BEING ON WALKING DISTANCE.</p> <p>Total amount of land available within walking distance of the population needs to increase dramatically. 30% of households do not have access to a car. Even in households with access to a car, the person who wishes to travel to the allotment may not have access to a car or are able to drive, when they are required to travel. Many people with access to a car do not see that it is economically viable to use it daily to travel to a site.</p> <p>Consequently the take up rate for allotments in areas without a site within walking distance, is much lower. In Caerphilly town where I live, I estimate that there is one allotment plot for every 60 homes. However the take up rate is not uniform throughout the town. e.g. In areas beyond walking distance the take up rate may be as low as 1 in 200 homes. In areas where the sites are within walking distance the rate could be in the region of 1 in 20. Compare this area of the Caerphilly basin with the adjacent area of Bedwas /trethomas and Machen where the ratio is approximately 1 plot for every 14 homes. Therefore Bedwas trethomas and Machen has 4 times the provision as Caerffili. Lack of provision of accessible sites is stifling demand.</p>
City and County of Swansea	<p>Land availability in the right area (matching resident interest with suitable land)</p> <p>Encouraging residents to participate</p> <p>Financial resources</p> <p>Staff resources</p> <p>Planning system</p> <p>Future calls on the land</p>



## Log of Responses to WG22211

	Lack of continued interest from residents which could lead to land being left in a condition which will require considerable resources to reinstate it to its original condition.
Isle of Anglesey County Council	Identifying sufficient land
Delegates to Welsh Region of NSALG	The Shortage of land. The shortage people to serve on committees to run the allotments, mainly shortage of funds to develop land into allotments
Sully Terrace Allotments Association	<p>STAA consider that the key issues are:</p> <p>Demand for community growing land continuing to outstrip supply.</p> <p>Available growing space is not always where demand is highest.</p> <p>Competing pressures on potential / existing sites for housing, roads and commercial development.</p> <p>Barriers to using land for community growing</p> <p>Confusion about rules and regulations</p> <p>Skill, time and or confidence gap of (potential) growers, representative organisations</p> <p>Large number of disparate growing groups</p> <p>Priorities include to:</p> <p>Identify alternative sources of suitable growing land</p>

## Log of Responses to WG22211

	<p>Reduce / remove barriers (economic, planning, contractual) to using land for community growing</p> <p>Match potential land to demand</p> <p>Improve protection for existing community land from commercial development</p> <p>Introduce protection for growers on private allotment sites</p> <p>Provide guidance "How To Best Practice" on community growing to help more people set up and get involved in schemes and increase diversity of growers.</p>
Denbighshire County Council	Key issues are the provision of enough land to be used for cultivation to benefit the local community which in turn aids the well being and mental and physical health, develop skills and help keep the community spirit alive
Llandough Community Council,	N/A
One Voice Wales	We feel that the key issues in some areas will be the availability of suitable tracts of land, and also getting right the best organisational arrangements for each of the respective sites in question.
Federation of City Farms and Community Gardens	<p>The key issues for Wales are -</p> <p>a) To ensure there is a consistent approach to assessing the needs and demands for land for allotments and community growing spaces. This includes mapping current provision and recording demand for growing space. To gain an accurate and detailed picture of the land currently in productive use, land which would be suitable for use and where demand for allotments and community growing spaces is coming from Local Authorities should be supported in collecting this information in a consistent format. Welsh Government should stipulate what information should be recorded by local authorities and how that information is used to</p>

## Log of Responses to WG22211

	<p>influence local initiatives.</p> <p>FCFCG believe that all local authorities should collect the following information:</p> <ol style="list-style-type: none"><li>1. Current provision of Allotments and Community Growing Spaces</li><li>2. Up to date Waiting Lists for current provision.</li><li>3. Where enquires for allotment and community growing spaces are coming from. (An enquiry may not result in a name being added to the waiting list if there is no provision in the Enquirer's local area. Without recording where the enquiries come from vital information on areas of high demand may be lost.)</li></ol> <p>If this is not stipulated by the legislation it is likely that the response from local authorities will remain inconsistent and inequalities in provision will continue.</p> <p>A good example of a local authority collecting and using this information to target provision is Conwy Council who have an Allotment Strategy and five new growing sites based on this information. FCFCG would be keen to work with Welsh Government and Local Authorities to develop appropriate guidelines to ensure an accurate record of demand and supply of community growing space and allotments becomes available.</p> <p>b) To improve the availability and access to sites through more sustainable use of public land and through exploiting opportunities on new development schemes. If need is defined and local authorities produce community grown food strategies, developers can be obliged to provide community growing spaces on new schemes.</p> <p>The Community Land Advisory Service has had discussions with three local authorities in Wales about a standard methodology for defining the need for growing spaces. We are hoping this methodology can be replicated elsewhere in Wales. CLAS Cymru is also exploring opportunities for providing growing spaces as part of 'natural green space' open space provision that local authorities have to provide.</p> <p>c) There is currently no system established to encourage private landowners to make their land available for</p>
--	--

## Log of Responses to WG22211

	<p>community growing and allotments. It is anticipated that the pressures on local authorities to release land assets may mean there is less local authority land, suitable for growing food, in some areas. Other public bodies such as NHS Trusts, Town and Community Councils and educational institutions as well as private landowners should be obliged to make unused land available for growing if there is sufficient demand in the area. FCFCG can provide examples of where this has happened and had a beneficial impact on the local community and environment.</p> <p>d) If demand is defined a landowner needs clear guidance and routes for setting up growing spaces themselves and with the ability to pass on the management of such spaces to a local community group who is keen to grow (devolved management). FCFCG is aware of numerous examples where management of growing spaces has been passed on after the initial set up phase by the landowner (be it local authority, community or town council or private landowner). This is a successful model that could easily be replicated if the tools were defined and made consistent. This would overcome the issues that community groups have with the huge challenges of setting up a new allotment or growing space for themselves.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	<p>Provision of sites must offer an economically sustainable option to the landowner. Provision for growers to sell surplus produce, possibly through the landowner, will help.</p>
Mick Antoniw AM	<p>Clearly there is insufficient land available. Waiting times are currently at ten years in RCT.</p> <p>A joined-up approach which provides a more transparent and fairer means of allocating plots is required. Currently the process for applying for a plot is inconsistent and leads to anomalies, such as people adding their name to a number of lists and thereby distorting waiting numbers.</p> <p>A sense of community ownership is vital, not least because allotments require volunteers to serve on</p>

## Log of Responses to WG22211

	<p>committees etc.</p> <p>Allotment committees need the appropriate support from the Local authority, particularly in respect of dealing with 'problem' leaseholders.</p>
Bridgend County Allotment Association	<p>The key issues are, from the allotment perspective, that there are not enough plots available in the areas where demand is greatest, and that local authorities are so strapped for cash that they are not able to provide the money required to make the available land viable as an allotment. i.e. They are not able to provide funding for land clearance, fencing, paths, community buildings, toilets., etc. Therefore, land that could be utilised is left unused because of lack of funding for essential amenities. The provision of land alone is not sufficient. Our local authority has offered us several parcels of land but no money to provide the basics - fencing, paths, land clearance, as mentioned previously.</p>
<p>Food Cardiff</p> <p>This is an endorsement of the FCFCG response with the additional comments in question 1 and 15</p>	<p>The key issues for Wales are -</p> <p>a) To ensure there is a consistent approach to assessing the needs and demands for land for allotments and community growing spaces. This includes mapping current provision and recording demand for growing space. To gain an accurate and detailed picture of the land currently in productive use, land which would be suitable for use and where demand for allotments and community growing spaces is coming from Local Authorities should be supported in collecting this information in a consistent format. Welsh Government should stipulate what information should be recorded by local authorities and how that information is used to influence local initiatives.</p> <p>Food Cardiff believes that all local authorities should collect the following information:</p> <ol style="list-style-type: none"> <li>1. Current provision of Allotments and Community Growing Spaces</li> <li>2. Up to date Waiting Lists for current provision.</li> <li>3. Where enquires for allotment and community growing spaces are coming from. (An enquiry may not result in a name being added to the waiting list if there is no provision in the Enquirer's local area. Without recording</li> </ol>

## Log of Responses to WG22211

	<p>where the enquiries come from vital information on areas of high demand may be lost.)</p> <p>If this is not stipulated by the legislation it is likely that the response from local authorities will remain inconsistent and inequalities in provision will continue.</p> <p>A good example of a local authority collecting and using this information to target provision is Conwy Council who have an Allotment Strategy and five new growing sites based on this information. FCFCG could work with Welsh Government and Local Authorities to develop appropriate guidelines to ensure an accurate record of demand and supply of community growing space and allotments becomes available.</p> <p>b) To improve the availability and access to sites through more sustainable use of public land and through exploiting opportunities on new development schemes. If need is defined and local authorities produce community grown food strategies, developers can be obliged to provide community growing spaces on new schemes.</p> <p>The Community Land Advisory Service has had discussions with three local authorities in Wales about a standard methodology for defining the need for growing spaces. We are hoping this methodology can be replicated elsewhere in Wales. CLAS Cymru is also exploring opportunities for providing growing spaces as part of 'natural green space' open space provision that local authorities have to provide.</p> <p>c) There is currently no system established to encourage private landowners to make their land available for community growing and allotments. It is anticipated that the pressures on local authorities to release land assets may mean there is less local authority land, suitable for growing food, in some areas. Other public bodies such as NHS Trusts, Town and Community Councils and educational institutions as well as private landowners should be obliged to make unused land available for growing if there is sufficient demand in the area. FCFCG can provide examples of where this has happened and had a beneficial impact on the local community and environment.</p> <p>d) If demand is defined a landowner needs clear guidance and routes for setting up growing spaces themselves and with the ability to pass on the management of such spaces to a local community group who is</p>
--	---

## Log of Responses to WG22211

	<p>keen to grow (devolved management). There are numerous examples where management of growing spaces has been passed on after the initial set up phase by the landowner (be it local authority, community or town council or private landowner). This is a successful model that could easily be replicated if the tools were defined and made consistent. This would overcome the issues that community groups have with the huge challenges of setting up a new allotment or growing space for themselves.</p>
<p>Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.</p>	<p>Few landowners will voluntarily give up their land to allotment tenants who cannot pay large rents, or sell land at a price based on the money value of allotments.</p> <p>In addition to this it is considered the development of an understanding of food growing within communities would be beneficial alongside a training programme to sit alongside any potential developments. These training programmes could also assist in encouraging the use of allotments within communities.</p>
<p>Growing Green Teens Project</p>	<p>Clearer view of current situation and new opportunities for joined up working</p>
<p>Natural Resources Wales</p>	<p>A spatial analysis should be undertaken, mapping land availability (and ownership) close to communities most in need of growing opportunities (whether expressed or not), and SMART proposals developed to ensure that opportunities are provided where they have the most potential to deliver multiple benefits. As the consultation acknowledges, the evidence base needs to be strengthened. The report undertaken by the Rural Observatory whilst useful was research conducted through consultation with <i>existing</i> community growers, not with the demographic who are currently not growing and identifying the reasons why they aren't taking part. Additional quantitative evidence is needed to support the development of a major new strategy that could impact upon legislation.</p> <p>Specific responsibility for leading on and promoting this work and the opportunities it offers needs to be clearly allocated to an existing organisation (or organisations) along with the targets and clout needed to</p>

## Log of Responses to WG22211

	<p>galvanise action. Local Authorities, Community Councils, Social Registered Landlords will have an important role to play, alongside third sector organisations – but responsible leads need to be designated. As local authorities are a local constant with responsibility for long-term planning, they are likely to be the most appropriate for this role. Resourcing this work adequately in the long-term in a time of reducing budgets will be a key issue.</p> <p>Leases or any other agreements entered into locally will need to guarantee long-term interest in sites as far as possible.</p>
National Botanic Garden of Wales	<p>- Good locations and awareness to accessing facility</p> <p>- Knowledge about growing. People are increasingly lacking adequate knowledge about how to grow, and as a result can become demotivated if they make mistakes or do not know how to start - which given the worryingly low base-line of knowledge and skills is inevitable.</p>
Gelligaer Community Council	<p>Availability of land ,.Financial help is required to help set up and maintain and improving sites i.e. provision of sheds, fencing and toilets</p> <p>New sites need water supply, car parking and good access.</p>
Cornelly Community Council	<p>The key issues are likely to be financial and availability of accessible land.</p>
National Society of Allotment & Leisure Gardeners Limited	<ol style="list-style-type: none"> <li>1. Local authorities should be encouraged and enabled to fulfil their legal duty to provide a sufficient number of allotments;</li> <li>2. Local authorities should be given, and should be encouraged to adopt, good practice guidance in managing their allotments, including the fostering of devolved management regime, building on Growing in the Community, A Place to Grow, the NAS's Allotment Officer Fora and Allotment Development Mentors network, and the training provided by APSE, adapted as appropriate to the varied contexts within Wales;</li> <li>3. The NAS also welcomes the prospect of greater support for other, collective forms of gardening, not least as</li> </ol>



## Log of Responses to WG22211

	a route into allotment gardening for those who find they have the time and the necessary commitment to stewardship of a garden of their own.
Penarth Town Council	Identification of available land to be held on a central database together with advice and guidance for land owners and those seeking land for use.
FlintShare	Councils and other public landholders should allocate more of their own land for allotment/Community Garden (A/CG) use. They also need to promote the use of A/CG by local people and to link in with educational bodies or local horticulturists to provide courses/advice on growing. They also need to promote the physical and mental health benefits of A/CGs.
St Dogmaels Allotment Association	To Raise awareness of the legislation from the Welsh Government. Ensure that any changes are adopted by local Councils
Egg Seeds	<p>The big issues for Wales are:</p> <p>a) Having a consistent and transparent process to record and display demand, existence and occupation of growing spaces. This should sit on a national database and be in accessible and compatible formats that are consistent with technology advances. We would want to see at minimum</p> <ul style="list-style-type: none"> <li>-- current provision of allotment and classification</li> <li>-- up to date info on demand/waiting lists and expected delay “can be automated”</li> <li>-- recording of demand, especially where no provision baseline is available</li> </ul> <p>b) Inconsistent development plans and strategies across LA that overlook these provisions or more sensitive strategies to the environment. We suggest that LDP and Biodiversity mapping is consistent and carried out across Wales. It should meet the need for green spaces, allotment provision, community growing space, biodiversity action plans, and the need for sustainable local food to be available to the region. I would like to</p>

## Log of Responses to WG22211

	<p>stress the need to develop housing/infrastructure on pre-existing/underutilized lower quality land, not easily developed high quality agricultural land.</p> <p>c) Cross boundary working for LA whether the LA represent a city, region or another manifestation—guidance and support needs to be given to encourage a more joined up and collaborative approach to planning and delivering allotment strategies and support community growing projects.</p> <p>d) There is no system to encourage private landlords, landowners, developers, businesses to adopt green architecture or to offer up underutilised spaces: land, roofs, car parks or for LA to also engage in similar review.</p> <p>e) There is a need for more open transparent and robust delivery of allotment strategy and spaces by LA that is subject to third party review to make sure LA have adequate community consultation, 3rd sector/interested party input and consultation when developing strategies and tenancy alterations. Welsh Government (WG) could appoint an overseeing team of organisations to provide guidance on best practice gained from FCFCG, tyfu bobl, ARI initiative, CLAS, community food projects, university research, NSALG...</p> <p>It has been apparent that there is an inconsistent engagement of LA with these organisations.</p> <p>f) Need for simple and straightforward process for gaining land for a project or for holding suitable tenancy/lease agreement for activity and site being used historically or in the future. This would mean utilising work being carried out by CLAS to help LA develop tenancies/leases that acknowledge groups and provide a group with some rights and ability as individual i.e. for 10 years riverside community garden has held a tenancy under one individual name as LA don't have the scope to recognise a group as a valid allotment tenant.</p> <p>g) There is a need for clear guidance and support for land owners private or public to release land for community growing projects or allotment provision. This could be done by developing a toolkit and easy guidance and incentives to encourage land owners, farmers, private business, NHS, etc. to open up unutilised land for short to long term use as allotment and or community growing initiatives and to support potential</p>
--	---

## Log of Responses to WG22211

	<p>routes for communities to take over management. FCFCG have many examples of this.</p> <p>h) Agriculture and horticulture are deemed lower jobs and are less respected and paid yet are some of the most important jobs to our healthy survival. We need a food revolution in Wales where we pay our farmers, growers a higher living wage. Local growers organic and non are recognised, celebrated and promoted.</p>
Confidential	Try to educate the population and make the idea of growing food part of the mind set and have this idea firmly rooted in the context of the wider natural environment.
Jocelyn Kynch	<p>1. The aim of increasing vegetable growing is problematic. (J S Mill called it people "growing their own poor rate" and the trade unionist Joseph Arch was opposed to allotments.) Encouragement to grow their own food is experienced as patronising by many poorer people. I would argue that allotments and community growing are primarily social and creative: pretending to be a peasant farmer on an allotment, intergenerational and cultural exchange of knowledge, BME or LGT integration played out over vegetables and flowers.</p> <p>2. Being poor is too time-consuming to also grow vegetables as an aim.</p>
Allan Evans	<p>Lack of high quality plots suitable for allotments use within easy to reach distances from potential allotment holders</p> <p>Skills training - understanding of plants and principles of growing rotations and succession growing</p> <p>Establish a buddy support for the starter novice who has a first plot</p> <p>The supply of seeds and plants and equipment at affordable costs (re cycle tool banks)</p> <p>Good quality fertile soil good site location fenced areas protection from winds</p>
Bay of Colwyn Town Council	The key issues are availability of land and sustainability in which respect Town and community councils could have a greater role, provided they have access to adequate resources (including financial and staffing with appropriate knowledge and skills).

## Log of Responses to WG22211

<p>Radyr &amp; Morganstown Community Council</p>	<p>Ensuring sufficient land is allocated and, where possible, good horticultural quality, productive land is allocated in LDPs and use cannot be changed. Ensure that the sites are easily accessible and not hidden in the corner of development sites.</p> <p>Plots have traditionally been rented as single or half plots. More people would rent and grow food if they were able to rent smaller plots, e.g. quarter plot.</p> <p>The cost of renting should not be a barrier to growing food. Any increases in rental should be gradual and published so that renters can budget. Recent local experience is that half plots have increased from less than £20/year to £52/year over 5 years.</p> <p>Creating and managing a productive allotment takes 2-3 years, depending on the crops and the site condition. Plot holders are unlikely to invest their time and money in a site if they cannot be sure that they can plan for several years.</p>
<p>Lisvane Community Council</p>	<p>The Local Government Association has produced “Growing in the Community” to help those who are responsible for allotment services. Welsh Government guidance needs to be published and circulated to inform and support all those involved in the process.</p> <p>The Welsh Government should encourage and support public and private landowners to make land available for community grown food.</p> <p>This could also have a positive impact in the long term, by promoting growing food, rather than relying on food banks in urban areas.</p>
<p>Cardiff Council</p>	<p>It is important to ensure that any guidance is able to explain the purposes of the allotment legislation as well as provide a set of guidelines dealing with growing issues on non-statutory land.</p> <p>Current allotment legislation may be criticised for being archaic in language, however it is tried and tested and has delivered continuously cultivated land for the production of food for personal consumption for the best part of a century. Whilst this could be criticised for being an overly legalistic process, when administered well it</p>

## Log of Responses to WG22211

	<p>works in the best interest of the land owner and tenant – and those living in the immediate vicinity of the site.</p> <p>Chronic underfunding of existing allotment sites is an issue across Wales. Unless there is adequate funding to enable local authorities and/or other bodies to make adequate provision for serviced allotment sites, there will continue to be discontent expressed by allotment holders.</p> <p>Any guidance must take account of the importance of identifying local needs. A wide range of communities exist across Wales and guidance should acknowledge that what works in a large city may not work in a town or rural area. Engagement with local residents is key to the success of any community based project and to this end it would be helpful to showcase good practices from growing projects across Wales.</p> <p>A further issue is the need to balance increasing demand for land for development (housing and employment) due to population growth against the need for land for growing. This is particularly an issue in urban areas where the population is increasing at a faster rate than in rural areas (and where this population growth is dictated by WG via the LDP process).</p> <p>In planning terms, there is a need to ensure that new housing developments deliver an effective supply of community grown food sites. To this end it is important to ensure that Local Development Plans and related Supplementary Planning Guidance provide a policy framework which enables provision for allotments and community growing in conjunction with new housing development through either on site provision or through planning obligations or Community Infrastructure Levy funding. In this respect it is important that Welsh Government Planning Guidance set out in Planning Policy Wales and Technical Advice Note 16 Sport, Recreation and Open Space is reviewed in parallel with the proposals set out in the consultation paper in order to reflect the wider ambition to provide community grown sites rather than just allotments. Only this way can the Planning system deliver the goal set out above. In addition a consistent and robust evidence base on the provision and demand for allotments would help inform the preparation of appropriate policies in LDP's and is welcomed.</p> <p>What is needed in guidance is a clear, consistent, robust but flexible approach, which does not impose unmanageable or unresourced bureaucratic obligations on either landowners or tenants and minimises the</p>
--	---

## Log of Responses to WG22211

	potential for conflict.
PLANED	<p>PLANED consulted with members of Pembrokeshire Community Growing Network on October 4th and they raised the following issues and suggestions:</p> <p>Planning- WG needs to put pressure on local authorities to put policy into practice and remove barriers, such as planning restrictions on sheds and storage space.</p> <p>Information- the advisory role of FCFCG (including CLAS) is valued and must continue</p> <p>Resources - there can be considerable capital outlay for community growing and there is a need for grants and also schemes such as tool libraries and machinery rings that share rotavators etc.</p> <p>Glastir should recognise and support farmers who make land available for CSA schemes and other community initiatives</p> <p>Living on agricultural land- planning barriers need to be removed so that people are able to live on land (in temporary dwellings) that is deemed agricultural, for stewardship purposes and to raise animals.</p> <p>Seed libraries - should be supported to ensure heritage of plants is not lost</p> <p>Security of tenure- community growers need leases that are longer term than annual in order to develop their plots over a number of seasons.</p>
RTPI Cymru	<p>It needs to be recognised that the planning system, through its development plan, development management and regeneration functions can provide support for the Welsh Government's (WG) goal.</p> <p>Local Development Plans (LDPs) consider future needs and the competing pressures for the use and development of land, including the pressures on existing open land within and on the fringes</p>

## Log of Responses to WG22211

	<p>of urban areas and the need to include open land for a variety of amenity, recreational and leisure uses in major new developments. The policies and proposals of the LDPs are the prime consideration in dealing with individual planning applications for development. Designs for regeneration schemes and major new development areas can include consideration of incorporating open land for amenity and leisure uses within schemes. The provision of allotments and community grown food schemes could be among the uses considered.</p>
Cwm Harry Land Trust	<p>Co-ordinated approach. Guidelines at the very least, or better still local authority targets, that have to be met with consequences if they don't support from local authority - Lack of resources, not seen as a priority</p> <p>Public land mapping service to show what land is available</p> <p>Templates for leases, licenses or Community Asset Transfers</p>
CLA Cymru	<p>Adequate provision will only be achieved through co-ordinated effort. With the current 22 Local Authorities and numerous Community Councils there appears to be no standard means of data collection. This makes the creation of a spatial map a key priority. Whilst useful, the work of the Wales Rural Observatory was limited to existing provision but does provide a sound starting point. Responsibility for the collection of the baseline data should be delegated to a corporate body to ensure that the task is completed and that a standard model approach is applied throughout Wales. We acknowledge that Local Authorities are seeking to rationalise work due to financial constraints hence funding such work could be an issue. However, colleagues already active in this area of work have cited examples of existing good practice within some Local Authorities which could be adopted throughout Wales with minimal development costs.</p> <p>The development of additional allotment areas requires intelligent knowledge of where demand exists. We support the intention to revisit the area of allotment waiting lists. From the consultation paper information, whilst the size of the task can not be underestimated, an overhaul of the system is imperative. Again we would endorse a standard data capture exercise in order to truly evaluate</p>

## Log of Responses to WG22211

	<p>community needs.</p> <p>Comments have been made throughout the consultation paper on increasing the supply of land available. CLA Cymru support examination into the feasibility of integrating existing publicly owned land for the creation of additional capacity. Any requirement for additional land beyond that which can be identified within the public estate needs to be considered separately.</p> <p>Existing legislation acknowledges the differences between private landlords letting land for allotments and local authorities and we seek to maintain that distinction. We suggest that any risk to security of tenure for the private landlord would have an immediate impact on the amount of land available. This is evident from the introduction of the 'assets of community value' (as established in the Localism Act 2011) process which is a deterrent that discourages the making of land available to groups for growing and is therefore counter-productive.</p> <p>We encourage the development and publication of guidance designed to support private landowners wishing to consider creating opportunities for allotments or community growing projects. The guidance must be comprehensive and unequivocal in its coverage of issues such as cross compliance considerations, EU support payments together with clarification on the needs for planning permissions.</p>
Vale of Glamorgan Council	Identifying local need not just demand, identifying funding / resources to progress the priorities, identifying land available, identifying communities who want to undertake community growing cost effectively.
Torfaen County Borough Council	The availability of "suitable" land and funding.



## Log of Responses to WG22211

Cardigan Allotments Ceredigion	allotments should be affordable, land made available
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- Promotion of healthy living</li> <li>- Better understanding and environmental awareness</li> <li>- Community Sustainability</li> </ul>
Greener Aberystwyth Group	<ul style="list-style-type: none"> <li>i/ Identify current provision</li> <li>ii/ Analyse demand</li> <li>iii/ Identify potential land to satisfy current demand</li> <li>iv/ Identify potential land to meet future demand based on perceived population growth</li> </ul>
Llanhilleth Family Allotments Project	To improve the availability of land for allotments, to protect land for allotments and to improve opportunity for community growing.
Watton Allotment Association	Security of tenure is essential, with a reasonable time period and/or a plan to move to a nearby site if necessary. Our waiting list is now 18 potential new members surely this is a good indicator of the need. Its 'umbrella' organisation is essential to monitor provision and control of new sites.
<b>Q3. Do you agree or disagree that guidance specific to Wales should be produced?</b>	
Cheow-Lay Wee	Yes, I do.

## Log of Responses to WG22211

Confidential	As long as it is not a massive 80 page document full of government speak some clear guidance would be useful.
Cyrenians Cymru	Agree - Wales has specific landscape and demography, and guidance should be specific to Wales - but taking account of exemplar schemes in the rest of the UK, Europe and beyond.
Capita	We have the opportunity to come up with innovation in the way communities can grow food this should drive our Wales specific guidance
Cwmni Nod Glas Cyf.	ydw
Owen Jenkins	Agree
Gill Wislocka	Yes unless England will do the same
Bleddyn Williams	<p>Yes I agree. Wales could lead the world in this but as so often happens we have lower standards than the rest of the UK with regard to environmental matters. The problem does not lie with the production of guidelines. It is ensuring the guidelines are followed.</p> <p>The other factor is the content of the guidelines .both this initiative and the previous 2010 effort, appear to have been decided before they were written and no consideration given to other views. There are many guidelines and powers in existence already which are ignored.</p> <p>It is the duty of local authorities when compiling local plans to providing for the competing needs (land use) of the population. They do not do this with regard to allotments. Welsh Government approves the plans even though they do not include allotment provision. Welsh Government approves the sale of statutory allotments</p>

## Log of Responses to WG22211

even though inspectors report indicate that the proper legal procedures have not taken place.( e.g. sale of Pandy rd. allotments Caerffili circa 2003). Local authorities can use compulsory purchase as a means of obtaining allotment lands but do not. They can also use money raised from the sale of unused allotment land in one area to provide land in other areas. They do not use this power. Many local plans (e.g. .Caerffili LDP) have provisions to block development of any area where a development would be detrimental to providing a reasonable level of community facilities locally. This means that a housing development should not go ahead if other facilities such as allotments and playing fields are in short supply. They ignore their own LDPs with approval of Welsh Government. Welsh Government has guidelines which indicate that if there is a shortage of public open space in a community then open space cannot be developed in that area without approval of the Welsh Government. This is either ignored or rubber stamped. Without the will to follow guidelines and Welsh Government monitoring them then the plan will not be successful.

Here is an example of the process to illustrate the above point.

Despite a keen love of gardening I had to give up my allotment in 1987 due to the distance from my home to the allotments. 25min walk there and back. to spend 30min per day in the allotment I would spend the whole evening after work walking there. I had a young family and they needed attention. In 1989 I approached the local council who owned some of the land in the area to provide allotments locally. They said that there were vacancies at other sites in Caerffili so no more would be provided. I did the same in 1995 this time armed with the names of ten other people and had the same reply. I said it was the duty of the council to provide for the demand and was told they need only provide them in the Parish. I said it was a big parish and too far to walk. They suggested I buy a pushbike! In 2000 with less demands from my family I took on an allotment spending 50min walking on each visit. About the same time I was involved with an environmental group in Caerffili who objected to the Proposed UDP as among other things it failed to provide adequate provision for allotments within walking distance. The Council's reply was that there were vacant plots on other sites in the County and produced in evidence a list showing vacant plots some up to 20 miles from my area. We attended a Public Inquiry Chaired by a Welsh Assembly Inspector who agreed with the council on the grounds that. Although the council have a duty to provide sites there is no guidelines on the distance from people's homes they need to be. We pointed out to the inspector that the Assembly has indicated a distance of 600 metres as a distance for

## Log of Responses to WG22211

	<p>replacement allotments and this indicates that the assembly thinks that this distance is reasonable. The Welsh assembly inspector could easily have taken the view that this was a reasonable standard to set and advised the council to revise its plans. He chose not to.</p> <p>In approx. 2005 the new LDP was being drafted and once again I objected to the plan on the same grounds and suggested that a field in my area be earmarked partly for allotments. It was owned by the council and was originally bought for a school site and was no longer required. The plan was included in the deposit ldp. However there was an amendment to the plan and the proposal was withdrawn. Within walking distance of this site over the period 1995-2013 planning permission has been granted for approx. 1,500 homes on 110 acres of ground. The majority of the homes have been bought by people from outside the county so there is not the demand locally for this scale of housing provision. I cannot believe that 2 acres of land could not have been found for allotments. Land was found for a pub and car park, 3 fast food takeaways and an off licence (all within site of the local primary school yard). The proposed allotment site is still unused and has been for 30 years. 120 acres of land has been found for a golf course, 20 acres being on Caerffili Common. A large section of the housing development was owned by the council. The development is surrounded on 2 sides by farmland used for grazing horses and some sold off quite cheaply at auction and not being used and becoming overgrown.</p> <p>There is no excuse for not providing allotments. This indicates to me that THERE IS NO WILL BY POLITICIANS LOCALLY OR NATIONALLY TO PROVIDE GROWING SPACES. THEY PREFER TO ALLOCATE LAND FOR THE SALE OF ALCOHOL AND JUNK FOOD.</p> <p>The 2009/10 initiative will not produce any increase in growing spaces and unfortunately I do not think this one will either. So the process started in 2009 and in 2019 nothing will have improved. 10 wasted years when good growing land is being ruined by mis-use and neglect. What is required is a change of mind set and determination to apply existing guidelines NOW.</p>
City and County of	The Housing Service welcomes guidance on community growing and the provision of community gardens, provided that the guidance is not unduly prescriptive and recognises that there might be particular issues

### Log of Responses to WG22211

Swansea	surrounding particular applications or particular locations. We welcome the link to the anti-poverty agenda and agree that the guidance must address the preventative agenda including health promotion.
Isle of Anglesey County Council	Yes, agree with proposal
Delegates to Welsh Region of NSALG	Yes we agree but within the Allotments Acts
Sully Terrace Allotments Association	Yes.  As above, STAA believe that this is needed to simplify, make fairer and help more people to be involved.
Denbighshire County Council	The information which is currently available is quite comprehensive, but I believe that more local information specific to Wales could help. At the present time you have to search various sites to find out what you require. The Tyfy Pobol Website covers the whole of Wales and information could be channelled either through them or specifically through the Welsh Government.
One Voice Wales	Yes, specific guidance to Wales should be produced.
Federation of City Farms and Community Gardens	We agree that guidance should be produced. As suggested above guidance for landowners, local authorities and growers should be provided and written for each specific audience. To ensure that local authorities are supported in developing this specific area of work, it is important that guidance is drafted with the third sector in mind, outlining what roles they could perform. FCFCG is well positioned to help with many areas of this work e.g compiling guidance, and we are also aware of Member organisations and groups that could help with

## Log of Responses to WG22211

	<p>management of spaces or present a more hands on role in set up of such spaces.</p> <p>FCFCG were part of the taskforce that created "Growing in the Community" in 2000 and it's revised version in 2008. We would be keen to assist in creating a similar set of guidelines and information that would support Welsh Government's objectives and meet the needs of our population. Community growing has increased exponentially in Wales in the last five years. There is now a clear evidence base of good practice in Wales that should be replicated where provision does not meet the aims and objectives set out in this consultation document. Comprehensive guidance specific to Wales that can be used to promote and support this work would be welcomed.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	I agree
Mick Antoniwm AM	I agree that in Wales we should have specific guidance. We have an opportunity in Wales to create a culture where home grown food is commonplace and where the skills and knowledge to do so is shared across the community and down the generations. The potential to enhance the sense of community, which is so important and characteristic of Welsh villages and towns, is huge.
Bridgend County Allotment Association	<p>The guidance that currently applies to allotments would be perfectly ok if it were put into action.</p> <p>Unfortunately, it seems that lack of resources from local government is the reason why so many people are stuck on allotment waiting list, as there is no real interest in providing more allotment plots. This has been the case for the last several years.</p>
Food Cardiff	We agree that guidance should be produced. As suggested above guidance for landowners, local authorities and growers should be provided and written for each specific audience. To ensure that local authorities are

## Log of Responses to WG22211

<p>This is an endorsement of the FCFCG response with the additional comments in question 1 and 15</p>	<p>supported in developing this specific area of work, it is important that guidance is drafted with the third sector in mind, outlining what roles they could perform. FCFCG is well positioned to help with many areas of this work e.g. compiling guidance, and we are also aware of Member organisations and groups that could help with management of spaces or present a more hands on role in set up of such spaces.</p> <p>FCFCG were part of the taskforce that created "Growing in the Community" in 2000 and it's revised version in 2008. We would be keen to assist in creating a similar set of guidelines and information that would support Welsh Government's objectives and meet the needs of our population. Community growing has increased exponentially in Wales in the last five years. There is now a clear evidence base of good practice in Wales that should be replicated where provision does not meet the aims and objectives set out in this consultation document. Comprehensive guidance specific to Wales that can be used to promote and support this work would be welcomed.</p>
<p>Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.</p>	<p>Yes</p>
<p>Growing Green Teens Project</p>	<p>Yes as Wales is unique</p>
<p>Natural Resources Wales</p>	<p>Yes. Wales-specific guidance will promote national 'ownership' of the work, and can be tailored to the Welsh context – e.g. exactly who are the public landowners, how to contact them, what they'll require, response and service standards, common agreements etc. However, the guidance should be developed in partnership with the devolved governments across the UK in order to maximise learning and best practice and to take into</p>

## Log of Responses to WG22211

	account cross-border issues.
National Botanic Garden of Wales	Agree
Gelligaer Community Council	Agree
Cornelly Community Council	Agree.
National Society of Allotment & Leisure Gardeners Limited	The NAS supports the production of guidance for Welsh local authorities on their role in promoting and supporting community growing activities, which should include a clear statement of duties and powers under the existing Allotments Acts, the generic logic underpinning current good practice documentation such as Growing in the Community and A Place to Grow, and explicit recognition of the diverse challenges faced in providing and administering allotments in Wales.
Penarth Town Council	The work already produced by the Federation of City Farms and Community Gardens could be built upon.
FlintShare	We agree.
St Dogmaels Allotment	Yes we Agree , specific guidance is needed because Wales is a strong, smaller community to implement change in this way and to produce the guidance using the Welsh language



## Log of Responses to WG22211

Association	
<p>RSPCA Cymru</p>	<p>We note that the Welsh Government is proposing the production of guidance focussed on promoting and supporting community grown food.</p> <p>The development of guidance for Local Authorities and others responsible for allotment services provides a clear opportunity to acknowledge and highlight the issue of animals based on allotments. As such, this issue must be a focus of any guidance documents.</p> <p>Animals should not be kept in an Allotment-setting unless they can be provided with appropriate levels of care and a suitable environment. As noted, people have a legal responsibility to take positive steps to ensure they care for their animals properly, providing for their five basic welfare needs. RSPCA Cymru recommends those responsible for allotment sites - such as Local Authorities - draw up an '<i>Animals on Allotments</i>' policy, clearly outlining what species of animals may be kept, how many of these may be kept, and identifying the standards of care which should be delivered. Such a policy should promote to members of the public their legal responsibilities to these animals, and - for certain species - the need to adhere to relevant Codes of Practice. Also, whilst referring to minimum legal requirements, we would encourage bodies to aspire to ensure plot holders meet higher standards of welfare.</p> <p>Additionally, RSPCA Cymru believes those wishing to keep livestock on an allotment space should be able to demonstrate appropriate standards of experience and training. We hope Guidance highlights the significant commitment involved in the keeping of livestock, and urges allotment providers to emphasise this and set benchmarks for plot holders.</p> <p>Guidance may also seek to propose to allotment providers ways in which they may wish to undertake pre-arranged or spot checks in relation to animals being kept on a particular site. Such checks could be undertaken by a Local Authority officer, or a designated person from the allotment society, and Guidance should also outline the appropriate knowledge which such an individual should have to deliver this, as well as any training need required regarding other functions concerning animals at the site.</p>

## Log of Responses to WG22211

	<p>Other pertinent issues which guidance should consider in relation to animals include steps which can be taken to urge plot holders with animals to prominently display emergency contact details should issues arise with their animals; and an individual's responsibilities under the Wildlife and Countryside Act 1981 to not allow non-native species to escape into the wild and measures which can be taken to prevent this.</p> <p>Clearly, the development of Guidance offers the chance to help ensure the welfare of animals on allotments is safeguarded, and RSPCA Cymru would be delighted to work with the Welsh Government on the development of any such messaging.</p>
Egg Seeds	<p>Agree—I would welcome guidance to be created and would recommend engaging FCFCG and taking input from third sector/interested parties of which Food Cardiff are one and knowledge gained from national and international university research. This guidance should be written for the audience in accessible way not just a document but utilising better communication strategies and be produced for landowners, LA, and growers (both groups and individuals).</p> <p>I would expect the use of pattern language in creating this guidance and would welcome an online toolkit - not a lengthy document but an interactive tool that helped compile best practice guidelines, made you aware of processes, support organisations, tools, issues to be aware of, planning guidance and limitations, advice, examples, solutions etc.</p> <p><a href="http://en.wikipedia.org/wiki/Pattern_language">http://en.wikipedia.org/wiki/Pattern_language</a></p>
Confidential	<p>Yes if it could include some sort of initiative to take out the knotweed and plant fruit bushes and hazel and hawthorn instead so that the land that currently supports knotweed could be used for vegetables or fruit trees that would be a godsend. Yes as long as our natural resources are respected. Yes if it stops the decline in our bee population.</p>
Allan Evans	<p>Yes I agree that we have guidance for Wales which sets out our core aims vision and ambitions and also explains how they can be taken forwards. Examples of good practice could be included and contacts of</p>

## Log of Responses to WG22211

	organisations to be included.
Bay of Colwyn Town Council	Disagree that requirements for community growing are different in Wales than other countries and consider that community growing should be promoted beyond national boundaries. However as a devolved government Wales has the opportunity to be more proactive in relation to promoting community growing on land that is set aside from agricultural provision. We therefore think that the existing guidance could be updated to include a section directly relevant to Wales's Strategic priorities, rather than re-writing existing guidance. The guidance should also be circulated widely, to include Town and Community Councils, as we have not previously received it.
Radyr & Morganstown Community Council	Agree
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	The development of specific guidance on promoting and supporting community food would be welcomed. This guidance would provide the opportunity to raise the issue of potential ground contamination associated with brown field sites, the risk associated with their use for growing of fruit and vegetables and steps that can be taken to identify and eliminate that risk.
Cardiff Council	There is general agreement that Wales's specific guidance should be produced, but this should be done in parallel a review of Welsh Government Planning Guidance so it aligns properly with the goal set out above.
PLANED	Agree: In our experience community groups made up of volunteers can find the administration not only a challenge but in some cases a barrier to projects so any assistance and clear, straightforward guidance that

### Log of Responses to WG22211

	can be given would be welcome.
RTPI Cymru	Agree. This is important given the planning system and national planning policy context is specific to Wales.
Cwm Harry Land Trust	Yes - lets lead the way - but guidance can be ignored why not make some of it a statutory provision
CLA Cymru	Agree, as indicated in our response to Question 2 we believe that there is need for comprehensive guidance to encourage participation in such schemes. The knowledge requirements may however be audience specific. Those seeking to avail themselves of opportunities will have differing needs to those creating spaces, therefore thought needs to be given to the differencing target audiences.
Vale of Glamorgan Council	Good quality guidance does not necessarily need to be specific to Wales as the guidance should be specific to community food growing however it could be appropriate that the guidance is uniformly recognised by all local authorities and used in Wales.
The Landscape Institute	The LIW agrees that Wales-specific guidance would be a positive step, but we feel it is essential for this thinking and guidance urgently to influence the 'Positive Planning' process - the Welsh Government's comprehensive reform of the Planning System. [Please see more on this in our answer to Q 21.]
Torfaen County Borough Council	Torfaen manages its allotments in accordance with allotment law. There are two Allotment Associations who are under a Devolved Management Agreement of which there are 40 allotment sites and approximately 1000 plots of varying sizes. Welsh Government guidance would provide overall consistency.
Cardigan Allotments Ceredigion	Yes.
Cwmcarn and Abercarn	Agree

## Log of Responses to WG22211

Allotment Association	
Greener Aberystwyth Group	Agree however relate to guidance developed elsewhere and adapt to meet particular needs in Wales
Llanhilleth Family Allotments Project	Yes – Particularly for the <u>old industrial ( mining community areas)</u> areas that need to move on and consider other types of work e.g. tourism, farming and growing food.
Watton Allotment Association	Agree – but fail to see how this directly addresses the need to tackle poverty.  Emphasise = health benefits, community cohesion mental well being plus the other points in John Griffiths' foreword
<b>Q4. What issues should the guidance to cover?</b>	
Cheow-Lay Wee	Timescale to responding to requests from residents and to fast track through the planning process Each Local Authority to produce a policy statement Length of leases (but not prescriptive)
Confidential	Options for communities (Communal growing, community allotment etc). Simple process regarding how to get land.
Cyrenians Cymru	Individual allotments, community growing schemes, involvement of community groups and third sector, schemes for young people, schemes for disadvantaged groups, support mechanisms, training, mechanisms for temporary and permanent transfer of land etc.
Capita	Could Welsh Government set up a team of Expert advisors that communities can draw on, this could include ADAS to advise on soil quality and improvement methods. Aberystwyth University for advice on crop growing.

## Log of Responses to WG22211

	Clas Cymru for help in sourcing land
Cwmni Nod Glas Cyf.	popeth er mwyn cefnogi cymunedau sydd heb ystyried beth yw'r ffordd ymlaen
Owen Jenkins	The guide line should always be to consult the community- and to try and achieve the community aim. It should not be prescriptive.
Gill Wislocka	Ensuring that Councils know the law & any guidance
Bleddyn Williams	WALKING DISTANCE TO HOMES  PROTECTION OF EXISTING LAND .MIS-USE OF LAND IS COMMON, MAKING IT INCAPABLE OF CULTIVATION IN FUTURE.  FORCING LOCAL AUTHORITIES TO PROVIDE LAND BY USING EXISTING POWERS ,CPO'S AND LDP'S
City and County of Swansea	Timescale to responding to requests from residents and to fast track through the planning process Each Local Authority to produce a policy statement Length of leases (but not prescriptive)
Isle of Anglesey County Council	As many issues as possible relating to the goal
Delegates to Welsh Region of NSALG	Promote and Protect Allotments with adequate funding All proposed sites should be developed in the community within 1Km where there is a demand. Allotments should be part and parcel within the community
Sully Terrace	How to identify potential growing land and bring into use. Reduce / relax planning rules whilst protecting /

## Log of Responses to WG22211

Allotments Association	<p>conserving environment / amenity land. Protect landowners and growers.</p> <p>Allocation of growing land to individuals and groups – ensure access is fair.</p> <p>Good practice for community growing: from how organisations run, proper cultivation, activities and structures, environmental protection, public liability.</p>
Denbighshire County Council	Guidelines on how to obtain private land (with a willing landlord) and how to set up your own allotment society to manage and run the areas.
Llandough Community Council,	N/A
One Voice Wales	
Federation of City Farms and Community Gardens	<p>The guidance should cover:</p> <p>1) Welsh Government objectives, clearly setting out local authority responsibilities with regard to the provision of Allotments and Community Growing Spaces including the adoption of Community Grown Food Policies.</p> <p>2) A minimum requirement and recommended method for the collection of data regarding allotment and growing space provision, waiting lists and geographical demand. It should also encourage all local authorities to assign responsibility for work and enquiries to an officer or team to make it easier for members of the public to report demand and request information. There should also be guidance on how to use the data to satisfy local demand.</p> <p>3) Information on different models of community growing including, but not limited to, Allotments, Community Gardens, Community Orchards, public edible planting, Community Supported Agriculture. FCFCG are well</p>

## Log of Responses to WG22211

	<p>placed to provide information on the different models and provide examples of good practice.</p> <p>4) How to identify appropriate land for new sites, including working with private landowners where public land is not available in areas of high demand.</p> <p>5) Encouraging public land to be made available for growing even where there is scope for development in the medium to long term. Explaining the use of "Mean-while" leases to satisfy demand for growing spaces.</p> <p>6) Encouraging partnership working and utilizing third sector organisations with knowledge and experience in this field to increase local authority capacity.</p> <p>7) Explanation of the basic requirements of allotments and growing spaces (access, water, storage facilities) and advice to local authority planners to regard these basic facilities as essential for the creation of a successful site. Ideally, local authorities should be required to provide these facilities, or allow the site management committees to develop them under the local authorities own development rights (General Permitted Development Order).</p> <p>Welsh Government has funded FCFCG to produce a comprehensive guide for Setting up a Community Growing Project which will be launched next year. This provides a toolkit for groups wishing to create and manage community growing sites. This will be a valuable resource for groups and landowners which will empower communities to grow. FCFCG would be pleased to work with WLGA or a similar organisation to develop a toolkit for public and private landowners based on this work.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration	<p>The full food chain. Guidance should cover all potential ends of the chain - ie will food be eaten by the grower or extended families/friends? Will it be bartered, traded/sold? All demands and all potential markets for food produced should be covered in the guidance. This should include selling through the 340+ Community Food Co-ops that have started in Wales in the last decade.</p> <p>Guidance should also cover long term potential benefits from producing community grown food ie career progression into commercial horticulture, signposting to follow on initiatives such as Farm Start Schemes.</p>



## Log of Responses to WG22211

Unit.	This will enable community growing to create long term benefits to Welsh horticulture in general.
Mick Antoniwm AM	The guidance should be robust enough to ensure that sufficient land is made available to meet demand, to ensure that plot distribution is fair and equitable, to ensure that high standards are maintained, to ensure that site location is sufficiently close to the demand (i.e. within walking distance) and to define what constitutes an allotment verses, say a 'village farm'. This final point is important since the presence of livestock has the potential to change the site's relationship with the wider community. This is not to say that livestock should be discouraged, but that the impacts on the community (both positive and negative) should be considered.
Bridgend County Allotment Association	The current state of provision is not sufficient to cover the demand in certain areas. Some areas are sufficiently covered, and there is no waiting list. Others have long lists. The barriers seem to be lack of funding and lack of interest from our local authority. I cannot speak for other areas.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	<p>The guidance should cover:</p> <ol style="list-style-type: none"> <li>1) Welsh Government objectives, clearly setting out local authority responsibilities with regard to the provision of Allotments and Community Growing Spaces including the adoption of Community Grown Food Policies.</li> <li>2) A minimum requirement and recommended method for the collection of data regarding allotment and growing space provision, waiting lists and geographical demand. It should also encourage all local authorities to assign responsibility for work and enquiries to an officer or team to make it easier for members of the public to report demand and request information. There should also be guidance on how to use the data to satisfy local demand.</li> <li>3) Information on different models of community growing including, but not limited to, Allotments, Community Gardens, Community Orchards, public edible planting, Community Supported Agriculture. FCFCG are well placed to provide information on the different models and provide examples of good practice.</li> <li>4) How to identify appropriate land for new sites, including working with private landowners where public land</li> </ol>

## Log of Responses to WG22211

	<p>is not available in areas of high demand.</p> <p>5) Encouraging public land to be made available for growing even where there is scope for development in the medium to long term. Explaining the use of "Mean-while" leases to satisfy demand for growing spaces.</p> <p>6) Encouraging partnership working and utilizing third sector organisations with knowledge and experience in this field to increase local authority capacity.</p> <p>7) Explanation of the basic requirements of allotments and growing spaces (access, water, storage facilities) and advice to local authority planners to regard these basic facilities as essential for the creation of a successful site. Ideally, local authorities should be required to provide these facilities, or allow the site management committees to develop them under the local authorities own development rights (General Permitted Development Order).</p> <p>Welsh Government has funded FCFCG to produce a comprehensive guide for Setting up a Community Growing Project which will be launched next year. This provides a toolkit for groups wishing to create and manage community growing sites. This will be a valuable resource for groups and landowners which will empower communities to grow. FCFCG would be pleased to work with WLGA or a similar organisation to develop a toolkit for public and private landowners based on this work.</p>
<p>Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.</p>	<p>Use of publicly owned land -long term and temporary security of tenure for allotment holders from public bodies as landlords.</p> <p>Long term care and maintenance of sites and liabilities.</p>

## Log of Responses to WG22211

Growing Green Teens Project	Consistent rules and guidance for scope of development
Natural Resources Wales	<p>The Federation of City Farms and Community Gardens is the leading organisation on this issue and is best placed to advice. Much guidance is already available, and will need brigading to make it as audience specific as possible. Wide ranging but specific information is needed by both landowners and communities involved in developing growing projects, and should be tailored for each.</p> <p>The spatial dataset of available land and ownerships (see above) should be included in the guidance and be publicly available and easily searchable (e.g. using postcodes). Natural Resources Wales has a number of datasets that could contribute to this mapping work.</p> <p>Guidance needs to address the Who? What? Why? Where? When? And How? Of Community Food Growing, and should include, for example:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Benefits of community growing for individuals and communities</li> <li><input type="checkbox"/> How to set up a group from scratch – signposting, templates etc.</li> <li><input type="checkbox"/> Securing and managing resources</li> <li><input type="checkbox"/> Roles and responsibilities</li> </ul> <p>How to find a site and assess its suitability – what to take into account</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Negotiating with landowners</li> <li><input type="checkbox"/> Demonstrating the wide-ranging possibilities - involving all section of the community (equality and diversity issues), schools, GP referrals, access issues</li> <li><input type="checkbox"/> Developing a business plan and becoming a social enterprise</li> <li><input type="checkbox"/> Signposting to business mentors</li> <li><input type="checkbox"/> Frequently asked questions and links</li> <li><input type="checkbox"/> Case studies – from both Wales and beyond</li> </ul>
National Botanic Garden of	Again the guidance should include very clear information and help on how to access 'How to Grow' knowledge, skills, and information sources.

## Log of Responses to WG22211

Wales	
Gelligaer Community Council	<p>Guidance on allotment constitutions</p> <p>Training on how to manage allotments</p> <p>Sale of produce to local people</p>
Cornelly Community Council	As detailed in question 2.
National Society of Allotment & Leisure Gardeners Limited	<p>Growing in the Community (Second edition, 2008) and its update A Place to Grow (2010) are not prescriptive documents, but contain generic advice which should be adapted to local contexts. In particular, although the former is strong on health promotion, and the synergistic value to be derived from interacting with other forms of community growing, it does not stress what is in Wales a strong commitment to tackling poverty. Allotments have traditionally been stigmatized for an association with poverty, so the NAS would argue for an approach that is sensitive to that fact, and realistic about the contribution that allotments (and any other form of community food growing) can make to poverty alleviation. The advantage of the allotment model is that the food is at least consumed by the grower, while commercialization can lead to food produced by the poor flowing to those who can afford to pay most for it. The NAS is uniquely well placed to contribute to the production of guidance on allotments for Wales, as the body that represents the allotment gardeners of Wales and supports them through its national representative and its Allotment Development Mentors. It also has exclusive access to the authors of Growing in the Community and A Place to Grow, who are key members of its policy team and were central to the Allotments Regeneration Initiative, which has contributed so much to the modernization of allotments administration, in Wales and beyond.</p>
Penarth Town Council	A lot of very useful information is already produced by way of guidance by the Federation of City Farms and Community Development.

## Log of Responses to WG22211

	Guidance should include roles and responsibilities of growers/tenants and landowners particularly in relation to plots in areas of mixed use such as parks/schools/hospital grounds etc.
FlintShare	<p>The release of public land for A/CG use</p> <p>How to resolve the potential conflict between allocating land for this use, with little financial benefit to the public authority, and offering the land for commercial development.</p> <p>Provision of land for A/CG should be part of a local authority's strategy and action plan on the provision of green spaces. An example of such a strategy framework is the Green Space Framework Strategy for Flintshire: (<a href="http://www.flintshire.gov.uk/en/PDFFiles/Countryside--Coast/Greenspace-framework-strategy-Flintshire.pdf">http://www.flintshire.gov.uk/en/PDFFiles/Countryside--Coast/Greenspace-framework-strategy-Flintshire.pdf</a>).</p> <p>The strategy includes 'Allotments, Orchards, Community Gardens and Community Supported Agriculture' in the list of types of green spaces to be considered, but regrettably the action plan makes no mention of them. Clear guidance to local authorities is needed to ensure that greater priority is given by them to the provision of land for A/CG near to centres of population.</p> <p>Guidance to public authorities is needed to ensure that where provision of public land for A/CG is proposed, it is based on an adequate assessment of the site with regard to safety of users, soil quality and freedom from contaminants that might affect the safe consumption of the produce.</p> <p>Guidance to educational departments of Local Authorities and schools on setting up school gardens for food production by the pupils (for consumption at the school), and for the integration of such practical experiences with the school curriculum.</p> <p>The kind of guidance currently provided by CLAS to landowners and interested community groups should be built upon, to ensure that CSA projects are properly set up, to avoid potential legal or financial pitfalls.</p> <p>The experience gained with the Tyfu Pobl project will also suggest topics and issues that should be covered in</p>

## Log of Responses to WG22211

	<p>such guidance.</p> <p>In the case of allotments, guidance is also desirable in relation to the special provisions that are needed for people with limited mobility, wheel chair users or people with impaired vision.</p>
St Dogmaels Allotment Association	Guidance for Local councils making land available, either private, or council owned. Planning legislation for any change of use and to simplify the process of application to set up and fund Allotments and Community Gardens
RSPCA Cymru	Answered together with question 3 – see above
Egg Seeds	<p>I recognise and support the Federation of City Farms and Community Gardens FCFCG suggestions and have a few additional points along with points mentioned above about making of a pattern language tool kit for people to use. To see an example of this you can refer to the Transition Companion that called its patterns" ingredients" instead. This allowed people to have a few core ingredients when starting out or setting up a group. They then had a whole host of other different ingredients that helped them develop in a way that best suited their personal set of circumstances and environment. These support tools illustrated how, when and why each element they chose linked with other ingredients.</p> <p>t.w.henfrey@durham.ac.uk Tom Henfrey was a lead researcher I have worked with in the past, using pattern language to develop a research toolkit for researchers to engage with transition movement groups and visa versa to develop research useful to both parties.</p> <p>The finished toolkit should be interactive and publically available online to utilise all forms of media - text, video, graphic, and spoken word creating an accessible toolkit for all.</p> <p>The guidance should cover:</p> <p>1) Welsh Government objectives, clearly setting out local authority responsibilities with regard to the provision</p>

## Log of Responses to WG22211

	<p>of Allotments and Community Growing Spaces including the adoption of Community Grown Food Policies.</p> <p>2) A minimum requirement and recommended method for the collection of data regarding allotment and growing space provision, waiting lists and geographical demand. It should also encourage all local authorities to assign responsibility for work and enquiries to an officer or team to make it easier for members of the public to report demand and request information. There should also be guidance on how to use the data to satisfy local demand.</p> <p>3) Information on different models of community growing including, but not limited to, Allotments, Community Gardens, Community Orchards, public edible planting, Community Supported Agriculture. FCFCG are well placed to provide information on the different models and provide examples of good practice.</p> <p>4) How to identify appropriate land for new sites, including working with private landowners where public land is not available in areas of high demand.</p> <p>5) Encouraging public land to be made available for growing even where there is scope for development in the medium to long term. Explaining the use of "Mean-while" leases to satisfy demand for growing spaces.</p> <p>6) Encouraging partnership working and utilizing third sector organisations with knowledge and experience in this field to increase local authority capacity.</p> <p>7) Explanation of the basic requirements of allotments and growing spaces (access, water, storage facilities) and advice to local authority planners to regard these basic facilities as essential for the creation of a successful site. Ideally, local authorities should be required to provide these facilities, or allow the site management committees to develop them under the local authorities own development rights (General Permitted Development Order).</p> <p>Welsh Government has funded FCFCG to produce a comprehensive guide for Setting up a Community Growing Project which will be launched next year. This provides a toolkit for groups wishing to create and manage community growing sites. This will be a valuable resource for groups and landowners which will</p>
--	---

## Log of Responses to WG22211

	<p>empower communities to grow. FCFCG would be pleased to work with WLGA or a similar organisation to develop a toolkit for public and private landowners based on this work.</p> <p>Food Cardiff supports the FCFCG as an organisation to develop the toolkit.</p>
Confidential	<p>How to put back into the soil the nutrients that are needed to sustain a crop. How ornamental gardens are sterile even if they are easy to maintain. How to get rid of knotweed and get the soil back to being able to sustain crops. How to improve connectivity and encourage the pollinators. In Germany, near Osnabruck they had an initiative of planting cherry and plum trees along the road side instead of ornamental trees. I am sure that there are many examples of good practice that other countries have initiated to get communities growing more produce.</p>
Allan Evans	<p>The current situation what the vision is and how it might be delivered what improvements are required to realise this goal and other health and educational gains and the benefits of "plot to plate" supply of food at minimum costs</p>
Bay of Colwyn Town Council	<p>We are not sure what is in it now, but if guidance is required at all and this is not just a costly exercise in bureaucracy then it should encompass the recommendations of the Wales Rural Observation and support the work of the Fcf&amp;cg in promoting biodiversity and community cohesion</p>
Radyr & Morganstown Community Council	<p>Issues specific to Wales such as sites within communities, existing and proposed. Consideration should be given to sites with suitable soils with practical advice for communities without productive land.</p>
Lisvane Community Council	<p>Insufficient involvement with allotments and community gardens in our area to respond constructively to this question</p>
Welsh Land	<p>The issue of risks associated with utilising brown field sites for the growing of fruit and vegetables should be</p>



## Log of Responses to WG22211

Contamination Working Group	identified and the steps necessary to ensure that risk is adequately identified, characterised and mitigated. In addition to contamination risks the allocation of any new allotment land adjacent to watercourses/ sewers needs to be considered. Cardiff have had a number of problems where flooding has occurred and allotment sites have been impacted by floodwaters and sewage.
Cardiff Council	<p>It would be helpful if the guidance could include the following:</p> <ul style="list-style-type: none"> <li>• A clear definition of the terms 'allotment' and 'community growing sites'</li> <li>• Guidelines on how to undertake audits of provision and demand for allotments and community growing space</li> <li>• Target standards of provision of allotments and community growing spaces</li> <li>• Guidance on safeguards to protect areas of open space which are important for amenity value.</li> <li>• Examples of good practice</li> </ul> <p>The guidance should not be too prescriptive – it should allow local authorities to adopt their own measures to meet local demand, but set out model processes. It also needs to be supported at a Wales wide level.</p> <p>Other areas that could be considered within the guidance include:</p> <ul style="list-style-type: none"> <li>• The planning position in respect of development control.</li> <li>• The expectations, rights and responsibilities of the various parties that could be involved in community growing with the emphasis on collective responsibility.</li> <li>• A model constitution which allows a consistent level of governance across disparate community groups while allowing some flexibility to reflect differing circumstances.</li> <li>• A clear process for setting up community gardens indicating the various stages, permissions ,</li> </ul>

## Log of Responses to WG22211

	<p>requirements etc.</p> <ul style="list-style-type: none"> <li>• Guidance for both landowners and community groups wishing to provide or set up land for community growing – ‘how to’ guides for both parties covering – <ul style="list-style-type: none"> <li>o For landowners <ul style="list-style-type: none"> <li><input type="checkbox"/> How to identify sites</li> <li><input type="checkbox"/> How to market them</li> <li><input type="checkbox"/> Forms of legal agreements</li> <li><input type="checkbox"/> Possible uses of sites</li> <li><input type="checkbox"/> How to manage sites</li> <li><input type="checkbox"/> Potential planning issues etc. for landowners</li> </ul> </li> <li>o For community groups <ul style="list-style-type: none"> <li><input type="checkbox"/> How and what to grow on</li> <li><input type="checkbox"/> Planning advice.</li> </ul> </li> </ul> </li> </ul> <p>There are a number of issues that would arise from the use of land for community growing. For example - even if land owners let the land for peppercorn rents there are still initial set up costs to be met, such as legal costs for the licence agreement etc. If local authorities are to play a key role in achieving this goal then WG must fund staff costs to facilitate as a minimum.</p>
PLANED	<p>What support is available and how to access it.</p> <p>Whether or not funding is available for land preparation, installation of rain-water harvesting kit, composting</p>

## Log of Responses to WG22211

	<p>facilities, rabbit-proof fencing etc.</p> <p>Planning: In theory, this should not be an issue. Some groups have had no issues with planning and others have had a great deal of bother - it seems dependent on the local authority to whom you apply. - the guidance needs to be clear to communities and planners. WG should play a role in ensuring that planning authorities put guidance and policy into practice.</p>
RTPI Cymru	<p>From a planning perspective, the guidance should include a clear definition of the planning position and encourage support for allotments and community grown food schemes as part of the operation of the planning system.</p>
Cwm Harry Land Trust	<p>Licences, Leases, Community Asset Transfers,</p> <p>Who to contact for help</p> <p>Good &amp; Bad case studies</p> <p>What constitutes community growing</p> <p>what planning issues might there be - or better still what provision is there for land within planning frameworks already</p>
CLA Cymru	<p>Strategic guidance should aim to answer the basic questions; Why? How? Where? And When?</p> <p>This would allow for an overview of the Welsh Government policy objectives and details of how those policy priorities are to be met in a practical sense. The spatial map created should accompany the guidance to answer the where and when questions.</p> <p>Beyond this practical guidance notes could elaborate on the practical how questions. These should deal with a range of subjects from the practical gardening/food growing side, the health benefits derived, an understanding of the needs of nature, the management of such sites including the needs or otherwise for planning permissions through to the business/property right implications for</p>

## Log of Responses to WG22211

	land owners as described in the response to question 2.
Vale of Glamorgan Council	Community cohesion and how to work together. To develop local food growing, land management, crop rotation, ecological diversity and the Action Plan for Pollinators in Wales
The Landscape Institute	<ul style="list-style-type: none"> <li>• The importance of design and location for new community growing areas to help with the success of the project. A basic level of infrastructure is needed.</li> <li>• Empowering the Community Council &amp; Town Council Plans which are being proposed in the Future Generations Bill to make provision for community growing, and encouraging local ownership.</li> <li>• Actively encourage schools to be growing part of what children eat as we are wanting to encourage a cultural shift.</li> <li>• Within the existing community we have a proportion of older people who are skilled in food growing, such skills are very hard to find and therefore there is an opportunity to reconnect older people with the younger generations to pass down those skills in some form of social development initiative – again this should be encouraged via the future Generations Bill.</li> </ul>
Torfaen County Borough Council	There should be a back-up for local authorities for clarification of allotment law in the event of disputes.
Cardigan Allotments	planning, funding, management structures

## Log of Responses to WG22211

Ceredigion	
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- How to use produce grown</li> <li>- How to obtain land for use as an allotment</li> <li>- How associations should be managed</li> <li>- Guidance/support on funding availability</li> <li>- How allotments can be self-supporting</li> <li>- How to best manage the environment on and around the allotment site</li> </ul>
Greener Aberystwyth Group	<p>Include:- Planning and Monitoring</p> <p style="padding-left: 40px;">Legal</p> <p style="padding-left: 40px;">Management</p> <p style="padding-left: 40px;">Funding</p> <p style="padding-left: 40px;">Obligation to Provide</p>
Llanhilleth Family Allotments Project	As above – encouragement and incentives to grow food
Watton Allotment Association	<p>Land provision – authorities e.g. councils must take a more positive approach to this.</p> <p>Security of tenure</p>

## Log of Responses to WG22211

	<p>Definition of the sites e.g. allotments, community gardens etc.</p> <p>Restriction on commercialisation</p>
<b>Q5. What examples of good practice exist in this area that the Welsh Government should build on to help land be released for community grown food?</b>	
Confidential	Did Brighton do some good work around this? I think all potential growing land, that is publically owned, should be mapped out, updated yearly and presented to the public.
Cyrenians Cymru	Vetch Veg is an excellent example of good practice, as is Flintshire landshare. The WG should look further afield to examples in Europe and the USA.
Capita	The Land Trust who I act for in Wales has a number of examples that are worth examining although not for community food growing
Cwmni Nod Glas Cyf.	gofyn i dirfeddianwyr cyhoeddus sy'n cynnwys cymdeithasau tai i gymryd stoc o'u hasedau a fyddai'n addas ar gyfer rhandiroedd
Owen Jenkins	<p>As a land-owner 1ha of my 25ha farm is given over to a Community garden. It gives me pleasure to see people enjoying the outdoors, growing their own food, entering collaborative projects whilst keeping healthy.</p> <p>A note of caution- Starting an allotment on fresh ground can be very difficult even in perfect conditions. Allocating brown field sites or those in less than ideal conditions (lack of sunshine/ over-exposed- poor soils or drainage) just so that a council could full-fill its obligations is not the answer.</p>
Bleddyn Williams	I am not aware of any
City and County of	Community vegetable/ fruit projects are being established in 2 Sheltered Complexes in Swansea. In the first project set up - the raised flower beds include a sustainable edible garden / vegetable patch section which is

## Log of Responses to WG22211

Swansea	accessible to wheelchair users and those with mobility issues. The raised beds were constructed and filled in collaboration with local Day Centre users and a nearby Work Development Service. The Vetch Veg project is a further example of best practice.
Isle of Anglesey County Council	No comment
Delegates to Welsh Region of NSALG	Self management of allotments should be encouraged, land released should be considered to be statutory
Sully Terrace Allotments Association	Community Land Advisory Service – identify and match land and growers  Land share  RCMA Community Allotments and Market Garden  Vetch Veg  Plot share
Denbighshire County Council	The Authority is currently attempting to create community growing areas within Denbighshire, recently a raised bed site has been created upon a disused Refuse Tip hard standing compound area. Also in the pipeline is a further raised bed (in the centre of Rhyl), this is at the planning stage. This is being created out of an old run down dilapidated multi use play area. As Denbighshire are having difficulty now identifying their own suitable "green" land they are utilising other areas of disused/dilapidated land for use by the local community

## Log of Responses to WG22211

<p>Federation of City Farms and Community Gardens</p>	<p>There are various examples of good practice in the use of land for community growing (see below). FCFCG would be happy to provide further information if required.</p> <p>Several Local Authorities have adopted or created policies supporting and promoting the use of land for community growing. These include Swansea, Wrexham, Monmouthshire, Newport and Powys.</p> <p>Community Growing projects on publicly owned land:</p> <p>Llangattock Area Community Allotments, Llangattock Community Council</p> <p>Cymdeithas y Dalar, National Trust, Carmarthenshire</p> <p>Green Valley Project, Rhondda Cynon Taff CBC</p> <p>Conwy Community Orchard</p> <p>Gerddi Bro Ddyfi Gardens, Machynlleth</p> <p>Community Growing projects on non local authority land:</p> <p>Brit Growers / Our Garden, Valleys to Coast RSL</p> <p>Cultivate / Pen Dinas Community Garden, Coleg Powys</p> <p>Chapter Community Garden, Chapter Arts Centre</p> <p>Community Growing projects on privately owned land:</p> <p>Narbeth Allotments and Community Garden, Pembrokeshire</p> <p>Knucklas Castle Community Allotments, Powys</p> <p>St Peters Community Garden, Cardiff</p>
---	---



## Log of Responses to WG22211

	<p>Hanley Landshare, Chepstow</p> <p>Caerhys Organic Community Agriculture, Pembrokeshire</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	No comment
Mick Antoniwn AM	<p>Community ownership is vital, including the management of waiting lists and allotment sites. This is most effectively achieved through the Community Council.</p> <p>Welsh Government should do all in can to encourage Local Authorities to release land, including using LAs who do so as examples of best practice.</p>
Bridgend County Allotment Association	In our local authority area there is no interest in encouraging local land-owners to provide land for growing - whether for allotments or other growing schemes. I am sure that local farmers/landowners would be prepared to make land available, but there is no pressure on them to do so from our local authority. This is probably because they are afraid that if they were to do this, they would be asked to provide funding for fencing, paths, etc. (as in the previous question) which they do not have.
Food Cardiff	There are various examples of good practice in the use of land for community growing (see below). FCFCG would be happy to provide further information if required.
This is an endorsement	Several Local Authorities have adopted or created policies supporting and promoting the use of land for community growing. These include Swansea, Wrexham, Monmouthshire, Newport and Powys.

## Log of Responses to WG22211

<p>nt of the FCFCG response with the additional comments in question 1 and 15</p>	<p>Community Growing projects on publicly owned land:</p> <p>Llangattock Area Community Allotments, Llangattock Community Council</p> <p>Cymdeithas y Dalar, National Trust, Carmarthenshire</p> <p>Green Valley Project, Rhondda Cynon Taff CBC</p> <p>Conwy Community Orchard</p> <p>Gerddi Bro Ddyfi Gardens, Machynlleth</p> <p>Community Growing projects on non local authority land:</p> <p>Brit Growers / Our Garden, Valleys to Coast RSL</p> <p>Cultivate / Pen Dinas Community Garden, Coleg Powys</p> <p>Chapter Community Garden, Chapter Arts Centre</p> <p>Community Growing projects on privately owned land:</p> <p>Narbeth Allotments and Community Garden, Pembrokeshire</p> <p>Knucklas Castle Community Allotments, Powys</p> <p>St Peters Community Garden, Cardiff</p> <p>Hanley Landshare, Chepstow</p> <p>Caerhys Organic Community Agriculture, Pembrokeshire</p>
<p>Joint response</p>	<p>National Trust project at Craflwyn, Beddgelert.</p>

## Log of Responses to WG22211

from Brecon Beacons, Pembrokes hire Coast and Snowdonia National Park Authorities.	Moelyci Community Owned Environmental Centre, Tregarth North Wales
Growing Green Teens Project	Awards and information, perhaps a dedicated Welsh website
Natural Resources Wales	<p>Natural Resources Wales manages a significant area of land, and receives regular requests from community groups to undertake food growing – particularly on the Welsh Government Woodland Estate – and we are keen to support this wherever possible. Requests are received through our Woodlands and You scheme. Woodlands and You is designed to manage and promote public access to the Welsh Government Woodland Estate (delivering Welsh Government strategic objectives), whilst ensuring high levels of public safety in working woodlands. The scheme is open to groups, social enterprises and individuals and proposals can be made at any time. The woodlands are used for activities and events of all kinds, surveys, training and enterprise ventures, health and well-being initiatives, arts and community regeneration programmes. It is intended that this approach is extended over the next year to include all land owned and managed by NRW. The model could be used and adapted by all managers of public land to facilitate a range of activities and manage risk – including the Welsh Government in relation to its surplus land holdings (details held on the EPIMS database).</p> <p>Over the past two years, we have been working closely with the Federation of City Farms and Community Gardens (FCFCG) and its Community Land Advisory Service (CLAS) initiative. A Memorandum of Understanding is being developed to put the partnership on a firm footing. The Federation and CLAS offer support with issues such as site assessment, group constitution options, project planning and design, and</p>

## Log of Responses to WG22211

	<p>signposting. Successful <i>Woodlands and You</i> applicants enter into Allotment Tenancies – fixed term leases granting exclusive use of designated areas.</p> <p>Criteria for site selection and suitability have been developed with the Federation and CLAS. There are currently two allotment tenancies on NRW managed land in South Wales with further sites being actively investigated and developed. The potential for more is considerable, and a scoping exercise in North Wales is planned.</p> <p>A number of successful schemes provide useful case studies and could inform development – for example:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Caerau and Maesteg Market Garden</li> <li><input type="checkbox"/> The Community Foodie Project</li> <li><input type="checkbox"/> The work of Cynefin in Newport to establish community orchards on underused public land in urban areas</li> <li><input type="checkbox"/> Development of allotments on community farms in north Wales - e.g. Felin Uchaf, Rhoshirwaun, Pwllheli: <a href="http://www.felinuchaf.org">www.felinuchaf.org</a> have developed a biodynamic community garden from which they sell vegetables; Moel y Ci, Tregarth, Bangor : <a href="http://www.moelyci.org">www.moelyci.org</a> - a community farm</li> <li><input type="checkbox"/> Brighton and Hove Allotment Federation - a large area of allotments and community gardens involved in enterprise and marketing: <a href="http://www.brighton-hove.gov.uk/content/leisure-and-libraries/parks-and-green-spaces/allotments">http://www.brighton-hove.gov.uk/content/leisure-and-libraries/parks-and-green-spaces/allotments</a></li> <li><input type="checkbox"/> Leeds - <a href="http://www.leeds.gov.uk/leisure/pages/allotments.aspx">http://www.leeds.gov.uk/leisure/pages/allotments.aspx</a> - Leeds has a long standing culture of allotments and community growing</li> </ul>
National Botanic Garden of Wales	<p>The RDP supply chains EU-funded 'Growing the Future' pan-Wales project based at National Botanic Garden of Wales.</p> <p>There are also examples of communities growing together in 'Incredible Edible' - Abergavenny, Conwy is starting a new incredible edible.</p>
Cornelly Community Council	None known.
National Society of Allotment &	The NAS welcomes any measures that will help release underutilized public land for allotments and other forms of community food growing. What paragraphs 25-30 in the consultation document overlook, however, are the powers that local authorities already have to discharge their statutory duty to provide allotments, by securing

## Log of Responses to WG22211

Leisure Gardeners Limited	land through compulsory lease and compulsory purchase, powers that should be promoted as a part of enhanced good practice guidance, and retained in any modifications to the law affecting allotments and community food growing more generally in Wales.
Penarth Town Council	There should be a central register of land owned by public bodies and private landowners suitable and available for use as allotments and community gardens.
FlintShare	To our knowledge public landowners, specifically Flintshire CC have done very little in this area. An honourable exception is Glyndwr University, which has allowed the use of part of its Northop college site to be used. Two excellent examples of private landowners providing land for A/CG use are the Hawarden estate, which has provided land, and a local landowner who has provided land in the Cilcain village area. All three examples involve provision of land to FlintShare, a local Community Supported Agriculture and Community Garden group.
St Dogmaels Allotment Association	In our experience a private landlord wanted his field to be used by the local community. The local community council supported this
Egg Seeds	<p>I support FCFCG in their recommendations and just wish to add in the Vale of Glamorgan the Community Foodie project has just wrapped up so we must ensure findings and best practice can be gleaned from their reports. There are various examples of good practice in the use of land for community growing (see below). FCFCG would be happy to provide further information if required.</p> <p>Several Local Authorities have adopted or created policies supporting and promoting the use of land for community growing. These include Swansea, Wrexham, Monmouthshire, Newport and Powys.</p> <p>Community Growing projects on publicly owned land:</p> <p>Llangattock Area Community Allotments, Llangattock Community Council</p>

## Log of Responses to WG22211

	<p>Cymdeithas y Dalar, National Trust, Carmarthenshire</p> <p>Green Valley Project, Rhondda Cynon Taff CBC</p> <p>Conwy Community Orchard</p> <p>Gerddi Bro Ddyfi Gardens, Machynlleth</p> <p>South Morgan Place Community Garden, Riverside , Cardiff</p> <p>Community Growing projects on non local authority land:</p> <p>Brit Growers / Our Garden, Valleys to Coast RSL</p> <p>Cultivate / Pen Dinas Community Garden, Coleg Powys</p> <p>Chapter Community Garden, Chapter Arts Centre</p> <p>Community Growing projects on privately owned land:</p> <p>Narbeth Allotments and Community Garden, Pembrokeshire</p> <p>Knucklas Castle Community Allotments, Powys</p> <p>St Peters Community Garden, Cardiff</p> <p>Hanley Landshare, Chepstow</p> <p>Caerhys Organic Community Agriculture, Pembrokeshire</p>
Confidential	<p>Well turning the Swansea Vetch Field into a community growing project right in the heart of Swansea was a pretty good idea, but then the houses nearby are all terraced with tiny gardens so the location was excellent. Also a lot of schools have started growing gardens but once the summer holidays come then there is a tendency</p>

## Log of Responses to WG22211

	that these get neglected and in a hot summer all the hard work just dries up.
Jocelyn Kynch	<p>The examples of institutional spaces for community growing are excellent, and these could be flexible, depending on having people available to inspire them as well as active participants in growing. They would be likely to change over time.</p> <p>50% of people who think they want to grow things find out that they don't actually enjoy it. That is fine, but needs to be accepted as inevitable.</p> <p>Community growing could be added to activities associated with town and village greens, allowing it to be used as evidence for registration. (This looks like a Good Idea now I've typed it.)</p>
Allan Evans	I the Conwy County area I am not aware of a community scheme however we have a few allotment sites either ran by the local Authority or as In Llandudno by an Association of collective plot holders.
Bay of Colwyn Town Council	The obvious examples are the proposals for a community land bank and "landshare" but principal authorities should also consider their powers in respect of CPOs where land is not readily available. As allotments have a reputation for being unsightly, examples of good practice such as allotment societies should be encouraged. The provision for compensation to the landlord contained in section 4 of the 1950 act should also be borne in mind.
Lisvane Community Council	<p>The existing Landshare initiative (see <a href="http://www.landshare.net">www.landshare.net</a>), which provides a mechanism to bring together people who wish to grow their own food with those who have land to share for that purpose, provides a useful example of how a land bank facility could work.</p> <p>The Community Grown Food Action Plan 2010 cited the main issues preventing the land being offered for community grown food is an understandable reluctance amongst farmers to enter into agreements which can be perceived as giving up control of their land and not having a guaranteed income from it. However, there are examples of where growers and landowners have worked together, such as the FlintShare initiative, in north east Wales.</p>

## Log of Responses to WG22211

	Advice and guidance should be sought from as many successful projects as possible.
Cardiff Council	<p>Cardiff Council is currently undertaking a land review process which includes identifying land that is either vacant or underused that may be suitable for community growing on either a permanent or 'meanwhile' basis. A pilot study on four potential areas of land is being carried out on four areas of land in Ely / Caerau area by the Federation of City Farms and Gardens in association with Action for Ely and Cardiff and Cardiff Council with a view to taking forward one or two of these sites to be marketed for community growing in association with CLAS. The intention is to make this a model for future land releases – to test the best ways of advertising land availability, the best model agreements to be used and the most appropriate means of assessing the capacity of organisations interested in taking on this type of land. This work is being undertaken as a response to three issues: 1) finding uses for land that has been designated as unsuitable for development 2) a request for 'meanwhile use' land from one particular community based organisation 3) the need to address issues raised by community groups with broad ambitions on established allotment sites who are constrained by allotment legislation.</p> <p>CLAS work with local authorities on identification of land, draft legal agreements etc.</p>
PLANED	COCA- Caerhys Organic Community Agriculture based near St David's.
RTPI Cymru	<p>On the 7th October the RTPI are launching the Promoting Healthy Cities Centenary Paper (<a href="http://www.rtpi.org.uk/about-the-rtpi/rtpi-centenary-2014/rtpi-centenaryprojects/">http://www.rtpi.org.uk/about-the-rtpi/rtpi-centenary-2014/rtpi-centenaryprojects/</a>) The paper contains interesting information on the importance of food growing and health along with practice examples for example Brighton and Hove has issued a Planning Advice Note on how food growing can be incorporated into proposals for new developments.</p>
Cwm Harry Land Trust	<p>We are engaged in several community growing sites, but have also assisted in many more - we currently have 4 pieces of a mix of public and private land being used for community growing - we are more than happy to talk about the good and bad processes we have been able to get through to get where we are. I'm also involved in a further site outside of Montgomeryshire which is in Ceredigion - I have good and bad examples of how different</p>



## Log of Responses to WG22211

	local authorities view this topic.
CLA Cymru	No direct evidence.
Vale of Glamorgan Council	<p>Nightingale Community Garden</p> <p>Gibbonsdown Community First Allotment Group</p> <p>Treoes Community Garden</p> <p>Tidy Plots, Ystradowen</p> <p>Community Foodie.</p>
The Landscape Institute	<p>The Landscape Institute's position statement on Green Infrastructure</p> <p>HYPERLINK"<a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf">http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf</a>"<a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf">http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf</a> showcases the Business Improvement District (BID) as a way to increase urban growing spaces. "London's Victoria BID went live in April 2010 and set itself an ambitious programme to help boost the local economy, improve visitor experiences of the area and enrich the sense of place. A Green Infrastructure (GI) audit for the BID area undertaken by Land Use Consultants identified a potential 1.25ha of new terrestrial GI, 1.7ha of enhancements to existing GI and suitable space for 25ha of green roofs. A significant environmental issue in the BID area is surface-water flooding, which has led to the temporary closures of Victoria Station and the underground in the past. But fitting 25ha of green roofs alone could deal with 80,000m<sup>3</sup> of rainwater each year. As a BID is valid for five years and all BID members make an annual contribution to the running of the programme, this model could provide a sustainable option for delivering urban Green Infrastructure in the longer term." Swansea's has been in the vanguard of the Business Improvement District Movement, so could be a pilot for this approach to community growing in the heart of the city (in addition to the successful Vetch Veg Project on the former Vetch football ground).</p>

## Log of Responses to WG22211

Torfaen County Borough Council	Torfaen is currently looking into “Incredible Edibles” partnership projects including assisting with the acquisition and development of a new Community Council allotment project and other voluntary providers of supplementary box schemes.
Cardigan Allotments Ceredigion	the forest garden movement is a way of producing lots of food in a woodland type structure making excellent use of land and a beautiful bio diverse environment (London councils donated 2 pieces of land for forest garden projects)
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- Prevent large corporations (such as supermarket chains) from creating their own land banks</li> <li>- Insist that all new housing/retail developments must provide some common land for community gardening and allotments for each nn houses</li> </ul>
Greener Aberystwyth Group	utilise expertise evident in Wales farming/horticulture and organic growers - also schools/colleges/university and IBERS etc.
Llanhilleth Family Allotments Project	The federation of farms and gardens have helped growers in the Torfaen area sell their excess food via a home delivery (veg) service.
Watton Allotment Association	Please see attaches – No other experience.
<b>Q6. What key ways could the Welsh Government to provide support to farmers to make land available?</b>	

## Log of Responses to WG22211

Cheow-Lay Wee	That farmers will get a return for allowing land to be used into allotments or community areas. Awards from the European Union should also be given so that farmers are compensated. Including in encouraging allotment plot holders or community gardens from growing wild meadow flowers in their plot.
Confidential	Not sure, there aren't many farmers in Cardiff so I have no experience in this field.
Cyrenians Cymru	Subsidies? Tax incentives?
Capita	My parent's farm had land utilised for allotments during the war, we were prevented from turning the land back into agricultural use until the last user gave up, this sterilised two acres of land until the mid sixties. It then took a great deal of effort to remove all of the walls paths and sheds to get the land back into production. A far more farmer friendly arrangement is needed to get their cooperation. I have suggested to Clas Cymru that farmers would probably be up for the planting of fruit trees in hedge lines, which would not impact on their business.
Cwmni Nod Glas Cyf.	trafod a negyddu beth fyddai orau i'r ffermwr a'r gymuned i ryddhau'r tir
Owen Jenkins	I get no rental income from my Community garden. It pains me that I am also denied Single farm Payment and that the area was therefore also excluded from My Glastir contract even though it is the most valuable hectare of land for the community, for production and for biodiversity on the farm. Landowners should not be disadvantaged by offering land for community use.
Bleddyn Williams	is this strategy a worthwhile exercise? The only land useful for allotments would be land adjacent to settlements. These landowners are holding out for planning consent and would only make it available short term. Short term security is no good for encouraging people to invest time and money to develop growing spaces

## Log of Responses to WG22211

Delegates to Welsh Region of NSALG	<p>Purchasing or Hiring with the power under the Allotment Legislation Acquisition of land for purpose of Act.</p> <p>(1) The Council of a borough, urban district, or parish may, for the purpose of providing allotments, by agreement purchase or take on lease land, whether situate within or without their borough, district, or parish [F7or may purchase such land compulsorily in accordance with the provisions of this Act and of the [F8Acquisition of Land Act 1981], in that behalf].</p>
Sully Terrace Allotments Association	STAA have no specific comments
Denbighshire County Council	The biggest problem is that there is no certainty for the Farmers to obtain vacant possession of their own land when they require it and upon the other hand the "tenants" would require security of tenure also. I believe that this is a sticking point.
Federation of City Farms and Community Gardens	<p>The consultation document clearly recognises the beneficial impact of community growing on people, communities and the environment. This recognition could be demonstrated by awarding farmers points under Glastir. This practical acknowledgement of the value that community growing brings to the population and environment would encourage farmers to allow groups access to their land.</p> <p>Clear guidance and advice for farmers considering letting communities grow on their land is vital. Specific advice including:</p> <ul style="list-style-type: none"> <li>Tenancy and rights of occupation/termination of lease</li> <li>Financial Considerations</li> <li>Responsibilities and Insurance</li> <li>How to deal with conflict</li> </ul>

## Log of Responses to WG22211

	<p>Case studies of successful cases with the benefits outlined - i.e. closer links with the community will result in farming being better understood and farmers more supported by the community. It could also open up markets for direct sales with increased profits - and opportunities for schemes such as community supported agriculture with associated financial and social benefits.</p> <p>Details of support organisations such as FCFCG, Soil Association could also be provided.</p> <p>This guide could be promoted by NRW, FUW, Farming Connect - until it becomes normalised. The Community Land Advisory Service already provides an impartial service to communities and landowners as well as professional technical advice - and the Federation of City Farms and Community Gardens can provide support to both farmers and groups with the setting up and running of effective groups, site design and funding.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	<p>Provision of sites must offer an economically sustainable option to the landowner. Community growing initiatives need to be able to compete with other potential land users. WG should support the provision for growers to generate income by selling produce, possibly through the landowner or direct to customers through WG developed community food co-operatives. This will reduce their reliance on funding and help them afford realistic site rents.</p> <p>WG should recognise that, in some cases, selling of produce should not be limited to surplus produce. This will help initiatives to be more sustainable and encourage farmers to make land available.</p>
Bridgend County Allotment Association	<p>There seems to be an assumption that farmers/landowners do not want to make land available. I am sure they would do so, but in the case of our local authority, they do not want to ask for land to be made available as they are not interested in supplying land for growing schemes. In other areas, it may be less off-putting to land-owners if they were not restricted by long tenancies.</p>
Food Cardiff  This is an endorsement	<p>The consultation document clearly recognises the beneficial impact of community growing on people, communities and the environment. This recognition could be demonstrated by awarding farmers points under Glastir. This practical acknowledgement of the value that community growing brings to the population and</p>

## Log of Responses to WG22211

<p>of the FCFCG response with the additional comments in question 1 and 15</p>	<p>environment would encourage farmers to allow groups access to their land.</p> <p>Clear guidance and advice for farmers considering letting communities grow on their land is vital. Specific advice including:</p> <p>Tenancy and rights of occupation/termination of lease</p> <p>Financial Considerations</p> <p>Responsibilities and Insurance</p> <p>How to deal with conflict</p> <p>Case studies of successful cases with the benefits outlined - i.e. closer links with the community will result in farming being better understood and farmers more supported by the community. It could also open up markets for direct sales with increased profits - and opportunities for schemes such as community supported agriculture with associated financial and social benefits.</p> <p>Details of support organisations such as FCFCG, Soil Association could also be provided.</p> <p>This guide could be promoted by NRW, FUW, Farming Connect - until it becomes normalised. The Community Land Advisory Service already provides an impartial service to communities and landowners as well as professional technical advice - and the Federation of City Farms and Community Gardens can provide support to both farmers and groups with the setting up and running of effective groups, site design and funding.</p>
<p>Joint response from Brecon Beacons, Pembrokeshire Coast and</p>	<p>Perhaps through the agricultural support payments system</p>

## Log of Responses to WG22211

Snowdonia National Park Authorities.	
Growing Green Teens Project	Information, networking and advice
Natural Resources Wales	<p>Any support system designed to encourage farmers to make land available for community growing will need to be developed in the context of the forthcoming shift to area-based direct payments, the requirements of the cross compliance system and other regulations as well as the availability of a range of land management schemes and advisory services under the Rural Development Plan (RDP).</p> <p>Many farmers are likely to be concerned at the prospect of losing access to direct payments and/or RDP schemes such as Glastir should they make land available for community growing. This is partly because such activity may not be compatible with cross compliance obligations and the prescriptions available under agri-environment schemes, but also because of the difficulties (whether perceived or otherwise)</p> <p>likely to be involved in establishing who has control over the land and who is responsible for meeting the requirements of any agricultural support measures applicable to the land in question.</p> <p>A simpler approach would be to use the provisions of the RDP to encourage more farmers to sell or rent their land to community organisations – with the proceeds from such arrangements then compensating for any reduction in agricultural support/agri-environment payments.</p> <p>In particular, RDP mechanisms such as Farming Connect could be used to signpost the role of organisations such as the Community Land Advisory Service (CLAS) in facilitating the establishment of community growing sites. Farming Connect could also be used to provide one-to-one expert advice to farmers including the provision of legal support and the provision of model contracts. Bringing the CLAS into the range of support measures provided under Farming Connect could help to speed up the process of reaching agreement between community groups and farmers, not least through publicising examples of successful projects and making the whole approach seem more mainstream.</p> <p>In relation to the provision of land for community growing under leases/ licences, it will be important to ensure that any moves to increase the level of legal protection available to allotment holders/community initiatives do</p>

## Log of Responses to WG22211

	<p>not result in perverse outcomes (e.g. by reducing the willingness of landowners to make suitable land available on a relatively short term basis). In this context, the kinds of advice and guidance made available during the negotiation of a contract needs to be framed in such a way as to ensure that both parties to any agreement are fully aware of their rights and responsibilities so that the risk of subsequent disputes can be minimised.</p> <p>As an alternative to systems based on renting land for defined periods, it might be possible to use the other parts of the RDP, such as the new Rural Community Development Fund, to support those community groups who are interested in purchasing suitable areas of land from farmers. Those communities in greatest need should be prioritised and all applications for support should be required to demonstrate explicit links with Local Development Strategies and the cross cutting themes of the new RDP; helping to support sound environmental management alongside local supply chains, employment, skills development, equality and diversity.</p>
National Botanic Garden of Wales	<ul style="list-style-type: none"> <li>- Provide simple single payment incentives</li> <li>- Ensure that making land available to support this does not reduce other payment/subsidy eligibilities. Important farmers do not lose payment if they give land for community use as it is not a substantial or dependable payment/income.</li> <li>- Promote or encourage organic growing and related subsidies, reduction of using chemicals and intensive farming practices, and encourage diversification of farm businesses and small-scale horticulture</li> </ul>
Gelligaer Community Council	Pay farmers a subsidy
Cornelly Community Council	Financial incentive / subsidies.
National Society of	Despite the wording of Proposal 3, the exemplars given in paragraphs 31-33 actually have nothing to do with allotments in the strict sense. In addition to the collaborative models given in these paragraphs, the NAS would



## Log of Responses to WG22211

Allotment & Leisure Gardeners Limited	encourage the authors of the proposed good practice guidance to look at lessons to be learned from elsewhere, and particularly from Northern Ireland, where farmers have played a constructive role in the development of private allotments on a commercial basis as part of farm diversification.
Penarth Town Council	Could farmers be offered incentives ?
FlintShare	<p>There are many examples, across the UK and in other European countries, of CSA schemes that benefit both the farmer and the community. For the farmer, the advantages include closer ties with the community and a reliable source of income (in the form of guaranteed FlintShare sale of the produce to a well defined and committed group in their locality and/or payment for labour and investment). A review of these schemes would no doubt suggest specific measures that could be adapted for Welsh conditions.</p> <p>Farmers could be offered financial incentives, by analogy with some agri-environmental schemes, to release suitable parcels of land for allotments or community gardens, with or without their direct involvement in the use of the land. Such incentives could be justified on the basis of the social and health benefits to the community and concomitant reductions in the cost of health and social services. The typical land area required for a given A/CG scheme will generally be no greater than a hectare, which need not be in one block. Thus there is considerable scope on many farms to designate those corners of land that are less productive or not amenable for commercial production.</p>
St Dogmaels Allotment Association	If farmers have "Set Aside" land they could be given an incentive to release land . To make clear to farmers that the responsibility of, and practise of " good upkeep" of the land would be the responsibility of the new association.
Egg Seeds	As a representative of FACE in South Wales I support the idea to recognise and reward farmers through Glastir for supporting community food growing projects and also having flexibility in Glastir guidelines that promotes

## Log of Responses to WG22211

	<p>use of land for community growing.</p> <p>The consultation document clearly recognises the beneficial impact of community growing on people, communities and the environment. This recognition could be demonstrated by awarding farmers points under Glastir. This practical acknowledgement of the value that community growing brings to the population and environment would encourage farmers to allow groups access to their land.</p> <p>Clear guidance and advice for farmers considering letting communities grow on their land is vital. Specific advice including:</p> <p>Tenancy and rights of occupation/termination of lease</p> <p>Financial Considerations</p> <p>Responsibilities and Insurance</p> <p>How to deal with conflict</p> <p>Case studies of successful cases with the benefits outlined - i.e. closer links with the community will result in farming being better understood and farmers more supported by the community. It could also open up markets for direct sales with increased profits - and opportunities for schemes such as community supported agriculture with associated financial and social benefits.</p> <p>Details of support organisations such as FCFCG, Soil Association could also be provided.</p> <p>This guide could be promoted by NRW, FUW, Farming Connect - until it becomes normalised. The Community Land Advisory Service already provides an impartial service to communities and landowners as well as professional technical advice - and the Federation of City Farms and Community Gardens can provide support to both farmers and groups with the setting up and running of effective groups, site design and funding.</p>
Confidential	<p>Give them money, our farmers are struggling to make ends meet to compete with cheap imports and legislation. The biggest problem though is the mind set of most people. It's easier, when it is raining, to get into</p>

### Log of Responses to WG22211

	a car to drive to a local supermarket and bring home a bag of clean washed potatoes put them in a pot and cook them, than it is to put on wellies, and a raincoat, get your garden fork out of your locked shed, dig up the potatoes in the rain, get inside take off your wet clothes, wash the potatoes and then cook them and that's when you have a garden right by your house!
Jocelyn Kynch	No comment
Allan Evans	Provide grants to release parcels of suitable areas set aside funding to purchase these sites
Bay of Colwyn Town Council	The Welsh government could agree that land used for community growing is set aside from agricultural land and constitutes a diversity of use, being of greater value in terms of biodiversity and being more of a social than economic activity.
Radyr & Morganstown Community Council	No comment to make.
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Cardiff Council	There is an urban fringe land use issue in expanding urban areas where high quality agricultural land is being taken out of production and either allocated for development or leased for horse grazing, both of which will reduce the quantity of land available for local growing. If farmers were incentivised to allocate land for community growing this would help to retain the land in production. However farmers would also need provision to ensure that their income could be guaranteed and that ensured provision was in place for them to be able to reclaim land within a specified timescale if needed for other uses..

## Log of Responses to WG22211

PLANED	Glastir should support farmers that make land available to community growers.
RTPI Cymru	No comment
Cwm Harry Land Trust	Look at good practice - there are 3 or 4 examples in Montgomeryshire of how this has worked - several through local authority farm estate land, but also some private ones - so long as they can show income will be greater than a land rent for grazing, and the fact they wont end up with a shanty town, that they cant get rid of they should not have any issues.
CLA Cymru	With the move to area based payments under CAP reform, farmers are facing a period of significant change and many may need to adapt current working practices. A number of the rules for the new scheme still require further clarification including what constitutes an active farmer, greening measures and the future requirements for cross compliance. Any guidance developed needs to be comprehensive and deal with all issues of EU support and the rules governing such support payments. Critically the development of any guidance is not a one off exercise. Any guidance would also need to be reviewed as scheme rules change, e.g. . it is already known that the rules for Glastir will be reviewed by 2016. Additionally, any financial implications for any farmer must be fully integrated into guidance to ensure that sound business decisions can be made.
Vale of Glamorgan Council	Review the Planning legislation regarding change of use of agricultural land
The Landscape Institute	Support for the farming community is almost totally divorced from the local community, therefore we might encourage the Welsh Government to explore opportunities within Europe-wide agricultural intervention systems to reconnect communities with food growing in the interests of community resilience as 40% of our food is imported, in the interests of driving down food waste, in the interests of regaining employment back into the food industry, in the interests of creating a local market for local produce and in the interests of reconnecting and rebuilding trust between the farming community and urban based communities. For example in the reconfigured Pillar 2 of the CAP in 2015 could the Welsh Government fund agricultural land close to

## Log of Responses to WG22211

	communities to be given over in long term leases to local communities for food growing?
Torfaen County Borough Council	<ul style="list-style-type: none"> <li>• Identify local needs</li> <li>• Compile waiting list</li> <li>• Negotiate area of land and costs</li> <li>• Set up legal agreement</li> <li>• Agree terms and conditions of Tenancy</li> </ul>
Cardigan Allotments Ceredigion	provide a payment / financial incentive
Greener Aberystwyth Group	(liaison with FUW) Establish 'Community Benefit' - funding to make land available (Possibly also on 'meanwhile' basis).
Llanhilleth Family Allotments Project	There appears to be a lot of waste land – ex coal board no one knows who owns it. ( or it is difficult to find out)
Watton Allotment Association	No experience
<b>Q7. Do you think that providing guidance on this matter would help provide the clarity needed by plot holders?</b>	
Cheow-Lay Wee	Absolutely. No one plot holder should construct something that overshadows (literally) another plot. Sheds should be erected at the end of the plot, or in a specific area, so that they do not obstruct the main growing areas.

### Log of Responses to WG22211

Confidential	As long as it is written in plain English (and Welsh...of course).
Cyrenians Cymru	Broad guidance would be useful, such as that produced by allotment societies. Bureaucracy and overbearing rules should be minimised, and the traditions of allotments respected.
Capita	Yes but this needs to include their removal as well.
Cwmni Nod Glas Cyf.	ydw
Owen Jenkins	Fine - providing that the land-owner also has an input.
Gill Wislocka	yes
Bleddyn Williams	<p>guidance is required and legal compulsion is also needed. This was recommended in the 2010 report .nothing has happened in the last 4 years. a blanket planning permission should be granted for all allotment sheds up to a certain size and base.</p> <p>Deviation from the guidelines should not be permitted. Too many sites are unsightly and ruin large areas of ground with concrete bases patio and barbeque areas etc.</p> <p>Standards need to be laid down and enforced to protect the future of the land for growing.</p>
City and County of Swansea	Absolutely. This is an area of concern and guidance in this area would be welcomed.
Isle of Anglesey County	Yes, definitely there needs to be clear guidance

## Log of Responses to WG22211

Council	
Delegates to Welsh Region of NSALG	The rules already exist in the Leases which are signed annually. Tool-sheds should be allowed provided they are properly manufactured shed and not exceeding a certain size
Sully Terrace Allotments Association	<p>Yes STAA consider that a clear set of rules will help everyone to know what is and what is not allowed.</p> <p>However, STAA believe that the guidance should be clear over process for making decisions on unusual and new forms of structures as uses and technology evolve; for example solar and water harvesting. Legal, environmental and amenity factors need to be balanced and the decision making process needs to be fair, reasonable and proportionate. STAA think that the Guidance should:</p> <p>Include how to deal with applications / requests for structures</p> <p>Be flexible and fair to deal with standard and exceptional requests and new technologies</p> <p>Be achievable, efficient, low /nil cost and not over burden capacity / capability of the organisation who are mainly volunteers and not planning "experts".</p>
Denbighshire County Council	I believe that each site should continue to have its own jurisdiction upon what structures are to be erected within their own sites. Within our existing agreement we allow a small shed to be erected and only polly tunnels - at the end of their tenancies all structures are to be removed off site. I do not know what is included within other Authority Agreements. The clarity is held within the Allotment Agreement
One Voice Wales	Yes.
Federation of City Farms	Guidance would be greatly welcomed. This relies on clearly defining what is a registered community grown food site. For instance, would this include statutory allotments as well community managed orchards, as well as

## Log of Responses to WG22211

and Community Gardens	<p>community managed allotments? FCFCG would argue that it should.</p> <p>The erection of structures in association with growing on an allotment site amounts to development that requires planning permission. There are no permitted development rights so a planning application is required to the local planning authority. FCFCG are aware of local authorities in Wales that are overlooking this requirement as it would not be in the public interest or make best use of public money to ask for a planning application to be submitted. Such structures include tool sheds, small polytunnels, ponds and drainage ditches.</p> <p>Clear guidance of how such structures might fall within a certain permitted development class is long overdue and would be greatly welcomed. Local authorities are not dealing with such structures in a consistent manner as they are firstly, unsure whether they require planning permission and secondly, are unaware of guidance or policy on how to assess the merits of such structures or works, especially when they are to be sited just beyond settlement boundaries.</p> <p>A guidance note for local authorities on what development requires planning permission within a 'registered community grown food site' and policy on what should be deemed acceptable or unacceptable should be provided. Planning Division and the Outdoor Recreation Team of Welsh Government need to collaborate to provide this guidance.</p> <p>Whilst we understand the importance of proper planning controls, an element of common sense should be used in determining appropriate controls on for example garden / allotment sheds and small scale polytunnels, car parking, toilets and other infrastructure.</p>
Community Food Co- operative Programme in Wales - Rural Regeneration	yes



## Log of Responses to WG22211

Unit.	
Mick Antoniw AM	Yes.
Bridgend County Allotment Association	Yes, it would make it clearer to land-owners if there were restrictions placed on plot-holders re: sheds, etc. Our tenancy agreements already specify this.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	<p>Guidance would be greatly welcomed. This relies on clearly defining what is a registered community grown food site. For instance, would this include statutory allotments as well community managed orchards, as well as community managed allotments? FCFCG would argue that it should.</p> <p>The erection of structures in association with growing on an allotment site amounts to development that requires planning permission. There are no permitted development rights so a planning application is required to the local planning authority. FCFCG are aware of local authorities in Wales that are overlooking this requirement as it would not be in the public interest or make best use of public money to ask for a planning application to be submitted. Such structures include tool sheds, small polytunnels, ponds and drainage ditches.</p> <p>Clear guidance of how such structures might fall within a certain permitted development class is long overdue and would be greatly welcomed. Local authorities are not dealing with such structures in a consistent manner as they are firstly, unsure whether they require planning permission and secondly, are unaware of guidance or policy on how to assess the merits of such structures or works, especially when they are to be sited just beyond settlement boundaries.</p> <p>A guidance note for local authorities on what development requires planning permission within a 'registered community grown food site' and policy on what should be deemed acceptable or unacceptable should be provided. Planning Division and the Outdoor Recreation Team of Welsh Government need to collaborate to</p>

## Log of Responses to WG22211

	<p>provide this guidance.</p> <p>Whilst we understand the importance of proper planning controls, an element of common sense should be used in determining appropriate controls on for example garden / allotment sheds and small scale poly tunnels, car parking, toilets and other infrastructure.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	No objection to providing comprehensive guidance which could include for example when planning permission might be needed for certain structures.
Growing Green Teens Project	Yes as there seems to be differing rules which creates barriers
Natural Resources Wales	Yes – clarity on <i>all</i> planning issues related to community growing is essential.
National Botanic Garden of Wales	Yes
Gelligaer	Yes

## Log of Responses to WG22211

Community Council	
Cornelly Community Council	Yes
National Society of Allotment & Leisure Gardeners Limited	Yes: The NAS would welcome clearer guidance on planning permission as it affects structures and other elements of allotment infrastructure, while recognizing that the local context (including visual amenity) can be an important consideration in planning decisions, and cannot always be anticipated in generic guidance.
Penarth Town Council	This guidance is vital to overcome issues of unsuitable/unsightly structures being erected inappropriately within a site. There should be a duty on the plot holder to maintain the structure in a good condition. The removal of sheds left in a state of disrepair is a costly problem for those who manage allotments/landowners.
FlintShare	Some guidance may be useful to ensure that the overall visual impact is acceptable in the particular location. However, such guidance should allow a certain degree of latitude, to promote informality and community spirit.
St Dogmaels Allotment Association	Yes - Because confusion arises with a changed use of land and the planning issues that ensue can be very complex.
Egg Seeds	<p>A Pattern language tool kit that can pull in examples and allow flexibility depending on need and other factors.</p> <p>Have a guide of accepted/permitted development available to all could reduce administration costs within LA</p> <p>Also where not on public land having LA guidance and flexibility for food growing enterprise/group on private ground around permitted development that is sensitive to land owners lease agreement and is reflective of the</p>

## Log of Responses to WG22211

	<p>longevity of the lease. We at food Cardiff want to see more people and organisations accessing fresh local produce and understand that there will be a need of rapid growth in small scale production to help meet demand so incentives and measured flexibility will need to be given to aid new food producers to setup, ramp up scale. It is recognised that planning process and approach is not consistent across counties and is not knowledgeable about sustainable horticultural practices or practices on a small scale that falls below permitted development size this further strengthens the idea that a pattern language toolkit could help individuals, groups, businesses and planners fit inside permitted development and reduce delays, costs and upsets in planning decisions. This toolkit should incorporate sustainability and biodiversity agendas and mitigation and impact reduction methods for structures such as supporting green roof structures over standard for both visual and environmental benefit.</p>
Confidential	<p>Well, if people are going to work their plots then they are going to want to store their tools and if there is a shed then it gives shelter from the rain and if there is shelter then people tend to want to make it comfortable and then if it is very comfortable then they may want to stay there so yes I think that guidance is necessary otherwise what started out as a community growing food initiative could turn into a growing community with little homesteads and as with any community personality clashes occur. But then on the other hand if people are driving to the allotments they could bring their tools with them and so there is no need for a shed but then maybe people don't have cars! And anyway if it is a community growing site then shouldn't the community be able to walk to it!</p>
Jocelyn Kynch	<p>Yes</p>
Allan Evans	<p>Yes currently planning laws do not allow the erection of polytunnies on local authority land and there are restrictions imposed as to shed sizes common sense must prevail</p>
Bay of Colwyn Town	<p>Yes, but much of the guidance needed is already available, particularly in not erecting large or permanent structures and complying with the 1950 weed act, but also preventing the cultivation of non-native invasive</p>

## Log of Responses to WG22211

Council	species. Perhaps what is needed is better signposting to the existing information.
Radyr & Morganstown Community Council	Clarity is welcome provided rules are simple, simply stated and relevant to plot holders.
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	
Cardiff Council	Cardiff Council provides guidance to allotment holders on this issue, but national guidance would be extremely helpful to ensure that there was a consistent approach to this across the country.
PLANED	<p>Yes Point 34: Planning: In theory, this should not be an issue, as in point 34, it states that "Planning permission is not required to create an allotment site, or to use land for community grown food."</p> <p>However, some groups have had a different experience, a great deal of bother convincing planners that permission is not required, before the question of structures is even broached - it seems dependent on the local authority to whom you apply. - the guidance needs to be clear to communities and planners.</p> <p>This issue is not simply about land use, but water pipes, tool storage sheds, fencing are all essential to community growing and</p>

### Log of Responses to WG22211

RTPI Cymru	Yes. Particularly providing clear advice on the planning position for allotments and community grown food schemes and for ancillary works, structures and uses.
Cwm Harry Land Trust	I would not see this as a priority - model leases / tenancy's for plots would be fine - better to get the governance and maintenance of sites right first
CLA Cymru	Yes, clarity on the need or otherwise for planning permissions is critical. Currently there is both confusion and inconsistency within the planning authorities with some requiring a request for planning permission for the erection of for example a tool shed on an allotment site whilst others are not. There needs to be a re-examination of what constitutes permitted development rights and guidance should be issued to the 25 planning authorities to remove the current confusion.
Vale of Glamorgan Council	Yes it is important that clear comprehensive advice is provided so that communities can adequately manage their sites in a responsible fashion.
The Landscape Institute	Yes.
Torfaen County Borough Council	<p>The Allotments Officer holds Bi-Monthly meetings with both associations which as a result of negotiations has resulted in the issuing of a document called the "Site Secretary's Handbook" which the above is specifically addressed including many other allotment related matters therefore, no structure can be erected without the prior submission of an application form which must include all dimensions and the material.</p> <p>Whilst Torfaen has clear guidance, Welsh Government guidance would provide overall consistency.</p>
Cardigan Allotments Ceredigion	yes that could help, it would be down to the allotment association to manage the rules about structures.

## Log of Responses to WG22211

Cwmcarn and Abercarn Allotment Association	Yes
Greener Aberystwyth Group	Yes - as consultation paper para.35 also good practice examples needed - perhaps fund 'model exemplars' (could be as a competition)
Llanhilleth Family Allotments Project	Yes. Clear guidelines would help considerably and facility of.
Watton Allotment Association	Guidance yes, edits no as this could cause financial problems and directly go contrary to reducing poverty. Only temporary structures – no brick or block structures – only timber sheds etc. Restrictions on size and location of sheds. Our site permits sheds/greenhouses only around the perimeter, except in special circumstances.
Respondent	Comments
<b>Q8. (If yes at question 7) What should be considered within the scope of this guidance in relation to the types of structures and land management conditions?</b>	
Cheow-Lay Wee	Things should be constructed from wood, and from recycled sources
Confidential	I have no idea.
Cyrenians	Guidance should be issued on bio-diversity e.g. in relation to organic, and wildlife friendly gardening practices.

## Log of Responses to WG22211

Cymru	Structures should be sympathetic to the location, and certain size restrictions should be in place.
Capita	I am against allotment holders having individual sheds they should be encouraged to utilise communal storage and limit individual structures to greenhouses and cloches this is a much better use of the available land.
Cwmni Nod Glas Cyf.	bod corff a chyfansoddiad ac yn cynrychioli aelodau / cymuned a bodd modd newid hyn yn unol a'r cyfansoddiad. rhaid i'r corff ddangos cynaliadwyedd ariannol ar hyd y ffordd a bod yn atebol.
Bleddyn Williams	the basic would be to not permit any structure on growing land which not be easily restored to growing land .e.g sheds on stilts rather than concrete basis. no concrete.
City and County of Swansea	See above. This is an area where prescriptive guidance would be welcomed. Perhaps detailed Planning requirements, model constitutions (Plain English) or examples of land / management agreements could be included.
Isle of Anglesey County Council	Size/specification/design of structures. Good housekeeping/land management
Delegates to Welsh Region of NSALG	To get away from the shanty town appearance of most allotment sites and move into the 21st century all structures should be factory made and bought in block to get the best deal from retailers or manufacturers.
Sully Terrace Allotments Association	STAA consider that the guidance should include:  All structures used by individuals or groups for purpose of cultivation (green house, poly tunnels, raised beds), storage (tools, machinery, produce, materials, water), harvest (rain, solar, wind, hives) and communal use (for meetings, training, kitchen, W.C.s). Land management of communal space, boundaries, headlands and



## Log of Responses to WG22211

	individual areas.
Denbighshire County Council	All contained within the Allotment Agreement. The only provision I would put in that no Glass Greenhouses are to be allowed on any site
Federation of City Farms and Community Gardens	<p>The Planning Division and the Outdoor Recreation Team of Welsh Government need to collaborate to provide this guidance as outlined above in our response to question 7. We would hope that this would include:</p> <p>Sheds, cycle parking and security fencing, poly tunnels and greenhouses, including guidance on sizes and base materials - i.e. concrete bases being permanent. Also ponds and ditches including sizes which require planning. Parking spaces and types - i.e. grass, permeable, hard-core, tarmac. Paths and vehicle access, new access routes to sites. Conditions under which change of use must be applied for.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	not qualified to comment
Mick Antoniwn AM	Sheds need to be properly manufactured (i.e. safe and fit for the purpose) and not exceed a certain size. If allotments are to become a central part of more communities, then lease agreements should include the requirement to maintain structures to a certain standard and for the structure to harmonise with the surroundings.
Bridgend County	I note from the privately owned site in Cardiff that they limit the size and number of sheds, greenhouses etc. This would all have to be written in to any agreement between the landowner and the local authority. Our

## Log of Responses to WG22211

Allotment Association	allotment tenancy agreements already do this. It may be best, on new sites, to provide sheds so that they all look the same to make the site more attractive - although it has been the accepted thing on allotments that tenants make do with all sorts of bits and pieces which have usually been salvaged for free.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	The Planning Division and the Outdoor Recreation Team of Welsh Government need to collaborate to provide this guidance as outlined above in our response to question 7. We would hope that this would include: Sheds, cycle parking and security fencing, poly tunnels and greenhouses, including guidance on sizes and base materials - i.e. concrete bases being permanent. Also ponds and ditches including sizes which require planning. Parking spaces and types - i.e. grass, permeable, hard-core, tarmac. Paths and vehicle access, new access routes to sites. Conditions under which change of use must be applied for.
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	Other land management issues that should be considered are run off from sites into any adjacent waterways and no invasive species are introduced. Furthermore issues surrounding any potential impacts on landscape including any structures which may be located within the allotments.
Growing Green Teens	Consideration needs to be taken as to the purpose of structures e.g.

## Log of Responses to WG22211

Project	community learning resource/ individual
Natural Resources Wales	Provision should be made for the inclusion of community learning and working/produce packing spaces alongside the traditional greenhouses and sheds e.g. yurts, geodomes, gazebos, pergolas.
National Botanic Garden of Wales	Clear guidance on the different types of structures, plots, facilities should be a minimum requirement.  Provide support and advice for development of social businesses to manage the allotments. Create links possibly to the Community Asset Transfer fund.
Gelligaer Community Council	Greenhouses, poly tunnels, sheds, solar panels facing away from dwellings and small wind turbines should all be considered.
Cornelly Community Council	Size, material and style of buildings on available space to ensure uniformity. Keeping of livestock and pesticides regulations.
National Society of Allotment & Leisure Gardeners Limited	The NAS would not wish to see guidance that is overly prescriptive on design detail, given that the construction of plot-level infrastructure is part of the creative process inherent in allotment gardening. In addition to sheds and similar temporary structures, the guidance should cover permanent structures such as club-houses, access and parking, fencing and screening.
Penarth Town Council	Suitable materials, dimensions, siting all to be submitted for approval by the land owner

## Log of Responses to WG22211

FlintShare	It may be useful to provide guidance, on size and number of structures (as a function of the number of plots) and on suitable construction materials and finishes.
St Dogmaels Allotment Association	Small temporary sheds, greenhouses, wc's, offices ,storerooms. access pathways, parking facilities, driveways, disabled access
Egg Seeds	<p>The Planning Division and the Outdoor Recreation Team of Welsh Government third parties such as FCFCG need to collaborate to provide this guidance as outlined in our response to question 7. We would hope that this would include:</p> <p>Sheds, cycle parking and security fencing, poly tunnels and greenhouses, including guidance on sizes and base materials - i.e. concrete bases being permanent. Also ponds and ditches including sizes which require planning. Parking spaces and types - i.e. grass, permeable, hard-core, tarmac. Paths and vehicle access, new access routes to sites. Conditions under which change of use must be applied for.</p> <p>As sites become embedded in the community, the role evolves and at such time may be bound by further considerations related to fulfilling this new role requiring further developments to help satisfy health and safety to facilitate new roles. The pattern language would be flexible to incorporate this but if not used then the LA would need to recognise community impact from the project and show appropriate support and guidance to allow this positive development. For example becoming an education zone for schools to visit would require basic shelter, toilets and hand washing facilities.</p> <p>Boundaries and fencing can be an issue both positive and negative impact. Guidance should be given to encourage softer fencing such as living fences - fedges, strawberry fence, edible hedgerows where appropriate and to minimise long term community impact by reducing its use of concrete and pallasade fencing that just implies lack of trust culture in community.</p> <p>Regarding land management it should be recognised in the toolkit that there are many forms of land management and to address the need for more sustainable land practices the guidance should be flexible and</p>

## Log of Responses to WG22211

	open to allow different forms but have clear guidance as to when terms will be breached and when for example the lease terms must be adhered to such as using raised beds on skids/pallets on temporary use land or contaminated land.
Confidential	Well types of structures depend on whether it is just for storage of tools or whether it is aimed at providing shelter. So I guess if for example a farmer was prepared to let a field be used for a local community growing project then as people enter the field they can go to their own lock up locker and collect their tools and then go to their plot and start to work. If at the centre of this field there was a communal area with no sides but a roof so that the workers on the plots can shelter from the rain and maybe sit and chat and have their picnic lunch well that would be a bonus. Surely, the point of growing is to grow and not to have structures and cabins. Anyway, far more importantly in my mind is to work out where is the water coming from to water the plants when it's dry and will there be a ban on pesticides and herbicides because what one person does on a plot will have an effect on surrounding plots and how do you overcome people's perceptions that this plot is "mine"!
Jocelyn Kynch	Sheds, ponds, animals: materials, duty of care.  Land management should be restrictive on pollutants and pesticides.  Innovative techniques can be encouraged.
Allan Evans	Fencing, Sheds, Poly tunnels and small glasshouses fruit trees
Bay of Colwyn Town Council	The promotion of good fertility and drainage of the land and the restriction of any practice that would be detrimental to the land being used for agriculture at a future date. This would encompass the size and permanence of structures and the removal of all contamination, including concrete and broken glass.
Radyr & Morganstown Community Council	Size of sheds and materials used  Greenhouses and poly tunnels re effect on neighbouring plots' light and shelter. Use of water collection from roofs.

## Log of Responses to WG22211

	<p>Size and proximity to boundary of any structures.</p> <p>Access to water and irrigation methods (e.g. the use of hoses and stand pipes)</p> <p>Use of mechanical rotavators</p>
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Cardiff Council	<p>The proposal to produce such guidance is welcome and would help avoid community growing projects encountering problems with the planning system. Suggest guidance should be included on following:</p> <ul style="list-style-type: none"> <li>• Access and car parking</li> <li>• Sheds, greenhouses, portable building and containers</li> <li>• Poly tunnels</li> <li>• Communal huts and toilet facilities</li> <li>• Fencing</li> <li>• Water supply, water butts and water storage tanks or pond/reservoir</li> <li>• Compost bins</li> <li>• Raised beds</li> <li>• Planning fees</li> <li>• Guidance on submitting a planning application</li> </ul>

## Log of Responses to WG22211

	<ul style="list-style-type: none"> <li>• Certificate of lawful developments</li> <li>• Permitted development rights for small buildings on school land</li> </ul> <p>The guidance could also increase the sustainability of allotment sites through insistence that all new structures are required to make provision for water harvesting.</p>
PLANED	<p>Making the application process clearer and more streamlined will help get more groups involved in community growing. If a group faces problems at each stage, they will not have the capacity to continue, and you risk losing the wealth of knowledge that local people have to share with others.</p> <p>If the groups know exactly what is acceptable they can prepare accordingly and risk fewer issues with their requests.</p>
RTPI Cymru	<p>The following should be considered in providing guidance:</p> <p>The use of land for allotments and community grown food schemes;</p> <p>The erection of fences, buildings and other structures;</p> <p>Access works;</p> <p>Any ancillary or other uses including on site shops.</p>
CLA Cymru	<p>We would anticipate that the guidance should cover the erection of sheds, greenhouses, poly tunnels and potentially access and parking spaces for both bikes and cars. There is a need for clarification as to the permitted size, materials employed and potentially positioning of such structures.</p>
Vale of Glamorgan	<p>Type, size of construction, maintenance - how to obtain relevant permissions - planning, landlords consent.</p>

## Log of Responses to WG22211

Council	Removal of redundant structures
The Landscape Institute	<p>In a European context, allotment gardens or leisure gardens, whilst as in the UK are primarily used for vegetable production, have a strong recreational use, and include such structures as small sheds, greenhouses and summer houses - which may be occupied during the summer months.</p> <p>Design guidance with respect to these types of structures would assist in the overall appeal and use of the allotment gardens.</p>
Torfaen County Borough Council	<ul style="list-style-type: none"> <li>• Clear and definitive boundary's regarding what is and is not permitted an allotment.</li> <li>• The maximum area of an allotment plot permitted for a structure.</li> <li>• Good husbandry for the wellbeing of animals.</li> <li>• Proximity to neighbouring properties etc.</li> </ul>
Cardigan Allotments Ceredigion	shed, poly tunnels green houses, communal shelters tools sheds, paths, communal trees, tracks gates,
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- What can legally be stored on a site (manure, fertilisers etc.) especially in build up areas</li> <li>- fencing and security</li> <li>- Sheds</li> <li>- Poly tunnels</li> <li>- Greenhouses</li> <li>- Communal meeting areas</li> <li>- Garages/storage facilities</li> </ul>



## Log of Responses to WG22211

Greener Aberystwyth Group	<p>Planning Permission - Permitted development clarification needed!</p> <p>Structures: Sheds, glasshouses, sitting/relaxation space BBQ's, composting, bees ponds</p> <p>Management: Types of crops - invasive species</p> <p>Pesticide Use - Livestock (Chickens/Pigs as of Aberarth allotments)</p>
Llanhilleth Family Allotments Project	<p>Nothing too complicated and easy for the community areas to follow and nothing <u>too</u> limiting. You need to encourage people particularly the <u>young</u>.</p>
Watton Allotment Association	<p>Materials from recycled or sustainable sources.</p> <p>Availability of grants</p> <p>Allow planning on 'permitted development grounds' instead of formal permissions</p>
<b>Q9. What should be included in a revised definition of allotments and community gardening?</b>	
Confidential	<p>I am not sure what the existing definitions are. Anything that encourages and supports community growing or allotment growing is a good thing.</p>
Cyrenians Cymru	<p>Any land designated for the purpose of growing vegetables, fruit and herbs for public use.</p>
Capita	<p>There is a real problem in marketing and selling produce, particularly as there is always a glut of similar produce at peak times. Diversity in what is grown needs to be encouraged and WG help in persuading food chains such as the Co-op to join the supply chain.</p> <p>In defining what the term relates to I would leave out the allotment reference and refer to Community Food</p>

## Log of Responses to WG22211

	Growing Initiative
Cwmni Nod Glas Cyf.	?
Owen Jenkins	Yes surplus food should be encouraged to be sold- especially if such proceeds could be directed towards community benefits.
Bleddyn Williams	<p>why change definition of allotments? Is there any benefit in this? Sounds as if someone wants to turn over allotments to community gardens. Why is there a benefit? At present if a community group want to grow collectively they can put their names on a waiting list and share a number of allotments. Proposal 5 is lacking in any sort of detail. It sounds as if it has been dreamt up by someone with no idea of growing, marketing and selling food. The only example I can see of this type of community growing is in the "hippy type Communes" is this the model we want o pursue? I do not like the tone of this proposal and would reject it straight away. This proposal indicates that allotment holders only garden for themselves and do not have a community ethos. Nothing could be further from the truth. I have been gardening on 5 different allotment sites wherever I have lived and they all have common features. Every plot I have taken on I have had many offers of help. Digging, materials. Tools sheds, even a greenhouse. I am given plants I give away surplus plants, seeds and produce. At the height of the season I attend my plot and someone asks do you want a cabbage or some beans/tomatoes etc. Whatever they have surplus. I reciprocate. If I have a bad year with one item I am never short of offers. It .It is a wonderful ethos on an allotment site .I have never sold anything of my allotment it is always given away to plot holders/ friends and family without expectation of something back. However i do get lots in return. I imagine that the author of this proposal has never been part of an allotment site or maybe has but is one of the small minority who cadges off everyone but never gives .These characters exist on community sites as well and let someone else do the work and expect to share the spoils.</p> <p>In general allotment sites set an example to young people who join the site and breed people with generous spirits .sharing produce and knowledge.at the same time they are responsible for their own plots and soon realise that "you only get out what you put in".</p>

## Log of Responses to WG22211

	<p>The security offered by the strict rules of a statutory allotment site encourages people to take a long term view in planning a garden and are willing to invest effort and cash into improving and maintaining a site.</p> <p>The author of proposal 5 has a naïve and inflated idea of how much produce can be grown and profit generated from a community garden compared with the time spent growing the food. my estimate is that the value of the produce grown in a standard size allotment plot varies between 200 and£1000 most plot holders would probably grow less than £300 worth of a variety of produce and spend £100 on rent fertilisers seeds water and sewerage charges transport etc. some people are lucky to break even in a bad year and many are working for less than£1 an hour. That is at retail prices. A large section of the garden is taken up by sheds compost heaps resting part of the land and growing cheap produce which need to be harvested and stored and could be bought at wholesale prices e.g. potatoes and onions. Unless community gardens grew high value crops and grew them on a large site with scope to use machinery and sell enough to warrant the expense of setting up a retail outlet then it is not viable. This sound like growing on a farm scale</p>
City and County of Swansea	We consider that the legislation defining and governing the use of allotments (and to a lesser extent, community gardens) is in need of modernisation and improvement and must allow for greater flexibility of use and reclamation.
Isle of Anglesey County Council	Type/specification/location of land
Delegates to Welsh Region of NSALG	As already specified within the Allotment Acts. Community Gardens Groups can be accommodated on allotment sites if sufficient plots and land was available. All food grown for personal use not for commercial gain
Sully Terrace Allotments	STAA believe that a revised definition should include

## Log of Responses to WG22211

Association	<p>flexibility to increase diversity of growing spaces where this improves land use and benefits wider sections of the community::</p> <p>Orchards – Bute Cottage, Penarth</p> <p>Community Market Gardens – Riverside, Cardiff</p> <p>But need to retain recreational, woodland and coastal areas for public enjoyment</p>
Denbighshire County Council	<p>I believe they are two separate entities. An allotment should be purely for the benefit of an individual/family whereas community gardening is more of a collective "free for all" where produce can be sold/distributed or swapped.</p>
Federation of City Farms and Community Gardens	<p>Allotments and community gardens are very different operations. Allotment legislation protects statutory allotment land and this protection should be valued and maintained. There is a widely held belief that statutory allotments should not be called Community Gardens. This arises in part out of a feeling that new allotment sites, called community gardens or growing plots may be subject to closure as they have no statutory protection, only that contained within their individual lease or agreement. In practise even new local authority allotment sites are rarely designated as allotment land and therefore are not protected by the legislation. The revival in allotments in the last fifteen years has seen sites which were neglected and in danger of being sold off and developed now thriving with long waiting lists. This revival seems firmly established and not a trend. Therefore any diminution of the protection of these sites would be unwelcome.</p> <p>FCFCG sees no need to redefine community gardens as allotments. The phrase "Community growing projects" encompasses the whole range of projects; allotments, orchards, school gardens, Incredible Edible schemes etc. People understand the difference between allotments and community gardens and that is beneficial.</p> <p>In practice an Allotment is cultivated by individuals for their own benefit and potentially that of their families and friends. A Community Garden is cultivated by a group who share the risks and rewards of the work. There is a</p>

## Log of Responses to WG22211

	<p>clear expectation of group/community benefit rather than individual gain.</p> <p>It is wise to recognise that there are common themes to be found on allotments and community gardens such as food production and environmental stewardship and therefore both have a role to play in creating a sustainable and resilient Wales. FCFCG is glad that the consultation document includes provision for both and would welcome local authority responsibilities to provide growing spaces being made clear but we would not ask that community gardens receive the same level of protection as statutory allotments as we feel this would discourage landowners from making land available for new sites. The perceived perpetuity of allotment land can be a barrier for groups wishing to obtain land.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	<p>Definitions should allow for commercial marketing of produce and income generation where appropriate.</p> <p>Definitions should define "surplus produce".</p>
Mick Antoniwi AM	<p>Food produced should not be for commercial use.</p> <p>Define what constitutes an allotment verses, say a 'village farm' (see Q4.)</p> <p>Allotment sites should be for long-term use. Short term or temporary sites are not appropriate.</p>
Bridgend County Allotment Association	<p>I do not see any reason to re-define allotments. They have been perfectly well defined in the Allotments Acts. I can quite understand that local authorities do not like this definition as it requires them to provide allotment plots per head of population, and it appears that they do not want to do this. Also, I can quite understand that local authorities are more inclined to prefer community gardens as they do not currently come under this</p>

## Log of Responses to WG22211

	<p>definition, and they can allow or dis-allow them at will.</p> <p>It may be best to define community gardens in the same way, thereby eliminating the current preference to financially support community gardens even though there are presently long waiting lists for allotment plots and none for community gardens. I have no objection to surplus food being provided to food banks or for charitable use, but not sold, as this would only encourage people to run their allotment as a business and not for their own family's use. Allotments are not intended for this purpose.</p>
<p>Food Cardiff</p> <p>This is an endorsement of the FCFCG response with the additional comments in question 1 and 15</p>	<p>Allotments and community gardens are very different operations. Allotment legislation protects statutory allotment land and this protection should be valued and maintained. There is a widely held belief that statutory allotments should not be called Community Gardens. This arises in part out of a feeling that new allotment sites, called community gardens or growing plots may be subject to closure as they have no statutory protection, only that contained within their individual lease or agreement. In practise even new local authority allotment sites are rarely designated as allotment land and therefore are not protected by the legislation. The revival in allotments in the last fifteen years has seen sites which were neglected and in danger of being sold off and developed now thriving with long waiting lists. This revival seems firmly established and not a trend. Therefore any diminution of the protection of these sites would be unwelcome.</p> <p>FCFCG sees no need to redefine community gardens as allotments. The phrase "Community growing projects" encompasses the whole range of projects; allotments, orchards, school gardens, Incredible Edible schemes etc. People understand the difference between allotments and community gardens and that is beneficial.</p> <p>In practice an Allotment is cultivated by individuals for their own benefit and potentially that of their families and friends. A Community Garden is cultivated by a group who share the risks and rewards of the work. There is a clear expectation of group/community benefit rather than individual gain.</p> <p>It is wise to recognise that there are common themes to be found on allotments and community gardens such as food production and environmental stewardship and therefore both have a role to play in creating a sustainable and resilient Wales. FCFCG is glad that the consultation document includes provision for both and</p>

## Log of Responses to WG22211

	would welcome local authority responsibilities to provide growing spaces being made clear but we would not ask that community gardens receive the same level of protection as statutory allotments as we feel this would discourage landowners from making land available for new sites. The perceived perpetuity of allotment land can be a barrier for groups wishing to obtain land.
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	All "not for profit" un-subsidised agriculture on allotment sized plots should be eligible to register as allotments.
Growing Green Teens Project	Potential for allotment shop/sales/social enterprise Information points Allotments as a community resource for socially disadvantaged groups
Natural Resources Wales	A revised definition of allotments and community gardening should be flexible enough to cover the wide variety of models that currently exists, to avoid excluding future options for growing for a community benefit. It should also include the right for community growers to market and sell surplus food both individually and as part of a social enterprise.
National Botanic Garden of Wales	Promote the knowledge around social businesses to trade produce.  However, will need to ensure that allotments are not seen as cheap venue for individual entrepreneurs to the detriment of community access for individual allotments.  Recommend the definition of allotments in broadened.

## Log of Responses to WG22211

Gelligaer Community Council	Community gardens, school & college gardens, therapeutic gardening for people with learning difficulties, mental health issues and physical disabilities
Cornelly Community Council	Original not seen so not possible to comment on revision.
National Society of Allotment & Leisure Gardeners Limited	<p>The NAS has deep concerns about Proposal 5, and the arguments developed in paragraphs 36-40 that underpin it.</p> <p>Regarding paragraph 38, the NAS would welcome increased legal protection for all forms of community food growing, including allotments. The popular response to proposed changes to the Allotments Acts under the Coalition Government, however, demonstrated the depth of feeling amongst allotment gardeners to any changes that would undermine the legal protection they and their gardens currently enjoy. The Welsh Government's caution appears well-judged.</p> <p>Regarding paragraph 39, the NAS strongly opposes any change to the statutory definition of an allotment garden and the protection that allotments are currently afforded in law. There is no reason why the definition of an allotment should incorporate or reflect other forms of community food growing organized on a collective basis, and we believe the latter should be recognised in law in their own right, with appropriate provisions made to ensure accountability for the use of public assets by collective bodies, including the eventual surrender of those assets in good order. We reject the formulation "individuals and communities" as a false opposition, as allotments are embedded in the communities they serve. The correct binary is between two different modes of organizing community food growing, the one based on individual stewardship, responsibility and accountability, the other a collective mode derived either from voluntary association or imposed as a condition of participation. We question the reference to "traditional allotments" which fails to recognize the strides that have been made in managing and opening access to allotment gardening over recent decades, while noting that these spaces are valued not just "by their users", but also by many people who languish on waiting lists. The accusation that the</p>



## Log of Responses to WG22211

	<p>current definition of an allotment “fails to include land for other interests such as community growing” is false, because allotments are part of community growing. It is also the case that many allotments are worked collectively yet in compliance with allotment law, by families, friends and other groups, through informal or formal relationships for which a named individual takes responsibility. In other words, the current legal framework for allotments, sensitively and intelligently applied, is more flexible than this paragraph implies.</p> <p>Regarding paragraph 40, the NAS notes with great concern the reference to legislative change that will “provide greater scope and flexibility for meeting demand”. We welcome the notion of “equal protection for sites across the scope of growing interests”, but do not believe that this should be achieved, in whole or in part, by changes that allow local authorities to substitute forms of collective provision for the allotments to which people are currently entitled, and for which the demand is so evident.</p>
Penarth Town Council	Clear definitions of both an allotment and a community garden. Appropriate use ie crops (including suitable trees), bees or livestock such as hens Guidance on how produce from a community garden is to be distributed.
FlintShare	The nature and scope of active community engagement with sustainable local production of healthy food is varied and still evolving. The optimal mode of engagement will vary depending on various local factors, and therefore no one model can suit every community. The definition should therefore be as wide as possible to encompass not only allotments and community gardens, but the various types of CSA schemes, school gardens, community farms, community orchards, etc.
St Dogmaels Allotment Association	Allotments and Community gardens are a "not for profit" organisation and is not within the remit to compete with local existing market gardens, nurseries and garden centres.
Egg Seeds	Without maintaining current descriptions of allotments the legislation that has preceded this consultation and guidance could potentially become invalidated reducing some of the protections and rights gained by nearly 100 years of allotment law.

## Log of Responses to WG22211

	<p>What we don't want to see happen is for the obligation of allotment provision to be reduced but raised using creative and planning measures.</p> <p>We also don't want to see the protections and rights associated with allotment and growing space such as tenure security against development and right to carry out activities such as keep hens and rabbits reduced in any way.</p> <p>What concerns us is that new provision is not always being offered with same protections against development as to reduce LA obligations to maintain and keep it and to keep the asset available for sale.</p> <p>Community gardens are different from allotments in the psychology of operation. The practicality of groups not an individual or family maintaining it. Certainly we recognise the merits of both and believe both should have security of tenure where need and results can be demonstrated. Having ability for a community garden and or groups to operate on an allotment site is important and may offer sustainable solution to enhancing allotment sites, providing training and a portal to access site whilst waiting for own plot to become available. Volunteers at Riverside Community Garden have said "If I had known you existed and were open at times when I was available I wouldn't have waited 2 years and taken on my own plot, I would have joined you and not asked for my own plot, why are we not told that community gardens operate in Cardiff when we apply?"</p> <p>Community gardens require greater space to cope with potential large numbers of individuals but we have worked with FCFCG to measure the produce reaped from the space and when well managed you will harvest more produce with greater diversity than same size plot gardened individually . Community gardens should be considered at every suitably sized allotment site to be part of the resource on site with the understanding they only operate efficiently long term with good management and funded persons behind them.</p> <p>In Cardiff we know a charitable organisations being set up Grow Cardiff that will be best suited to give advice and support, and designed to help facilitate community gardens enhance management and sustainability and will promote working in partnership to deliver projects.</p> <p>It is wise to recognise that there are common themes to be found on allotments and community gardens such</p>
--	--

## Log of Responses to WG22211

	<p>as food production and environmental stewardship and therefore both have a role to play in creating a sustainable and resilient Wales. Food Cardiff and FCFCG is glad that the consultation document includes provision for both and would welcome local authority responsibilities to provide growing spaces being made clear but we would not ask that community gardens receive the same level of protection as statutory allotments as we feel this would discourage landowners from making land available for new sites. The perceived perpetuity of allotment land can be a barrier for groups wishing to obtain land.</p>
Confidential	<p>Well I think there should be more community gardens and places like schools and care homes should have gardens and blocks of flats should have community gardens. But then some people have absolutely no interest in nature at all and you can't grow everything you need on one piece of land because maybe some earth will support potatoes and maybe other types of earth will suit carrots better and you need a greenhouse for tomatoes and grapes. Gardening is quite a skill to be able to nurture plants to grow and get the best produce from them. Gardening can also be very therapeutic.</p>
Jocelyn Kynch	<p>I am very opposed to including allotments with community gardening. Allotments have a permanent basis, with soil built up over decades and I favour the existing legal basis.</p> <p>Allotments are special, allowing people to believe they are farmers in touch with the land, places of equality and imaginative flights of fancy, and a source of gifting to family and friends. This is an individual activity, not a communal one, although great friendship emerges.</p> <p>Community gardening in all its forms is great and I love to see spaces used to grow food and flowers collectively, but it is not the same at all and should be kept legally distinct.</p> <p>Allotment sites exist in their own right under law. Community gardening is usually on institutional sites or under an organisation. They require different structures to run well.</p>
Allan Evans	<p>Tenancy agreements need to be changed currently you are not allowed to sell produce off your allotment</p> <p>Community gardening should be encouraged as people learn from one another. Accessibility to grants would</p>

## Log of Responses to WG22211

	be easier if the definition was broadened
Bay of Colwyn Town Council	Any land under one hectare which is managed on a collective or co-operative basis by community growers. This would include hospital or school grounds and community orchards, including those in public parks where there is a strong community partnership with land owners or local authorities.
Radyr & Morganstown Community Council	<p>A broader more appropriate definition for the 21st century is welcome. What can be grown, by whom and how it can be shared should be considered.</p> <p>We support the idea that produce can be sold, eg, an allotment stall on site but we recognize that this would be difficult to limit to stop commercial exploitation of allotment sites. We therefore suggest that sales of produce are restricted to raising funds for management and maintenance of the allotment site by each allotment association rather than by individual plot holders. That way, local people could buy fresh produce with zero food miles and might promote own-grown community produce.</p>
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Cardiff Council	<p>Allotment and community garden definition need to be kept separate due to differing nature of end user – but one could be a subset of the other.</p> <p>Generally allotments are about a community of people occupying individual plots within a controlled access site and growing for their own consumption on an annually renewable tenancy within the terms of allotment legislation. A community growing site we would identify as being an area of land occupied by a constituted group who set their own rules about how the land is managed within the terms of their lease – which unlike individual allotment plots will probably be for 5+ years.</p>
RTPI Cymru	There is a need to be clear that this proposal is to change the definition for the purposes of allotments legislation. However, thought should also be given as to whether and how any revised definition is to apply

## Log of Responses to WG22211

	<p>within the planning and development field. To date, a core feature of allotments has been that they have typically been community based facilities which have primarily served as either or both a leisure pursuit and a source of home-grown flowers, fruit and vegetables for individuals; The enlargement of the definition brings in the element of collective effort and the marketing (and, presumably, sale?) of food grown; From a planning perspective, this would extend the scope towards commercial and business uses.</p>
Cwm Harry Land Trust	<p>Though one, but yes, the legislation is so out of date - needs to allow for the whole host of different forms of community growing to be able:</p> <p>Community Supported Agriculture</p> <p>Community Orchards</p> <p>Community Allotments - of all sizes</p> <p>Community Gardens</p> <p>Community Market Gardens Etc.</p>
CLA Cymru	<p>Allotments and community gardens are very different operations and operate under different legislative frameworks. Allotment land is set in statue. We question why an extended definition is needed when it could be more appropriate, in our opinion, for the land to be let under a farm business tenancy.</p>
Vale of Glamorgan Council	<p>Current legislation specifies allotments; an agreed definition on what constitutes a community garden would be welcome. Community Gardens need to identify the equitable governance of the site and how, for example the produce will be distributed.</p>
Torfaen County Borough	<p>Allotment Law could be revised and brought up-to-date to reflect current needs.</p> <p>Private allotments should be managed in accordance with allotment law.</p>

## Log of Responses to WG22211

Council	
Cardigan Allotments Ceredigion	we like this idea ( a communal shop)
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- The ability to sell surplus produce and products made using allotment produce</li> <li>- The promotion of allotments for school and youth groups</li> <li>- The protection of the environment</li> <li>- The emphasis placed on organic principles</li> </ul>
Greener Aberystwyth Group	<p>Community ownership to be emphasised. Marketing opportunities for surplus produce.</p> <p>Greening and sustainability</p> <p>health Benefits}</p> <p>Social Benefit } 'Highlight'</p> <p>Educational}</p>
Llanhilleth Family Allotments Project	As above – we need to encourage and not put off people of all ages to grow. Incentives and easy guidelines are required.
Watton Allotment Association	Definition of existing allotments should stay but scope of provision could be extended to include community gardens. If current definition goes, this could end and anger statutory allotments which get lost in the mix. Most allotmenters are very proud of their plots and the complete site. To lose this definition could endanger the very

## Log of Responses to WG22211

	worthwhile efforts to engender community spirit.
<b>Q10. What are the advantages and disadvantages of including, in legislation, provisions which enable the delegation of allotment and community growing from local authorities to a third sector body?</b>	
Cheow-Lay Wee	I'm not sure about moving from local authorities to third sector. It's important that policy continues to rest with local authorities as they would act as the authorities arbiter and would have sufficient respect from stakeholders in terms of making decisions. A third sector body would take time to achieve this respect and would face arguments of favouritism more readily than the local authority
Confidential	No idea.
Cyrenians Cymru	<p>Traditionally, service-users of charities have not been able to access allotments. Where schemes have been implemented by third sector organisations, they have been very popular and have helped people who are homeless, who have mental health or addiction problems, to feel part of the community in a very productive way.</p> <p>A partnership between local authorities and charities on community growing would be a very positive and valuable step forward. Perhaps the community assets transfer scheme could be extended for this purpose (where for example the upkeep of land is a financial burden in times of financial cuts).</p>
Capita	Local Authorities are currently stretched to the limit and have little time to devote to managing and promoting allotments and community growing. There are a number of third sector bodies already in existence who would be better placed to provide the enthusiasm and drive needed to make this successful
Cwmni Nod Glas Cyf.	does dim rhaid i hyn gael deddfwriaeth yn fy marn i, os oes ewyllys i wneud, dim ond i wneud SLA gyda chorff a chyfansoddiad ac yn cynrychioli eu haelodau
Owen Jenkins	The third sector is usually far more creative, flexible and enthusiastic than local authorities.

## Log of Responses to WG22211

Bleddyn Williams	<p>It has already been done. Most allotments in my area have been forced to adopt self-management. They are leased from the council and run by the plot holders committee. The committee collects and keeps the rent the main advantage is that the council save money. I.E. If the council were spending more on upkeep of the allotments than they were collecting in rent.</p> <p>The advantage to plot holders is that all the rent of one site could be spent on that site and maintenance work carried out by plot holders themselves will benefit them by keeping the rents low.</p> <p>The disadvantages are that if the committee on a site is poor and does not manage properly then the site could deteriorate into a mess. It could be open to mismanagement of the finances etc. and if the committee do not enforce the rules then the site could be open to abuse. e.g. plot holders dumping waste onsite ,using the site to run a business, sleeping on site ,parking caravans on site. Permanently damaging the ability of the site to grow food. It requires strict leasing regulations laid down by the council and policed by the councils. However even when the sites were managed by the councils these bad practices were carried on.</p> <p>Self-management committees seem to be under the impression they can charge whatever rent they want and do what they like.</p> <p>If urgent large expenditure was necessary the sites do not have the resources to carryout the work .this leaves the resistibility on the management group who are held personally responsible. This has discouraged many good people from being on the management committee or trustees of the sites.</p>
City and County of Swansea	<p>We consider that whilst there is scope for the third sector to take a more formal role in the provision and management of community growing spaces, individual local authorities have substantial experience in this area which must be preserved. Local Authorities are able to undertake a more strategic review of available space and any future calls on it, so their leadership role should continue.</p>
Isle of Anglesey County	<p>Financial - possibility of grant aid. Administration/Management - closer links with the end user</p>



## Log of Responses to WG22211

Council	
Delegates to Welsh Region of NSALG	This already exists, but not on a commercial basis. Only self management by Allotmentteers which seems to work very well
Sully Terrace Allotments Association	<p>STAA consider:</p> <p>Advantages: a third sector body would have specialist interest in and understanding of community growing</p> <p>Disadvantages: any body would need to represent increasing number of disparate growing groups and should also take account of people who are unsure about or do not do want amenity land to be cultivated.</p> <p>Balancing managing multiple views and needs is likely to be time, resource and skill intensive.</p>
Denbighshire County Council	Where Authorities currently have fixed sites which are running well I cannot see any justification in delegating these down to a third party. An attempt was made not so long back to create an Allotment Association upon one of our sites and the tenants were not interested they were quite happy with status quo. The only advantage of having an Association or a third sector body upon sites is that they would be able to attract funding for any projects relating to that site.
Llandough Community Council,	The danger here is the lack of effective public control which could result in badly managed sites resembling 'shanty' town developments and a lack of regard given to matters such as the appropriate destruction of invasive weeds such as Japanese knotweed.
One Voice Wales	It is not clear whether community and town councils are considered by this consultation document as being "local authorities" or "third sector bodies" (which they are not). A number of local councils provide community allotments and these vary enormously in size and in kind. We would ask whether the Government sees these local councils as public bodies that could potentially wish to consider outsourcing the running of allotments to

## Log of Responses to WG22211

	third-sector or third-party organisations.
Federation of City Farms and Community Gardens	<p>The benefits would be that a third sector organisation may be better placed to work with the community, and may have specialised knowledge and enthusiasm for community growing. However - third sector organisations need funding to run and at the moment the funding for allotments in local authorities is decreasing and is often very minimal, with the responsibility for allotments being a small part of an officers job, with the costs of maintaining that post largely met by the other responsibilities. Local authorities may be reluctant to pay enough for the services to be run properly by a third sector organisation.</p> <p>Many allotment sites are self managed and the responsibility of the local authority is limited to security and fencing, occasional strimming and administration of the plot holders fees, water bills etc. It's easy to envisage a situation where responsibility was delegated to a third sector organisation but not accompanied by a budget which would make the service susceptible to the vagaries of funding.</p> <p>In practise new allotment sites and other community growing spaces are set up independently of the local authority - and even if the land is leased from the local authority, no services are provided. It's not a good idea to let local authorities potentially distance themselves completely from any responsibility - rather that responsibility should be increased as in the proposal in this consultation that local authorities have an obligation to adopt an allotment and community growing strategy.</p> <p>Given that, there are other opportunities for the third sector to play a role in allotment and community garden provision across Wales. FCFCG already map and register all the sites it works with. There are currently over 400 projects registered on our database. We could extend this work to include existing (long standing) allotment sites and other projects that other partners are aware of. We have already done this with Wrexham and Swansea local authorities through our CLAS Cymru pilot authority work. We are well placed to drive this work forward into a more all encompassing phase. FCFCG is therefore, interested in this proposal provided that such work is contracted using a realistic budget.</p> <p>We would welcome further discussion on this idea with Welsh Government, WLGA and other potential partners such as Community Housing Cymru. We see scope for a potential social enterprise to provide a Wales wide</p>

## Log of Responses to WG22211

	standard of service supporting the delivery of new sites. The ambition would be to increase local capacity where required so that devolved site management could be transferred to site management committees once training and support had been received. The sites would then be self-sustaining, reducing the need for local authority involvement.
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	Advantage: The potential to link with other third sector bodies when selling surplus produce, such as 340+ community buying groups (Food Co-ops). This should be included in the local authority/third sector body agreement.
Mick Antoniwm AM	I support this in principle, but whilst the LA could delegate day-to-day operational decisions it should retain overall responsibility. The local authority should not delegate the maintenance of a plot register or providing support to allotment committees (see Q2)
Bridgend County Allotment Association	It all depends who the third sector body is. Will it be a body which seeks to provide growing spaces regardless of current legislation or a body which will work within the legislation to provide growing spaces for all.
Food Cardiff  This is an endorsement of the	The benefits would be that a third sector organisation may be better placed to work with the community, and may have specialised knowledge and enthusiasm for community growing. However - third sector organisations need funding to run and at the moment the funding for allotments in local authorities is decreasing and is often very minimal, with the responsibility for allotments being a small part of an officers job, with the costs of maintaining that post largely met by the other responsibilities. Local authorities may be reluctant to pay enough

## Log of Responses to WG22211

<p>FCFCG response with the additional comments in question 1 and 15</p>	<p>for the services to be run properly by a third sector organisation.</p> <p>Many allotment sites are self managed and the responsibility of the local authority is limited to security and fencing, occasional strimming and administration of the plot holders fees, water bills etc. It's easy to envisage a situation where responsibility was delegated to a third sector organisation but not accompanied by a budget which would make the service susceptible to the vagaries of funding.</p> <p>In practise new allotment sites and other community growing spaces are set up independently of the local authority - and even if the land is leased from the local authority, no services are provided. It's not a good idea to let local authorities potentially distance themselves completely from any responsibility - rather that responsibility should be increased as in the proposal in this consultation that local authorities have an obligation to adopt an allotment and community growing strategy.</p> <p>Given that, there are other opportunities for the third sector to play a role in allotment and community garden provision across Wales. FCFCG already map and register all the sites it works with. There are currently over 400 projects registered on our database. We could extend this work to include existing (long standing) allotment sites and other projects that other partners are aware of. We have already done this with Wrexham and Swansea local authorities through our CLAS Cymru pilot authority work. We are well placed to drive this work forward into a more all encompassing phase. FCFCG is therefore, interested in this proposal provided that such work is contracted using a realistic budget.</p> <p>We would welcome further discussion on this idea with Welsh Government, WLGA and other potential partners such as Community Housing Cymru. We see scope for a potential social enterprise to provide a Wales wide standard of service supporting the delivery of new sites. The ambition would be to increase local capacity where required so that devolved site management could be transferred to site management committees once training and support had been received. The sites would then be self-sustaining, reducing the need for local authority involvement.</p>
<p>Joint response</p>	<p>Advantages - third sector may have more expertise and flexibility.</p>

## Log of Responses to WG22211

from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	Dis-advantages - third sector organisations which are big enough for paid staff may become dependent on financial support from local authorities, or have long term viability issues - no statutory powers.
Growing Green Teens Project	Consistent dedicated staff with commitment to develop community opportunities
Natural Resources Wales	<p>Advantages:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Flexibility of management options</li> <li><input type="checkbox"/> expert, specialist third sector organisations can provide a clear support and delivery focus</li> <li><input type="checkbox"/> access to a wider range of funding sources / development funds</li> <li><input type="checkbox"/> community groups may feel more inclined to engage with an independent third sector body</li> </ul> <p>However – local authority involvement and partnership is still required. Specialist, dedicated, actively involved LA officers would still be essential.</p> <p>Disadvantages:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> limited availability of secure, long-term funding for the third sector – risk of schemes failing in the medium-long term</li> <li><input type="checkbox"/> reduction in engagement of local authorities</li> </ul>
National Botanic Garden of	<p>The positive of this suggestion is the potential for allotments to link to social value and access third sector funding.</p> <p>The risks will be public sector cuts - might lead to public bodies providing allotments with no financial support,</p>

## Log of Responses to WG22211

Wales	no development - seen as a way to give away and make savings.
Gelligaer Community Council	The third sector body may comprise of people with a far greater understanding, knowledge and interest in community growing.
Cornelly Community Council	The disadvantages would be that it may not be possible to ensure appropriate administration of Allotment site.
National Society of Allotment & Leisure Gardeners Limited	The NAS welcomes the role of third sector organisations in allotment management which are democratically accountable to the community of growers that they serve and to the wider local community. We believe that the core third sector organization of relevance to the management of allotment is the allotment association, to which local authorities can already devolve a great deal of management responsibility, as is described in Growing in the Community. Where sites are small, and the pressures on the local authority to devolve responsibility are great, formal agreements with federations of allotment associations (along the lines pioneered in England by LB Barnet and Blackpool) represent a promising way forward. We note that these developments have taken place within the existing legislative framework.
Penarth Town Council	There should be no disadvantage to the delegation of allotments/community growing to a third sector body subject to legislation and guidance being clear and the third sector organisation having the knowledge and skill to manage .
FlintShare	<p>The risk of delegation to a third sector body is that it can create a democratic deficit, in that the electorate can hold the local authority to account, whereas that has often been proved to be problematic with unelected bodies. There is also the question of financial accountability, again not a uniformly happy experience with third sector bodies.</p> <p>We think that local authorities should not be able to duck out of their responsibility for developing and ensuring the implementation of a strategy framework for the provision of allotments and community growing schemes.</p>

## Log of Responses to WG22211

	<p>Nevertheless there is scope for the delegation of managerial responsibilities to a third sector body that can provide the required knowledge and skills base. Delegation to a third sector body could offer some gains in efficiency in the use of resources, especially if delegated on a regional basis, so that the specialist resources are shared across several local authority areas.</p> <p>Another model that deserves consideration is for the local authorities to be assisted by a group of interested people with the requisite experience, by analogy with the statutory Local Access Forums that advise on access to the countryside.</p>
St Dogmaels Allotment Association	<p>The Third Sector body could simplify the rules enabling a standard of maintenance/procedure for diverse groups. They could provide a real bridge to access further information ie; funding. It would be a disadvantage if they implemented more rules and restrictions.</p>
RSPCA Cymru	<p>Should any delegation of allotment and community growing provisions from Local Authorities to the third sector take place, it is vital that the body assuming responsibilities devotes adequate consideration to animal welfare when discharging these functions.</p> <p>RSPCA Cymru is eager to work with local allotment officers, allotment societies and holders in the interests of animal welfare, and would encourage Local Authorities to ensure any third sector body adopting their responsibilities gives adequate consideration to the issue of animals, and takes appropriate steps to ensure plot holders protect their welfare.</p>
Egg Seeds	<p>The benefits would be that a third sector organisation may be better placed to work with the community, and may have specialised knowledge and enthusiasm for community growing. However - third sector organisations need funding to run and at the moment the funding for allotments in local authorities is decreasing and is often very minimal, with the responsibility for allotments being a small part of an officers job, with the costs of maintaining that post largely met by the other responsibilities. Local authorities may be reluctant to pay enough for the services to be run properly by a third sector organisation. It is recognised that smaller organisations can run at higher efficiency and reduce operational costs and procedural delays but would still need adequate</p>

## Log of Responses to WG22211

	<p>secure funding.</p> <p>Many allotment sites are self managed and the responsibility of the local authority is limited to security and fencing, occasional strimming and administration of the plot holders fees, water bills etc. It's easy to envisage a situation where responsibility was delegated to a third sector organisation but not accompanied by a budget which would make the service susceptible to the vagaries of funding. Also passing responsibility further over to volunteer committees on sites leaves allotment provision susceptible to abuse and personalities dictating and dominating. This is already present.</p> <p>In practise new allotment sites and other community growing spaces are set up independently of the local authority - and even if the land is leased from the local authority, no services are provided. It's not a good idea to let local authorities potentially distance themselves completely from any responsibility - rather that responsibility should be increased as in the proposal in this consultation that local authorities have an obligation to adopt an allotment and community growing strategy.</p> <p>Given that, there are other opportunities for the third sector to play a role in allotment and community garden provision across Wales. FCFCG already map and register all the sites it works with. There are currently over 400 projects registered on our database. The FCFCG could extend this work to include existing (long standing) allotment sites and other projects that other partners are aware of. The FCFCG have already done this with Wrexham and Swansea local authorities through our CLAS Cymru pilot authority work. The FCFCG are well placed to drive this work forward into a more all encompassing phase.</p> <p>We support the FCFCG suggestion to further discussion on this idea with Welsh Government, WLGA and other potential partners such as Community Housing Cymru. We agree that there is scope for a potential social enterprise to provide a Wales wide standard of service supporting the delivery of new sites. The ambition would be to increase local capacity where required so that devolved site management could be transferred to site management committees once training and support had been received. The sites would then be self-sustaining, reducing the need for local authority involvement.</p>
--	--



## Log of Responses to WG22211

Confidential	<p>More paperwork because you will then want reports and outcomes so you can see if the delegation is working and if not then you can withhold funding or charge more to pay for the processing of managing the paperwork. Also you would have to make sure that planning law is up to speed so that some organisation can't claim "adverse possession" if they've fenced and worked a piece of land unhindered for 12 years. I suppose the Land Registry would be the ideal vehicle for the registration of allotments but then someone has to be responsible for the register and oversee all this processing.</p>
Jocelyn Kynch	<p>The advantage is getting a duty off the councils' books.</p> <p>Friends who have allotments (on different sites) under third sector bodies report problems. The third sector is not good at managing (as opposed to setting up groups) waiting lists or basic earthy matters - they lack the necessary skills. Established allotmenters are silenced by loud recent arrivals. Cliques emerge. Manure fails to be organised or arrive on time, charges are made for composting or the heap put in the wrong place. They tell me it is creeping privatisation, and that while the council was tardy, they did eventually get round to things and do them properly, and without demanding money.</p> <p>I am opposed to allotments being delegated to third sector bodies.</p> <p>Community growing is much more strongly related to the third sector.</p>
Allan Evans	<p>Realistically in the current economic climate I personally cannot see how local Authorities can deliver or lead on this and truly commit to this guidance - they do not have the staff or the expertise to deliver on this ambition. There may well be experts in certain Authorities but they remain very few. I favour Local Associations supported by an all Wales Allotment Community Association of experts.</p>
Bay of Colwyn Town Council	<p>The advantages are that it would reduce the burden of provision from the local authorities and also that the third sector could attract funding outside of the council precept.</p> <p>The disadvantages are the strength and commitment of the third sector organisations and their stability or capacity. To overcome this would require a gradual approach and trial periods, even with an organisation that</p>

## Log of Responses to WG22211

	has the experience of the Federation of City Farms and Community Gardens.
Radyr & Morganstown Community Council	<p>Advantages of 3rd sector : skills and advice</p> <p>Disadvantages of 3rd sector : less likely to have land to allocate</p>
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	
Cardiff Council	<p>The main advantage of delegating allotments and community growing to a third sector body would be that this would free up local government resources in times of extreme cuts, however we consider this would be outweighed by the potential disadvantages of ensuring duty of care, continuity of service and longevity of service if passed over to a third sector body.</p> <p>Within allotment legislation there is scope for allotment sites to be managed by groups other than the local authority – and in Cardiff we have had an arrangement of local management of some sites which gives some autonomy to the way in which sites are managed (currently under review). However in Cardiff there is still central management of waiting lists and payments which helps ensure that smaller sites are not disadvantaged, and those wishing to take up an allotment can choose a site with a smaller waiting list without having to approach all sites individually.</p> <p>Central billing, management of waiting lists and a consistent approach to the enforcement of allotment legislation are they advantages of a centrally managed allotment service. Whilst these elements could</p>

## Log of Responses to WG22211

	<p>potentially be undertaken by a third sector body, the scale of allotment gardening will differ from one areas to another and in the case of Cardiff, where there is an established allotment administration function, it is unlikely that this would be more effectively managed elsewhere. Some local sites in Cardiff have indicated that they are keen to take on responsibility for managing their own waiting lists, both without a central co-ordinating function it is difficult to see how this could be achieved whilst ensuring that individuals do not take up multiple plots across the city, default on cultivation on one site and move to another etc.</p>
PLANED	<p>It appears that local authorities are under increasing pressure to deliver more for less money. It would make sense to allow some of these projects requiring more specialist knowledge to be supported by groups that have more experience in this area.</p>
RTPI Cymru	<p>No comment</p>
Cwm Harry Land Trust	<p>Advantages - it might actually get done How are these then controlled</p> <p>Disadvantages - Who pays for it</p> <p>Is it simply allowing Local Authorities to pass the buck</p> <p>you might end up with NSLAG having a dominance - not a good thing at all</p>
CLA Cymru	<p>CLA Cymru opposes the delegation of such important powers. We are concerned that such action could lead to a lack of accountability and would result in a less engagement with Local Authorities. Local Authorities have extensive powers and we believe it would be inappropriate to place these in the hands of others.</p>
Vale of Glamorgan Council	<p>Delegation of allotment and community growing would affect the financial management of Local Authorities. There is financial pressures on Council to realise capital receipts from land sales and further encumbering the situation by allowing allotment use (even on a temporary basis) may delay realising those receipts at best and at worst, may possibly hinder the disposal completely (due to</p>

## Log of Responses to WG22211

	pressure to keep a successful growing garden/allotment going).
The Landscape Institute	
Torfaen County Borough Council	The management of the Council's allotments works well under the current Devolved Management Agreement I therefore do not see any merits of putting this out to a third party however, this may need to be reconsidered under the current financial climate.
Cardigan Allotments Ceredigion	third sector must have relevant knowledge and be good at relating and sound ethics
Cwmcarn and Abercarn Allotment Association	Risk of losing sites if not profitable for a 3rd party to manage. Should the fashion for allotments change, they would easily lose interest.
Greener Aberystwyth Group	Some additional funding may be available.  Adv. include -expertise growth of community growing and where commercial support may be available  Dis - include - cost 'transparency' diminished
Llanhilleth Family Allotments	The third sector may be non profit making but I believe there would be better success in empowering locals to sustain their own communities and try and make profit from excess.

## Log of Responses to WG22211

Project	
Watton Allotment Association	<p><u>PROS:</u> 3<sup>rd</sup> sector could be seen as more approachable and less forbidding than local authorities. Increase participation around various organisations. Reduce costs by encouraging not for profit organisations to replace local authorities (but with a responsibility to those authorities). See doc attached with response)</p> <p><u>CONS:</u> Another tier of bureaucracy</p> <p>Councils could simply pull the plug or not provide the necessary framework leaving the newly formed groups without representation.</p>
Respondent	Comments
<p>Q11. How should such a register be compiled and kept up to date?</p> <p>We would be interested to hear in your response whether such a register could form part of any existing land or property inventory, what body should be required to produce it, and who should have access to the register and for what purpose.</p>	
Cheow-Lay Wee	
Confidential	FCFCG and local authorities should work together to regularly gather data about existing activity and to promote the activity to the public.
Cyrenians Cymru	Whatever system is adopted, it has to be fluid. The adage about bureaucracy 'making the possible impossible' holds true here. A light touch regulation is essential.
Capita	If the management is passed onto a third sector body that covers the whole of Wales then they should be the one to manage and monitor community land usage.

## Log of Responses to WG22211

Cwmni Nod Glas Cyf.	rhestr gan yr awdurdod sydd yn rheoli tiroedd comin
Owen Jenkins	There is no need for a register. The formalisation of a register could be off-putting to private land-owners and lead to a reluctance to both private and public bodies offering sites.
Bleddyn Williams	obviously correct. however the time taken to compile the register should not be used as an excuse for inaction. Start improving provision now. there are known deficiencies at present
City and County of Swansea	There are many 'green maps' produced by, or on behalf of local authorities which could be overlaid with allotments and community growing provision. Local Authorities have considerable experience in procuring or producing these 'green maps' and should continue to be the lead body in this area, especially regarding issues surrounding natural resource management. We would consider that those concerned with day to day operational matters would be best placed to actually manage the register and ensure consistency.
Isle of Anglesey County Council	Simple database and GIS mapping systems, produced and updated by a National Society/Association
Delegates to Welsh Region of NSALG	Local authority should be responsible with access to all
Sully Terrace Allotments Association	STAA believe that a register of community growing sites could be a useful resource for individuals, groups and local authorities. It could offer comparisons and share innovation across local authorities and regions. To be effective, a register would need to be comprehensive, up to date and ideally should include relevant contact details and categories of use, scope and size. Producing, maintaining a comprehensive register would pose

## Log of Responses to WG22211

	<p>logistical, and resource challenges.</p> <p>Local authorities could compile local registers but this would not guarantee consistency across Wales.</p> <p>Alternatively, an umbrella organisation, such as the Federation of City Farms and Community Gardens, could complete and maintain the register. They already have experience gained from CLAS. A single e- register would be simpler to search and would be easier to manage. This function would need to be centrally resourced.</p> <p>In either case, a register would need the active co-operation / participation of all growing groups.</p>
Denbighshire County Council	<p>With the Authority all sites are currently held upon their Property Database, Mapping System and Asset Valuations systems and these are always kept up to date. It would be possible for the Authority to hold mapping information upon third party sites with a contact name for "persons" to contact the various sites directly.</p>
Llandough Community Council,	<p>A register is needed for the purpose of public information and schedules of contact for making application for an allotment should be available on-line.</p>
One Voice Wales	
Federation of City Farms and Community Gardens	<p>Most local authorities hold information about their statutory allotment sites. Many local authorities are also in the process of identifying land that has potential to be used for community growing. This is to be encouraged and all Local Authorities should be under an obligation to maintain a register of unused and underused land as well as land already assigned to food production. The Federation of City Farms and Community Gardens already maintains a database of community growing projects and allotment sites that have required our support, although projects choose whether to appear on a public map so not all the information is available to the public. As we only record projects with whom we have worked, allotment sites which have been running for</p>

## Log of Responses to WG22211

	<p>years and require no input do not appear on the map the list does not include every site or growing space. This work could be expanded and we are ideally placed to do so.</p> <p>Local authorities could be required to provide up to date information on their sites and link from their websites to our online map.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	Not qualified to comment
Mick Antoniwm AM	The register should be kept at local authority level and incorporate all sites (i.e. whether managed via the local authority or not). This register should be available to the public within the confines of data protection requirements.
Bridgend County Allotment Association	Yes, I think this would be a good idea. It would give the Welsh Assembly an idea where the demand is for growing spaces, in conjunction with the waiting lists. The register could be made available to all those with an interest in providing land.
Food Cardiff  This is an endorsement of the FCFCG	<p>Most local authorities hold information about their statutory allotment sites. Many local authorities are also in the process of identifying land that has potential to be used for community growing. This is to be encouraged and all Local Authorities should be under an obligation to maintain a register of unused and underused land as well as land already assigned to food production.</p> <p>The Federation of City Farms and Community Gardens already maintains a database of community growing</p>



## Log of Responses to WG22211

response with the additional comments in question 1 and 15	<p>projects and allotment sites that have required our support, although projects choose whether to appear on a public map so not all the information is available to the public. As we only record projects with whom we have worked, allotment sites which have been running for years and require no input do not appear on the map the list does not include every site or growing space. This work could be expanded and we are ideally placed to do so.</p> <p>Local authorities could be required to provide up to date information on their sites and link from their websites to our online map.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	<p>Advantages - third sector may have more expertise and flexibility.</p> <p>Dis-advantages - third sector organisations which are big enough for paid staff may become dependent on financial support from local authorities, or have long term viability issues - no statutory powers.</p>
Growing Green Teens Project	Local councils should produce an Annual online survey, with information available online
Natural Resources Wales	<p>Whilst this is an excellent proposal which would help in both the monitoring of a community food growing scheme for Wales and act as a development resource, it would be essential to establish long-term management resources, reliable maintenance processes, quality assurance and public data access issues at the outset. Subject to data protection considerations, an on-line register should be publically accessible. Is the WG's own EPIMS database a useful starting point? This work links to the potential site mapping work and land ownerships (see response to Q2). If the register is to be managed by a third party, long-term maintenance and access issues will need to be secured and safeguarded should the body close or change remit.</p>

## Log of Responses to WG22211

National Botanic Garden of Wales	<p>A good open register could provide information on available land.</p> <p>However, recommend the local authority maintains this register</p>
Gelligaer Community Council	Local authorities should maintain a register/database to which the public should have access to.
Cornelly Community Council	This is not considered necessary. This would be another tier of unnecessary expensive Government.
National Society of Allotment & Leisure Gardeners Limited	The NAS welcomes the proposal to establish a map and register of community food growing sites, with responsibility for its production vested in the relevant local authorities. We believe that the map and register should be open to public inspection and use on an unconditional basis.
Penarth Town Council	A register should be compiled by one central organisation and the information should be capable of being interrogated so that land availability and use can be identified within each local authority area.
FlintShare	Several bodies, inter alia the Soil Association and the Federation of City farms and Community Gardens maintain partial records of CSA/CG projects but the information is patchy and incomplete (to the best of our

## Log of Responses to WG22211

	<p>knowledge inclusion in such records is voluntary). For example the entries give no indication of acreage or number of participants in the community group, both indicators that would be needed to assess the development and uptake of of CSA in its various forms.</p> <p>A central registry could therefore be useful, provided it was designed to contain the information needed to allow periodic assessment of developments and of the success or otherwise of implementing WG policy. Another use for such a record is to enable people to find out which groups are active in their area, and for groups considering initiating a CSA scheme to find out about other groups from whose experience they could benefit. There are already networks through which CSA groups interact, but this could provide an additional route for the spreading of good ideas and best practice.</p> <p>We therefore consider that any such central records should be accessible to all members of the public. Web based access with suitable search facilities would be particularly convenient and easy to maintain.</p> <p>If records are to be assembled by public authorities, the local authority will be best placed to collect the information for their area, and collation of these records into a central registry could then be carried out by WG or a suitable national agency. Consideration should also be given to commissioning a third sector body such as the Federation of city farms and community gardens, that already have good links with many extant CSA groups, provided that they are adequately resourced for the task.</p> <p>For allotments, the Local Authority will have records of the number and location of plots on their land, and either manages the site or (more frequently) delegates management to the group of plot holders. Thus the required information will already be available locally. There are some instances of allotments provided on private land and it is not clear to us whether, or how, local authorities keep track of those. Clearly, if current processes do not capture the relevant information, they will need to be revised in order to provide an accurate data set.</p>
St Dogmaels Allotment Association	<p>The Third Sector body could be responsible for maintaining a register, whereby everyone interested i.e.; media publicity and local groups can be kept informed about local sustainability in Wales and the aims of sustainability.</p>

## Log of Responses to WG22211

<p>Chris O'Brien Public Affairs Manager  RSPCA Cymru</p>	<p>The development of any Wales-wide register of community food growing sites offers potential to play a role in the protection of animals based on such sites.</p> <p>Depending on the form of any such register, RSPCA Cymru would welcome discussions on this potentially containing information on whether animals are allowed to be based on particular sites, and which particular species are permitted.</p> <p>RSPCA inspectors have experienced issues whereby, when dealing with welfare problems or emergencies on allotments, it has been difficult to identify or contact those responsible for the animals involved. If this situation could be addressed within the scope of the planned development of a register, RSPCA would be eager to be party to any such discussions.</p>
<p>Egg Seeds</p>	<p>We believe a database of allotments, community growing projects needs to be created. It needs to be created with the right infrastructure and be a National database with LA having obligation to keep it up to date. The portal should be accessible to public with varying degrees of accessibility to the data.</p> <p>Welsh Government should provide database development and infrastructure or provide well positioned organisations to create/maintain it.</p> <p>LA should provide up to date info on allotments (via secretaries)</p> <p>The Welsh Government and LA should work with organisations to map potential spaces and to recognise work that has already been done in this field.</p> <p>Record demand for allotments on a GIS Map showing hot spots for demand - this data should appear as a population ratio not a simple number such as 2 per every 100 adults(who live in the area) are asking for allotments not 10 people have asked. So that areas of low population should still have demand met and not left waiting for people to move into the area to raise demand.</p> <p>Third sector such as FCFCG—update on community Gardens</p>

## Log of Responses to WG22211

	<p>Other—update on gardens/groups manage</p> <p>Group/individual—Keep registration contact details and desire for allotment/community garden access up to date.</p> <p>All overseen by an auditor to make sure demands are being met, system is functioning and organisations are carrying out their responsibilities .</p> <p>The portal needs to be multilingual and not just English/Welsh.</p> <p>The portal/database need to be electronic online with a user interface where individuals/groups can add themselves to a waiting list anywhere in Wales “with checks” but limited to a maximum of 5 location and suitable waiting list to warrant this. Ie if 5 yr waiting list a person may wish to move say to Pembrokeshire in 4 years and so puts themselves on the list.</p> <p>When entering interest for location a score is created to evaluate position on what list you are on.</p> <p>For example gather details about housing, income, location, age, family size, access to a garden (and size) and say you live in rented flat with no garden, on income support and shown interest in allotment 5 minutes from address so because of all great benefits we know allotments/community gardens have the person assigned score and gets placed into the waiting list higher than person X who lives in owned house with garden of 50m squared and has income of £50K+</p> <p>The scoring system would try to balance out the current system observed where allotments are not always accessible to those who need them most and to do away with first come first served approach which is great in some things but does not offer best utilisation of resources to needs.</p> <p>The length someone has been on the list would also raise their score, and if a person’s situation changes “change recorded by the individual” then score position changes with safeguards and checks to reduce abuse.</p> <p>When someone registers interest an automated email should be sent and information on screen informing them</p>
--	---

## Log of Responses to WG22211

	<p>of community gardens in the area showed interest in allotment.</p> <p>For people registering who cannot locate suitable allotment they should have a function built into the select location map that allows them to toggle into suggest location map or have a register interest screen. An automatic email or popup screen will suggest nearest allotments/community gardens but log interest taken from postcode which at the back end for 3rd sector/LA and auditors can see a GIS map build up of black spots in provision demand.</p> <p>The allotment such as they are in Cardiff that have voluntary committees and secretaries to help administer plot sign up from waiting list would also have a login and have access to live updated lists. They would have a back end that enabled them to log attempted contacts—phone, email, letter, and if tour given, plot let, didn't respond, decided not on that site etc.</p> <p>This would then affect score, move or remove them from a waiting list.</p> <p>The waiting time per site will be an average from sign up to allotment list to sign up to an allotment plot. The expected waiting time along with shortest and longest time waiting will be presented on screen about the allotment when people select which sites they wish to join. When a user is assigned an allotment they are removed automatically from other allotments in that region. This will affect average waiting times on those sites in real time and would also allow them to stay on other regions list if timescale is still relevant.</p> <p>---- every 6 months automatic reminder to check details, renew interest. Promoting community spaces across preferred sites.</p> <p>---- Automatic renewal for bill</p> <p>----Secretaries on sites can flag/log problems with plots online which would generate an email or report to overseeing officer on a regular basis and could stop automatic bill generation until concerns addressed.</p> <p>----users/individuals/groups would manage personal details and allotment, community garden interest in the</p>
--	---

## Log of Responses to WG22211

	same easy way people do with email preferences.
Confidential	Again more paperwork, at least farmers are honest they buy or inherit the land they own and try and make a living from it even though no one wants to keep milking cows because there is no money in it and they have to make their cows and sheep travel long distances to be killed because there is no local slaughter house and there is more money in planting Christmas trees than growing a field of carrots! Well if you use the land registry then I guess you can put a time limit on the use of the land and the ownership wouldn't be in dispute you could use the model of a mortgage where a charge is put on a property - a charge would be the use of the land for allotments and if it wasn't being properly used then the owner can reclaim the land! As regards a register and who should have access then just like the Land Registry you would have to pay a fee.
Jocelyn Kynch	No comment
Allan Evans	The all Wales Association would hold that information This would be a stand alone organisation and would be funded from allotment site levies and other sources. They would hold a data base and contact details of each site
Bay of Colwyn Town Council	The statutory responsibility should remain with the local authorities, even where responsibility of provision is delegated, in order to provide a scrutiny and overview of provision.
Radyr & Morganstown Community Council	Many sites are within local authority control and they should be able to provide inventories to a central register. Sites held by private landowners may be harder to record and an audit of these could be done by a 3rd sector body.  Potential plot holders should have access to the register so that they can see what is available in their area.
Lisvane Community	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question

## Log of Responses to WG22211

Council	
Welsh Land Contamination Working Group	<p>The development of a register identifying community food growing sites would assist Local Authorities in discharging their duties under Part 2A of the Environmental Protection Act 1990. By having access to a database showing allotment land uses Authorities can check historic plans to determine any potential sites where significant risk may exist to site users from contamination. WG could request LA to submit an annual data return on allotment land use/ allocation etc. Data could be mapped by WG and published on line to allow public to search their area for allotments/ community schemes .</p>
Cardiff Council	<p>It would be useful to hold such a register on a Wales wide basis – the preparation of such a register could be a good opportunity to register non statutory allotment as well as define areas for permanent or temporary community growing. But who would keep such a register as this goes wider than just local authority, or even wider public sector, owned land? This would need a lead organisation to take on this role for Wales and a dedicated member of staff as a minimum in order to maintain the list up to date.</p> <p>Since the data required for such a register would have to be collated on a local authority basis and since community gardening is essentially a local issue, then it would seem more sensible for each local authority to maintain a register of sites subject to adequate resources being made available – with perhaps a requirement to submit the list annually to a central point (Welsh Government?).</p> <p>Community gardens could apply to go on the register and then perhaps have to renew their registration after a period of time in order to ‘weed out’ sites that have been abandoned or transferred into a different use. The register could be in the public domain, published on the local authority web-site with the view of allowing prospective community gardeners finding out where their nearest garden is.</p> <p>The register should specify the location, the type of site i.e. community growing or allotment. The Federation of City Farms and Community Gardens have already produced a very good leaflet which is available at: <a href="https://www.farmgarden.org.uk/farms-gardens/your-region/wales/1028-welsh-resources-new">https://www.farmgarden.org.uk/farms-gardens/your-region/wales/1028-welsh-resources-new</a></p>



## Log of Responses to WG22211

PLANED	It would be useful to have a register of some sort
RTPI Cymru	Access to a map and register which was produced and maintained to consistent standards of accuracy would be valuable for planning purposes.
Cwm Harry Land Trust	<p>wow what a great target to try and reach, but I can't quite see it being made real.</p> <p>You could use an online portal, backed up by a dedicated small admin team - mail shots out to all sites that are known, and this could be pushed through by organisations assisting community growing.</p> <p>Each local authority or public land agency should be required to produce and maintain one each year. To include water authorities and the likes of NRW</p>
CLA Cymru	<p>As explained in Question 1 and 2 we suggest that the information currently held by the 22 Local Authorities is used as a basis for creating a register.</p> <p>We are aware of the work of the Federation of City Farms and Community gardens and it is our understanding that they maintain a database of groups that they work with. More work needs to be undertaken in capturing the information of independent groups working in the sphere of community gardens, perhaps the Local Authority is best placed to gather this information through its community links.</p> <p>Access should be restricted to service users and potential users but the level of information made available needs further consideration. Barriers to encouraging new landowners in making space available should be avoided hence we suggest a further consultation with private owners as to the level of information that is accessible by third parties.</p>
Vale of Glamorgan	The resources required for this type of register would be high for whoever kept the register. How and when would it be updated and what would in essence be the purpose?

### Log of Responses to WG22211

Council	Would a register increase up take, or delivery of more sites?
The Landscape Institute	
Torfaen County Borough Council	Local authorities, Community Councils etc. provide regular feedback to the Welsh Government.
Cardigan Allotments Ceredigion	either a third sector org - like wales community gardens association , which already has on the ground knowledge.
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- Annual survey to existing sites</li> <li>- Compilation of any panning applications made to council for the creation of new sites</li> </ul>
Greener Aberystwyth Group	Utilise existing L.A.Y practice and expand to include publicly available register and locations maps etc. WAG to establish 'model'.
Llanhilleth Family Allotments Project	Compiled on a website with encouraging signals like e.g. ' look what ... community has done' to give others ideas – everyone should be able to access and schools encouraged to take part as well. Education authority update?
Watton	Very limited experience. Presumably local authorities would have overall responsibility with the information

## Log of Responses to WG22211

Allotment Association	gathered by them. Individual 'sites' to have a duty to report every year. i.e. membership, waiting lists and indeed their existence. This must be a public document.
Respondent	Comments
<p>Q12. As a part of this should there be a third party right to apply for a site to be registered or deregistered, and how should that work? We are particularly interested to hear your views about how appeals and arbitration could work here.</p>	
Cheow-Lay Wee	I am not sure that an area be deregistered. There are not sufficient safeguards for stakeholders in a deregistered system. The appeal should be fair and be based at local authority level.
Confidential	Not sure what this means.
Cyrenians Cymru	<p>I have no experience in this area, but would suggest that there should be a presumption of approval for the registration of a site, where it could be demonstrated that that site has not been in use for 5 years or more.</p> <p>Appeals would have to be via local authorities.</p>
Capita	<p>There definitely needs to be a robust system for dealing with registering the sites and returning them to other usage should the land owner have a pressing need or if the land is not productively used.</p> <p>I think this could be covered in the terms of a lease spelling out what would end its usage and the termination time from notice end its use.</p>
Cwmni Nod	?

## Log of Responses to WG22211

Glas Cyf.	
Owen Jenkins	<p>As a landowner of an allotment that has a fixed term 5 year lease I would be very nervous to extend the period of that lease if I thought that legislation may be in the pipeline to ensure that I could not end the arrangement at a time of my choosing and without having to offer an alternative site.</p> <p>In fact the very tone of this consultation document is making me have reservations.</p>
Bleddyn Williams	<p>Stick to your own rules to start with and follow up any infractions.</p> <p>aim for all sites to be statutory allotments</p>
City and County of Swansea	Local Authorities will take a view on registering and deregistering of sites which will take into account the wider strategic aims and objectives of the Local Authority.
Isle of Anglesey County Council	<p>Right for a third party to apply should be considered, by submission of written application with supporting evidence</p>
Delegates to Welsh Region of NSALG	This should be dealt by Local Authority or Welsh Assembly Government and local branch of N.S.A.L.G. Ltd
Sully Terrace Allotments Association	STAA believe that third parties should have the ability to apply for sites to be registered and deregistered. This will help keep the register up to date and accurate. The process for doing this and for challenging must be transparent and simple with set notice periods. This should minimise disputes. Where the register manager cannot reach agreement between parties alternative dispute resolution should be preferred (RICS' Dispute

## Log of Responses to WG22211

	Resolution Service) rather than using Ministry of Justice Lands Chamber.
Denbighshire County Council	I believe that this is where you will have problems with Farmers releasing land for the use by community gardens or allotments, if there are no right for him/her to deregister their own land. Current registered sites are protected as per below.
Llandough Community Council,	N/A
One Voice Wales	The response to this question would depend upon what the definition of a third-party would be.
Federation of City Farms and Community Gardens	<p>Registering a site should be a clearly defined process with clearly defined consequences and benefits. Advantages of having a registered community grown food site will result. For a statutory site, that could be maintenance of it's statutory protection. For a community growing site it could be access to local authority support such as free compost from council recycling or the opportunity to receive funding from public bodies such as Neighbourhood Partnership Schemes. Publically funded grant providers such as Environment Wales place conditions on projects before they are eligible for funding, being a registered community growing project could be one of these.</p> <p>It would be important to make the process as simple as possible as the bureaucracy of setting up a community group can be off-putting to many groups. It is vital that the benefits of being a registered site are clear to all current and new community projects.</p> <p>FCFCG feels that statutory and non statutory community growing sites should be classified differently. There is a fine line between having rights over land that groups occupy for community growing purposes and undermining the efforts of many to engage with landowners to gain their permission to use sites for community growing.</p>

## Log of Responses to WG22211

	<p>Registration should reflect the tenure of land use. Therefore statutory sites would be registered in perpetuity while community gardens etc. could be registered for their length of lease or tenancy. Registration could be renewed as land agreements are extended or as groups move to new sites.</p> <p>There should be a process in place that could allow a community growing site on public land to apply for statutory site status where this is appropriate. Conditions for this could include public land or community owned land, length of successful cultivation, strength of community feeling. This right should not apply to sites on private land as it would have a deterrent effect on landowners considering making land available.</p> <p>A panel of experts drawn from NRW, FCFCG, WLGA and the National Allotment Society plus potentially other interested bodies could consider appeals and arbitration as required.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	No comment
Mick Antoni AM	I agree and this application should be considered by the Community Council (see Q14). The appeals process should be managed by the Local Authority.
Bridgend County Allotment Association	Once a site has been registered as an allotment, it should be really, really difficult for an application to be made for de-registration. Unless, of course, that has been written into any lease given to a landowner other than a local authority. Local authorities are pretty keen to get rid of allotments if at all possible, and it should not be made easy for them to do so.

## Log of Responses to WG22211

<p>Food Cardiff</p> <p>This is an endorsement of the FCFCG response with the additional comments in question 1 and 15</p>	<p>Registering a site should be a clearly defined process with clearly defined consequences and benefits. Advantages of having a registered community grown food site will result. For a statutory site, that could be maintenance of it's statutory protection. For a community growing site it could be access to local authority support such as free compost from council recycling or the opportunity to receive funding from public bodies such as Neighbourhood Partnership Schemes. Publically funded grant providers such as Environment Wales place conditions on projects before they are eligible for funding, being a registered community growing project could be one of these.</p> <p>It would be important to make the process as simple as possible as the bureaucracy of setting up a community group can be off-putting to many groups. It is vital that the benefits of being a registered site are clear to all current and new community projects.</p> <p>FCFCG feels that statutory and non statutory community growing sites should be classified differently. There is a fine line between having rights over land that groups occupy for community growing purposes and undermining the efforts of many to engage with landowners to gain their permission to use sites for community growing.</p> <p>Registration should reflect the tenure of land use. Therefore statutory sites would be registered in perpetuity while community gardens etc. could be registered for their length of lease or tenancy. Registration could be renewed as land agreements are extended or as groups move to new sites.</p> <p>There should be a process in place that could allow a community growing site on public land to apply for statutory site status where this is appropriate. Conditions for this could include public land or community owned land, length of successful cultivation, strength of community feeling. This right should not apply to sites on private land as it would have a deterrent effect on landowners considering making land available.</p> <p>A panel of experts drawn from NRW, FCFCG, WLGA and the National Allotment Society plus potentially other interested bodies could consider appeals and arbitration as required.</p>
<p>Joint</p>	<p>Registration should be available on request based on simple objective criteria. Similarly for de-registration. If</p>

### Log of Responses to WG22211

response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	permitted development rights are linked to registration and used as allotments, that should be sufficient for publicly-owned land. Security of tenure of privately owned allotments is probably more important than a statutory system of appeals over registration and de-registration.
Growing Green Teens Project	All sites should be registered but there could be some sort of measure of what is available and the standard (score)
Natural Resources Wales	Key principles of any established system should be clarity, openness, transparency and timeliness – with thorough consultation and safeguarding at its heart.
National Botanic Garden of Wales	Recommend that there is an ability to highlight concerns and provide comments rather than require deregistration. Important to not provide a body to allow personal grievances a voice.
Gelligaer Community Council	(Left Blank)
Cornelly Community Council	As question 11.



## Log of Responses to WG22211

National Society of Allotment & Leisure Gardeners Limited	The NAS has no objection to third parties having a right to apply for a site to be registered, provided that this is a transparent process. Deregistration, however, is likely to impact on existing allotment holders or others participating in food growing, and we believe they should have a right to be included in any consultation process leading to deregistration. Reregistration and deregistration should not be confused with the classification of allotment sites as temporary or statutory, which is based on historic criteria.
Penarth Town Council	(left blank)
FlintShare	There are some circumstances under which we would favour such third party rights. For example if the local authority is minded to provide some public land to a community group for their use as a community garden, some third parties may have legitimate grounds for objecting. In the first instance one might hope that such disagreements would be resolved by local negotiation, but failing that some form of arbitration would be desirable.
St Dogmaels Allotment Association	The Third Sector could provide support through the minefields of by-laws, objections, bias, ignorance and legislation that arise when changes are made.
Egg Seeds	<p>All statutory sites are registered and all private and public growing projects being private or community should be incentivised to register such as cannot receive apply for Environment Wales funding etc without registering.</p> <p>Clear guidance should be given as to why one should register for all new and old groups.</p> <p>For non allotment sites—registration of private allotment or community project should relate to tenure and should be required for inputting into the database to allow tailored support but also to try and maintain and</p>

## Log of Responses to WG22211

	<p>attract private landlords. The site would then expire at end of tenure.</p> <p>A panel of respected organisations should oversee appeals and arbitration such as NRW, FCFCG, NSALG and local recognised interested bodies.</p>
Confidential	Well that sounds like an opt out so that if someone wants to put a road through an allotment or build more houses then they can apply to have the site deregistered or conversely registering it to stop development. From my experience when the Government says that Councils have to..... then no amount of appeals or arbitration will change that directive.
Jocelyn Kynch	
Allan Evans	The All Wales Association would provide advice and support and promote the guidance A Management board would exist and they would act as arbitrators in disputes calling upon independent experts if required.
Bay of Colwyn Town Council	Where a site meets the definition of an allotment or community growing area they should be registered as such. Where a site is no longer required or is required for another priority, the existing rules regarding de-registration should apply, as per the 1950 act.
Radyr & Morganstown Community Council	It should be easier to establish a site than deregister it. If a site is known to be unregistered it should be possible for members of the public to notify the register holder.
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contaminatio	

## Log of Responses to WG22211

n Working Group	
Cardiff Council	<p>Care should be taken in considering this as an option as the 'meanwhile' use of land is an important consideration. If third parties are given the right to apply for registration this is likely to deter land owners from putting sites forward for temporary use (as we are currently considering in Cardiff).</p> <p>If there were to be considered but there would need to be strong legal safeguards in place to secure the rights of landowners to regain the land and use for an alternative purpose if this was the basis on which the community garden was set up in the first place.</p> <p>In practise it may be more sensible to allow only land owners the right to apply for a site to be registered or deregistered, however a mechanism for individuals / groups to lobby site owners for inclusion / exclusion could be provided.</p>
PLANED	
RTPI Cymru	
Cwm Harry Land Trust	
CLA Cymru	<p>Any attempts to register a site by a third party would act as a serious deterrent to private landowners coming forward with new opportunities as well as those currently providing space. Registration of any site should be a clearly defined process with explanations of benefits and consequences. Any attempt to circumvent a defined process should be rejected on the basis that it would fundamentally undermine future projects. Any process adopted should be user friendly and kept as simple as possible.</p> <p>Registration procedures should also acknowledge and distinguish between different land tenures. An increase in the amount of private land made available will only be facilitated by clear guidance</p>

### Log of Responses to WG22211

	on the legislation to encourage landowners to make the land available. Beyond this the removal of any threats to the landowner's right to determine use of his land (beyond a season's notice) would be an effective tool in encouraging wider take-up.
Vale of Glamorgan Council	No - a third party right to register / deregister sites may be used vexaciously
The Landscape Institute	
Torfaen County Borough Council	A third party should have the right to register and deregister a "non statutory" site.
Cardigan Allotments ceredigion	
Cwmcarn and Abercarn Allotment Association	
Greener Aberystwyth	Yes - local community groups should be included in decision making (more discussion/reference to case law

## Log of Responses to WG22211

Group	needed? re Arbitration and appeals
Llanhilleth Family Allotments Project	To make it easy for everyone there should be a template guidance <u>contract</u> template for people/community allotment committees to use or adapt slightly.
Watton Allotment Association	Yes- third parties should have the right to apply and if necessary appeal, providing they are able to demonstrate the need etc. appeals – ombudsmen’s office?
Respondent	Comments
Q13. Existing legislative provisions require that local authorities need to consult the Welsh Ministers if they intend to dispose of a statutory allotment site, and the Welsh Ministers’ approval would usually require the provision of a compensatory site of similar amenity value. Should this approach be extended to all registered sites?	
Cheow-Lay Wee	Absolutely. It should also be extended to deregistered sites
Confidential	Not sure.
Cyrenians Cymru	Yes - land for growing should grow,not decrease. It is important that pressures on local authorities do not lead to a decrease in available land for economic gain (as has happened with school fields for example).
Capita	I feel we should get away from statutory allotments if we want to gretly expand community food growing. A lot of land owners would accept a 5 or 10 year lease with the land being returned to them and have a clause that they could take it back if circumstances changed possibly forcing them to sell the land.
Cwmni Nod	dylid

## Log of Responses to WG22211

Glas Cyf.	
Owen Jenkins	No- and if such legislation is intimated then I shall immediately give a 12 month notice to close for our Community gardens
Bleddyn Williams	definitely
City and County of Swansea	See above. We consider that Local Authorities are best placed to make decisions based on wider strategic objectives. We do however support the provision of a compensatory site.
Isle of Anglesey County Council	No
Delegates to Welsh Region of NSALG	Yes Within the Allotments Acts
Sully Terrace Allotments Association	<p>Yes</p> <p>Sully Terrace Allotments has been a private site since 1895. It is not protected under the exiting legislation. There have been threats to sell and develop the land in recent decades. There are currently 47 members who cultivate full or half plots. STAA welcomes the proposal that all registered sites should have statutory protection.</p> <p>This will give growers who have maintained and improved land over many generations some protection and reduce the threat of nurtured green spaces being sold off to cash in on high land prices at the expense of</p>

## Log of Responses to WG22211

	health, social and community benefit.
Denbighshire County Council	Yes I do believe that this should be extended to all registered sites
Llandough Community Council,	Yes.
One Voice Wales	Yes.
Federation of City Farms and Community Gardens	<p>FCFCG believe it is vital for there to be different classifications for statutory allotment sites and potentially less permanent community growing sites.</p> <p>If the process suggested above were applied to all registered sites it is likely to reduce the amount of land offered for community growing and would therefore be counter-productive.</p> <p>We would like to see the current levels of protection for statutory allotment sites continue and therefore ask for a tiered protection system.</p> <p>FCFCG would suggest the following:</p> <ol style="list-style-type: none"> <li>1. Statutory Allotment sites - Full protection as stated above, in perpetuity.</li> <li>2. Community Growing on Public Land - Full protection for length of land agreement, presumption in favour of renewal, and ability to apply for statutory/perpetual protection if conditions are met.</li> <li>3. Community Growing on Private Land - Protection provided by terms of land agreement. If the tenant group break terms of agreement they will be subject to sanctions agreed in their tenancy or lease.</li> </ol>

## Log of Responses to WG22211

Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	No comment
Mick Antoni AM	Yes.
Bridgend County Allotment Association	Yes.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	<p>FCFCG believe it is vital for there to be different classifications for statutory allotment sites and potentially less permanent community growing sites.</p> <p>If the process suggested above were applied to all registered sites it is likely to reduce the amount of land offered for community growing and would therefore be counter-productive.</p> <p>We would like to see the current levels of protection for statutory allotment sites continue and therefore ask for a tiered protection system.</p> <p>FCFCG would suggest the following:</p> <ol style="list-style-type: none"> <li>1. Statutory Allotment sites - Full protection as stated above, in perpetuity.</li> <li>2. Community Growing on Public Land - Full protection for length of land agreement, presumption in favour of</li> </ol>



## Log of Responses to WG22211

	<p>renewal, and ability to apply for statutory/perpetual protection if conditions are met.</p> <p>3. Community Growing on Private Land - Protection provided by terms of land agreement. If the tenant group break terms of agreement they will be subject to sanctions agreed in their tenancy or lease.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	Planning policy advice plus willingness to "call -in" applications to build on allotments could probably achieve similar aims without legislation.
Growing Green Teens Project	Yes
Natural Resources Wales	Yes
National Botanic Garden of Wales	No - private land will not come in under this suggestion. For private land, it is recommended that notice is given at the beginning of the allotment year if the landowner intends to return the land back to private use and deregister it as an allotment.
Gelligaer Community	Yes

## Log of Responses to WG22211

Council	
Cornelly Community Council	No
National Society of Allotment & Leisure Gardeners Limited	The NAS would welcome the extension of this provision to temporary allotment sites and other sites where food is produced within the community.
Penarth Town Council	If the demand for such sites is to be met then any disposal of land should require a compensatory site
FlintShare	If the registered site is on public land we think that there is merit in such a consultation and compensation provision, unless it had been agreed at the outset that registration and use of the land for CG or CSA was time limited for specified and justifiable reasons, for example because the site was allocated for some approved development planned to start some years later.
St Dogmaels Allotment Association	Yes - As long as the organisation has in-put on the suitability of a new site.
Egg Seeds	I support the FCFCG response which read  "FCFCG believe it is vital for there to be different classifications for statutory allotment sites and potentially less permanent community growing sites.

## Log of Responses to WG22211

	<p>If the process suggested above were applied to all registered sites it is likely to reduce the amount of land offered for community growing and would therefore be counter-productive.</p> <p>We would like to see the current levels of protection for statutory allotment sites continue and therefore ask for a tiered protection system.</p> <p>FCFCG would suggest the following:</p> <ol style="list-style-type: none"> <li>1. Statutory Allotment sites - Full protection as stated above, in perpetuity.</li> <li>2. Community Growing on Public Land - Full protection for length of land agreement, presumption in favour of renewal, and ability to apply for statutory/perpetual protection if conditions are met.</li> <li>3. Community Growing on Private Land - Protection provided by terms of land agreement. If the tenant group break terms of agreement they will be subject to sanctions agreed in their tenancy or lease."</li> </ol>
Confidential	<p>Yes sounds like a good idea providing there is a need for another site, but then considering the Swansea Vetch site, if Swansea wanted to build high rise housing and suggested that the community allotments moved to say a part of Clyne Gardens in Mumbles then I guess even though it is only a couple of miles away, it's not really a community garden for the residents of Sandfields and who would travel to the new site, it is quite a way to walk, not so far by car, but again would you want to spend over an hour walking to and from your community garden which isn't in your community and could you carry your produce home with you if you are elderly!</p>
Jocelyn Kynch	<p>No, I don't see how the flexibility of provision for community growing could coexist with the same approach - but allotments and community growing should not come under the same legal framework.</p> <p>I also would argue that community growing should come under village green activities and contribute to evidence for town and village green registration - this would encourage flexibility of use of the land but also protect areas used over 20 years.</p>

## Log of Responses to WG22211

Allan Evans	Yes but if a new approach were taken then the All Wales Association could in time take over this responsibility and report annually to the Minister
Bay of Colwyn Town Council	If all registered sites were to require ministerial approval prior to disposal this could deter farmers from entering in to agreements to lease land. In such cases, the terms of the lease should take precedence, although should the need remain it would fall upon the local authority or their delegate to provide an alternative site. Provision for notice is already enshrined in the present act and providers should ensure that plot holders are aware of their tenure.
Radyr & Morganstown Community Council	Yes. Any decision to approve disposal should give considerable weight to the horticultural value of the existing site created by years of cultivation. It should compare this with the horticultural value of the compensatory site and consider how long it will take to match the existing one. Long and well-cultivated soil is a valuable community asset and should not be destroyed without good reason.
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	
Cardiff Council	<p>No. Extending such a provision for all registered sites including more informal sites such as community farms and harvesting schemes could discourage the provision of such schemes.</p> <p>Consideration could be given to a two tier system with one tier being those sites where the landowner/local authority is happy to dedicate a site in perpetuity and which would require ministerial approval to dispose of, and a second tier, such as 'meanwhile' sites where the constraints would be less onerous.</p>

## Log of Responses to WG22211

	<p>Maybe local agreements could be entered into allowing local authorities to give an undertaking to use its best endeavours to find an alternative site but not binding it to.</p> <p>If land allocated for community growing is not being used productively there should be a requirement to see if there is another use to which the land could be put which could then revert back to community growing if demand re-emerges. Allocating or designating land for a use that is not likely to be taken up is a waste of resources.</p>
PLANED	Yes
RTPI Cymru	
Cwm Harry Land Trust	<p>No because this would not allow use of temporary sites (brown fields etc)</p> <p>However there should be a minimum requirement in legislation of statutory provision, based on a population figure or something - and this needs to be law - without any loop-holes for local authorities to crawl through</p>
CLA Cymru	There should be no extension of this requirement any attempt to extend this legislative requirement beyond the statutory protection of allotments could jeopardise future developments and thus become counter-productive.
Vale of Glamorgan Council	No, specific legislation already exists. Extending this legislation to all sites could affect the way local authorities manage their land holdings.
The Landscape Institute	
Torfaen County	I cannot see how a non statutory site can be subject to the same requirements?

## Log of Responses to WG22211

Borough Council	
Cardigan Allotments ceredigion	yes
Cwmcarn and Abercarn Allotment Association	Yes
Greener Aberystwyth Group	YES process must be seen to be fair with interests of local community needs paramount
Llanhilleth Family Allotments Project	Yes if possible.
Watton Allotment Association	Yes – definitely with the obvious proviso that where other planning constraints already exist. There needs to be care however that local planning is not used to place restrictions on sites unnecessarily as a means of land banking
Respondent	Comments
<p>Q14. How should waiting lists be compiled and kept up to date?</p> <p>We would be interested to hear in your response what body you believe should be required to produce such a list.</p>	

## Log of Responses to WG22211

Cheow-Lay Wee	An officer or assistant in the local authority should maintain the list, in a first-come-first-served system. There should be no role for any nepotism or of those who shout loudest. Everyone should get a plot when it is their turn
Confidential	The local authority and FCFCG should work together on this.
Cyrenians Cymru	Surely it is possible for ICT to be effectively used in this area, which should be logically coordinated by local authorities.
Capita	<p>Most local authorities already have a list of people waiting for allotments but I feel this is not reflective of the number of people who would want to get involved in community food growing.</p> <p>Again a third sector body covering all of Wales would be the best body to compile and maintain this list.</p> <p>There are very few people without internet access these days so this could be a very simple task</p>
Cwmni Nod Glas Cyf.	awdurdod sydd a chyfrifoldeb dros diroedd comin
Owen Jenkins	<p>There are two reasons for a waiting list</p> <p>To establish whether is a demand</p> <p>To fairly allocate plots as they become available</p> <p>However if demand exists then a more pro-active approach needs to be undertaken to meet that demand other than wait for a plot to become available.</p>
Bleddyn Williams	
City and	lease see Q11.We would consider that those charged with the management of operational matters would be

## Log of Responses to WG22211

County of Swansea	best placed to actually manage and update waiting lists.
Isle of Anglesey County Council	Compiled and produced by the organisation administrating/managing the sites
Delegates to Welsh Region of NSALG	<p>Yes All sites should keep up to date waiting lists from year to year, a copy is attached to this response</p> <p>Official Waiting List for _____ Starting 2014 copy to be kept and a copy must be sent to Secretary every 31st December with rent</p> <p>Date and Time   Name   Address   Telephone   Email   Signature of Applicant</p>
Sully Terrace Allotments Association	<p>Demand for STAA plots has exceeded supply for over 10 years. There are currently 28 people on the waiting list and our average wait for a plot is currently 4 years. We understand that many people register on several different lists to improve their chance of securing a plot.</p> <p>Although a central register could be a solution, STAA do not think that additional administrative layer would work. We are unsure how or if this would be resourced. We think allotment groups should manage their own lists. However, guidance on how best to manage a list could be useful.</p> <p>STAA try to be fair to potential plot holders and actively manage the waiting list. At least once a year, we update the list. We contact everyone to check that they still want a plot and give an update on the estimated wait to allocation. In the past, there have been difficulties when individuals, move and or change their contact information. We make it clear to new applicants how and when we will be in touch and that if we cannot contact them because they have not told us about any changes they risk being removed from the list.</p>
Denbighshire County	All sites which are run by the Authority have waiting lists which are consistent and fair. Each site has its own list which is based upon the date of when they asked to go on the site, next available allotment name is taken off



## Log of Responses to WG22211

Council	the oldest (top of the list) date If the sites are run by third parties the third party should keep these up to date as they will have a knowledge of their own sites.
Llandough Community Council	WG guidance should be issued to ensure fairness in the process of allocation of plots. Management of allotments is best vested in community and town councils or properly constituted tenant's associations linked with the managing third sector organisation.
One Voice Wales	We have presumed that waiting lists will be maintained locally by each organisation running the allotment site in question. There is a case for putting in place national guidelines that indicate how all such lists should operate in a broad sense.
Federation of City Farms and Community Gardens	<p>There can only really be a waiting list for allotments. Community gardens have their own criteria for access and generally it's self regulating in terms of number of people.</p> <p>Local authorities should be responsible for keeping up to date waiting lists for their allotment sites and to require self managed sites on council land to keep lists and make them available to the local authority. Allotment sites on private land should be encouraged to give waiting list numbers to local authorities so they can assess demand and need. The waiting list numbers should be publicly available.</p> <p>The process of joining and leaving an allotment waiting list should be straightforward as this is likely to result in more accurate information. Currently the situation exists in some local authorities where people can add their name to the waiting list for multiple sites. There is a need to create a system that will avoid this duplication.</p> <p>A national database will be required to facilitate the proposed register of community growing sites. This should be developed by Welsh Government, potentially in collaboration with a third sector organisation such as FCFCG. Local authorities should be given responsibility for ensuring the database is populated with standardized information on current provision and demand.</p> <p>This database could be used to map the current provision and demand and used to plan new provision. It would be possible to create a portal to this database so that individuals and groups could apply for an allotment</p>

## Log of Responses to WG22211

	<p>or community growing space in one central place. Access to this could be through links on local authority websites. This would lessen the administrative burden on local authorities but potentially result in an over-estimation of demand.</p> <p>Information on site provision and areas of demand should be available to local authorities and third sector organisations engaged in community growing.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	
Mick Antoni AM	Waiting lists should be managed by the Community Council (or LA where there is no CC).
Bridgend County Allotment Association	There are so many council run allotments, privately owned allotments, community spaces, etc., that it would be very difficult to compile such a list, although I can see that it would be beneficial. Our local authority did this quite recently. They did a full survey of allotment plots within the Borough, including privately owned and council-run sites. Even though they were aware of a shortfall of allotment plots in certain areas, they did nothing to remedy this, regardless of current legislation. So, a list is all very well but there must be some compulsion on local authorities to do something about the problem once it has been flagged up.
Food Cardiff This is an endorsement	<p>There can only really be a waiting list for allotments. Community gardens have their own criteria for access and generally it's self regulating in terms of number of people.</p> <p>Local authorities should be responsible for keeping up to date waiting lists for their allotment sites and to</p>

## Log of Responses to WG22211

<p>of the FCFCG response with the additional comments in question 1 and 15</p>	<p>require self managed sites on council land to keep lists and make them available to the local authority. Allotment sites on private land should be encouraged to give waiting list numbers to local authorities so they can assess demand and need. The waiting list numbers should be publicly available.</p> <p>The process of joining and leaving an allotment waiting list should be straightforward as this is likely to result in more accurate information. Currently the situation exists in some local authorities where people can add their name to the waiting list for multiple sites. There is a need to create a system that will avoid this duplication.</p> <p>A national database will be required to facilitate the proposed register of community growing sites. This should be developed by Welsh Government, potentially in collaboration with a third sector organisation such as FCFCG. Local authorities should be given responsibility for ensuring the database is populated with standardized information on current provision and demand.</p> <p>This database could be used to map the current provision and demand and used to plan new provision. It would be possible to create a portal to this database so that individuals and groups could apply for an allotment or community growing space in one central place. Access to this could be through links on local authority websites. This would lessen the administrative burden on local authorities but potentially result in an over-estimation of demand.</p> <p>Information on site provision and areas of demand should be available to local authorities and third sector organisations engaged in community growing.</p>
<p>Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park</p>	<p>Unitary authorities are probably best placed to do this and lists should be kept up to date.</p>

## Log of Responses to WG22211

Authorities.	
Growing Green Teens Project	Local councils
Natural Resources Wales	The locally designated lead should be responsible for this – see response to Q2 above.
National Botanic Garden of Wales	Maintain existing lists - however, ensure lists are refreshed and at least an annual check on the people on the list to see if they are still interested in an allotment.
Gelligaer Community Council	Allotment federations for an area should compile a register
Cornelly Community Council	Local Authorities should already be using such lists as good practise.
National Society of Allotment & Leisure Gardeners Limited	<p>The NAS welcomes any proposal to improve the management of waiting lists, an issue already expanded upon in A Place to Grow. It is concerned to ensure, however, that when people are placed on a waiting list their preferences between allotments and other, collective forms of community growing space, are clearly recorded, so that they are not vired between these categories at the point of provision against their wishes.</p> <p>The discussion of waiting list management in paragraphs 48-50 appears dated, and uninformed by the recommendations of A Place to Grow, particularly regarding non-cultivation and plot sizes, which appear to</p>

## Log of Responses to WG22211

	<p>have been successful in helping local authorities in England reduce their waiting lists substantially. There is an issue around the diffusion of good practice between allotment authorities in this area, something which can be facilitated by Allotment Officer Forums (as organized by NAS) and the training seminars run by APSE.</p>
Penarth Town Council	<p>Within Penarth there are systems in place on both Town Council and Association run sites to ensure waiting lists are kept up to date.</p> <p>In relation to community gardens either community or town councils where they exist could keep a register of available land and waiting growers or a national organisation such as the Federation of City Farms and Community Gardens.</p>
FlintShare	
St Dogmaels Allotment Association	<p>A register of individual plots is the responsibility of each association and kept up to date. Again the Third Sector could produce a map of actual sites in Wales.</p>
Egg Seeds	<p>With creation of an all Wales allotment and community growing projects database and web portal waiting lists can be live and accessible but responsibility to check data input and moderation should fall with LA who have authority to run checks on secondary systems such as electoral register, housing situation, benefits situation.</p> <p>There could be a national, regional or local centre made up of LA employees who can answer and facilitate calls about access, duplication, etc.</p> <p>There will be 3 types of waiting list, one for individuals/groups for allotments which is the main list and will have a list per allotment as well as an amalgamated list in a geographical area of high demand/low provision so that if a new site is created a list is present to fill it from previously registered interest in the area. This would remove issue of new site being created and unfairly someone in the know not on any list quickly inputting interest when that site came available and getting a plot before others realised it was open who have been on a previously</p>

## Log of Responses to WG22211

	<p>established allotments waiting list. Where no secretary/committee exist a third party may be employed by Welsh Government or LA to administer the list/plot sign up but responsibility should fall back with LA if no one present.</p> <p>The third waiting list should be groups interested in setting up community gardens and a local register of suggested site and available sites. A third party may liaise between LA and group and offer guidance and support to help them through process of acquiring public/private land available o them. LA responsible to have catalogue short, mid, long term available sites public and private with any specified restriction or considerations particular to that site. The lease guidance being produced from CLAS and LA should be made to recognise this tenancy period and guidance produced.</p> <p>In Cardiff we have a charity forming called Grow Cardiff which will be made up of experienced community growers and have links with National and local organisations to hopefully offer this bridging organisation for Cardiff LA to utilise and farm out this work to . We also have local group who map land that could be grown on in communities that may not be recognised as potential site by the LA team who carry out an asset mapping exercises as they may not have sufficient knowledge, time, desire to map all potential..... Offering work out to groups like Farm Cardiff/Grow Cardiff/FCFCG to do can support LA in gathering more accurate live data.</p>
Confidential	<p>Waiting lists to a consistent standard haven't worked for the NHS or the ambulance service I can't see how they would work for community food growing sites. If you keep using the word community then surely it has to be the community that can identify a site in their community that could be used and a body of people that are prepared to use it at least that way you have a good starting point and as it stands now if this is the case then this body can write to the local authority to see if there this identified land is available. More often than not the local authorities are trying to fulfil the other targets set by government for sustainable housing or better infrastructure with smaller budgets so providing an allotment site or community growing site is a long way down on their lists of priorities.</p>
Jocelyn Kynch	No comment

## Log of Responses to WG22211

Allan Evans	Once again I feel that local Authorities do not commit fully to registers I have registered with Conwy since 2007 for an allotment and am still waiting to hear - I have no idea where I am on the waiting list this is totally unacceptable since I have approached Llandudno Association and they run an effective fair waiting list
Bay of Colwyn Town Council	In the first instance this should remain with the local authority, however, delegation may be possible provided agreement can be reached as to where such responsibility can be delegated and a single waiting list be kept for each authority area. Applications for plots should be renewed annually with any application pending for more than 18 months being recorded as a failure to meet provision. Should this failure be for more than six applicants then further provision must be made (this would trigger the development of an appropriate strategy for delivery), with an ultimate aim of no applicant waiting for more than two years. Provision may be satisfied by neighbouring authorities or alternative arrangements such as garden adoption schemes or inclusion in a co-operative project.
Radyr & Morganstown Community Council	<p>No comment to make except to say that transparent lists that can be updated and viewed online are welcome. This would help individuals plan their waiting period. At present, we can cite an example where the allotment secretary is only aware of the top 20 names on that list.</p> <p>We suggest a central public waiting list for each local authority. When people put their names down for a plot, there needs to be some kinds of locality identifier so that they can be allocated the plot nearest to them. This would also help plan future allotment sites based on demand.</p>
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	See answer 11

## Log of Responses to WG22211

Cardiff Council	<p>This could either be a function of the local authority (through the existing allotment administration) or something managed by Welsh Government through a body such as CLAS. We have already identified in Cardiff that if land is leased for community growing outside of allotment legislation, there will be a need to inspect the land to ensure that the terms of the agreement are being adhered to and this could be a function of the existing allotments officer.</p> <p>It is difficult to envisage a situation where the local authority would maintain waiting lists for allotment and community gardens on non – council land. Perhaps legislation could include a standard ‘constitution’ for community gardens requiring the constituted groups to manage lists on a consistent and fair basis, with a right of appeal to Councils with regard to council owned sites and another body – WG? – on non-council sites.</p>
PLANED	If allotment and community growing services are delegated to a third sector body then that body should compile and update the waiting list, otherwise the local authority should maintain the list.
RTPI Cymru	
Cwm Harry Land Trust	
CLA Cymru	Local Authorities should continue to gather information on allotment requirements - please see response to question 2.
Vale of Glamorgan Council	<p>The landowner should maintain an equitable list.</p> <p>Waiting lists are already in existence and there is not a need for a national list.</p> <p>Waiting lists should be held on a first come basis for specific sites and regularly updated.</p>
The Landscape	



## Log of Responses to WG22211

Institute	
Torfaen County Borough Council	Waiting lists should be managed locally.  Each association manages their individual waiting lists which are regularly reviewed.
Cardigan Allotments Ceredigion	it could be a public register that the public can view- so you know who else is interested in your area. Here Pembrokeshire said it might 8 years before they could provide an allotment site
Cwmcarn and Abercarn Allotment Association	Independently within each allotment association with an annual submission to governing body or council for audit/review.
Greener Aberystwyth Group	key role for local AY WAG guidance essential to ensure parity in Wales
Llanhilleth Family Allotments Project	The local council or someone officiated like the federation of farms and gardens.
Watton Allotment Association	Please see Q1.  Compilation should be local to the site as much as possible (subject to enough members etc.) waiting lists should be reported to local authorities but should not be centrally compiled as this destroys the community aspect. Allowing local authorities to allocate plots from central lists could lead to cherry picking if the LA wished

## Log of Responses to WG22211

	to render \ site inoperable they could starve it of genuine new members. Councils etc. could also 'call in' waiting lists and monitor their administration.
Respondent	Comments
<p>Q15. What should be the trigger(s) for the development of a community grown food strategy, and do you agree that the local authority should lead on its production?</p> <p>We would be interested to hear your views on whether such a strategy could form part of single integrated plans or the proposed natural resource plans, or be developed to complement these high level plans.</p>	
Cheow-Lay Wee	
Confidential	It should be written and agreed on in a multi agency like through the Cardiff Food Council.
Cyrenians Cymru	Yes. The trigger should be as per the Allotment Acts. Community growing and allotments should be an integral part of single integrated plans.
Capita	I do not agree that local authorities should have this duty imposed on them I feel strongly that a third sector body covering the whole of Wales would be driven to meet demand if land is available, which is a problem for any body placed with this responsibility.
Cwmni Nod Glas Cyf.	yr awdurdod lleol sydd yn gyfrifol am diroedd comin i arwain ar hyn
Owen Jenkins	No this should be allocated to the third sector with clear goals and targets to be met.
Bleddyn Williams	how do you define a clear demand.as i have explained previously that using waiting lists is not a good indicator of demand. There is a massive latent demand from people who cannot travel to a site and have no sites within walking distance. these people do not appear on waiting lists. It should be assumed that a figure

## Log of Responses to WG22211

	<p>such as 1 in 15 homes would require an allotment within walking distance.</p> <p>to only cater for clear demand in itself is contrary to your own policy of encouraging people to grow food. I.E. your policy is to:</p> <p>INCREASE DEMAND. the flaw with using the local authorities to lead on this subject is that the local authorities are the ones with the responsibility to provide the sites. They have no real wish to provide them and there are not many votes in it for the politicians. Their instinct is to try and suppress demand. This was indicated in the 2010 report which adopted the policy of reducing waiting lists by decreasing the plot sizes. This will eventually reduce food growing area by having say 2 tenants on a plot instead of one .I.e.2 sheds greenhouses and compost heaps instead of one. It will encourage people to go back on the waiting list to get another or bigger plot</p> <p>I do not care who leads as long as they have the teeth to force the providers and have no other competing interests.</p>
City and County of Swansea	See answers above. The Local Authority will have an overarching understanding of wider strategic objectives within the Authority and should lead on strategic development. Different LAs will have differing delivery mechanisms so responsibility for the strategy should be decided by individual LAs. Ideally, a stand alone, cross cutting and inter-departmental strategy should be produced which should complement the objectives of the higher level strategies.
Isle of Anglesey County Council	A strategy should be developed as a matter of course. If the LA is not best placed to take the lead, then yes
Delegates to Welsh Region	<p>Per Allotment acts where the Demand for allotments is needed. Duty of certain councils to provide allotments.</p> <p>(1) If the council of any borough, urban district, or parish are of opinion that there is a demand for allotments . .</p>

## Log of Responses to WG22211

of NSALG	<p>. F2 in the borough, urban district, or parish, F2 the council shall provide a sufficient number of allotments, and shall let such allotments to persons . . . F2 resident in the borough, district, or parish, and desiring to take the same.</p> <p>(2)On a representation in writing to the council of any borough, urban district, or parish, by any six registered parliamentary electors or [F3persons who are liable to pay an amount in respect of council tax] resident in the borough, urban district, or parish, that the circumstances of the borough, urban district, or parish are such that it is the duty of the council to take proceedings under this Part of this Act therein, the council shall take such representation into consideration. The Councils ignore this completely</p>
Sully Terrace Allotments Association	STAA have no comments to add.
Denbighshire County Council	Denbighshire has always attempted to secure new allotment sites/community food growing areas as it is within their existing constitution and policy
Llandough Community Council,	Yes but there should be tangible evidence of local demand before responses are determined.
One Voice Wales	
Federation of City Farms and Community	<p>If local maps of provision and demand could be produced through the creation of a local or national database it would be clear where the areas of unmet or undermet provision were.</p> <p>Without a database it will be onerous and time consuming to demonstrate that demand is not being met. A community grown food strategy should be developed by each local authority whether or not it is perceived as</p>

## Log of Responses to WG22211

Gardens	<p>providing a good service in this area already. It should form part of the Single Integrated plan under the following headings</p> <p>National Health Service (Wales) Act 2006 (Part 3: S40) – Health, Social Care and Well-being Strategies;</p> <p>Local Government (Wales) Measure 2009 (Part 2: Ss 37-46) – Community strategies;</p> <p>The commitment to and public nature of the SIP would mean that the community grown food strategy would be embedded across the council departments. Community groups, support organisations and councillors could cite it when dealing with different departments which don't have a community or wellbeing focus when trying to access land or support. For example when accessing land or negotiating with maintenance and highways depts. Guidance should be provided on developing the strategy developed from the proposals in this document.</p> <p>FCFCG agrees that waiting lists for statutory provision, once past a defined threshold should be one trigger for the creation of new sites. We agree that representations from the public, local Councillors and Welsh Ministers should also affect action. It would also be beneficial to include public bodies such as NHS Trusts and Schools into the group of bodies that could request provision under the legislation.</p> <p>The question of what should trigger development of new sites is complex and FCFCG would welcome the opportunity to explore this with Welsh Government, WLGA, the National Allotment Society and other interested parties.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration	Not qualified to comment

## Log of Responses to WG22211

Unit.	
Mick Antoniwm AM	The trigger to release land should be based on waiting times, with a target of say six months maximum wait. The decision on which land to be released should be primarily based on the location of those waiting, with a view to making plots accessible without the need for transport.
Bridgend County Allotment Association	There is already a trigger set out in the Allotments Acts in that a certain number of allotment plots should be provided per head of population. Also, if six people living in an area with insufficient provision ask for an allotment, the Council is bound to look at their request. In our area this is not being done.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	<p>The recent Public Health England review "Local Action on Health Inequalities: Improving access to green spaces (Sept 2014)" provides considerable evidence on the health (physical, mental and social) benefits of green spaces. It also highlights, how, in England, access to green spaces in the most affluent 20% of wards in England have five times the amount of green space than the most deprived 10% (p5). Has this analysis been done in Wales? Local mapping in conjunction with Welsh census data could provide this picture. Food Cardiff would like to ensure that the most deprived communities in Wales have at least equal access to food growing opportunities either through allotment provision or community gardens.</p> <p>If local maps of provision and demand could be produced through the creation of a local or national database it would be clear where the areas of unmet or undermet provision were.</p> <p>Without a database it will be onerous and time consuming to demonstrate that demand is not being met. A community grown food strategy should be developed by each local authority whether or not it is perceived as providing a good service in this area already. It should form part of the Single Integrated plan under the following headings</p> <p>National Health Service (Wales) Act 2006 (Part 3: S40) – Health, Social Care and Well-being Strategies;</p> <p>Local Government (Wales) Measure 2009 (Part 2: Ss 37-46) – Community strategies;</p>

## Log of Responses to WG22211

	<p>The commitment to and public nature of the SIP would mean that the community grown food strategy would be embedded across the council departments. Community groups, support organisations and councillors could cite it when dealing with different departments which don't have a community or wellbeing focus when trying to access land or support. For example when accessing land or negotiating with maintenance and highways depts. Guidance should be provided on developing the strategy developed from the proposals in this document.</p> <p>FCFCG agrees that waiting lists for statutory provision, once past a defined threshold should be one trigger for the creation of new sites. We agree that representations from the public, local Councillors and Welsh Ministers should also affect action. It would also be beneficial to include public bodies such as NHS Trusts and Schools into the group of bodies that could request provision under the legislation.</p> <p>The question of what should trigger development of new sites is complex and FCFCG would welcome the opportunity to explore this with Welsh Government, WLGA, the National Allotment Society and other interested parties.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	<ol style="list-style-type: none"> <li>1. Waiting list is probably best evidence of un-met demand.</li> <li>2. Generous support from Welsh Government is the single factor most likely to contribute to more publicly owned allotments.</li> <li>3. The need for allotments could form evidence base for Local Development Plans and could be land allocations within them.</li> </ol>
Growing Green Teens Project	Not completed
Natural	The requirement for strategic development plans is a good one. However in terms of the trigger for these,

## Log of Responses to WG22211

Resources Wales	<p>waiting lists only reflect the demand of already well-informed and motivated people aware of community growing opportunities. There's the risk that wider social and economic factors, such as local health and well-being data are not taken into account. We suggest that a proactive, promotional approach is needed (asking if people are interested in growing, provided 'taster' days, involving schools and existing community organisations etc.) to explore the development of community growing provision. Where there is no local history of allotments, people can sometimes not be aware of what's possible.</p> <p>Local strategies should include take account of likely increasing future demand and should be referenced in single integrated plans and natural resource management plans.</p>
National Botanic Garden of Wales	<p>This should be part of all new developments of land. Planning departments should consider this as part of planning applications, e.g. new housing should include an area for allotments in order to keep up with future demand rather than try and find land in the future Impose a planning levy?</p>
Gelligaer Community Council	<p>All local authorities should produce a strategy in consultation with local allotment holders and residents</p> <p>It should be developed as part of the single integrated plan</p>
Cornelly Community Council	<p>If local Planning Authorities keep in mind the need for new build homes to have adequate gardening space, there would be less need for identification of suitable allotment sites. This would also cut down on another expensive tier of Government.</p>
National Society of Allotment & Leisure Gardeners Limited	<p>The NAS fully endorses the call in Growing in the Community for local authorities to prepare dedicated allotment strategies, covering provision but also promotion and management issues. Through its Allotment Officer Forums and collaboration with APSE it is already active in promoting good practice in this area. The NAS welcomes the preparation of community food strategies, particularly where these acknowledge and support the contribution of allotment gardens to self-provisioning, but as is clear from Growing in the Community, allotments deliver far more than food, and these broader benefits and values also need to be taken into account.</p>



## Log of Responses to WG22211

Penarth Town Council	The Town Council would welcome the opportunity to work with the local authority and other interested organisations to produce a community grown food strategy. Given relevant and expert input there is no reason why such a strategy could not be developed to complement these high level plans.
FlintShare	<p>As indicated in reply to question 4, the provision of public land for community gardens and other CSA can be incorporated in a comprehensive strategy framework for green spaces. In addition to their specialised function of food production, CG/CSA schemes share with other green spaces the functions of providing relaxation, enhancing a sense of wellbeing and all the health benefits of communal outdoor activity. In addition of there is scope for local authorities to promote the provision of land by private owners to local community groups.</p> <p>Local community involvement is the very essence of CG and CSA schemes and such projects are often most effective when the initiative and drive comes from members of the local community. The local authority will generally be better placed to respond to such local pressures than any central body or agency and should therefore lead in development and implementation of a strategy that takes account of local circumstances and needs.</p>
St Dogmaels Allotment Association	The Trigger is the need shown by local people to develop sites for growing food stuff.
Egg Seeds	<p>Cardiff has Food Cardiff, sustainable/fair food council to try and create Cardiff as sustainable food city. Food Cardiff should be part of the conversation in developing a community grown food strategy as should community focused groups with interest in local, sustainable food growing. For example, local transition town groups in the absence or under representation of a food council.</p> <p>In Cardiff most food and community focused organisations have links into or representation in Food Cardiff.</p> <p>In response to the question I support FCFCG response</p> <p>"If local maps of provision and demand could be produced through the creation of a local or national database</p>

## Log of Responses to WG22211

	<p>it would be clear where the areas of unmet or undermet provision were.</p> <p>Without a database it will be onerous and time consuming to demonstrate that demand is not being met. A community grown food strategy should be developed by each local authority whether or not it is perceived as providing a good service in this area already. It should form part of the Single Integrated plan under the following headings</p> <p>National Health Service (Wales) Act 2006 (Part 3: S40) – Health, Social Care and Well-being Strategies;</p> <p>Local Government (Wales) Measure 2009 (Part 2: Ss 37-46) – Community strategies;</p> <p>The commitment to and public nature of the SIP would mean that the community grown food strategy would be embedded across the council departments. Community groups, support organisations and councillors could cite it when dealing with different departments which don't have a community or wellbeing focus when trying to access land or support. For example when accessing land or negotiating with maintenance and highways depts. Guidance should be provided on developing the strategy developed from the proposals in this document.</p> <p>FCFCG agrees that waiting lists for statutory provision, once past a defined threshold should be one trigger for the creation of new sites. We agree that representations from the public, local Councillors and Welsh Ministers should also affect action. It would also be beneficial to include public bodies such as NHS Trusts and Schools into the group of bodies that could request provision under the legislation.</p> <p>The question of what should trigger development of new sites is complex and FCFCG would welcome the opportunity to explore this with Welsh Government, WLGA, the National Allotment Society and other interested parties."</p>
Confidential	<p>Where there is clear evidence of demand for allotments or community gardening not being met yes a plan should be drawn up setting out how provision can be made to address this need but as this is currently being done at local council level I guess the councils should feed this information back to the Welsh Government.</p>

## Log of Responses to WG22211

	<p>Of course, it would be great if Wales had a joined up thinking plan about our natural resources, the greatest of these being water, yet here we are facing the challenges of fracking in my area which seems to me to be completely barmy, using good clean water to mix with toxic chemicals to pump into our earth to release gasses when the area has been extensively mined! It just doesn't make sense. Anyway now we have all these wind turbines with good access roads why don't we make a law that says the area beneath them can be community growing areas and allotments! At least that would help mitigate the impact they are having on the environment. Yes we do have the land around us that could be better used to produce food for our communities but we need must be mindful to keep what's left of our natural environment, natural. All I can see is that we are reactionary instead of visionary. We react to guidelines and proposals and legislation from Europe and Whitehall and we don't look at the longer term bigger picture or try to have our own Welsh way of doing things we are different to other places and we have got a lot of things going for us if we can only get out act together.</p>
Jocelyn Kynch	Local authority to lead on allotments and these can be part of plans.
Allan Evans	<p>Local Authorities in North Wales claim they have no capacity and are underfunded I am afraid that I cannot feel confident that they can or will want to lead on this unless it is made statute requirement by act.</p> <p>Partnership working with other agencies might be more productive - Housing Associations Community groups explore new working possibilities with these.</p>
Bay of Colwyn Town Council	As local authorities already have a statutory duty in respect of allotment provision they should be encouraged to widen their strategy to cover all community grown food and this could be a supplementary part of their LDP. The trigger for developing a strategy should be whether or not there is a demand from residents within the authority which has not been met (see Q14 above) and not be imposed where there is insufficient demand.
Radyr & Morganstown Community	Allocation of land should be a part of all local authorities' Local Development Plans and SIPs and associated land use strategies. Community Grown Food Strategies should be a mandatory part of LDPs and SIPs. In that way, the area of land needed to meet the local population can be established, maintained and planned for. If a CGFS has to be triggered then development on greenfield or brownfield sites could go ahead without

## Log of Responses to WG22211

Council	any allocation of land because there is, at the planning stage, no residents to demand an allotment. Allocation of allotments should be part of the master plan for any new development above a specified number of dwellings.
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	
Cardiff Council	<p>The criteria used to judge 'clear evidence' needs to be properly tested. We have recently analysed the allotment waiting list in Cardiff – which is consistently around the 900 mark, but beneath that statistic, letting and terminations are occurring throughout the year. Demand is consistently high – but waiting lists are not static and there are allotments available and sites with short waiting lists.</p> <p>A community grown food strategy is a good idea and should be developed to complement high level plans to ensure that it reaches beyond high level policy. This would provide a robust evidence base to feed into planning decisions and section 106 agreements and inform the preparation of Local Development Plans and could also be used to secure funding from the Community infrastructure Levy.</p> <p>If it is the case that outside of allotment provision, the majority of land for community growing be outside of LA control it would make sense for the LSB (soon to be statutory Public Service Boards) to lead on this issue as the organisations represented have access to lots of land?</p>
PLANED	Local authorities should work in partnership with specialist advisers and community growers to develop strategies, whether or not waiting lists exist. It makes sense to integrate these strategies into SIPs or natural

## Log of Responses to WG22211

	resources plans.
RTPI Cymru	There needs to be a strong link with LDP preparation to ensure that identified needs and land requirements are considered alongside other land and development proposals, to ensure proper integration between different forms of development and creation of more sustainable settlements;
Cwm Harry Land Trust	
CLA Cymru	The creation of a spatial map should ensure that demand for provision is identified by area. Again there needs to be further proactive work on establishing the levels of interest rather than confine the findings to those who have already proactively placed themselves on a waiting list. We would suggest that the relevant Local Authority with areas of under provision are then charged with the development of a community food strategy.
Vale of Glamorgan Council	Local demand should be the trigger for the development of a community grown food strategy that could be linked to integrated community plans.
The Landscape Institute	
Torfaen County Borough	<p>The number of people on a waiting list. The local authority could lead on this but future funding would need to be provided from the Welsh government.</p> <p>Torfaen is considering reducing the size of a plot to ease the waiting lists.</p>

## Log of Responses to WG22211

Council	
Cardigan Allotments Ceredigion	don't leave it to the local authority unless they have been given clear direction about developing such projects
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- Level of deprivation in an area</li> <li>- Level of poor health</li> <li>- lack of any existing provision within an area</li> <li>- The availability of land</li> </ul>
Greener Aberystwyth Group	Yes - but keep it simple and in line with current thinking (Non partisan!)
Llanhilleth Family Allotments Project	People who are passionate about growing their own would take the lead and their ideas and vision should inspire others of all ages, Help should be given to those passionate people.
Watton Allotment Association	<p>Length of waiting lists is an obvious trigger. We average a change of membership of perhaps 3 per year. Our waiting list will last 6 years with our new applicants.</p> <p>No Experience. (on views re. such a strategy could form part of integrated plans..)</p>
Respondent	Comments
Q16. Under what circumstances, and with what safeguards, should local authorities and communities be able to register and	

## Log of Responses to WG22211

use land that they do not own or lease for community growing?	
Cheow-Lay Wee	
Confidential	If land is not being used and there are no clear plans for its use community groups should be able to grow food on a meanwhile basis. If the land is unsafe or contaminated then maybe it would be best not to be used for community growing. Common sense needed.
Cyrenians Cymru	Where it can be demonstrated that land has not been used for 5 years or more. Where there is land that is obviously unused (e.g. purchased by speculators for long-term economic gain).  Brownfield sites that are falling into decay.
Capita	A simple agreement is needed giving clear reasons for the right of the land owner to terminate the use of the land for food growing. This needs to include trespass and damage or misuse of the land
Cwmni Nod Glas Cyf.	fel unrhyw diroedd cyhoeddus, mae SLA yn gallu cael ei greu i sicrhau lleihad risg a bod y les i gr?p cymunedol fod yn un gyfreithiol. dim ond wrth wneud hyn mae modd sicrhau dyfodol llwyddiannus i'r tiroed hyn
Owen Jenkins	I fear that Councils may use such power to satisfy Central Government targets- but very often such areas may not be suitable sites.  It takes several years before nature allows the gardener to take over a sight. Plot holders therefore need a five year assurance to make their efforts worthwhile.
Bleddyn Williams	aren't they able to use compulsory purchase orders now?  Just do it now register all they can. If it is subsequently contested then so be it .the land is still there and will have been improved.as I understand it if anyone wishes to use unclaimed land then all they need to do is

## Log of Responses to WG22211

	fence it off and place a notice to that effect on it .it is then up to the owner to contest. Just do it. I'm fed up with this in action and procrastination. If public land is used and is wanted in future for development then replacement allotments must be provided >if they cannot then development should not take place in an area lacking in facilities.
City and County of Swansea	Similar safeguards probably exist in relation to residential properties.
Isle of Anglesey County Council	If all other options have been exhausted then this should be pursued on a temporary/short term use
Delegates to Welsh Region of NSALG	The right to hire/register or compulsory purchase already exist within the legislation and should remain the responsibly of Local Authorities, community councils
Sully Terrace Allotments Association	<p>STAA agree in principle that Local Authorities, Community Councils and others should be able to register unused and underused public land on a temporary / permanent basis for the purpose of community grown food if this does not remove valuable natural habitats, negatively impact on wildlife and or reduce amenity land.</p> <p>There must be open and thorough consultation of all current and potential users.</p> <p>There must be provision for reinstatement.</p>
Denbighshire County Council	There should be a proviso within the Land Registry that the land is shown and marked differently, there should be a twelve month period claw back for any land to go back to its proper owner. How would the above correlate with public open space, would this come under the same provision above or would public open



## Log of Responses to WG22211

	space be protected and not used for community growing
Llandough Community Council,	N/A
One Voice Wales	We do not have the legal background or confidence to answer this question properly, but we feel that a great deal of work would be required to iron out the many legal and/or financial implications of this particular proposal.
Federation of City Farms and Community Gardens	<p>This is a radical and far reaching proposal that we support fully. It would encourage land to be used productively for the benefit of people and the environment and create a presumption that land not meaningfully used could be assigned to food production and community benefit. This would be heartily welcomed by FCFCG and communities wishing to grow.</p> <p>Guidance is needed for situations when it proves impossible to identify land ownership. Not all land is registered by the Land Registry and we usually recommend that people enquire extensively locally and put a notice on the boundary to establish who owns a piece of land. There is clearly potential for conflict and it would make people feel much more comfortable to be backed up by government guidance on using land where the owner can't be identified.</p> <p>It would also go some way to solving the problem of local authorities and the Welsh government estate not allowing groups to use land which is clearly underused - for example the Bryn Cegin Business Park outside Bangor. 90 acres of land which has been unused for 12 years as no tenants can be found.</p> <p>Guidance for both parties would be very helpful including sample land use agreements and guidance about what structures/uses would be allowed without planning permission on a temporary basis, and a right of swift appeal where groups are obstructed or don't get a speedy response.</p> <p>FCFCG would also welcome the expectation of non-local authority public land being used for community</p>

## Log of Responses to WG22211

	growing. While we think it is important that responsibility ultimately lies with local authorities, we think creating a framework for other public bodies to enable increased provision is to be applauded.
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	Not qualified to comment, although we support the idea.
Mick Antoniwm AM	Local Authorities have the power to register or compulsory purchase land that they do not own. Where demand exists (subject to the trigger point being reached, see Q15) Local Authorities should use all levers at their disposal. LAs as a matter of best practise should discuss plans with the appropriate Councillor and in certain circumstances a wider community consultation may be appropriate, although this should be the exception and not mandatory.
Bridgend County Allotment Association	The provision of land should be the responsibility of the local council. It should not be left to community groups to do this.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in	<p>This is a radical and far reaching proposal that we support fully. It would encourage land to be used productively for the benefit of people and the environment and create a presumption that land not meaningfully used could be assigned to food production and community benefit. This would be heartily welcomed by FCFCG and communities wishing to grow.</p> <p>Guidance is needed for situations when it proves impossible to identify land ownership. Not all land is registered by the Land Registry and we usually recommend that people enquire extensively locally and put a notice on the boundary to establish who owns a piece of land. There is clearly potential for conflict and it</p>

## Log of Responses to WG22211

question 1 and 15	<p>would make people feel much more comfortable to be backed up by government guidance on using land where the owner can't be identified.</p> <p>It would also go some way to solving the problem of local authorities and the Welsh government estate not allowing groups to use land which is clearly underused - for example the Bryn Cegin Business Park outside Bangor. 90 acres of land which has been unused for 12 years as no tenants can be found.</p> <p>Guidance for both parties would be very helpful including sample land use agreements and guidance about what structures/uses would be allowed without planning permission on a temporary basis, and a right of swift appeal where groups are obstructed or don't get a speedy response.</p> <p>FCFCG would also welcome the expectation of non-local authority public land being used for community growing. While we think it is important that responsibility ultimately lies with local authorities, we think creating a framework for other public bodies to enable increased provision is to be applauded.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	<p>1. Applications to register land as allotments where no owner can be found should be subject to similar safeguards as planning applications on land where some or all owners cannot be found. As land ownership records gradually become more comprehensive, there should be less land in unknown ownership. Compulsory Purchase procedures could be used where no owner can be found.</p> <p>2. Welsh Government could demonstrate how to overcome concerns and practical difficulties by allowing use of some of its own land as allotments.</p>
Growing Green Teens Project	Guidance should be produced by WAG for proposals for groups to register interest with timescales and targets, probationary periods could enable withdrawal if things are not working. Advice and guidance must be available
Natural Resources	Advice should be sought from the Federation of City Farms and Community Gardens on minimum lease lengths required for a viable growing scheme. Plots take time to prepare and establish, and investments (both

## Log of Responses to WG22211

Wales	<p>time and money) need to be proportionate.</p> <p>Where a previously developed site is proposed for community growing, a survey of biodiversity should be undertaken if it is possible that the site could contain open mosaic habitats or if the site is likely to contain another Biodiversity Action Plan priority habitat. Some sites which appear to be close-mown amenity grassland of no biodiversity significance may contain plants of great importance for pollinators, which have been suppressed, rather than eliminated by repeated mowing. To discover if this is the case the site should be left uncut between early March and late September, and a record of the flowering plants kept during that time by a competent person or organisation. If the competent person or organisation subsequently judges the site to be of low biodiversity value then no objections should be raised to its use for community growing.</p>
National Botanic Garden of Wales	<p>Consider the environmental protection of such land - all checks on wildlife and habitat before the land is used.</p> <p>If the land is proven to be owned, there needs to be a safeguard to return the land.</p> <p>Recommend highlighting that land availability may be temporary, and have fair and reasonable notice period suited to such use (probably a year)</p> <p>This recommendation should only include unused 'public' land, not private land - the choice of land use for private owners should remain with the landowner.</p>
Gelligaer Community Council	<p>Should parcels of land be developed for allotments where the owner of the land is not known, a period of secure tenure should be put in place in case owners come forward.</p>
Cornelly Community Council	<p>Any land identified as 'owner unknown'. If, after extensive enquiries no owner can be found and the land has not been used for a substantial period of time.</p>
National Society of Allotment &	<p>Allotment law already provides for compulsory purchase or lease of allotment land. The NAS believes these provisions should be more widely understood, and deployed when negotiated solutions cannot be achieved.</p>

## Log of Responses to WG22211

Leisure Gardeners Limited	
Penarth Town Council	There would need to be a clear procedure and guidelines for local authorities and communities to follow prior to being able to register land they do not own for such use and subject to the procedure being adhered to the local authority/community would be free from any future claims being made against them.
FlintShare	We support the principle that underused public land can often provide an excellent site for community gardens, orchards or other CSA. Depending on location and past usage of the land, there would need to be an assessment of risks such as those alluded to in the consultation document and outlined in part of our reply to question 4.We
St Dogmaels Allotment Association	If there is a local need to use these sites for the community. Land improvement with provision regarding public safeguards.
Egg Seeds	<p>I support FCFCG collective response. We have the Incredible edible projects, bus stop gardens in London, Chicago USA community regeneration initiatives by developing abandoned lots into food growing spaces, local Farm Cardiff projects, Edible walks appearing in Ely, Cardiff, and the list goes on of activity and projects to learn from. Cardiff LA schools and community groups are working with myself to develop many different edible projects across Cardiff in 2015.</p> <p>"This is a radical and far reaching proposal that we support fully. It would encourage land to be used productively for the benefit of people and the environment and create a presumption that land not meaningfully used could be assigned to food production and community benefit. This would be heartily welcomed by FCFCG and communities wishing to grow.</p> <p>Guidance is needed for situations when it proves impossible to identify land ownership. Not all land is registered by the Land Registry and we usually recommend that people enquire extensively locally and put a</p>

## Log of Responses to WG22211

	<p>notice on the boundary to establish who owns a piece of land. There is clearly potential for conflict and it would make people feel much more comfortable to be backed up by government guidance on using land where the owner can't be identified.</p> <p>It would also go some way to solving the problem of local authorities and the Welsh government estate not allowing groups to use land which is clearly underused - for example the Bryn Cegin Business Park outside Bangor. 90 acres of land which has been unused for 12 years as no tenants can be found.</p> <p>Guidance for both parties would be very helpful including sample land use agreements and guidance about what structures/uses would be allowed without planning permission on a temporary basis, and a right of swift appeal where groups are obstructed or don't get a speedy response.</p> <p>FCFCG would also welcome the expectation of non-local authority public land being used for community growing. While we think it is important that responsibility ultimately lies with local authorities, we think creating a framework for other public bodies to enable increased provision is to be applauded.</p>
Confidential	<p>Well you've got a problem with underused public land, you have to ask yourself why is it underused. Then think of the emotional impact if a community has spent years cultivating the soil only to have it deemed needed to be used when a developer wants it. I think you need to define "community grown food". How big is the community? What is the community? Is it a handful of dedicated gardeners who will share what they produce amongst themselves or is it a project to provide a local town with home grown tomatoes or apples free of charge or for a price. I think when it is clear about what you mean by community growing then you will have defined it a bit better although there will be issues of whether a community growing project is a commercial enterprise if it sells for profit and all that legislation to comply with and follow.</p>
Jocelyn Kynch	<p>Land which isn't being used, and is either not polluted, or is treated (eg plants which absorb pollutants).</p> <p>Agreement to leave at the end of growing season if owner emerges.</p>
Allan Evans	<p>Ensure that the land is registered is available for use does not impose upon the local community discuss with</p>

## Log of Responses to WG22211

	the community its plans and how it will assist the community If there is a shortage of suitable sites
Bay of Colwyn Town Council	<p>Firstly land needs to be suitable for growing so caution must be taken to ensure that land is not contaminated. Secondly the owner of the land should be held responsible for the upkeep of land and should be given notice to such affect. If land is well managed, there is no case for anything other than a negotiated use. There may be a case for using vacant industrial land, but again caution must be taken to avoid contamination. There is very little common land and what there is should remain for the common use and not be able to be 'taken over' by any individual or group.</p>
Radyr & Morganstown Community Council	<p>We support the principle that unused land be taken for this purpose. This sounds somewhat like Village Green registering. The process should not be onerous but should not leave communities or community councils with liabilities they cannot meet.</p> <p>There would need to be an indication of minimum rental period so that plot holders can plan their growing.</p> <p>Such land should be accessible, suitable for cultivation and safe.</p> <p>Consideration needs to be given should the land have a pre-existing value, eg biodiversity or recreational.</p>
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	<p>As a group concerned about the risk presented from land contamination, any process whereby land is to be used for the cultivation of crops for human consumption should include measures that ensure that an assessment of the land use is made to ensure it is suitable for its intended use. This assessment must include a review of the historic land use(s) to ascertain the likely presence of contamination, and where necessary appropriate investigations and mitigation measures to ensure that there are no unacceptable risks from contamination. A requirement for formal consultation with the Public Protection Section of the Local Authority should be part of any process whereby Local Authorities and communities are able to register and</p>

## Log of Responses to WG22211

	use land they do not own for community growing.
Cardiff Council	<p>There is reluctance to support this suggestion which could only be an action of last resort in the face of overwhelming demand.</p> <p>It has to be recognised that many open spaces surrounding public buildings, hospitals and housing association developments provide an important amenity function both in terms of visual amenity and leisure amenity such as dog walking or informal recreational activities. Given this, safeguards would need to be built in to criteria used to make a judgement on underuse to ensure that areas which have high amenity value are protected.</p>
PLANED	There is an issue with temporary use as growing needs to take place over many seasons. However, a degree of flexibility and choice for community growers is desirable and even temporary land is better than no land for community growing.
RTPI Cymru	<p>If this was introduced, planners would need to consider possibilities for such use in the design and layout of schemes which include public open areas.</p> <p>Some safeguards should be required to prevent unsuitable sites being occupied and developed.</p>
Cwm Harry Land Trust	
CLA Cymru	We have grave concerns regarding this proposal. Land ownership is a complex issue and there is often misunderstanding about the perceived management of land. We have had reports of land being described as unkempt and abandoned by some community groups when in fact the affected



## Log of Responses to WG22211

	<p>land is being managed under an agri-environment schemes as habitat or fallow. We would vigorously oppose any attempts to register such land for public use at the expense of farmers failing to meet the requirements set by the EU under CAP agreements.</p> <p>We would oppose any moves to commandeer land for use by the public at the expense of private landowners. It is unclear from the proposal as to whom would judge land as under used and we seek urgent clarification on this aspect. We would only support the utilisation of land that is offered by the landlord and we are confident that this form of collaboration with local landowners would provide much better results.</p> <p>Additionally, the rent commanded by land rented out as allotments is traditionally low whilst the maintenance with the requirements for the provision of facilities and water etc. can be quite high. Care needs to be exercised to ensure that interested parties are not deterred in making land available by the loss of income or an increase in administrative burden upon business.</p>
Vale of Glamorgan Council	<p>That imposing a register of land which could be used for community growing, may have significant resource implications also – who determines whether this use detracts or impacts on the designated purpose or other amenity value and who would fund or pay to register the land. How would anyone know whether or not the land would be suitable for use?</p>
The Landscape Institute	<p>The Landscape Institute Wales supports this goal. In our Green Infrastructure position statement we say:  <a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf">HYPERLINK</a>  <a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf">"http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf"</a>  <a href="http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf">http://www.landscapeinstitute.co.uk/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf</a> “Creating space – even temporary space – for food production through allotments, community gardens and orchards increases access to healthy food, provides educational and business opportunities, contributes to food security and reconnects communities with their local environment. Joining local communities with these assets using footpaths and cycle ways can encourage this reconnection further. “</p>

### Log of Responses to WG22211

Torfaen County Borough Council	Only when every option for provision has been exhausted within the locality.
Cardigan Allotments Ceredigion	needs to be a secure tenancy for a given time frame ,
Cwmcarn and Abercarn Allotment Association	Check for contaminants within the ground
Greener Aberystwyth Group	<ul style="list-style-type: none"> <li>- Where Ex. waiting lists remain unresolved and exceed for 2 years for example</li> <li>- where misuse of land 'located within' a living community creates a blight</li> <li>- however green issues (incl. Natural Habitat/Wildlife green space should not be threatened.</li> </ul> <p>Must advertise broadly.</p>
Llanhilleth Family Allotments Project	As Question 12 – there should be a template contract available on the internet via a ‘community growing site for Wales’.
Watton Allotment Association	No experience but private land must not be taken into authority ownership.

## Log of Responses to WG22211

Respondent	Comments
Q17. To what kind of areas should this proposal be extended, and what safeguards would be required?	
Cheow-Lay Wee	
Confidential	See above.
Cyrenians Cymru	As above.
Capita	<p>This is a difficult area that will could need input from the authorities planning officer on complex cases. For new large housing developments an allocation for food growing can be a planning condition.</p> <p>To use existing public open space would be contentious and would need to be discussed at a public Consultation at least with a planning officer having the final say.</p>
Cwmni Nod Glas Cyf.	?
Owen Jenkins	Ad-hoc growing of veg/fruit in public spaces should not be encouraged. Public spaces are for all of the public. A garden on an unused verge effectively makes that a no playing area for children and a no walking area for others.
Bleddyn Williams	Could be done to give people a taster and encourage people to obtain a permanent site however it is a hard slog to clear a land for growing and sometimes needs 3/4 years to settle down and produce a good fertile pest free soil. This daunts people rather than encourages sometimes. Garden development is a long term venture.
City and County of	This is a strategic decision for the Local Authority and will need to be considered against many other priorities. In the case of Vetch Veg, the project was originally given a temporary consent whilst the need to provide

### Log of Responses to WG22211

Swansea	affordable housing was still seen as a long term priority. As in this instance, there are proven benefits from a temporary relaxation of land use.
Isle of Anglesey County Council	The extent should be limited and not include development land
Delegates to Welsh Region of NSALG	Where there is a demand and sufficient numbers, the land should be provided for Allotments where Community gardeners can be accommodated within
Sully Terrace Allotments Association	STAA believe that some areas such as those of historic and environmental significance, and communal amenity land like village greens, parks, playing fields and gardens should be protected. However, many other areas could benefit from community food and flower growing. For example wild flower, bulb and mini orchard areas at the edges of playing fields, parks, verges and woodlands. Provided appropriate safety and security was in place. Land at hospitals, schools, businesses and industrial parks could also be used. Town and city centre landscaped areas could also be used: Some local authority ornamental planters now have community displays of herbs, fruit and vegetables.
Denbighshire County Council	Public open space could be utilised also common land
Llandough Community Council,	N/A
One Voice	

## Log of Responses to WG22211

Wales	
Federation of City Farms and Community Gardens	<p>We fully support this proposal.</p> <p>Road verges, river banks and canal towpaths may be perfect for linear orchards. Contamination from traffic fumes and run-off would only be an issue in areas of high traffic. There are many small pieces of public land - unused corners of sports pitches, park edges, verges and roundabouts which would be perfect for food production or other community growing - for example plants for pollinators. Currently groups face a daunting process of contacting the department responsible for that land - often highways - who have no community remit and don't want their maintenance schedules to be complicated by having to avoid strimming fruit trees or wild flower borders.</p> <p>There should be guidance for public bodies and local authorities that encourages a right of access for groups to grow on public land unless there is a sight-line issue or the growing would interfere otherwise with the current use. An example would be to incorporate fruit bushes into wildflower planting on road verges where they will not interrupt or interfere with lines of sight but will increase the value of these environmental improvements. This simple measure would consolidate these initiatives, providing food for people as well as pollinators.</p> <p>We would also suggest that conditions should be placed on new developments of both a public or private nature that community grown food must be included. There should be an obligation on developers to benefit the local community and the environment through the delivery of orchards and/or edible planting in new schemes. Where schemes deliver housing or employment provision a threshold should be set where the provision of allotments or community gardens must be included.</p> <p>Guidelines would be helpful and FCFCG would be happy to explore the creation of this guidance with Welsh Government.</p>
Community Food Co-	Not qualified to comment, although we support the idea.

## Log of Responses to WG22211

operative Programme in Wales - Rural Regeneration Unit.	
Mick Antoniwi AM	Where demand exists (see Q15) and with reference to appropriate safeguards (see Q16)
Bridgend County Allotment Association	Certain areas of parks or gardens could be considered, but unless there is a fairly long timeframe there would be no point, as good growers want to improve their land over time and would not be happy to be moved on after a short period when they had done a lot of hard work making improvements.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	<p>We fully support this proposal.</p> <p>Road verges, river banks and canal towpaths may be perfect for linear orchards. Contamination from traffic fumes and run-off would only be an issue in areas of high traffic. There are many small pieces of public land - unused corners of sports pitches, park edges, verges and roundabouts which would be perfect for food production or other community growing - for example plants for pollinators. Currently groups face a daunting process of contacting the department responsible for that land - often highways - who have no community remit and don't want their maintenance schedules to be complicated by having to avoid strimming fruit trees or wild flower borders.</p> <p>There should be guidance for public bodies and local authorities that encourages a right of access for groups to grow on public land unless there is a sight-line issue or the growing would interfere otherwise with the current use. An example would be to incorporate fruit bushes into wildflower planting on road verges where they will not interrupt or interfere with lines of sight but will increase the value of these environmental improvements. This simple measure would consolidate these initiatives, providing food for people as well as</p>

## Log of Responses to WG22211

	<p>pollinators.</p> <p>We would also suggest that conditions should be placed on new developments of both a public or private nature that community grown food must be included. There should be an obligation on developers to benefit the local community and the environment through the delivery of orchards and/or edible planting in new schemes. Where schemes deliver housing or employment provision a threshold should be set where the provision of allotments or community gardens must be included.</p> <p>Guidelines would be helpful and FCFCG would be happy to explore the creation of this guidance with Welsh Government.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	Any areas could be considered provided they do not sterilize an area for an intended future need.
Growing Green Teens Project	Any green space could be developed if properly resourced and managed
Natural Resources Wales	All options should be available (subject to the biodiversity issues highlighted above) and assessed with regard to any existing, but possible not immediately apparent use. Local community consultation about proposals should be an essential part of the process, to ensure that people (including young people who often use green space informally) are engaged, informed and able to comment and take part.
National Botanic	Parks and gardens, town centres.

## Log of Responses to WG22211

Garden of Wales	However note that public access should continue.
Gelligaer Community Council	(left blank)
Cornelly Community Council	None.
National Society of Allotment & Leisure Gardeners Limited	The NAS welcomes the “meanwhile” use of land for local food production, and is willing to support such projects which are constructed around the allotment model (e.g. builders bag projects where bags are tenanted by individuals or families).
Penarth Town Council	Public open spaces/parks and other pockets of publicly owned land such as Plymouth Park in Penarth Marina a former tip owned by Welsh Government.  Land would need to be let under licences or tenancies to safeguard the land owner.
FlintShare	There are many instances of land being reserved for future development of one kind of another, that in principle could be used for community grown food. An advantage of allotments and community gardens is that they can be fitted on to quite small parcels of land or on strips and other odd corners that a commercial grower would find impractical to use.  There would need to be a safeguard that if, despite commitments made at the outset, the land is required earlier than originally anticipated, suitable compensation will be made for any loss to those participating in the



## Log of Responses to WG22211

	community projects.
St Dogmaels Allotment Association	There are Health and Safety issues with wasteland reclamation that need to be considered.
Egg Seeds	<p>I fully support this idea of utilising unused spaces for growing and further supports the response made by FCFCG</p> <p>"Road verges, river banks and canal towpaths may be perfect for linear orchards. Contamination from traffic fumes and run-off would only be an issue in areas of high traffic. There are many small pieces of public land - unused corners of sports pitches, park edges, verges and roundabouts which would be perfect for food production or other community growing - for example plants for pollinators. Currently groups face a daunting process of contacting the department responsible for that land - often highways - who have no community remit and don't want their maintenance schedules to be complicated by having to avoid strimming fruit trees or wild flower borders.</p> <p>There should be guidance for public bodies and local authorities that encourages a right of access for groups to grow on public land unless there is a sight-line issue or the growing would interfere otherwise with the current use. An example would be to incorporate fruit bushes into wildflower planting on road verges where they will not interrupt or interfere with lines of sight but will increase the value of these environmental improvements. This simple measure would consolidate these initiatives, providing food for people as well as pollinators.</p> <p>We would also suggest that conditions should be placed on new developments of both a public or private nature that community grown food must be included. There should be an obligation on developers to benefit the local community and the environment through the delivery of orchards and/or edible planting in new schemes. Where schemes deliver housing or employment provision a threshold should be set where the provision of allotments or community gardens must be included."</p>

## Log of Responses to WG22211

	<p>As a Food Cardiff council member I would also like to add that other groups such as Farm Cardiff and the new charity forming Grow Cardiff can also advise on areas not previously mapped and undertake community mapping projects.</p> <p>It would also be good to consider adding rooftop gardens as we have more examples in the South Wales appearing, vertical gardens, rooftop beehives, rooftop chickens, using railway verges to run poultry, waterfowl. Bring land annexed by rail networks into productive use without removing the green corridor it creates.</p> <p>Floating gardens in still or flowing water. Food Cardiff would support proposal to research this with FCFCG and other organisation with interest in this area such as Farm Cardiff EggSeeds etc.</p> <p>Safeguards</p> <p>All identified land could only be used especially where risk identified if group understand risks and show mitigation and risk assessment, hold correct insurances and have understanding of maintenance need. Safeguarding criteria should be sensibly reviewed as part of work suggested to be carried out by FCFCG. It would also make up part of the pattern language as each problem requires a solution or process to which the pattern language can help suggest.</p>
Confidential	<p>Again you are going to have to define "community grown food". If we plant apple trees or blackcurrent bushes in our local park to encourage the bees and provide diversity but as the park is public so anyone can come along and pick an apple or the berries to eat , well that to me is community food. It helps the bees and insects and the people from the community. However, if you say only the people who planted the fruit bushes can pick the fruit but then they can sell it well that's a commercial enterprise. Considering during WWII lots of parks and open land was turned over to growing food I do wonder how they managed to distribute this food they must have had a system. We managed back then to sort it out. But then these days we have food banks and again it goes back to the mind set of the people, it's easier to go to a food bank than it is to grow kidney beans in a bucket outside your back door and houses these days do not come with gardens that provide the means to grow food for the families that live in them. I think the gardens of the Terraced Houses in St. Fagins are a great example of how gardens used to feed us but then as the houses show the different time periods</p>

### Log of Responses to WG22211

	so by the time you get to the modernised terraced house the garden has a massive garden shed on it and is used as another room as part of the house and the gardening has just stopped.
Jocelyn Kynch	Verges should not be used because they are part of the carriageway and should be available for pedestrians and horses to get out of the way of traffic on the hard surface - often very important to access rights of way.
Allan Evans	Urban and urban areas where there is a shortage of available and suitable plots
Bay of Colwyn Town Council	As previously state, land needs to be free of contaminants and suitable for growing, which means that it needs to be safely accessible yet with limited access to the general public to avoid damage to crops. Even contaminated land can be utilised as growing space provided crops are in raised beds or containers filled with suitable growing medium. School and Hospital grounds have already been mentioned and, with careful planning, land around offices and industrial units also have potential, particularly for community orchards.
Radyr & Morganstown Community Council	It takes time to establish a productive cultivated soil so not all sites can be started quickly unless use of systems like raised beds or container gardening is possible.
Lisvane Community Council	Insufficient involvement with allotments and community gardens in our area to respond constructively to this question
Welsh Land Contamination Working Group	See answer 16
Cardiff Council	Area of under used open space, sites earmarked for development and 'left over' land (such as former back garage or communal areas in housing estates) are all being considered for community growing by Cardiff

## Log of Responses to WG22211

	<p>Council.</p> <p>This use would have to be subject to agreement of local members and consultation with local residents exempt from planning constraints and legislative requirements to advertise proposed disposal.</p> <p>Proposals should be limited to areas of amenity open space as authorities have other standards to meet in terms of recreational open space provision. Areas for safeguarding are set out below.</p>
PLANED	<p>This needs to be considered on a case by case basis. Schemes such as 'Incredible Edible' that originated in the North of England have shown that food can be grown outside police stations, hospitals, railway stations- in fact almost anywhere. And see comments above.</p>
RTPI Cymru	<p>Some safeguards would be required to prevent unsuitable sites being occupied and developed. See our response to Question 18 below.</p>
Cwm Harry Land Trust	
CLA Cymru	<p>Subject to the agreement of the landlord we have no objection to the principle of this proposal. Any areas brought forward should however be subject to stringent suitability checks including regard for the past use and potential contamination issues.</p>
Vale of Glamorgan Council	<p>To allow land that is earmarked designated for other purposes for community food production - who will judge or determine whether this use detracts or impacts on the designated purpose or other amenity value, who would fund or pay to register the land. How would anyone know whether or not the land would be suitable for use?</p>
The Landscape	

## Log of Responses to WG22211

Institute	
Torfaen County Borough Council	Consideration for the use of public open space which should then be licenced.
Cardigan Allotments ceredigion	areas in parks , around building plots, playing fields,nursery schools, unused areas
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- Site users security</li> <li>- Parking</li> <li>- Flood risk</li> <li>- New housing developments (See above)</li> </ul>
Greener Aberystwyth Group	<p>(see also Q.16)</p> <ul style="list-style-type: none"> <li>- Public Consultation and co-operation of landowners required.</li> <li>-Extensive grounds (School/Colleges/universities etc.)may offer opportunities</li> <li>-develop policy of 'Meanwhile' leases</li> </ul>
Llanhilleth Family Allotments Project	Waste land not used – a contract between local committee and owner to lease (as before)

## Log of Responses to WG22211

Watton Allotment Association	Again, any use of land already earmarked for other development must allow a reasonable length of tenure.  Existing planning must be seen to reasonable and genuine.
Respondent	Comments
Q18. How should assessments of suitability for community grown food be undertaken, and what matters should be considered?	
Cheow-Lay Wee	
Confidential	Assessments should be made by professionals including land owner, FCFCG, CLAS and LA.  Only considerations should be around safety of land and contamination issues.
Cyrenians Cymru	No comment
Capita	The assessment of sites needs to address the following:  Accessibility of the site by foot and vehicle  Suitability of the soil  Access to water  Absence of contaminants through a desk study of past usage, this can be done quickly on line.  Community views on the acceptability of its use for this purpose as there will not be a planning application that they can normally oppose

### Log of Responses to WG22211

Cwmni Nod Glas Cyf.	fyny i'r gr?p lleol mewn perthynas ar ALL i benderfynu ar hyn a'r gwaith yn cael ei ariannu gan yr ALL.
Owen Jenkins	
Bleddyn Williams	mainly toxicity of the soil.  obviously the land must be capable of being drained and fertility improved  reasonable levels of sunshine  capable of being then secured
City and County of Swansea	This is a strategic decision for the Local Authority and will need to be considered against many other priorities. Other considerations will include the appetite of the local community to partake in a scheme, current land use / restriction and future calls on land.
Isle of Anglesey County Council	Consideration should be given to need, land availability and  administrative/management use
Delegates to Welsh Region of NSALG	by public demand and assessing the waiting lists
Sully Terrace Allotments Association	STAA do not have any comments to add.
Denbighshire	There should be a collective approach made to the Local Authority from an Association and not individuals -

## Log of Responses to WG22211

County Council	problems arise when individuals will not form an Association then land is never maintained and worked to its full potential
Llandough Community Council,	N/A
One Voice Wales	
Federation of City Farms and Community Gardens	<p>Welsh government should devise a common standard of assessment to be included in local authority Community Grown Food Policies.</p> <p>Guidance should be provided which outlines the types of land that may be used for community growing and a simple flow chart of whether it's suitable or not. It may even be more pragmatic to assume all land is suitable but Welsh Government could define a set of conditions would exclude the land from suitability. Matters considered would be current and previous use, if growing would interfere with that current use and who would maintain the growing space. Access and security should also be considered. In industrial areas land should be assessed for contamination. Clear guidance on whether planning permission or change of use is required should be developed as discussed elsewhere in this response.</p> <p>Different rules should apply for meanwhile leases - if the project becomes established and a longer lease is issued then planning would be applied for. Sample agreements should be available to be regularly renewed. If a group disbands and a growing space is abandoned and unsightly then a local authority/public body should have the right to regain the land but should advertise visibly that they are to do so unless members of the community take it on. This shouldn't apply to fruit trees which can stay in perpetuity. Guidance can be provided to maintenance contractors on basic pruning of fruit trees in these circumstances.</p> <p>The whole process needs to be very clear and public - and the same in each local authority area so that groups can't be held up by unclear decision making processes. Legitimate grounds for refusal of land use</p>



## Log of Responses to WG22211

	should also be set out clearly.
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	Not qualified to comment, although we support the idea.
Mick Antoniwm AM	I assume you mean the suitability of the land? Clearly an assessment of the quality/safety of the land is required.
Bridgend County Allotment Association	The question of contamination would have to be considered if it were originally a brown-field site. We, together with a local housing association, re-developed a brown-field site in Pyle as an allotment. There was an immense cost to the housing association as they failed to do an assessment of the ground prior to commencement of the work.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	<p>Welsh government should devise a common standard of assessment to be included in local authority Community Grown Food Policies.</p> <p>Guidance should be provided which outlines the types of land that may be used for community growing and a simple flow chart of whether it's suitable or not. It may even be more pragmatic to assume all land is suitable but Welsh Government could define a set of conditions would exclude the land from suitability. Matters considered would be current and previous use, if growing would interfere with that current use and who would maintain the growing space. Access and security should also be considered. In industrial areas land should be assessed for contamination. Clear guidance on whether planning permission or change of use is required should be developed as discussed elsewhere in this response.</p> <p>Different rules should apply for meanwhile leases - if the project becomes established and a longer lease is</p>

## Log of Responses to WG22211

	<p>issued then planning would be applied for. Sample agreements should be available to be regularly renewed. If a group disbands and a growing space is abandoned and unsightly then a local authority/public body should have the right to regain the land but should advertise visibly that they are to do so unless members of the community take it on. This shouldn't apply to fruit trees which can stay in perpetuity. Guidance can be provided to maintenance contractors on basic pruning of fruit trees in these circumstances.</p> <p>The whole process needs to be very clear and public - and the same in each local authority area so that groups can't be held up by unclear decision making processes. Legitimate grounds for refusal of land use should also be set out clearly.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	For public land, landowners should be responsible for assessments of suitability. Sustainability of land, its quality, proximity to households, provision elsewhere in the locality and access.
Growing Green Teens Project	short, medium and long term plans, appropriate resources, management and structures in place- that there is a need, security, health and safety and community cohesion should be considered
Natural Resources Wales	Prior to approval of any location for allotments and community gardens, full consideration should be given to the previous use and setting of the land – particularly in relation to contamination. Consultation and discussion with the Local Authority should be undertaken to determine whether the location is suitable for proposed recreation activities, growing and consumption of food. A methodology should be developed to assess whether all or specific sites are considered in detail. This could start with simple site history searches that could be undertaken as part of this approach for site history etc. along with an assessment of potential contaminants on/near road verges and proximity to other sources or background concentrations.

## Log of Responses to WG22211

	<p>Any invasive species need to be identified and control measures agreed. .</p> <p>NRW has agreed the following criteria with the CLAS for sites on land it owns or manages - sites ideally need:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> To be close to and ideally within 10 minutes' walking distance of communities or on public transport routes</li> </ul> <p>Easy access and be as level as possible</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A south facing access with limited exposure to prevailing winds</li> <li><input type="checkbox"/> Adequate car parking space to avoid inconvenience to neighbours or road blocking (recognising that some people will drive to any site)</li> <li><input type="checkbox"/> Access to water</li> <li><input type="checkbox"/> To have no adverse impact on wider land management plans and no or few constraints (e.g. Planted Ancient Woodland Sites will rarely be suitable)</li> <li><input type="checkbox"/> To be free from designation as potential development land or with any tenure restrictions</li> <li><input type="checkbox"/> To have full information about any potential contamination issues.</li> </ul>
National Botanic Garden of Wales	Adhere to existing laws.
Gelligaer Community Council	Types of soil, proximity of toxins in the environment i.e traffic fumes, and access should be considered.
Cornelly Community Council	As question 17.
National Society of Allotment &	The key issue is risk of contamination from toxins, which should be professionally assessed and remediated as appropriate.

## Log of Responses to WG22211

Leisure Gardeners Limited	
Penarth Town Council	There needs to be a point of contact for expert advice on whether areas of land are suitable for community grown food.
FlintShare	<p>There would be little point in developing allotments or community gardens on a temporary site without a firm commitment that the land will be available for a sufficient period of time for the activity to yield the desired produce. The time frame envisaged would also largely determine the nature of the produce. It takes less time to grow a crop of lettuce than to harvest the first fruits from an apple tree.</p> <p>The land also has to be of sufficient quality and free of contaminants.</p>
St Dogmaels Allotment Association	Any land needs to be thoroughly checked and assessed ,historical use, adjacent land use, environmental, Soil testing, and Hydrology with access to the resultant information.
Egg Seeds	<p>No land should be excluded. All requests and suggestions should be considered as there are many types of growing, many products of these vary types that can utilise spaces better than others or create solutions to a space not considered in a blanket approach. A flow diagram or pattern language toolkit could be useful for example if project A look at site 89 and can satisfy and demonstrate all considerations and potential risks are mitigated to a level that LA or landowner satisfied with then project A should get clearance.</p> <p>It would make sense to encourage the use of safer obvious sites first but equally if enthusiasm and plans are in place for a harder site then consideration should be given fairly.</p> <p>Different rules should apply for meanwhile leases - if the project becomes established and a longer lease is issued then planning would be applied for. Sample agreements should be available to be regularly renewed. If a group disbands and a growing space is abandoned and unsightly then a local authority/public body should</p>

## Log of Responses to WG22211

	<p>have the right to regain the land but should advertise visibly that they are to do so unless members of the community take it on. This shouldn't apply to fruit trees which can stay in perpetuity. Guidance can be provided to maintenance contractors on basic pruning of fruit trees in these circumstances.</p> <p>The whole process needs to be very clear and public - and the same in each local authority area so that groups can't be held up by unclear decision making processes. Legitimate grounds for refusal of land use should also be set out clearly. .</p> <p>WG and LA should be responsible for assessing industrial sites for contamination and dealing with invasive species and providing a clear set of guidance in form of toolkit/ flow diagram.</p>
Confidential	<p>Whether the land requires a building such as a greenhouse or poly tunnel, whether there is a sufficient water source, and what are you going to grow and how will the produce be distributed. For example a poly tunnel or greenhouse will produce a very good crop of tomatoes but would this might require planning and then you have to remember that tomatoes are seasonal and so you would need another crop to make full use of the structures such as onions but then you have to think of doing something different the following years so that you don't deplete the soil but then would you have to ask for different planning consent depending on what you were producing? However, if it was a specific community growing project then that community will be defined but then would they need to be a constituted group. So, for example, Friends of a local hospital can set up a gardening group that will grow fresh food for that hospital and the friends who volunteer to garden it can share in the harvest but if that was a local charity growing food for the charity they support then they shouldn't partake of the harvest. At the end of the day you have to define "community grown food "If you are talking about allotments then those are managed by individuals and the allotment site has a management structure if you are talking about community growing sites then I'm not too sure what this concept is meant to be sorry.</p>
Jocelyn Kynch	Pollution, habitat.
Allan Evans	Accessibility climatic factors site security location supply of water and sheds for members to meet.

## Log of Responses to WG22211

<p>Bay of Colwyn Town Council</p>	<p>Anyone growing food for their own consumption needs to take responsibility for its quality, but food grown in public places must be treated with caution. Most of us have eaten blackberries picked from the hedgerow and are careful to pick away from dog fouling etc., but education about the risks of eating food that is outside the parameter of modern agriculture is essential.</p> <p>The use of chemicals needs to be regulated and an understanding of food hygiene must be promoted by those who are cultivating community grown food. Organic methods should be encouraged wherever possible.</p>
<p>Radyr &amp; Morganstown Community Council</p>	<p>Existing sites in use</p> <p>Existing site underused</p> <p>Potential sites</p> <p>Population and demand: now and future</p> <p>Access and water</p> <p>Soil conditions</p>
<p>Lisvane Community Council</p>	<p>Insufficient involvement with allotments and community gardens in our area to respond constructively to this question</p>
<p>Welsh Land Contamination Working Group</p>	<p>Any assessment process on the suitability of land for community growing should be looking at the potential for that land to contain chemical contamination and what the likelihood is that that contamination presents a risk to human health from the proposed use. Best practice assessment methodology is contained in "Development of Land Affected by Contamination: A Guide For Developers" produced by the WLGA and EAW. The Public Protection Section of the L.A. will be able to provide further advice if required but nevertheless should be consulted prior to commencing such an assessment and on its completion with regard to the findings.</p>

## Log of Responses to WG22211

Cardiff Council	<p>There should be a requirement to submit a report setting out the impacts and any mitigation measures required on the following issues:</p> <ul style="list-style-type: none"> <li>• Nature conservation interests</li> <li>• Visual amenity impacts</li> <li>• Leisure amenity impacts</li> <li>• Highway safety</li> <li>• Land Contamination</li> <li>• Traffic pollution</li> <li>• Flood risk</li> <li>• Conservation interests</li> <li>• Water supply</li> <li>• Management Arrangements</li> <li>• Potential impact on surrounding properties</li> <li>• Growing activities being considered</li> </ul> <p>The project described under question 5 is a good example of this process.</p>
PLANED	Land needs to be assessed for contaminants, traffic fumes adjacent land use and plans and needs to be assessed by community growers with advice and support from specialist services.
RTPI Cymru	This is an activity for which some form of planning assessment or use of planning knowledge and skills would

## Log of Responses to WG22211

	be suited but, given the current legal planning position, would need some new arrangements or legislative change to ensure that there was some form of prior scrutiny of sites to assess their suitability and prevent unsuitable sites being brought into use.
Cwm Harry Land Trust	
CLA Cymru	For the sake of consistency and transparency, Welsh Government should devise a standard of assessment for all such areas. Any assessments should mirror those that a farmer would be subject to by way of an Environmental Impact Assessment and biodiversity measurements. We should not allow lower standards of consideration for allotments or community food growth projects to those applied to commercial agriculture.
Vale of Glamorgan Council	<p>Is there a proven, sustainable, supported local demand for community grown food?</p> <p>Is the land suitable for growing?</p> <p>Where is the funding coming from?</p> <p>What resources are available to make it a successful enterprise?</p>
The Landscape Institute	
Torfaen County Borough Council	Location of land, Ground suitability, Bio-diversity, planning



## Log of Responses to WG22211

Cardigan Allotments Ceredigion	safety, chemical contamination, too near roads, noise
Cwmcarn and Abercarn Allotment Association	
Greener Aberystwyth Group	<p>establish small local consultive teams</p> <p>Consider: Disability and access issues</p> <p style="padding-left: 40px;">Safety</p> <p style="padding-left: 40px;">management Responsibility aspects</p> <p style="padding-left: 40px;">review procedures/ frequency</p>
Llanhilleth Family Allotments Project	The best way to encourage people is to provide fairly level or flat sites. The soil quality can always be improved on.
Watton Allotment Association	Previous use of land. E.g. was it used by a polluting industry where the land may be tainted or even poisoned?
Respondent	Comments

## Log of Responses to WG22211

Q19. Do you agree with the proposals above either as a collective package or in part?	
Cheow-Lay Wee	As a collective package. It has strengths in ensuring a cohesive strategy and policy implementation
Confidential	
Cyrenians Cymru	Yes - fully agree.
Capita	Yes with tweaking
Cwmni Nod Glas Cyf.	ydw ar y cyfan
Owen Jenkins	In part only
Bleddyn Williams	I agree with most of the proposals but on their own they will be ineffective have given my suggestions. Without the will to impose the existing powers then more will not help
City and County of Swansea	See above. We support the idea of increased flexibility and temporary relaxation of even certain protected areas.
Isle of Anglesey County Council	There should be a clear proposal/strategy in place
Delegates to Welsh Region of NSALG	Not all but in part yes

## Log of Responses to WG22211

Sully Terrace Allotments Association	Broadly yes subject to reservations indicated
Denbighshire County Council	I would suggest that some of the proposals are only done in part. They could create a minefield of problems with individuals demanding all sorts of areas of land.
Llandough Community Council	N/A
One Voice Wales	The proposals could work either in part or collectively.
Federation of City Farms and Community Gardens	FCFCG agrees with and welcomes the proposals as a collective package.
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	Yes, as a collective package.
Mick Antoniwn AM	I agree with all the above proposals, subject to confirmation of operational detail

## Log of Responses to WG22211

Bridgend County Allotment Association	It depends on where the development may be and what the impact may be. There would need to be consultation with local people.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	FCFCG agrees with and welcomes the proposals as a collective package.
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	Yes, subject to comments in response to individual questions.
Growing Green Teens Project	in part, different areas have different needs
Natural Resources	Collectively.

## Log of Responses to WG22211

Wales	
National Botanic Garden of Wales	In part
Gelligaer Community Council	Agree
Cornelly Community Council	Do not agree.
National Society of Allotment & Leisure Gardeners Limited	In part, as detailed above.
Penarth Town Council	(left blank)
FlintShare	Subject to the comments we have made to the specific questions we support the proposals as a whole.
St Dogmaels Allotment Association	Yes
Egg Seeds	I agree with and welcome the proposals on a collective package.

## Log of Responses to WG22211

Confidential	<p>Proposals 1-5 seem sensible enough</p> <p>Proposal 6, 7 &amp; 8 - a third party and a register and a waiting list just seems to be creating more bureaucratic processes</p> <p>Proposal 9 - there is an existing process for the creation of community allotments and it's worked in the past so why the need to change it?</p> <p>Proposal 10 - a right to use underused public land or to use land that isn't owned - this is going to need a law</p> <p>Proposal 11- if something is earmarked for other purpose wouldn't it make sense not to have it designated as "other purpose" since that is so vague "other purpose" could be "community food growing" but again you have to be mindful of "adverse possession"</p>
Jocelyn Kynch	Yes, agree, except for putting allotments and community growing under same legal framework.
Allan Evans	As a collective package but roll out may require a staged or phased approach
Bay of Colwyn Town Council	There is an obvious need to reconnect with food production on a community level rather than leave it to agribusiness and there are social and cultural benefits, but it must carry a health warning that you don't eat something that disagrees with you. It is not possible to agree with everything as there may be unforeseen circumstances, so we must revert to question one. Also the provision of allotments was originally to provide food for the urban population who did not have access to land but many allotment holders now have their own gardens and this should be taken into account when considering the 'need' for allotments.
Radyr & Morganstown Community Council	Collective.
Lisvane	Insufficient involvement with allotments and community gardens in our area to respond constructively to this

## Log of Responses to WG22211

Community Council	question
Welsh Land Contamination Working Group	<p>The development of a formal process which encourages the utilisation of unproductive and potentially visually detrimental areas of land is a positive step, however it should be acknowledged that many of these unused sites have the significant potential to have the presence of chemical contamination. Any process developed should include safeguards to ensure that consideration is given to the potential for chemical contamination at a site, the risk this presents and the implementation of any necessary mitigation before a land use change is instigated.</p>
Cardiff Council	<p>There is general agreement with the rationale of the proposals but not necessarily all the implications. Certainly the detail needs working out to ensure that needs of both landowners and community groups are met.</p> <p>This is an area that can become fraught with local issues and it is important to ensure that change is not being made for changes sake. Allotment legislation is easy to criticise but it has provided a robust model for community growing for the best part of a century. What is needed is complementary legislation (or guidance) to provide alternatives for those who wish approach growing in a different way - maybe to make a profit from their venture (along the lines of small scale tenant farming), or use sites for training or other community purposes, or to act collectively not as individuals and undertake activities not permitted under allotment legislation (e.g. add animals other than rabbits, bees or chickens).</p> <p>It would be a concern if all the administrative requirements arising from these changes were to be passed on to local authorities without any additional resources, and/or that it turned into a bureaucratic nightmare. Experience has shown that community gardens can wax and wane with changing demographics and trends, and a system is required that is nimble on its feet and able to adapt to changing circumstances.</p> <p>The best arrangement would be to devolve as much responsibility and authority to the community itself but with a responsible body/regulator of some sort to act as overseer and final arbitrator.</p>

## Log of Responses to WG22211

	For the Planning system to be able to help deliver this goal Welsh Government guidance would need to be reviewed to cover a wider definition of community growing than allotments.
PLANED	
RTPI Cymru	
Cwm Harry Land Trust	
CLA Cymru	Collectively.
Vale of Glamorgan Council	No, too ambiguous knowing the lack of available, suitable land in urban areas near to the population.
The Landscape Institute	
Torfaen County Borough Council	A collective package
Cardigan Allotments Ceredigion	
Cwmcarn and Abercarn Allotment	



## Log of Responses to WG22211

Association	
Greener Aberystwyth Group	GAG agrees with proposals as a collective privilege.  However we are doubtful if WAG implementation can produce a sufficiency 'thrusting' policy where community awareness and cohesion on vital food growing issues becomes meaningful and is produced expeditiously and with teeth!
Llanhilleth Family Allotments Project	Collective
Watton Allotment Association	All means to use under utilised land should be considered. Any proposals must be considered appropriate by the community and the potential end users.
Respondent	Comments
Q20. What are the potential impacts, positive and negative, of the proposals (all together or in part)?	
Cheow-Lay Wee	
Confidential	People should be able to grow food on unused land even if it is on a short term basis - simple.
Cyrenians Cymru	The potential impacts are wholly positive. More community growing leads to greater wellbeing, health and community cohesion. It improves the environment, and assists wildlife.
Capita	If the only benefit is to bring communities together it will have a positive impact on society as there are bound to be wider community benefits it is a worthwhile programme but unlikely to have much of an economic impact

## Log of Responses to WG22211

Cwmni Nod Glas Cyf.	maent wedi ei dweud yn barod
Owen Jenkins	Legislation could result in less land becoming available
Bleddyn Williams	The proposals are ineffective.
City and County of Swansea	Yes with the emphasis on flexibility and an acknowledgement of the wider strategic responsibilities of the Local Authority.
Isle of Anglesey County Council	Creating local interest, healthy communities. Potential loss of alternative designated use
Delegates to Welsh Region of NSALG	They seem to deal only with Community Gardens and not Allotments
Sully Terrace Allotments Association	Potential health, social, economic, environmental, educational, visual and community benefits.  Risk of conflict between existing and potential users of land, under resourcing lack of clarity and or guidance, sustained commitment.
Denbighshire County Council	There could be impacts upon too many small areas being used as community sites and these falling into disrepair when individuals tire of working the areas. A nucleus of areas managed by the Local Authorities co-ordinating and managing is a clearer way forward there would be more control etc of the sites - rather than turning areas into eyesores

## Log of Responses to WG22211

Llandough Community Council,	N/A
One Voice Wales	The positive impacts would be felt in relation to health, education, sustainability and economic and social well-being.
Federation of City Farms and Community Gardens	<p>These proposals will have an overwhelmingly positive impact on the Food Security of Wales and help address the increasing levels of food poverty experienced by many of the population. They will enable projects proved to improve the health and well being of those directly involved and have considerable benefits for the wider community and environment. These proposals will deliver a framework to make our food system fairer and good fresh food available to all. They will play a large part in making the future of Wales more sustainable and resilient and are to be commended and celebrated.</p> <p>The price of food - especially healthy food is rising year on year and is likely to continue to do so. Fruit trees and bushes in particular on verges, on the edge of parks and playing fields, on small public green spaces in towns and villages, will provide tonnes of fresh organic fruit year on year, public amenity in terms of beauty, food for insects, birds and small mammals. The increasing price of food will gradually set a precedent for people helping themselves to fruit which may at present go unpicked - Incredible Edible, foraging and "abundance" schemes and community fruit trees can show how this can be normalised. People can help themselves individually or communities can organise abundance type schemes, provide fruit and juice to sell for funding community projects, distribute them to schools and homeless hostels etc. So there is social and educational benefit also.</p> <p>There is potential for negative impact where there is conflict within communities about the land use. One of the most regular complaints to local authorities is about the state of verges. While they present crucial wildlife corridors for pollinators, insects, small mammals and birds, many people regard them as untidy if they're not mown regularly. This can possibly be helped by education. Some people will also be offended by fallen rotting fruit, and worried about rats and wasps. These problems are often overcome when negative expectations</p>

## Log of Responses to WG22211

	are replaced by positive experience. Some conflict is inevitable and shouldn't prevent this important change in land use.
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	Not qualified to comment, although we support the idea.
Mick Antoniwi AM	There is the potential for low-level conflict in respect of decisions to locate allotments at a particular site or to compulsory purchase a particular piece of land, however the community benefits that flow from these proposals far outweigh the minor issues that may arise from time to time and I believe they will attract overwhelming community support.
Bridgend County Allotment Association	It should, in all, provide more land as long as local authorities are given sufficient resources to develop it.
Food Cardiff  This is an endorsement of the FCFCG response with the additional comments in question 1 and	<p>These proposals will have an overwhelmingly positive impact on the Food Security of Wales and help address the increasing levels of food poverty experienced by many of the population. They will enable projects proved to improve the health and well being of those directly involved and have considerable benefits for the wider community and environment. These proposals will deliver a framework to make our food system fairer and good fresh food available to all. They will play a large part in making the future of Wales more sustainable and resilient and are to be commended and celebrated.</p> <p>The price of food - especially healthy food is rising year on year and is likely to continue to do so. Fruit trees and bushes in particular on verges, on the edge of parks and playing fields, on small public green spaces in</p>

## Log of Responses to WG22211

15	<p>towns and villages, will provide tonnes of fresh organic fruit year on year, public amenity in terms of beauty, food for insects, birds and small mammals. The increasing price of food will gradually set a precedent for people helping themselves to fruit which may at present go unpicked - Incredible Edible, foraging and "abundance" schemes and community fruit trees can show how this can be normalised. People can help themselves individually or communities can organise abundance type schemes, provide fruit and juice to sell for funding community projects, distribute them to schools and homeless hostels etc. So there is social and educational benefit also.</p> <p>There is potential for negative impact where there is conflict within communities about the land use. One of the most regular complaints to local authorities is about the state of verges. While they present crucial wildlife corridors for pollinators, insects, small mammals and birds, many people regard them as untidy if they're not mown regularly. This can possibly be helped by education. Some people will also be offended by fallen rotting fruit, and worried about rats and wasps. These problems are often overcome when negative expectations are replaced by positive experience. Some conflict is inevitable and shouldn't prevent this important change in land use.</p>
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	<p>If successful, more allotments could be made available.</p> <p>If procedures are too complicated, results may not justify extra work, that may be required of Local Authorities.</p>
Growing Green Teens Project	<p>could be too bureaucratic and over complicated/ too much paperwork</p>

## Log of Responses to WG22211

Natural Resources Wales	Covered above.
National Botanic Garden of Wales	Could easily become too legislative. Need to be mindful of restrictions versus flexibility and freedom to grow.
Gelligaer Community Council	Positive health impacts for allotment holders as in physical exercise and excellent for improving mental health. Other benefits are good food and alleviation of poverty.
Cornelly Community Council	Positive – more people will be provided with plots on allotment sites and this will allow them to produce their own food and subsequently this will have a positive impact on healthy lifestyles.  Negative – the Proposals will create another tier of expensive Government bureaucracy.
National Society of Allotment & Leisure Gardeners Limited	As detailed above.
Penarth Town Council	The proposals would bring uniformity and greater transparency to issues relating to allotments and community gardens.
FlintShare	
St Dogmaels	Positive - increase of productive land use, positive benefits to health and wellbeing of local communities and

## Log of Responses to WG22211

Allotment Association	community gardening. Negative -The sites has to be thoroughly researched to make sure that the soil is safe for growing foodstuffs and gardening.
Egg Seeds	<p>I fully support the response made by FCFCG</p> <p>These proposals will have an overwhelmingly positive impact on the Food Security of Wales and help address the increasing levels of food poverty experienced by many of the population. They will enable projects proved to improve the health and well being of those directly involved and have considerable benefits for the wider community and environment. These proposals will deliver a framework to make our food system fairer and good fresh food available to all. They will play a large part in making the future of Wales more sustainable and resilient and are to be commended and celebrated.</p> <p>The price of food - especially healthy food is rising year on year and is likely to continue to do so. Fruit trees and bushes in particular on verges, on the edge of parks and playing fields, on small public green spaces in towns and villages, will provide tonnes of fresh organic fruit year on year, public amenity in terms of beauty, food for insects, birds and small mammals. The increasing price of food will gradually set a precedent for people helping themselves to fruit which may at present go unpicked - Incredible Edible, foraging and "abundance" schemes and community fruit trees can show how this can be normalised. People can help themselves individually or communities can organise abundance type schemes, provide fruit and juice to sell for funding community projects, distribute them to schools and homeless hostels etc. So there is social and educational benefit also.</p> <p>There is potential for negative impact where there is conflict within communities about the land use. One of the most regular complaints to local authorities is about the state of verges. While they present crucial wildlife corridors for pollinators, insects, small mammals and birds, many people regard them as untidy if they're not mown regularly. This can possibly be helped by education. Some people will also be offended by fallen rotting fruit, and worried about rats and wasps. These problems are often overcome when negative expectations are replaced by positive experience. Some conflict is inevitable and shouldn't prevent this important change in land use.</p>

## Log of Responses to WG22211

Confidential	<p>Well considering what was set out as the goal - to see that the supply of community food growing sites and allotments meets local need more effectively. This tends to suggest that there has been a surge in requests for allotment or community growing sites. So from what I have read and answered it would seem to me that you would build up a very good picture of parcels of land to add to the Land Registry information if they would be the organisation to whom the registering process would be given, which in a way makes sense. And in principle if land is not being used then if a community want to take it over to grow things well that can't be a bad idea except of course when the land is then needed for fracking, or wind turbines or roads or a new housing estate. We already have a system in place that we can ask for allotment sites but the biggest question is who are these people who are going to grow things, where are they because I would like to meet more of them. Anyway, thanks to Google it would appear that there are a lot of people in England who are on waiting lists for Allotments and these are in large cities so I guess I am lucky to have grown up in Wales where everyone had a garden and we grew our own food but those days are gone as those people with big gardens now have houses at the bottom of them and new house builds don't seem to have much in the way of garden provision especially with all these apartments being built these days</p> <p>Allotments</p> <p>Standard Note: SN/SC/887</p> <p>Last updated: 22 March 2012</p> <p>Author: Christopher Barclay</p> <p>Section Science and Environment Section</p> <ul style="list-style-type: none"><li>• This note describes the law on allotments, including some issues that frequently arise.</li></ul> <p>The National Society of Allotment and Leisure Gardeners Ltd has a very useful website and is the main centre of allotment expertise.</p>
--------------	---



## Log of Responses to WG22211

	<ul style="list-style-type: none"> <li>• The law on allotments appears in several Acts of Parliament, some more than a century old.</li> <li>• The Small Holdings and Allotments Act 1908 imposed a duty on councils – which remains in force - to provide allotments if six or more people say that they want them. However, there is no time limit and many people would have to wait decades to obtain an allotment.</li> <li>• Building on statutory allotment land is only allowed when the allotment holders are offered alternative sites.</li> <li>• Despite these controls, many people have asked for the provision of more allotments to satisfy demand.</li> <li>• The Government argues that the neighbourhood planning regime, for which the Localism Act makes provision, could lead to many new allotments.</li> </ul>
Jocelyn Kynch	Delegation to third sector = creeping privatisation.
Allan Evans	<p>Negatives</p> <p>Lack of suitable land</p> <p>Lead partners unable to commit staff and resources due to budget restraints</p> <p>Lack of experienced staff and knowledge base</p> <p>Positives</p> <p>New opportunities - All Wales Association</p> <p>Increase local supply of locally grown food</p> <p>Reduce poverty</p>

## Log of Responses to WG22211

	<p>Community groups gain new skills</p> <p>Improved health gains - reducing demand on NHS</p> <p>Community cohesion</p> <p>Reduce carbon footprint</p>
Bay of Colwyn Town Council	<p>There is a good deal of land that is currently unsuitable for growing food and there is an increasing amount of food and green waste being recycled, which could be used to improve soil conditions or for container growing and more needs to be done to promote this. Also the size of plots must be taken into consideration as many modern day plots fall short of the standard 10 yards by 30 yards. Requests for 'full' or 'half-size' plots should be considered, with waiting lists annotated accordingly.</p>
Radyr & Morganstown Community Council	<p>Risk of over complexity that deters people from getting involved with an activity of fundamental simplicity: growing food.</p> <p>More sites with shorter waiting lists.</p>
Lisvane Community Council	<p>Insufficient involvement with allotments and community gardens in our area to respond constructively to this question</p>
Welsh Land Contamination Working Group	<p>See Answer 19</p>
Cardiff Council	<p>There is a concern that the proposals might actually weaken allotment legislation and make allotments far more difficult to manage effectively. Conversely there is an opportunity to create far wider opportunities for those who want to take up local food production and resolve some of the issues we have on allotments where</p>

## Log of Responses to WG22211

	<p>conflict is occurring because of community tenancies (issues relating to key holders, 'strangers' on the site, unauthorised activities - community events, pond building, willow mazes etc.).</p> <p>Raising the profile of allotments and community gardens should also help us in Cardiff to address inconsistencies in the way community gardens are currently set up and managed – as all have arisen through different circumstances and have differing forms of agreement in place (if any).</p> <p>There are a lot of questions generated by the idea of a community land bank:</p> <p>Who would own the land? Who would carry out work to make allotments ready? How would consultation be undertaken? Who would be responsible for maintenance of the land if no-one came forward to use it for growing? Who would maintain and set up the land bank service? Who would manage the allotments once set up? What support would land owners get?</p> <p>In planning terms there are potential negative impacts on amenity if such areas are allocated for community growing however in terms of sustainability an increase in community growing would have positive impacts in terms of reducing CO2 emissions and increasing health and wellbeing.</p> <p>The idea of more growing space being made available is appealing; however is there evidence for a real demand for this land? Pilot schemes need to be set up to see if community groups are still keen to utilise the land once the detail of what needs to be undertaken is a reality (ie legal agreements, management plans, duty of care for users etc.).</p>
PLANED	
RTPI Cymru	Proposals have the potential to impact positively or negatively on localities dependent on the exact nature of each proposal and the characteristics of the particular site in relation to its surroundings. However, control from a planning perspective is currently difficult due to the legal position in planning terms.
Cwm Harry	

## Log of Responses to WG22211

Land Trust	
CLA Cymru	There are benefits for social cohesion so long as the private ownership rights of individuals are respected. Failure to deal with these aspects adequately could give rise to community conflict and a decline in the willingness of landowners and farmers to allow community food growth projects.
Vale of Glamorgan Council	Potential planning blight on identified land. Cost of land in areas where the alternative use is generally development for housing / commercial use.
The Landscape Institute	
Torfaen County Borough Council	Positive:- Healthy eating, Exercise, Bio-diversity. Negative:- Potential loss of land for other intended purposes. Cost to set up an allotment and the loss if interest subsides. If interest falls, the land could become overgrown resulting in complaints from residents.
Cardigan Allotments Ceredigion	
Cwmcarn and Abercarn Allotment Association	<ul style="list-style-type: none"> <li>- Improved understanding and respect for the environment</li> <li>- better health</li> <li>- lower obesity related issues</li> </ul>

## Log of Responses to WG22211

	- Greater social cohesion
Greener Aberystwyth Group	More (guided) local responsibility a less manicured and merely 'face-painted' Wales is required for the future generations. We know that Wales has beauty - but does it have meaning - that includes local vitality on green and food growing issues?
Llanhilleth Family Allotments Project	There are only positive impacts for unsightly, unused waste areas. Blaenau Gwent needs regeneration and not only buildings (e.g. Ebbw Vale works site) will provide that or create a healthy lifestyle.
Watton Allotment Association	Social cohesion, health, (mental and physical) fresh food – reduce air miles.  Possible alienation of some land owners and resistance from some L.A's.
Respondent	Comments
Q21. In what other ways, other than those proposed above, could the provision of land for allotments and community growing be improved?	
Cheow-Lay Wee	
Confidential	I can't seem to tick the paragraph below but I would like to stay anonymous.
Cyrenians Cymru	Small-scale funding for start-ups.  Designated projects to assist access for young people, refugees, older people, people with disabilities etc.  Funding for training and links to other horticulture (e.g. Nat Trust, Nat Botanic Garden)

## Log of Responses to WG22211

Capita	Of the wall but I would like WG to explore imposing a pony tax as far too many people are keeping ponies they do not ride and are taking up good agricultural land. The tax could be used specifically to run this programme.
Cwmni Nod Glas Cyf.	dim ond ewylllys i wneud sydd ei angen a brwdfrydedd swyddogion ALL
Owen Jenkins	By compensating land owners for their loss of Single farm Payment and Glastir payments when giving land for community use.
Bleddyn Williams	I have listed my proposals which means starting to take action now using present powers. If you need to discuss this further I am available.
City and County of Swansea	We consider that this consultation comprehensively covers all options.
Isle of Anglesey County Council	No comment
Delegates to Welsh Region of NSALG	Providing Land and Funding. Councils should be aware of the "outstanding maintenance costs of bringing existing sites up to an agreed standard" and that sufficient budgets should be made available for such maintenance to be carried out.
Sully Terrace Allotments Association	No comments to add.
Denbighshire	It would be more beneficial if the laws were changed that Local Authorities could apply for grants to

## Log of Responses to WG22211

County Council	improve/increase their existing sites and which in turn would help in the creation of new sites.
Llandough Community Council,	N/A
One Voice Wales	<p>One Voice Wales is recognised by the Welsh Government as the national representative body for community and town councils in Wales. It represents the sector on the Local Government Partnership Council and over three-quarters of the 735 community and town councils are already in membership, with numbers growing year on year. As well as our representative role, we also provide support and advice to councils on an individual basis and have previously launched, with Welsh Government support, a modular training programme for councillors. We believe strongly that community councils are well-placed to develop the economic, social and environmental well-being of the areas they serve and, as such, are active and proactive in debating key issues such as energy policies, environmental issues and strategic planning. Our sector and its members will support and wish to participate in much of the locally based aspects of this agenda, many of whom will wish to become directly involved in the acquisition and running of allotments and/or community gardens. It is stressed that our members (approximately 8000) will be generally very supportive, often proactively so, but the sector will need to be considered as a key delivery option throughout the whole range of aspects covered within this consultation exercise. The current wording of the consultation document does not necessarily reflect this.</p>
Federation of City Farms and Community Gardens	<p>Housing associations and local authority housing departments which have large estates should be included in guidance about how to encourage communities to grow. At the moment there is a varied response.</p> <p>The Welsh Government could establish a fund for communities to buy land for community growing projects.</p> <p>The benefits to communities and the environment of community growing could be recognised and rewarded by making these schemes eligible for land management schemes such as Glastir.</p>

## Log of Responses to WG22211

	<p>The Welsh Government could establish a fund for communities to buy land for community growing projects and a start up small grant scheme, potentially delivered by a third sector organisation such as FCFCG.</p> <p>Local authorities should be encouraged to keep their estates intact - in terms of public land in towns and villages, and tenant farms, and not sell them off to mitigate financial problems in the short term.</p> <p>Developers could be encouraged to provide community growing space as part of significant developments of housing.</p> <p>Local authorities could be required to plant fruit and nut trees when creating new or replacing old street planting. This will reinforce the principal of community grown food and normalise it.</p> <p>Health boards, the church, NRW, Welsh Water, the Farmers Union in Wales, the NFU and large estates should be provided with guidance directly from the Welsh Government on how to allow access for community growing. This would go some way to alleviating fears which hold large landowners and farmers back from getting more involved in community growing.</p> <p>The Federation of City Farms and Community Gardens is well placed to assist in the development and facilitation of the provision of allotments and community gardens in Wales, and is able to provide coherent, robust and impartial advice to landowners and communities based on many years experience.</p>
Community Food Co-operative Programme in Wales - Rural Regeneration Unit.	
Mick Antoniwi	Consideration should be given to requiring all plot holders to be members of the national association (NSALG)



## Log of Responses to WG22211

AM	in order to promote high standards and access support in respect of insurance issues etc.
Bridgend County Allotment Association	The Assembly needs to provide more ring-fenced funding to local authorities if it wants to see more land provided and more schemes come to fruition.
This is an endorsement of the FCFCG response with the additional comments in question 1 and 15	<p>Housing associations and local authority housing departments which have large estates should be included in guidance about how to encourage communities to grow. At the moment there is a varied response.</p> <p>The Welsh Government could establish a fund for communities to buy land for community growing projects.</p> <p>The benefits to communities and the environment of community growing could be recognised and rewarded by making these schemes eligible for land management schemes such as Glastir.</p> <p>The Welsh Government could establish a fund for communities to buy land for community growing projects and a start up small grant scheme, potentially delivered by a third sector organisation such as FCFCG.</p> <p>Local authorities should be encouraged to keep their estates intact - in terms of public land in towns and villages, and tenant farms, and not sell them off to mitigate financial problems in the short term.</p> <p>Developers could be encouraged to provide community growing space as part of significant developments of housing.</p> <p>Local authorities could be required to plant fruit and nut trees when creating new or replacing old street planting. This will reinforce the principal of community grown food and normalise it.</p> <p>Health boards, the church, NRW, Welsh Water, the Farmers Union in Wales, the NFU and large estates should be provided with guidance directly from the Welsh Government on how to allow access for community growing. This would go some way to alleviating fears which hold large landowners and farmers back from getting more involved in community growing.</p>

### Log of Responses to WG22211

	The Federation of City Farms and Community Gardens is well placed to assist in the development and facilitation of the provision of allotments and community gardens in Wales, and is able to provide coherent, robust and impartial advice to landowners and communities based on many years experience.
Joint response from Brecon Beacons, Pembrokeshire Coast and Snowdonia National Park Authorities.	Generous financial support from Welsh Government for community groups to buy suitable land for new allotments.
Growing Green Teens Project	Dedicated champions/ambassadors to promote/ develop ideas
Natural Resources Wales	See our response to Q5 – we would recommend that all land-owning public bodies adopt formal schemes to actively encourage and facilitate access to land – for all community benefit purposes.
National Botanic Garden of Wales	<p>Knowledge, training and support is essential if the growing revolution is to continue.</p> <p>There is a very serious 30 year skills gap in the horticulture industry, which needs urgent investment and incentives in apprenticeships and good training to compensate.</p>
Gelligaer Community Council	Allotees/growers should be allowed to sell surplus produce to local people especially to those unable to grow their own i.e. disabled, including pensioners who have become disabled through age.

## Log of Responses to WG22211

Cornelly Community Council	Building new homes with gardens.
National Society of Allotment & Leisure Gardeners Limited	As detailed above.
Penarth Town Council	Under used uncultivated residential gardens often owned by older/infirm residents who would be happy to see their gardens maintained and would benefit from the social interaction.
FlintShare	A register of all council owned land and its current use should be available to all residents. This is land 'held in common'. Communities seeking land have little information available to them about what might be a possible sitett
St Dogmaels Allotment Association	Access to all. Help with setting up Organic gardens, promote Organic sustainable practises for health and environmental benefits.
Egg Seeds	<p>Housing associations and local authority housing departments which have large estates should be included in guidance about how to encourage communities to grow. At the moment there is a varied response.</p> <p>The Welsh Government could establish a fund for communities to buy land for community growing projects.</p> <p>The benefits to communities and the environment of community growing could be recognised and rewarded by making these schemes eligible for land management schemes such as Glastir.</p> <p>The Welsh Government could establish a fund for communities to buy land for community growing projects</p>

## Log of Responses to WG22211

	<p>and a start up small grant scheme, potentially delivered by a third sector organisation such as FCFCG.</p> <p>Local authorities should be encouraged to keep their estates intact - in terms of public land in towns and villages, and tenant farms, and not sell them off to mitigate financial problems in the short term.</p> <p>Developers should be taking into consideration solar capture and growing when designing new developments and not squashing in as many houses as possible with poor aspect and without considering growing provision as part of the building, gardens or communal spaces All amenity planting should have fruit and herbs incorporated as standard.</p> <p>Local authorities could be required to plant fruit and nut trees when creating new or replacing old street planting. This will reinforce the principal of community grown food and normalise it. Retail outlets, supermarkets, car parks should have edible/productive planting schemes or be offered to groups to use manage these zones. Herbs and fruit are great options for these zones. Cemeteries should encourage fruit and nuts to be grown onsite utilising huge areas of productive land.</p> <p>Health boards, the church, NRW, Welsh Water, the Farmers Union in Wales, the NFU and large estates should be provided with guidance directly from the Welsh Government on how to allow access for community growing. This would go some way to alleviating fears which hold large landowners and farmers back from getting more involved in community growing.</p> <p>Much more work needs to be done with education there should be compulsory use of outdoor space and greater emphasis on outdoor education and recognition of how this can help achieve better results than pure classroom focused targets. Growing, Animal husbandry and environmental awareness does not get high enough profile in curriculum this will go hand in hand with enhancing teacher training as cannot normalise use of outdoor space if not equipping teachers and assistants with suitable skills and exposure in teacher training or CPD. It would enhance education by inspiring interest in education and by enhancing skills such as observation, environmental learning, confidence engage back with outside world, growing, environment when older.</p>
--	--

## Log of Responses to WG22211

	<p>Food Cardiff Should be central to the conversation and be considered to open up any calls for development work to our very skilled and varied food council network. We believe the capital city should be an inspiration to the rest of the nation but can learn from great work being done around the nation through collaboration and the development of a unified toolkit and strategy for the whole of Wales and not for each individual LA as these may change form structure funding in the coming years.</p>
Confidential	<p>The people who have gardens have no need of allotments. The people who don't have gardens but who have to live in cities and who want to have that connectivity with nature and grow things have to find a way of making that happen. Be it urban roof top gardens or clearing spaces between houses for community growing areas. But as long as there is money to be made from selling off land for building purposes then unless town planning is changed there is little chance of making land available for community growing especially if the local councils can make money by selling the land to developers. However, there does seem to be hope for Swansea Vetch</p> <p><a href="http://www.bbc.co.uk/news/uk-wales-south-west-wales-26118422">http://www.bbc.co.uk/news/uk-wales-south-west-wales-26118422</a></p> <p>New plans have been put forward to revamp the site of Swansea City FC's former Vetch Field home. The Vetch was demolished in 2011, six years after the Swans moved to the Liberty Stadium, in a bid to attract a developer for the site. But no-one came forward and the site was landscaped with an allotments section called the Vetch Veg project. Now a new scheme will involve building sheltered housing, a care home or flats, and a shared community facility. “Start Quote The new master plan is focused on creating a sustainable design which can work for everyone “Nick Bradley Swansea council Under the title the Vetch Master plan, there will 40 terraced homes built to fit in line with the rest of the Sandfields area, while the Vetch Veg project will be extended. There would also be an open play area for children, a community orchard and a wild flower meadow where the centre circle was on the pitch of the old stadium. A community centre could be added further down the line. “Since the demolition of the old Vetch Field stadium there has been a significant greening of the space left behind, and the Vetch Veg project in particular has been a real boost to the community which no-one wants to lose.</p>

## Log of Responses to WG22211

	Nick Bradley, Swansea council's cabinet member for regeneration, said: "The purpose of the master plan is to provide a blueprint for the future development of the site that's sustainable in the long term, acceptable to local residents and offers opportunities to potential developers."
Jocelyn Kynch	By children and adults learning to dig!
Allan Evans	Awareness raising of the need of suitable plots in areas with landowners and farmers  Encourage landowners to sell plots to groups or rent  Co ops developed to oversee the sites and distribution of surplus produce.
Bay of Colwyn Town Council	No answer
Radyr & Morganstown Community Council	There are significant costs to setting up an allotment site or extending an existing ones even when land is available. High costs are involved with fencing, water supply and access roads. Even when there is a waiting for a site which could be extended there is not always funding to pay for the necessary infrastructure.
Lisvane Community Council	Lisvane Community Council would be interested in gaining some land for allotments given the planned expansion of the village in the coming years.  We would also suggest that, as part of the Wales-wide approach, there should always be land attached to any school to enable simple horticulture etc.to be taught.
Welsh Land Contamination Working Group	

## Log of Responses to WG22211

Cardiff Council	<p>In common with other areas that receive public funding, allotments are chronically under-funded. There are some major issue that need to be addressed in Cardiff relating in particular to water consumption, which represents the highest area of expenditure on allotments. The infrastructure of allotments mostly dates back to the 1940s-50s – particularly water supplies – and there is currently very little means of addressing this other than through local authority funding and or allotment income. It would be useful if any changes in allotment legislation could be accompanied with a funding stream that could be applied for to update allotment / community garden infrastructure to reduce waste (especially water) and further incentivise sustainable practises.</p> <p>In urban areas another potential avenue to increase provision is through the development of growing areas on roof spaces, balconies and atriums, particularly in large flatted developments and this is something that has been successively pioneered in Brighton.</p> <p><a href="http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/PAN6-Food_Growing_and_development-latest-Sept2011.pdf">http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/PAN6-Food_Growing_and_development-latest-Sept2011.pdf</a></p>
PLANED	Schemes such as garden shares, or land shares need resources to support their development. See also comments re Glastir supporting farmers who make land available to communities.
RTPI Cymru	Some LPAs may produce Supplementary Planning Guidance on open space/allotments that could provide more specific local planning advice to help the availability of allotments.
Cwm Harry Land Trust	
CLA Cymru	We believe that all public bodies should embrace the proposals put forward as an exemplar to the private sector.
Vale of Glamorgan	Individuals / community groups / local authorities can lease / purchase land for community use if the demand and funding / resources are available and there is a potential low or no subsidy.

## Log of Responses to WG22211

Council	
The Landscape Institute	<p>The Landscape Institute Wales recommends that the “Positive Planning” reform of the Planning process in Wales should ensure more growing spaces are provided through 'planning gain' when planning permissions are approved.</p> <p>In our public health position statement we advocate:</p> <p>“Civic squares and spaces in the public realm should be consciously planned and designed to promote social interaction. People living in urban areas also need easily accessible places where they can interact with nature, so community gardens, allotments and conservation projects are important. Green infrastructure provides a cost-effective way of meeting many of these objectives, while creating attractive green spaces that can also enhance property values and encourage tourism. All of these things benefit the socio-economic status of local populations and contribute to community cohesion and sustainable development, as well as benefitting wellbeing.”</p> <p>To achieve the goal, it will be essential to bolster Welsh Government Planning Guidance set out in Planning Policy Wales and Technical Advice Note 16 Sport, Recreation and Open Space.</p> <p>Similarly Local Development Plans and related Supplementary Planning Guidance must be harnessed to provide the policy framework which enables provision for allotments and community growing in conjunction with new development through either on-site provision, or through planning obligations, or via Community Infrastructure Levy funding.</p>
Torfaen County Borough Council	
Cardigan	



## Log of Responses to WG22211

Allotments ceredigion	
Cwmcarn and Abercarn Allotment Association	
Greener Aberystwyth Group	By reviewing and revealing existing food growing in Wales not solely confined to livestock and grassland issues and indirectly establishing more ex. mural university courses, horticultural society. lequires and advice on the ground.
Llanhilleth Family Allotments Project	Unsightly derelict buildings can be pulled ( e.g. Miners Baths Llanhilleth) if there is no money to renovate ( although I suggest it is turned into a local market hall) and land used to grow fruit trees, veg, bee hives and children's raised beds.
Watton Allotment Association	Educate LA's that they hold/own land in trust for the community and not in all cases as a resource for themselves for the future.
Respondent	Comments
<u>Miscellaneous Comments</u>	
Gloria Hawkins	I think the idea of making more land available for allotments is an excellent one.
Medwyn	I think it's a great idea and one farmer near where I live (Bodfari, Sir Ddinbych) has recently been advertising

## Log of Responses to WG22211

Roberts	<p>the rent of plots on one of his fields to use as allotments to anybody who is interested although I don't know what sort of response he's had.</p> <p>Unless they're already being considered, I wonder if the Welsh Government might like to consider the suggestions below:</p> <ul style="list-style-type: none"> <li>• Insist that all local authorities carry out a survey among residents within their area to assess the level of interest among the public to have an allotment.</li> <li>• Make it a legal requirement that all local authorities which have undeveloped greenfield or brownfield land should make some of it available for allotments to local residents at an affordable rent.</li> <li>• Provide some sort of incentive to private landowners to make some their land available for allotments in areas where the local authorities don't have sufficient land available to meet demand.</li> <li>• Launch an educational 'grow your own fruit and vegetables' programme aimed at the public to increase awareness and interest.</li> </ul>
Confidential	<p>I have an allotment in Cardiff called Ely great farm there are between 20 /30 unused plots if you phone Cardiff parks and ask for a plot at Ely great farm you will poss. be told you are no 30/32 on waiting list when I took over my plot 12 months last October I asked. Miss c hart allotment manager when will the council cut the boundary the weed and nettles are about 6 ft. tall she said it is down to an outside contractor also two plots down from is hazardous waste i.e. burnt plastic bottles plastic bags mats plastic bottles I asked her to clear it she said it is on my to do list that was last sept still waiting if the council were to clear up the allotments you would get a lot more people interested in this allotments but ask miss c hart to do anything you will wait for years if you contact her please don't tell her my name as she would ban me from the site if there is any thing you can do it would make my day</p>
Ian Rees	<p>I have received a link to the above consultation; unfortunately I received it through a third party. I have also circulated it to others. Since this consultation will have a direct impact on existing allotments etc. I am</p>

## Log of Responses to WG22211

	<p>disappointed that the existing people 'on the ground' have not been included. I feel that as wide a circulation as possible should have been used and not apparently restricted to those who are the providers and /or statutory bodies.</p> <p>Most of the information regarding the current state of allotments and waiting lists etc. is, I am sure, in the hands of allotments committees and the like. The same point would apply to other information plus views on the best way forward.</p> <p>Powys CC have my, and I'm sure many other people's, email addresses and wide circulation would be a reasonable and desirable action. No doubt the same applies to other councils and organisations.</p> <p>Another option could be National Society of Allotments and Local Gardeners (NSALG) who could be asked to circulate to their Wales based members.</p> <p>I would appreciate your views on this matter and perhaps a change of policy to your restricted consultation.</p>
Confidential	<p>I have been instructed by the Council to submit its response to the above:</p> <p>The Council's main concern is in Section 5.1. where Question 6 asks "In what key ways could the Welsh Government provide support to farmers to make land available? ". The Council's response is that in so doing there is a need to ensure that there would be no adverse "knock-on" effect on the "Single Farm Payments Scheme".</p>
Clerk to Llantilio Pertholey Community Council	<p>Please find below a response to the consultation exercise on improving the availability of allotments and community gardens, submitted on behalf of Llantilio Pertholey Community Council.</p> <p>'Llantilio Pertholey Community Council approve of the goals set out in the Allotment Provision paper and agree that guidance specific to Wales should be produced. The content should draw upon advice from national and local organisations associated with allotment management. In supporting WAG efforts it is</p>

## Log of Responses to WG22211

	<p>essential that funding sources be identified within any guidance issued.</p> <p>It has been the experience of this Community Council that although land has been identified and is available for the provision of 36 allotments in our locality that funding of £18,000 to £20,000 to prepare the site has not been forthcoming despite some (failed) applications made for contributions to cover the cost.</p> <p>Once established, such allotments would be self funding and meet the aims of WAG in regard to improving the health and physical wellbeing of the population. It is the conclusion of this Council that the major barrier to the establishment of allotments in local communities is 'set-up' costs and this issue must be addressed as a matter of urgency if the vision of WAG is to be realised.'</p>
Gus Phillips	<p>we have had an allotment in NARBERTH---PEMBS which has been rented after Pembrokeshire cc failed to find a suitable site. WE HOWEVER FOUND A SITE WHICH WE RENT FOR A FEE OF £1000 FROM A LOCAL FARMER. It would seem to me that this land should be purchased for us in line with Welsh gov policies</p>
Llandough Community Council,	<p>General comments:</p> <ul style="list-style-type: none"> <li>• Guidance on the erection of temporary structures should be sufficiently general to enable flexibility to be applied appropriate to the location of sites.</li> <li>• It may be the case that land is not so available in inner city and larger towns especially with the current focus of house building on brownfield sites.</li> <li>• There is a need to review the law relating to allotments relating to security of tenure and one growing season should represent the minimum period of notice required for termination.</li> <li>• Updated guidance should be issued on plot measurements and the reliance on perches and rods needs updating.</li> </ul>

## Log of Responses to WG22211

	<ul style="list-style-type: none"> <li>There should be regulations relating to the keeping of livestock on allotment sites.</li> </ul>
Sarah Sims Williams	<p>1. My experience is that there is a shortage of allotments across north Pembrokeshire, in particular St Dogmaels, Newport and Fishguard.</p> <p>My idea is to kill two birds with one stone so to speak. Currently farmers can earn £100- £200/ acre for grazing. If they were offered £500- £1000/ acre for the land to be used as allotments, I think there would be far more farmers offering their land.</p> <p>As figures show that more food can be produced per acre of allotments due to the intensity of allotment growing than broad scale farming, this would also help Wales meet targets for producing its own produce and local food.</p> <p>If more farmers offer their land up to allotments, there would be a lot more land for allotments, a lot more allotments and farmers would have a tidy extra to support them.</p> <p>The only down side is that allotments would cost £50-100 / full size allotment / year compared to £25. However it is still an excellent price at approx. £5/ month!</p> <p>2. My other idea, which is completely separate is to use more of the public land for growing. I am talking about land that is currently maintained by the council such as verges and town flowerbeds. The amount of fossil fuels used by strimmers is high because there is so much of this land (though scything could be a environmentally friendly alternative). These areas could be used to grow food, and councils could plant productive trees rather than ornamental trees.</p>
Natural Resources Wales	<p>We very much welcome these proposals which would deliver a wide range of benefits – health and well-being, community cohesion and pride, education and skills development, social enterprise. Community growing is an activity that people from all backgrounds, ages and abilities can take part in – wherever they live.</p>
Gwersyllt Community Council	<p>I am instructed to inform you that the Council welcomes the various proposals contained in the consultation document and recommends that any guidance drawn up by the Welsh Government for local authorities should cover, among other things, the availability of grant aid and other support to help community councils and community groups in securing the provision of allotment sites or land for community grown food.</p>

## Log of Responses to WG22211

Public Affairs Manager	RSPCA Cymru welcomes the opportunity to respond to the Welsh Government's consultation on improving the availability of allotments and community gardens in Wales.
RSPCA Cymru	<p>The mission of the Society is to prevent cruelty, promote kindness to, and alleviate suffering of all animals. Many animals in Wales are kept on allotments, and as such, elements of this consultation are of considerable interest to the RSPCA.</p> <p>The prevalence of animals on allotments is underlined by the fact that legislation has made specific reference to particular species, such as the 1950 Allotments Act noting a plot holder's right to keep hens and rabbits on an allotment.</p> <p>Furthermore, relevant tenancy agreements may make reference to rules in relation to the keeping of livestock or other animals on allotments, including which animals may be kept and how many are permitted on a particular allotment space.</p> <p>Certainly, RSPCA inspectors regularly deal with animal welfare issues related to animals being kept on allotments. To this end, we have often experienced that those keeping animals in such a setting commit welfare offences; including failing to ensure the individual needs of an animal are met. Under the Animal Welfare Act, those responsible for animals are required to ensure the following five welfare needs are met:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Need for a suitable diet</li> <li><input type="checkbox"/> Need for a suitable environment</li> <li><input type="checkbox"/> Need to be able to exhibit normal behavioural patterns</li> <li><input type="checkbox"/> Need to be housed with, or apart, from other animals</li> <li><input type="checkbox"/> Need to be protected from pain, suffering, injury and disease</li> </ul> <p>The Welsh Government's focus on allotments, community gardens and their availability provides a clear opportunity to highlight issues associated with the keeping of animals on allotments, and the importance of</p>

## Log of Responses to WG22211

	<p>ensuring measures are in place which emphasise to owners their responsibilities to these animals, such as those outlined above.</p>
NFU Cymru	<p>NFU Cymru welcomes the opportunity to respond to the Welsh Government consultation on improving the availability of allotments and community gardens. We note the consultation covers allotments and community growing and considers what action is necessary to improve current provision.</p> <p>NFU Cymru champions Welsh farming and represents farmers throughout Wales and across all sectors. Our aim is to establish the background conditions in which farm businesses can be profitable and develop. We would stress that it is not our intention to respond directly to all of the proposals and questions posed in the consultation, rather to address the areas of interest or concern to landowners in Wales.</p> <p>Firstly, we note in paragraph 13, that Rural Development Programme funding in the current round has been deployed to facilitate the exchange of knowledge and good practice within the community growing sector through the 'Tyfu Pobl' project. We would express concern that since this project has been delivered through the Federation of City Farms and Gardens a proportion of RDP funds, aimed at the development of rural areas, has been used to support the urban population.</p> <p>NFU Cymru does not support the deployment of RDP funds to urban areas and going forward, where RDP support is drawn down for community growing it should be targeted at rural communities only and funded through the allocation ring-fenced for LEADER and the Community Development Fund.</p> <p>NFU Cymru recognises the challenge to provide sufficient land for allotments and community growing and we note Proposal 2 in the consultation that the 'Welsh Government will encourage and support public and private landowners to make land available for community grown food activity'.</p> <p>We further note the proposals to create a community land bank service to facilitate access to land. NFU Cymru believes that if the land bank service is to include privately owned land then it is vital that this is done with the landowners permission that it is available for this purpose.</p>

## Log of Responses to WG22211

	<p>NFU Cymru broadly welcomes Proposal 3 of the consultation that the 'Welsh Government will explore ways of supporting and addressing barriers to farmers for providing land for allotments or community grown food'. We would concur that there are a number of barriers to farmers entering into agreements to provide land for this purpose.</p> <p>NFU Cymru would suggest that Welsh Government could support the industry to make land available in a number of ways as follows:</p> <p>Awareness raising – there is a role for Welsh Government to raise to profile of allotments and community growing as a potential diversification opportunity for farms located on the urban fringes throughout Wales. We would ask what steps local authorities are taking to engage with farmers on this issue?</p> <p>Information provision – Clear guidance needs to be offered to farmers on how to convert farmland to allotments or community growing. Information and advice on set-up costs, planning requirements, land tenure arrangements, SPS eligibility, cross compliance etc is required to inform the decision making process.</p> <p>Business case – we would highlight that there needs to be a clear business case for farmers to consider allotments and community growing as a realistic option. We note that there is no financial commitment from Welsh Government to make funds available to facilitate provision of land for allotments or community grown food and we would suggest that this will act as a barrier to new land coming forward.</p> <p>We note proposal 4 to 'provide comprehensive guidance for occupiers of plots on registered community grown sites relating to the erection and maintenance of temporary structures'. Whilst this proposal is noted we would highlight the real need to provide guidance on a range of other issues. These include practices that could adversely affect the environment – including managing run-off, use of crop protection products etc together with guidance on complying with regulations relating to animal health and welfare and disease control where the keeping of livestock such as chickens and pigs is permitted. Food safety is further area where guidance should be provided particularly where produce is to be marketed.</p> <p>With respect to Proposal 5 we note plans to extend the definition of allotments to include community gardens</p>
--	---



## Log of Responses to WG22211

	<p>with a more community based ethos where food can be marketed and is grown for collective as well as individual benefit. We would highlight that in Wales we have a small but important horticulture sector and it has been the objective of successive Farming Ministers to see this sector develop within Wales. There is a need to see continued support for these local food businesses and careful consideration is needed of the potential impact on growers as a result of increased allotments and community growing, particularly where marketing is actively encouraged.</p> <p>Finally, NFU Cymru does not support Proposal 10 which includes plans to register and use land where no owner can be established for the purpose of community grown food. We strongly believe that where private land is concerned, the consent of the landowner must always be obtained.</p>
Dinas Powys Community Council	<ol style="list-style-type: none"> <li>1. Dinas Powys is a very vibrant allotments community.</li> <li>2. All of Dinas Powys Community Council's allotments are let and the Council has a very long 'Waiting List' of local residents seeking to obtain an allotment.</li> <li>3. Dinas Powys Community Council's allotments are situated on the edge of the community and the Community Council perceives a need to have other allotments in other parts of the Community.</li> <li>4. Dinas Powys Community Council manage the allotments.</li> <li>5. The allotments service provided by Dinas Powys Community Council is very much appreciated by the community.</li> <li>6. Many residents support the need for further local allotment sites.</li> </ol>

### **Part of Response – Delegates to Welsh Region of NSALG**



Community Hut Including Toilets

## Log of Responses to WG22211



Tool Sheds



Orchard for apple trees and other fruits



Community compost Bins



Concrete or tarmac Roads and Paths to separate plot to stop weeds crossing, also access for wheelbarrows

And tractors transporting manure to all parts of the allotments



For the Disabled, Raised beds 460mm high x 1220mm wide with room between for a wheelchair to manoeuvre



Allotments that could be reserved for groups Community Gardeners or City Farm gardeners



Security Gates and Fences 2mtrs high to stop vandalism and stealing from Allotments



Water taps for filling water butts



Paved area outside community hut

Below a model plan of what all new Allotments should look like to bring Allotments into the 21<sup>st</sup> century  
In order to keep them tidy a Skip should be supplied every second year  
New allotments could be supplied by CIL as done in Bridgend by Asda Stores or with new money supplied by  
The Welsh Assembly Government to each Local Authority ring-fenced for Allotments



## Log of Responses to WG22211

### **Part of response – Delegates to Welsh Region of NSALG**

Official Waiting List for Allotment site name ..... Starting 2014 copy to be kept and a copy must be sent to Association Secretary every 31<sup>st</sup> December with rent

Date and Time of	Name	Address	Telephone	Email	Signature of Applicant
------------------	------	---------	-----------	-------	------------------------

## Log of Responses to WG22211

[illegible]