Federation of CITY FARMS & COMMUNITY GARDENS

Ffederasiwn FFERMYDD DINESIG A GERDDI CYMUNEDOL

Supporting Welsh Food Production in Planning Policy in Wales

1. Background

The Federation of City Farms and Community Gardens has been consulting and supporting Community Growers in Wales since 2008. Gaining access to land and being able to erect necessary structures has always been one of the biggest barriers to the movement progressing. In 2010 the Community Grown Food Action Plan[1] was produced and suggested a study was carried out to look at ways to increase the numbers of community growing projects in Wales and what barriers there were to preventing this. The Wales Rural Observatory[2] completed the study in 2012 and again identified access to land as being one the main barriers to community growing. It asked for more joined-up policy responses to community growing uses of land in its findings and concluded that community growing activities have relevance to a broad range of Welsh Government policy areas, including education and skills, health and physical activity, housing, planning, community regeneration, sustainable development, social justice and social enterprise. In 2013 the Big Lottery funded the Community Land Advisory Service in Wales to increase access to land for community growing spaces. One of the main outputs of the programme is to improve understanding by Welsh Government and other decision makers about issues relating to community land access and for that to result in in supportive policy guidance.

The Food Strategy for Wales (2010 – 2020) acknowledged in 2010 that we had entered a period of complexity in the food system brought on by global resource pressures on land, water, energy, population and biodiversity. It stated that the challenges of climate change adaptation and mitigation

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1 http://gov.wales/topics/environmentcountryside/foodanddrink/foodpolicyandstrategy/comgrownfoodactionplan1/?lang=en

2 http://www.walesruralobservatory.org.uk/sites/default/files/COMMUNITY%20GROWING%20DRAFT%20REPORT%20FINAL.pdf

mean our food sector must account for and respond to these developments in order to maximise its own vitality, and to continue to be able to supply consumers with the food they need. The Strategy talks about a food sector that is relevant and flexible to change. It encourages local food production methods and the need for collaboration across Welsh Government.

In 2016 Welsh Government commissioned Cardiff University to carry out a review of the Welsh Government Food Strategy and in June 'Food Policy as Public Policy: A Review of the Welsh Government's Food Strategy and Action Plan' was produced by Terry Marsden, Kevin Morgan and Adrian Morley. The report talks about a deepening set of food vulnerability conditions since 2010 (when the food strategy was produced). Conclusions drawn suggest that it is now even more urgent for clear policy visions and actions for achieving healthy and sustainable diets following a clear a lack of engagement with stakeholders and use of available policy levers. Currently, the Welsh food system is highly integrated into UK and European systems, and is set in a wider global context and this calls for a more integrated policy approach to food production.

2. Food growing issues relevant to the planning system in Wales

1. Carbon emissions and bio-diversity loss arising from the food sector need to be significantly reduced (Welsh National Assembly Environment and Sustainability Committee, 2014; European Commission, 2016). Food and farming need to play a central role in Wales' ambitions to reduce carbon emissions by 85% by 2050 (Environment Act, 2016).

2. Since 2010, food poverty and food inequality has grown across the UK and in Wales especially for low income groups, such that it is compounding health and well-being inequalities more broadly.

3. Wales lost over 250 dairy farms between 2009 and 2012 (see Adams, 20153) and there is a willingness for diversification and shorter supply chains.

4. The effects of climate change, not least an increased trend for flooding, are having greater impacts on food production; and livestock producers in particular are coming under greater pressure to reduce carbon emissions (Transmango, 2014; The Scottish Government, 2014; Garnett, 2014). Marsden, Morgan and Morley, 2016[4]

[3] Adams, M (2015). Understanding regional agri – food regimes and their supply chains - a socio technological approach PhD Cardiff University. Wales UK.
[4] Food Policy as Public Policy: A Review of the Welsh Government's Food Strategy and Action Plan by Terry Marsden, Kevin Morgan and Adrian Morley, 2016. http://ppiw.org.uk/files/2016/06/PPIW-Report-Food-Policy-as-Public-Policy.pdf

5. There has been an abundance of voluntary programmes and social enterprises that connect food consumers with producers as well as increasing knowledge amongst consumers in Wales. This in turn, has increased demand to make production more local to communities and Welsh Government have recognised this "*There is a continued and increasing demand for locally grown, shorter and more diverse food supply chains by consumers"* (Welsh Government, 2010).

Welsh Government or European Funded Programmes include:

Federation of City Farms and Community Gardens Tyfu Pobl programme, National Botanic Gardens Growing the Future Programme, Natural Resources Wales Come Outside programme. Horticulture Wales, Community Foodie Wales, Cynefin, Community Food Coops in Wales.

Big Lottery and other funded programmes include:

Community Land Advisory Service, Growing Together, Incredible Edible, Renew Wales, Space Saviours.

Community based enterprises and projects include:

Cae Tan CSA, Riverside Market Garden, Swansea Community Farm, Cardiff Food Council, Banc Organics, Caerrhys Organic Community Agriculture, Green Isle Growers, Flintshare, Field Days Organic, Brit Growers, Clynfyw Care Farm, Garth Hillside Organic Garden, Cwm Harry Land Trust, Vetch Veg, Green Meadow Community Farm, Moelyci Environment Centre, Radnorshire Education for Nature and Well Being, over 500 Community Gardens, allotments and school gardens across Wales.

6. There are major funding opportunities available such as, the use of Rural Communities – Rural Development Programme 2014 – 2020, to stimulate sustainable adaptive change in the food and farming sectors (RELU, 2016; European Commission, 2016).

7. In Wales, there has, since 2010, been a raft of new legislation and policies; (Well-being of Future Generations Act, Local Government Reform, Planning and Environment Acts, Green Growth) to which the agri food sector needs to positively respond to.

8. Globally, sustainable food has risen up the political agenda now forming a major part of the new UN Sustainable Development Goals and Sustainable Cities and Regions agenda. It is now no longer seen as a narrow sectoral issue, but a major vehicle for delivering sustainable development more generally. This is challenging governments around the world at different levels (e.g. the Milan Urban Food Policy Pact) to revise their food policies. (Marsden , Morgan and Morley)

9. A range of food nutritional research is showing that (i) the diets of typical British families now pose the greatest threat to their health and survival; (ii) healthier choices are limited, not understood and, more expensive and poorly promoted; and that (iii) good nutrition underpins strong economies (The Food Foundation, 2014).

10. Consumers are increasingly demanding more socially and environmentally responsible food products as well as greater value and variety in what they consume. The health impacts of food will continue to grow in importance and provide opportunities for all parts of the food sector.

11. Part of the appeal tapped by Brexiters was that exit would mean the UK 'takes back control' but what does this mean in a country which is heavily dependent on imported food? The CLAS Cymru Future Generation Growers Conference in July 2016 hosted a debate on what Brexit meant for the future of food production in Wales. It was agreed that the changes will be especially keenly felt in the world of food, farming and community growing where EU support has been so vital for so long. There is no doubt that there are grave concerns about what the future holds, but there are also huge opportunities; the Common Agricultural Policy, for instance, does little to support small, diverse farms that contribute so much to its overall aims. Many delegates felt that now we are set to leave the EU, it is up to communities, farmers and growers to lead the creation of a more secure and self-sustaining Welsh food system.

12. Community growing and community supported agriculture plays a vital role in community cohesion; bringing people together from all backgrounds and cultures. They will be vital in the long term to building resilient communities that rely more on themselves and less on public, and in particular EU, funding and resources. Community based farming and growing is also a powerful education tool, engendering a deeper understanding of food – both its production and consumption – giving the opportunity for people to learn new growing and cooking skills and how to adapt to climate change.

Could Wales Feed itself?

Amber Wheeler has carried out extensive research and consultation on this very conundrum. Amongst her conclusions she describes how Wales would need 2% of all its agricultural land to be given over to horticulture to feed its population. She refers to increasing food prices and the need for a much more joined up food system. Her recommendations ask Government to adopt new benchmark of production to fruit and vegetable requirement and to commit to increase proportion supplied from Welsh food production from 5% to at least 40% and for the all growers of Wales to Develop the 'Growers of Wales'

brand for small to medium scale producers which would link to a Wales Sustainable Food Network and be represented on the existing Wales Food and Drink Industry Board.

Land Needed to Meet Fruit and Vegetable Requirement in Wales at 18t/ha

Percentage of Fruit and Veg Requirement met	Tonnes needed for 3.1m Welsh pop (plus 45% waste*)	Area of land required at 18t/ha	Percentage of total agricultural land available, 1,811,669ha	Percentage Grade 1-3 land, 345,839ha
100%	620,000	34,444	1.9	10.0
90%	558,000	31,000	1.7	9.0
80%	496,000	27,556	1.5	8.0
70%	434,000	24,111	1.3	7.0
60%	372,000	20,667	1.1	6.0
50%	310,000	17,222	1.0	5.0
40%	248,000	13,778	0.8	4.0
30%	186,000	10,333	0.6	3.0
20%	124,000	6,889	0.4	2.0
10%	62,000	3,444	0.2	1.0
5%	31,000	1,722	0.1	0.5
3%	15,500	861	0.05	0.2
	Current	1,694	1811669	

Figures presented at the CLAS Cymru Future Generation Growers Conference[5], July 2016
Horticulture and Public Health: the fruit and vegetable requirement of the UK and Wales, implications and recommendations, Amber Wheeler, University of South Wales, July 2016

[5] http://wl.communitylandadvice.org.uk/en/event/23052016-1508/future-generations-growers-conference-wales

3. The role of Planning in aiding food security and sustainability in Wales?

Access to land

Since the Big Lottery funded the Community Land Advisory Service Cymru in 2013 the programme has supported over 170 community grown food projects with land and planning issues. In this time the landscape of community owned land has evolved and many public bodies are actively looking for communities to own or manage land as part of the community asset transfer regime in Wales. This has come with its own set of challenges but planning applications for works and structures on community food growing projects are only set to increase in the coming months and years. Planning guidance in this area needs to be clear and the legislation up to date so that valuable planning officer time is devoted to the developments that most warrant their consideration. CLAS Cymru has worked with 66 landowners and 45 new community growing projects have started up as a result. The programme has worked with all local authorities in Wales, as well as many public bodies and private land owners. In this time, CLAS Cymru has produced guidance on community growing for farmers and housebuilders and contributed significantly to compiling the Welsh Government Guidance on traditional allotments and community led gardening projects6. Welsh Government Planning Policy needs to positively encourage farm diversification and community supported uses of land. Landowners, especially public bodies, need clear guidance on the planning system and how providing land for community growers might impact them. The lack of guidance in this area provides confusion for landowners. Planners have the tools to enable clarity through Statutory Instruments, Planning Policy Wales and Technical Advice Notes.
The Well Being of Future Generations Act (Wales) Act 2015 asks public bodies to act in accordance with the sustainable development principle and in accordance with the Acts' well-being goals, Welsh Government Planning Division (under the Cabinet Secretary for Environment and Rural Affairs) should contribute to achieving the duty and goals.

Welsh Government recognition and commitment should transcend the divisions of Welsh Government. The long standing challenge for UK based small scale agricultural enterprises to gain planning permission for critical structures and works is now considered overdue for change. The most common challenges usually arise as a result of enterprises being 'non traditional' forms of agriculture and therefore not being recognised as 'agriculture' in planning terms, or that the works are not considered 'essential' for the purposes of agriculture on the enterprise. Other challenges are that agricultural units of less than 5 hectares need to apply for full planning permission for most structures and works. Local Planning authorities are having to devote valuable officer time on applications for agricultural works on

6 http://gov.wales/topics/environmentcountryside/foodanddrink/foodpolicyandstrategy/comgrownfoodactionplan1/allotments-community-gardens/?lang=en

smaller farming operations and this work is being made increasingly demanding by the lack of up to date planning guidance.

Examples of less traditional forms of agriculture often relying on less than 5 hectares beyond settlement boundaries

Community Agriculture	Other small scale Agriculture
Community Supported Agriculture Community managed market gardens Community Gardens School Farms Care Farms For more information on different types of Community Agriculture please refer to the Welsh Government Guidance on Allotments and Community Led Gardening projects	Mushroom farms Forest gardens [7] Seed production farms[8] Honey farms[9] fruit farms/ orchards Worm farms[10]

4. Updating planning legislation and policy for allotments and small scale agriculture

Planning Policy Wales

The text on this area in Planning Policy Wales is very brief and needs expansion and updating. Paragraph 5.5.8 states

"Allotments should be retained, particularly where they have an important open space function and contribute to sustainable development. A proposal to appropriate or dispose of statutory allotments for a different use would usually require the local authority to apply for the consent of the Welsh Government under Section 8 of the Allotments Act 1925".

Suggested further text -

Food production is an agricultural use of land. In all its guises, small scale agriculture has numerous benefits in urban and rural areas. Many people want to work with their communities to improve the local environment and make their communities better places to be for people and wildlife.

Local authorities should encourage allotments, and community led gardening projects and other forms of small scale agriculture (including for example, community gardens, community allotments, community orchards, forest gardens, community farms, school farms and gardens, community supported agriculture) by adopting a supportive and flexible approach especially in areas where demand outstretches supply for allotment space and land for community growing. In countryside locations where the activities may not be seen as conventional agriculture, a constructive approach should be taken. 21st Century Agriculture needs to efficient, flexible and responsive to climate change.

[7] https://wales.permaculture.org.uk/practical-solutions/forest-gardens
[8] http://www.realseeds.co.uk/about.html
[9] http://www.natureslittlehelpers.co.uk/about.html
[10] http://www.bubblehouseworms.com/

The Well Being of Future Generations (Wales) Act 2015 places an emphasis on improving the well-being of Wales to ensure present needs are met without compromising the ability of future generations to meet their own needs. The provision of allotments and community growing spaces are a clear indication of a local authority responding positively to the Act and showing a contribution to achieving its well-being goals. Additional benefits include –

- *Environmental health and planning in the public interest - Use of derelict and unsightly land*
- *Open space – provision of functioning open space and spaces for biodiversity*
- *Social care and public health – social cohesion and physical and mental wellbeing*
- *Education – educational resources for environmental and climate change issues as well as learning about field to fork.*

Planning considerations for small scale agriculture including allotments and community gardens

The growing of fruit and vegetables on a site is classed as agriculture (even on an allotment site11) and as agriculture is not included within the meaning of development in Section 55 of the Town and Country Planning Act 1990 it is usually acceptable to use any piece of land as an allotment or community growing project without the need to apply for planning permission. Local Authorities should provide guidance on exceptions to this in their areas. Any development[12] on land requires planning permission unless it is 'permitted development'. The following material planning considerations are considered important to the consideration of a planning application for development on an allotment or community growing project or indeed any small scale agricultural use of land (not exhaustive)

1. *Whether the use of the structure would be essential to the main use of the site or whether it would create a new use.*
2. *Whether the proposed location would be in the countryside or within the built up limits of a settlement.*
3. *The design of the structure or engineering operation and how appropriate it would be in its proposed location and surroundings.*
4. *The impact the proposed structure (and any new use) would have on neighbouring properties and existing uses of land.*
5. *If a new use would be created whether car parking would be required for the use of the structure*
6. *If a new use would be created what the highway implications would be.*
7. *If a new use would be created what sustainable modes of transport are available to get to the site.*

It should be noted that agricultural uses of land are not development and should not be included in applications for development that require planning permission. Further guidance can be found at Welsh Government Guidance on Allotments and Community Led Gardening Projects (2016).
http://gov.wales/topics/environmentcountryside/foodanddrink/foodpolicyandstrategy/comgrownfoodactionplan1/allotments-community-gardens/?lang=en

[11] See Crowborough Parish Council v Secretary of State for the Environment November 1980
[12] The lead case on whether small structures amount to development is Cardiff Rating Authority v Guest Keen Baldwins Iron and Steel Company 1949.

Technical Advice Note (TAN) 6 - Planning Sustainable Rural Communities

This TAN was published in 2010 and based on the evidence provided in this paper, it is need of significant update and clarity especially relating to farm diversification and the appetite for shorter and supply chains and smaller scale enterprises.

On a positive note the TAN states that planning authorities should assess the needs and priorities of rural communities. It specifically references the Wales Rural Observatory as a published source planning authorities should interrogate. It also states that if necessary they should commission research to identify rural economic and social conditions and needs. But the TAN does not go far enough to underline this Welsh Government intention. For instance, the mention of 'appropriate uses' in section 3 of the TAN is in urgent need of update. The whole document needs to acknowledge current market conditions, the needs of the environment, consumer needs and demands and the changing welsh rural economy; not to mention, the new Well Being of Future Generations and Planning (Wales) Acts.

Proposed Permitted Development Rights for Small Scale Agriculture Uses

Introducing wider permitted development rights for smaller scale agricultural enterprises (under 5 hectares) and making it clear that such enterprises fall within a recognised 21st Century agricultural use of land in planning terms, is very much needed if Wales is ever going to achieve a sustainable food system and the much desired shorter supply chains. Indeed Wales could be the first of the devolved UK nations to truly respond to the real social, environmental and economic demands of its consumers, especially as there are now well founded arguments that small and local methods of food production are the future of food security in the UK and will lead to a highly sustainable farming and food network.

Should this be extended to Community Growing projects?

Yes. Apart from the widely acknowledged social and public health benefits as well as the necessary adaptation to climate change that community growing projects provide some organisations are now building evidence to show that community food growing contributes to the food supply and economy of the UK. Capital Growth in London, is a network of over 2000 community food gardens and has been developing an online tool to help gardens measure the financial value of the food they harvest. So far the Harvest-ometer[13] estimates that £2.4m of food is being grown each year by communities across London. This could prove valuable justification for requiring planning permission for essential structures.

[13] http://www.capitalgrowth.org/the_harvestometer/

5. A Scenario

New Permitted Development Rights for All Agricultural Units in Wales?

Text adapted from existing Statutory Instrument

Part 6 of the General Permitted Development Order

Agricultural Buildings and operations

The General Permitted Development Order origins date back to 1948. Although it has been difficult to find the origins of part 6 of the Order (relating to Agricultural Development) it is not beyond the realms of possibility that some of the wording dates back as far as the 1040s. The wording has been simplified and updated in the following scenario and the text is intended to be an aid for discussion and debate.

Definitions

Agriculture – Section 336 of the Town and Country Planning Act 1990 defines 'agriculture' as including:

- horticulture, fruit growing, seed growing, dairy farming;
- the breeding and keeping of livestock (including any creature kept for the production of food, wool, (skins or fur) or for the purpose of its use in the farming of land);
- the use of land as grazing land, meadow land, osier land, market gardens or nursery grounds; and
- the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes.'

Agricultural Unit – (suggestion) - An Agricultural Unit is land in use for the primary purposes of agriculture occupied as a unit by one constituted organisation or business.

Parcel of Land – (suggestion) - A contiguous parcel of land under the same ownership or tenure not separated by a public highway.

Permitted Development

A. Within an agricultural unit of any size where the main use of land is agriculture –

a) Works for the erection, extension or alteration of a building
b) Any excavation or engineering operation

Which are reasonably necessary for the purposes of agriculture within that unit

Development not permitted

a) It would consist of or include the erection, extension or alteration of a dwelling;
b) It would consist of the provision of a building, or structure not designed for agricultural purposes;

c) Would exceed 50% of the total area of the parcel of land and no more than 500 sq. metres or be within 5 metres of another structure or works, built within the last 2 years. On Article 1(5) land (Conservation Area, AONB, National Park or World Heritage Site) the total area must not exceed more than 10% of the total area of the parcel of land.
d) Within 3 kilometres of the perimeter of an aerodrome or on article 1(5) land (Conservation area, AONB, National Park or World Heritage Site) the height of the works, structure or building would exceed 3 metres in height or 8 metres in height outside those areas;
e) Any part of the development would be within 20 metres of a classified or trunk road or within 5 metres of a public highway or public right of way.
f) The development would be within 100 metres of a protected building or park
g) Where the development involves mineral working or deposit
h) Where the development involves bringing waste materials onto the site

Suggested Conditions

1. The grower shall before the beginning the works, apply to the local planning authority for determination as to whether the prior approval of the authority will be required to the siting, design and external appearance of the building
2. The application shall be accompanied by a written description of the proposed development and of the materials to be used. A site layout plan shall be provided.
3. The application shall be accompanied by evidence detailing the amount of produce being produced or a produce forecast plan.
4. The development shall not begin before the occurrence of one of the following;
    a. The receipt by the applicant of written notice by the local planning authority that written notice is not required.
    b. The expiry of 28 days following the date on which the application was received by the local planning authority without the local planning authority making any determination as to whether such approval is required or notifying the applicant of their determination.
    c. Prior approval from the local planning authority (complying with certain criteria).

APPENDIX 1

Evidence of small scale growers planning issues

The Small is Successful Report

The Small is Successful report was produced by the Ecological Land Cooperative in 2011 in response to demand from planners and organisations interested in land based livelihoods; the common view being that for an agricultural holding to viable it must be large. Please be mindful that the report was compiled in 2011 and the examples mentioned may have moved forward in their planning requirements.

The reality is that most large scale farms rely on public funding and unpaid farmer labour for their viability. Most UK funding streams now recognise this flaw and support agricultural diversification and environmentally sensitive farming methods. Sustainability is now at the heart of farming and climate change and food security issues mean that there are increasing numbers of people trying to address the ills of food production and becoming directly involved in producing, processing and selling food.

The small scale farms mentioned in the Small is Successful report receive no agricultural subsidies, rely on local networks and rarely qualify for public funding but are successful economically, socially and environmentally.

The first case study (a farm shop and veg box scheme on 3- 6.5 acres) demonstrates that acreage is not the important factor but the soil quality and how the produce is marketed, determines success. The second case study (the Real Seed Collection) sees the planning system as the biggest threat to its survival. In 2011 the business was operating on only 2.5 acres, structures such as a drying barn, polytunnel or residential accommodation could not be erected. The third, a commercial forest garden operating on 4.5 acres (1.5 acres being cultivated) is a model of people centred agriculture relying on low cost labour and having sufficient accommodation to host 8-10 people at a time. The high levels of biodiversity and integration with the natural environment has created a resilient system on this holding, which will be much better placed to withstand the adverse effects of climate change than industrialised monocultures that the current UK planning system is geared towards supporting. Another organic vegetable and flower grower who occupies 6.5 acres at Spring Grove, Somerset took years to prove an agricultural workers dwelling was justified at the site and any additional polytunnels are unlikely to be considered favourably by local authority planners. In 2007 the enterprise made £23,100 in profit.
One of the most interesting case studies in the report, from a planning point of view, is 'Maesyffin Mushrooms' located in Ceredigion. This award winning enterprise operates on a 30m x 20m holding,

that's just 0.14 of an acre. The business has a turnover of £10000 per year. It contains the footprint of the house, garage, 2 polytunnels and a shipping container and is referred to as a 30m x 20m 'garden'. It is important that the operation remains adaptable so that it can evolve to meet its own needs but in 2011 it served a healthy local market and internet sales and it is possible that a number of local growers could set up throughout Wales. To date no planning permissions have been obtained for the structures. Many have been there for longer than 10 years and this can be seen as a clear example of the lack of public interest for planning applications for essential agricultural works.

Another small holding 'Honey pot farm' is a 5.5 acre holding which was originally a bare field with no infrastructure. The land is now divided into 7 x ¾ acre paddocks. Altogether 63 apple trees and 17 bush trees have been planted on grade 1 agricultural land. Up to 7000 litres of cider can be produced on the holding. Produce is sold at farmers markets, country fairs and festivals. Turnover for 2009/ 2010 was £12,300. Ideally the enterprise could take on another 5 acres but the entrepreneurs feel bombarded by planning and other regulations.

The final case study is the most profitable - a farming operation set on 2 acres of land. An income of £20000 a year is made on salad bags, £5,100 on veg boxes and £9000 on courses that are run on site. All of the produce is sold within a 4 mile radius.

Enterprises like this could be much more prevalent in Wales but it is essential that the growers are allowed to build the necessary structures for their growing system and that the businesses are responsive to change.

The report explains that high property prices and the fact that growers having to demonstrate earnings of over £50,000 to mortgage companies, the self-build route is essential for all new entrants. Planning regulations deter many, but if permitted development rights were created to allow structures to be built on small scale projects, the country could have many more local growers serving local populations. The essential structures that most projects need to start up are a polytunnel, a compost toilet and a sheltered area for packing. Fencing and pathways also need to be constructed.

Case studies

Cae Tan Community Supported Agriculture Scheme, the Gower Swansea

Cae Tan CSA was set up in 2014 on 4 acres of land to reinvigorate local sustainable food networks, by rebuilding the relationships between consumer, farmer and land. The Grower also wanted to challenge the lack of small scale farming on the Gower, Swansea. In its first year it provided veg boxes to 50 households and it is now providing 95 households with vegetables on a weekly basis. Local community

members have invested in the business and its produce. As the CSA is part of a wider coop on more than 5 hectares of land the operation benefited from permitted development rights to build structures by way of prior approval notice. 2 polytunnels have been erected via this route. The CSA then erected a packing shed, a compost toilet and a parking/ TB testing area without planning permission which meant a full planning application was required for the works. During pre-application discussions the local planning authority asked for a case to be made within the planning application that the structures and works were essential to the agricultural use of the land. As the CSA use of the land is non-conventional and an unfamiliar agricultural use the local planning authority are unconvinced that such structures are essential to the type of agricultural use of the land. The lack of clear planning guidance in this area makes it more difficult for the local planning authority in the determination of the planning application.

The Roundhouse Partnership, Vale of Glamorgan - planning decision

In this case a planning inspector granted retrospective permission for work carried out by a community growing group, overturning a previous decision by Vale of Glamorgan council.

The council had twice ruled that three ponds dug on a site by the Roundhouse Partnership – a community interest growers group – counted as an 'unauthorised development' and had twice turned down planning permission for the work as development not suitable in the countryside. The Council also felt that the character and appearance of the ponds were not appropriate in a countryside location.

However, the Planning Inspector ruled that: "The ponds are vital sustainable drainage, essential to sustain productive agricultural use."

The Inspector decided that the ponds would have minimal impact on the character and appearance of the countryside due to their small scale and natural appearance. It was further decided that community growing of this nature does not breach a requirement to protect the best and most versatile agricultural land.
She went on to state that although the activities may not be conventional, Planning Policy Wales asks for a constructive approach to be taken into account and that activities may need to be efficient and flexible in the agricultural industry. She also stated that the sustainable drainage scheme does not contradict Welsh TAN 6 (planning for sustainable rural communities) principles.

The ruling means that future community growing projects can be deemed to constitute agriculture for the purpose of the Town and Country Planning Act and most importantly, that development that is reasonably necessary for that agriculture, can be permitted.

Due to the rural nature of Wales many community growing projects are located beyond settlement boundaries and local planning authorities have often taken the view that community growing projects are not genuine agricultural enterprises. Development proposals on such sites are not permitted and sometimes, even a change of use of land is required by the local planning authority.

Deep Place Approach and Food Production by Professor Adamson and Dr Lang, 2014[14]

This study published in April 2014 suggests a foundation economy is the best type of economy to reduce social inequality, eradicate food poverty and achieve sustainability. It uses the Welsh town of Tredegar in Blaenau Gwent as its case study and suggests a highly localised food supply chain is essential to meeting every day needs. The report acknowledges the obstacles to achieving this (for example, climate) but nevertheless argues that localised food production is key to achieving a sustainable community. Professor Adamson has gone on to develop the Deep Place Approach further in two communities in Australia and these studies demonstrate further evidence that shorter supply chains, involving the communities they are serving, are critical to achieving a sustainable food supply in communities across Wales.

14 https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKEwjqjM2ukdPQAhXpB8AKHUAXCDIQFggiMAA&url=http%3A%2F%2Fwww.regenwales.org%2Fproject_9_The--Deep-Place--Study&usg=AFQjCNHK9B1rClkpSn-kmSiJgQ4Cqh-4HA

APPENDIX 2

Current definitions of agriculture/ agricultural unit/ agricultural holding

An update and clarification on these definitions would be greatly beneficial to local planning authorities in the determination of planning applications.

Section 336 of the Town and Country Planning Act 1990 describes Agriculture as ..

*"**Agriculture"** includes horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes, and "agricultural" shall be construed accordingly;*

Section 336 of the act makes clear that growing food falls within the definition of agriculture.

For agricultural land to have the fullest range of permitted development rights the land must be part of an Agricultural Unit over 5 hectares (12.4 acres)

The Planning Portal website refers us to Part 6 of the General Permitted Development Order 1995 for a definition of an agricultural unit...

"agricultural unit" means agricultural land which is occupied as a unit for the purposes of agriculture, including—
(a)

any dwelling or other building on that land occupied for the purpose of farming the land by the person who occupies the unit, or
(b)

any dwelling on that land occupied by a farmworker;

***"agricultural land"** means land which, before development permitted by this Part is carried out, is land in use for agriculture and which is so used for the purposes of a trade or business, and excludes any dwellinghouse or garden;*

It would be useful to have a clear and more up to date definition that is fit to serve in the 21st Century farming needs in Wales -

1. Agricultural land
2. Agricultural Unit

At this point we should call into question whether to benefit from a full range of permitted development rights the agricultural land should be used for the purposes of trade or business and also why agricultural units should be over 5 hectares.

Agricultural Holdings Definitions

To find a definition of an **'agricultural holding'** we need to delve beyond the scope of Town and Country Planning Legislation to the **Agricultural Holdings Act 1986**

http://www.legislation.gov.uk/ukpga/1986/5

part 1 –

Principal definitions

*(1)In this Act **"agricultural holding"** means the aggregate of the land (whether agricultural land or not) comprised in a contract of tenancy which is a contract for an agricultural tenancy, not being a contract under which the land is let to the tenant during his continuance in any office, appointment or employment held under the landlord.*

(2)For the purposes of this section, a contract of tenancy relating to any land is a contract for an agricultural tenancy if, having regard to—

> *(a) the terms of the tenancy,*
>
> *(b) the actual or contemplated use of the land at the time of the conclusion of the contract and subsequently, and*
>
> *(c) any other relevant circumstances,*

the whole of the land comprised in the contract, subject to such exceptions only as do not substantially affect the character of the tenancy, is let for use as agricultural land.

(3)A change in user of the land concerned subsequent to the conclusion of a contract of tenancy which involves any breach of the terms of the tenancy shall be disregarded for the purpose of determining whether a contract which was not originally a contract for an agricultural tenancy has subsequently become one unless it is effected with the landlord's permission, consent or acquiescence.

So the Agricultural Holdings *Act 1986 refers to* the question of whether the substantial user of the whole of the holding is agricultural or not – so one could interpret that under the GDPO 1995 definition of agriculture, the word 'holding' means that the user of the land should have a contract of an agricultural tenancy.

Other Agricultural Holding definitions in Wales?

http://gov.wales/topics/environmentcountryside/helpandadvice/county-parish-holding-numbers/?lang=en

Farmers need a County Parish Holding (CPH) number to submit grant and subsidy applications and to report livestock movements between locations. This is because Welsh Government use CPH numbers to identify agricultural holding(s) and any premises where cattle, sheep, goats and pigs are kept. These numbers are identity numbers and do not confer any planning rights or definitions.

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Evidence to the Welsh Government National Development Framework

The Community Land Advisory Service Cymru is managed by the Federation of City Gardens Community Gardens and funded by the Big Lottery Fund to increase access to land for community growing projects. We are working with many local authorities across Wales to help groups access and manage green spaces for community food growing. We are also working with local authorities to transfer areas of green space and parks to communities for various forms of community growing.

We are a member of the Wales Green Infrastructure Forum lead by Peter Frost of NRW. Via this forum, we have been informed of the following Committee Report to the House of Commons which was published on 15th February 2017. In sending out the report to the forum Peter Frost stated –

"The House of Commons Communities and Local Government Committee has just published a report on its inquiry into public parks, whilst it is written about parks in England, it draws on evidence from across the UK and the rest of the world, and is highly relevant to us here in Wales.

I urge anyone interested in parks and green spaces to read this because it is a great summary of the evidence of the well-being benefits of these places, and because it reviews the very real problems facing their management across the UK. The solutions to these problems in Wales may be different to those proposed for England, but the analysis is very pertinent."

Although the report is presenting evidence about parks and green spaces in England we feel it reflects the direction of travel for parks and green spaces in Wales. Public sector cuts now mean that the traditional models of providing, adopting and managing green spaces are being replaced by community lead and more innovative methods. The level of housebuilding growth in parts of Wales means we are in precarious times, yet green spaces are emerging as the single most prominent conduit for achieving sustainable development goals and well-being objectives. We are sure a national and strategic direction is required here in Wales. With the right level of consultation and support we feel this would be very much welcomed by the public, private and third sectors.

We would urge Welsh Government Planning Division to consider the following extracts from the Parks and Green spaces Inquiry in the House of Commons. The full version of the report is available here -

https://www.publications.parliament.uk/pa/cm201617/cmselect/cmcomloc/45/45.pdf

We feel that the following extracts provide valuable evidence on the case that there needs to be robust national policy, guidance and support on the provision, adoption and management of parks and green spaces in Wales.

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Inquiry into Public Parks in House of Commons

House of Commons

Communities and Local Government Committee

Public parks

Seventh Report of Session 2016–17

Report, together with formal minutes relating to the report

Ordered by the House of Commons to be printed 30 January 2017

CLAS Cymru Selected Extracts from the Report

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Need for a national body to oversee the quantity and quality of green spaces

Andrew Hinchley of the London Borough of Camden acknowledged that in London there were a number of networks, for example to encourage benchmarking, and forums to help connect people, but said that:

"That is a helpful tool, but what is missing is something at a national level. There seems to be a void since CABE Space and Greenspace disappeared, which is not pulling together the best practice".

Others stated:

"Because of the shift to where we need to look at wider benefits of green space, there is a need to step back and take that strategic look, and that is more difficult when there is not someone collating it for you at a national level. There is a lot of repetition and reinventing the wheel going on at the moment among authorities, because that is not there".

The Royal Town Planning Institute suggested that devolution to date had not placed sufficient emphasis on the potential benefits of a strategic approach to green infrastructure.

Housing delivery and green spaces

Many giving evidence raised current conflict between housing and green space -

"The country is facing a housing shortage, particularly for affordable housing. Local Authorities, Local Enterprise Partnerships and housing providers are considering new developments. The Government is committed to building a million homes over five years. The pressure for new housing, particularly in the south of England, is therefore intense. Whilst the focus tends to inevitably come down to how many houses can be built, there is a need to consider the well-being of the communities being created, as well as the impact on existing residents"

The Committee found that housing development can be a source of additional funding for parks and green spaces, through S106 payments in lieu of open space provision, or through the Community Infrastructure Levy (CIL). We heard from the London Borough of Camden that much of its capital funding for parks is raised in this way, with a portion of S106 monies reserved for maintenance and renewal of project sites to reduce pressure on the revenue budget. However, the introduction of CIL, which is not ringfenced, means that parks are increasingly having to compete with other service areas for the funding.

Birmingham City Council acknowledged that the NPPF provides some opportunities to secure open space provision from the private sector, but stated that some developers were resistant to putting long term management and funding arrangements in place, wanting instead to "discharge their liabilities once their development is complete and the properties sold".

Sefton Council noted that budget reductions created difficulties for developers, who would usually expect to hand responsibility for green spaces within new developments over to the council.

Stockport Metropolitan Borough Council suggested that it would be helpful if planning guidance could be interpreted more broadly, to allow planning gains to be used to enhance existing green space provision and facilities, where this would offer greater sustainability, rather than providing new play areas as part of new housing developments.

The inquiry stated –

We agree that green space should be at the heart of planning as it is fundamentally important to creating and shaping communities where people want to live, and where they are able to thrive. *When preparing or updating their Local Plans, local authorities should take a whole-place approach which recognises the importance of parks and green spaces both to existing and to new communities, in accordance with paragraphs 73 and 76 of the National Planning Policy Framework.*

Wider green infrastructure strategy in a national policy context

The committee stated –

Considering parks as a part of wider green infrastructure networks is likely to be a positive approach, but it will not be a panacea to resolve all of the challenges facing the parks sector. Traditional grey infrastructure, such as roads, is in our view often prioritised over green infrastructure, and many of our witnesses argued that planning policy needs to give greater recognition to green infrastructure. For example, Urban Pollinators Ltd stated that: *"National investment decisions prioritise highly visible structures such as roads and railways, supporting interventions in landscapes while neglecting the landscapes themselves*". Similarly, Merrick Denton-Thompson, President of the Landscape Institute, told us that planning policy currently gives insufficient attention to green infrastructure master planning:

"there is a need to be much more proactive, and to see green infrastructure as infrastructure, in the same way that hospitals and roads are. These are now very, very important public facilities".
In February 2016, the House of Lords Committee on the Built Environment concluded that:

"The Government must do more to protect and promote Green Infrastructure in national policy and guidance, including setting out its benefits for sustainability. […] Within and beyond Government, there must be wider recognition of the fact that Green Infrastructure is an asset, and offers wider economic, health and social benefits".

We agree with the Committee that the benefits of green infrastructure need to be more widely recognised, and that planning policy should support and encourage green infrastructure more effectively. In its response to the Lords' report, the Department for Communities and Local Government said that "The Government recognises the important role of green infrastructure in delivering sustainable development".

We welcome this acknowledgement. We also note that the Department stated that it had expanded the planning practice guidance for the preparation by local authorities of green infrastructure frameworks to inform their Local or Neighbourhood Plan-making.

Defra is currently leading in the development of the Government's 25-year Environment Plan, and the Town and Country Planning Association and the Landscape Institute suggest that this may provide an opportunity to ensure "that GI is properly embedded in planning and decision-making in the longer term".

The role of the community

Staffordshire County Council, which has been reviewing its approach to its parks, told us that the tight financial circumstances it was facing meant that it was "more important than ever for local people and communities to have a say and become involved in the management of our sites". We agree that local communities have a key role to play in securing a future for England's parks, but they cannot do it alone. As the Parks Alliance told us:

"Momentum is maintained when Friends Groups and other user groups are able to work alongside well-resourced parks services teams. There is a thin line, however, between drawing on the enthusiasm and commitment of volunteers, and exploiting their time and energy. It is important that budget cuts do not force park managers over this line. "

Others stated.. "Effective community participation requires more civic leadership not less. To see volunteer development as part of a process of civic disengagement is to

court disaster: volunteers should be seen as an addition to, not a replacement for, local authority responsibility".

The Inquiry Stated –

We welcome the contribution made to parks by friends, volunteer and other community groups and individuals across the country. The time and efforts which people freely give to their parks should not be underestimated, and nor should the benefits for parks, communities and for the individuals themselves.

Innovation and alternative approaches to managing green spaces/ parks

Local authorities, both individually and as part of wider programmes such as Nesta's Rethinking Parks, are exploring alternative models for the management of their parks, including, for example, parks trusts or formal partnerships with friends groups. Mark Walton, Director of Shared Assets, told us that there were a number of options open to local authorities, for example asset transfer or long leases to social enterprises or charitable trusts, or partnerships with community or other organisations. He argued that "It is about seeing a range of potential options that can either replace or add value to the existing local authority role".

Eddie Curry, Chair of the Core Cities Parks and Greenspace Group outlined his experience of leases to community groups to manage specialist spaces. He noted that local authorities could encounter difficulties as a result of this approach because

"there is only a limited amount of capacity in any authority to do the estates management, asset transfer and also the legal lease documentation".

Lydia Ragoonanan told us that, during its Rethinking Parks programme, Nesta had worked with local authorities to test the formal involvement of community groups in the management of parks:

"That is not without its difficulties. What we have tended to find is that, while parks groups and others have a real appetite to contribute back to their parks and public spaces, the level of skill, the level of effort and energy involved, really does require some sort of professional expertise that it is perhaps beyond the realms of parks groups necessarily to be able to have".

We explored the parks trust model in detail during our evidence sessions. Some local authorities told us that they had rejected the idea of establishing trusts for some or all of their parks because raising a sufficient endowment would be prohibitive. David Foster, Chief Executive of the Milton Keynes Parks Trust, acknowledged that the cost of raising an endowment for a trust could be a barrier for local authorities, but told us that:

"The real benefit of having a trust is not so much about the funding; it is about setting the parks free and the people who run the parks—setting them free to be innovative and creative. […] an independent trust that has nothing else to do but promote the parks, get them well managed and bring the money in to manage them, with a single purpose, is much more likely to succeed in making them work".

The Land Trust told us that its model, under which it only takes on the management of green spaces with long term financial strategies in place, was sufficiently flexible and adaptable to accommodate different types of land and landowners:

"This includes investing up front endowments and Section 106 payments, service charges from commercial and residential sectors, a mixture of both and other income which can be generated from our land, such as licences. We are then able to ensure there is income attached to each green space to protect it long term, whilst generating an annual maintenance budget to ensure each green space is well maintained for the benefit of local communities".

A key issue in relation to the development of new management models for parks is the establishment of transparent governance and accountability structures. Local authorities are ultimately held accountable by their communities at the ballot box; changes to the model by which parks are managed can weaken or remove this link, and it is important that careful thought is given to establishing governance arrangements which provide appropriate oversight and involvement in decision-making for local people. For example, Urban Pollinators Ltd stated:

"A powerful argument in favour of local authority control of parks is that of democratic legitimacy. Parks are overseen—ultimately—by democratically elected councillors, and ward councillors can voice local residents' concerns for the parks in their neighbourhoods. […] it must be accountable to the people who use the parks in as direct a manner as practicable, through transparent decision-making coupled with representative oversight".

Shared Assets worked with the National Trust and Sheffield City Council to explore whether a parks trust model might be appropriate for Sheffield's parks. Mark Walton told us that he remained concerned about the potential for charitable trusts to become "self-perpetuating oligarchies", which lacked suitable transparent governance and accountability to local communities. However, David Foster of the Milton Keynes Parks Trust argued that the

current challenges facing the parks sector suggested that democratic accountability through local authorities was not currently functioning well for parks because of the range of local authority responsibilities and priorities. He suggested that it was possible to provide for appropriate governance and accountability arrangements which ensure that there is suitable representation from the community among the trustees and that the trust's activities are in line with appropriate charitable and social objectives. The Charities Commission then has a role to play in ensuring that the trust's funds are spent only on delivering the trust's objectives.

Our review considered evidence on the governance of parks across the country. While many parks are very well run directly by local authorities in a traditional management structure, we also saw evidence that alternative management arrangements have been beneficial in some areas. We believe that these alternative management arrangements may have benefits in some additional other parts of the country, dependent on local circumstances, however, where they are used such arrangements must be suitably accountable to local people. The Minister should issue guidance to local authorities setting out key principles for the appropriate governance and accountability arrangements in non-traditionally managed parks which could be put in place as part of any emerging or alternative model for parks management. Such principles might include the involvement of local people in the governance and oversight arrangements and decision-making, or the establishment of appropriate objectives with which the activities of the management model must be aligned. Whatever innovative arrangement may be adopted, ownership of parks should stay with local authorities, as democratically accountable bodies. A new trust, for example, should have a long lease of a park, rather than taking over the freehold.

We welcome programmes such as Rethinking Parks, led by Nesta and funded by the Heritage Lottery Fund. However, it is clear that whatever models individual local authorities explore or adopt, there are risks and costs associated with both the exploration and development of alternative arrangements. The Heritage Lottery Fund and National Trust suggested that there was a need for transitional support to be available to assist pathfinder local authorities. We acknowledge the Minister's view that where service transformation is likely to unlock future savings, local authorities may need to find funds for invest to save projects locally. During our visit to Newcastle, we also heard from the National Trust, Newcastle City Council and Social Finance about the potential for local authorities to raise funds to support their parks through a blended model including local authority funding, commercial income, external grants, fundraising, and social investors. They suggested that where external management models, such as parks trusts, were established, such bodies might be able to access alternative funding sources which were not available to local authorities. This was reflected in the evidence we heard about the challenges for local authorities in identifying funding, whether on a transitional or ongoing

basis. For example the Herts Association of Cultural Officers Greenspace Managers Group told us that:

"while greenspace managers would like to be creative and have followed the research and pilot work undertaken by bodies such as Nesta, it is clear from Nesta's work there are no magic bullets to reducing revenue costs significantly and quickly, and a number of possible approaches require investment scenarios unlikely to be available from within existing parks budgets.

Transitional support for local authorities might also be in the form of expertise. For example, during our visit to Newcastle, we heard from Newcastle City Council about the work it is doing to develop a citywide trust model for its parks. The Council has been working with the National Trust and other partners to access expertise, but has nonetheless encountered some specific administrative and legal barriers and challenges. Such barriers include the complexity of conveyancing for multiple sites, and the impact of the restrictive covenants which apply to some of its parks which were gifted to the City by philanthropists. Eddie Curry of the Core Cities Parks and Greenspace Group told us that:

"Many parks come with endowments or covenants from previous land, philanthropic transfers and gifts from past years, which can often make the transfer into a new trust model quite challenging to overcome. Unpicking all those legal conditions can be a bit of a challenge at times".

We believe that addressing the challenges which face the parks sector in a way which secures a sustainable future for England's parks may require fundamental service transformation, which takes into account the wider value and benefits which parks deliver, beyond their amenity and leisure value. We have received a wide range of suggestions for alternative funding sources for parks, and examples of different approaches to parks management. We have not listed all of them, or explored the merits or otherwise of each in detail—the applicability of each for specific parks or local authorities will depend on local circumstances. However we would urge the Minister, the LGA and local authorities to read and reflect on the evidence we have received as part of our inquiry, and to consider whether and how to take forward the various suggestions made.

To support service transformation which parks require, the Minister and his cross-departmental group should work with local authorities which are pioneering alternative management models or funding arrangements, to address the barriers and manage the risks which arise and identify additional transitional support or funding which may be appropriate to nurture the development of such models. For example, the Minister should consider the proposals made by the National Trust and Newcastle City Council for

indemnities for local authorities which wish to transfer land to parks trusts, and for the establishment of a public interest test to enable local authorities to overturn restrictive covenants, where such covenants hinder the authority's ability to safeguard public parks.

The Minister and his cross-departmental group should encourage and facilitate the evaluation and benchmarking of emerging models for parks management, and the sharing of best practice within England and from elsewhere in the UK or internationally as appropriate.

A more joined up approach within local authorities

The Ramblers told us that they wanted to see local authorities providing

"support for parks in a more joined up way, working across departments such as health, transport, planning and education to increase funding for parks and ensure that parks directly contribute to the objectives of the entire authority".

We agree that this joined up approach is vital. Parks and green spaces contribute to many local authority objectives, and many local authority services have contributions to make to parks and green spaces. We have considered two alternatives by which this joined up approach might be achieved:

- **nomination of a senior elected member and a senior official within each local authority as parks champions, with responsibility for ensuring that the local authority takes a coordinated and joined up approach to its parks and green spaces;**
- **a statutory duty for local authorities, working with Health and Wellbeing Boards, to prepare and publish parks and green space strategies which clearly articulate the contribution of parks to wider local authority objectives and set out how parks will be managed to maximise such contributions.**

Parks and green space strategies

The second alternative is the imposition of a statutory duty for local authorities to prepare and publish parks and green space strategies. Keep Britain Tidy, which runs the Green Flag Award scheme for parks in the UK, told us that it was beginning to see declining scores for the quality of parks management plans. It described this as concerning, noting that:

"Without these plans our parks will lack future focus, direction and a framework to maintain standards. The reduction in the quality of planning can only lead to the decline of parks in future years".

Only 48 per cent of local authorities have current green space strategies—down from 76 per cent in 2014. Evidence shows that local authorities which have up to date strategies in place are more likely to report their parks to be in a good or improving condition, whereas only 18 per cent of local authorities for whom parks are not a corporate priority reported their parks to be improving in 2016.

The Town and Country Planning Association explained the benefits of taking a strategic approach to an area's parks:
"If you take a strategic look at your green space, you can start to put the resources where they will have most effect. It might even be that some areas have an over-provision of green space while others have an under-provision. You may even have a good reason to sell off a small patch of green space in one area, and invest that money in improving and expanding green spaces in another area. If you have a strategic view you can do that, in consultation with your community. If you do not, it becomes a hotchpotch, and you end up with these tiny little playgrounds that nobody wants or uses, rather than thinking about how you can maximise the benefits".

We recommend that the Minister issues very clear guidance to local authorities that they should work collaboratively with Health and Wellbeing Boards, and other relevant bodies where appropriate, to prepare and publish joint parks and green space strategies.

We welcome the steps taken by the parks sector in England to fill the gap left by CABE Space and Greenspace, such as the establishment of the Parks Alliance and the National Federation of Parks and Green Spaces, the Future Parks project led by the National Trust, and the work undertaken as part of Nesta's 'Rethinking Parks' programme to bring together a database of people and groups with an interest in parks. However, these initiatives, although important and commendable, will not necessarily be enough to provide the coordination and facilitate the sharing of best practice which we believe is necessary to secure and support a sustainable future for England's parks. We believe that the importance of parks to national strategic objectives such as climate change mitigation and public health mean that there needs to be leadership and vision at the level of national government. We look to the Minister to provide this.

We welcome the Minister's confirmation that he recognises the current lack of coordination, and his intention to establish a cross-departmental group to consider our report and recommendations. *We believe that the Minister's cross-departmental group should have an ongoing role in providing coordination and leadership within the parks sector to ensure that the Minister's vision for parks is delivered. We call on the Minister to publish, in his response to our report, details of the cross-departmental group's*

membership, terms of reference, initial priorities, how often it will meet, and how it will work collaboratively with the parks sector and the Local Government Association to secure a sustainable future for England's parks. We believe that early priorities for the group should include: establishing and maintaining an online parks information hub to make it easier for local authorities to find out about what other authorities are doing, to facilitate the sharing of learning and good practice, and to provide signposting to other sources of information or advice; and working with the Local Government Association to develop and implement options for establishing and supporting national or regional park manager forums in England, learning from the approach taken in Scotland.