

SEE ALSO
APPENDIX ABC + D



24/03/10

INQUIRY INTO ALLOTMENT PROVISION IN WALES

My name is [REDACTED]; I am [REDACTED] yrs old and have an allotment at the Pandy road site in Caerphilly. The site is nearly 2 miles (walking distance) from my home. I own a car but do not ordinarily have use of the car for travelling to and from my allotment. I usually walk or cycle to the allotment. I was born in Caerphilly county and have lived in 4 different areas of the County. I have had allotments in all four areas including tending my Father's allotment as a child.

I would like you to consider my view on the points the above enquiry will be considering.

1. THE DEMAND FOR ALLOTMENT SITES IN WALES AND THE AVAILABILITY OF SITES

When assessing the demand for allotments it is not sufficient to just to examine the waiting lists. Many areas do not have allotment sites within a reasonable walking distance. Therefore demand for allotments in these areas will be "dampened". The demand will only consist of people who have access to a car and are prepared to incur the cost of driving to the site. A large proportion of the people in Caerphilly for example do not have an allotment site within walking distance so require a car to use an allotment. 30% of households do not have access to a car and many more (such as me) have a car but cannot secure the use of it for accessing allotments.

In my experience there is very few people who would be willing to walk more than 0.5 mile to allotments.

The take up rate for allotments is many times higher in areas that have allotments within walking distance. If all areas had allotment sites within walking distance then the waiting list would be much higher than at present.

There is a hidden latent and potential demand for allotments which needs to be recognised.

2. Barriers/constraints (for users and Providers)

As I mentioned in section 1, in an area such as Caerphilly, many people do not live near an allotment site. Tending an allotment is not an activity that can be carried out using public transport. Without the use of a car allotmenting is restricted to people living within a 10 min walk (or how far you can push a wheelbarrow) of an allotment site. I would say that at least half the population of Caerphilly would require a car to access allotments. Therefore a large proportion of people are socially excluded in this respect.

Most people using cars to attend their allotments do so on a daily basis during the growing season. Not only is this bad for the environment it is very expensive.

I would say that many people who drive to allotments are actually losing financially. The motoring costs, rent, seed, fertiliser costs may be in excess of the value of the produce. I estimate that motorists need to produce at least £300 worth of vegetables just to "break even". This will further reduce demand for allotments unless they are provided locally.

ALLOTMENTS ARE NOT A FACILITY THAT NEEDS TO BE CENTRALISED. EVERY SMALL COMMUNITY NEEDS ITS OWN ALLOTMENT SITE. EVEN SINGLE PLOT SITES ARE USEFUL.

Overgrown allotments are a barrier to people taking up plots.

Some plot holders are reluctant to give up their plots when they can no longer maintain them. They continue to pay rent hoping their situation e.g. ill health etc. will improve. Therefore by the time the plots become vacant they are overgrown with vegetation such as couch grass and brambles. They become very unattractive to new plot holders who will cherry pick the best plots. The overgrown plots then become worse and trees start to grow and gradually they become unrecognisable as allotments. Some people take these plots on and work so hard clearing them that they become disheartened after doing 90% of the work and give up.

I have been working my existing plot for 9 years. Half of the plot had not been cultivated for at least 5 yrs and was full of brambles. It took me 6yrs of hard work to clear the plot completely. However the adjacent plot was in a similar condition and for 15 yrs no-one would take it on. It was overgrown with brambles, 15yr old ash, hazel and an oak tree.

The brambles were growing into my plot so it was causing me a lot of work cutting them back regularly. In order to encourage someone to take on the plot I cleared the site by hand myself. With no help from the landlord (Caerphilly council). As soon as I had cleared the site someone took on the site and has been improving it and has already paid 2 yrs rent to the council.

I WOULD LIKE THE LOCAL AUTHORITIES BE FORCED TO INSPECT ALL THEIR SITES REGULARLY AND ENSURE THAT ALL THE LAND IS CAPABLE OF CULTIVATION AND NOT OVERGROWN WITH WILD TREES ETC. IF NECESSARY THEY SHOULD ERADICATE THE OVERGROWTH THEMSELVES.

THERE DO NOT SEEM TO BE ANY MEASURES TAKEN TO MAKE SITES CAPABLE OF BEING USED BY DISABLED PEOPLE.

I HAVE SEEN SOME SITES IN OTHER AREAS BEING USED BY PEOPLE IN WHEELCHAIRS.

3 INNOVATIVE APPROACHES TO THE PROVISION OF LAND FOR ALLOTMENTS

In the first instance all land capable of cultivation within and on the fringe of urban areas should be protected. No activities should be allowed on that land which would render it unfit for cultivation of food. This land should be inspected regularly and should not be

allowed to be overgrown with problem plants such as Japanese knotweed etc. If the land was required for other purposes then obviously planning permission would be required. However unless the demand for allotments and other outdoor leisure activities is met then there is enough scope within the planning system to prevent using the land for other purposes'. Planning guidance Wales planning policy Para 199 stated that "Undeveloped land which has recreational or amenity value should be protected if it can be demonstrated that there is (or would be) a deficiency in accessible public open space in the area." This is in tan 16 which is out of date I hope the up to date one is better.

I have been involved with many planning procedures i.e. as secretary of the GREENDOORSTEP environmental group in Caerphilly I have made many representations to district, county U.D.P. structure plans etc. Although these plans should balance the need for competing demands for land use, in reality they never cater for the demand of allotments and have little regard for the provision of open space in general. Even when safeguards are built into development plans they are not implemented. E.g. Caerphilly C.B.C. u.d.p. states that development will only occur in an area if it does not degrade the ability to provide Public services (which I would have thought included Allotments) in an area. Yet housing development has occurred without the provision of any allotments, negligible open space and recreation areas.

During the last 30 yrs approx 4,000 homes on 5 sites have been built at the western end of Caerphilly alone that have been beyond a reasonable walking distance to an allotment site. These homes cover an area of at least 300 acres. I cannot believe that say 5 x 1 acre (less than 2% of the site area) could not have been provided within these sites for allotments. There is no political will existing to provide for allotments.

What I am proposing is not innovative as all the planning guidelines call for this already. Willingness to implement the planning guidelines would be innovative.

4. The evidence of the wider benefits allotment gardening can bring etc has already been well documented many times by countless government reports etc.

Is there any point wasting time going over the same ground all the time. E.G. see the report from The DETR in England "The government's response to the Environment, Transport and regional affairs committee's report THE FUTURE OF ALLOTMENTS" Many of our A.M.s M.P.s have already signed up to statements over the years agreeing with the benefits of providing allotments. Why don't they just get on with the job and do it. The legislation and duties are already in place. As far back as 01/02/2000 this subject was raised in the assembly with 22 members subscribing, inc. Mike German (See appendix A) what has happened in 10yrs.

5 THE NEED FOR INTERVENTION FROM THE WELSH GOVERNMENT

Clearly there is a need for the government to intervene as there is an unmet demand for allotments. There is also a potential and latent demand which is hidden. Obviously the demand fluctuates from time to time but when plots are not allowed to deteriorate then they are usually always tenanted.

There is no need for a long winded inquiry into this matter as there is a consensus within the London and Cardiff Government that allotments should be encouraged

The legislation already exists that places a duty on local authorities to provide allotments. The Welsh government needs to intervene to force them to do it.

There is no real political will within Welsh politics to provide allotments, despite the rhetoric

The smallholders act (1908) places a duty on local authorities to provide sufficient allotments according to demand and make provision for compulsory purchase of land by local authorities to provide allotments. **It has not.**

The disability discrimination act should ensure that disability is not a barrier to renting an allotment. **It has not.**

The U.D.P.process should have yielded enough land for the needs of all the community **but it has not as far as allotments are concerned.**

I was involved with the Caerphilly U.D.P. in 2001 where there were objections to the plans on the Ground that there were no allotment sites within a reasonable walking distance of many of the residents of Caerphilly. The Council did not accept this on the grounds that there were vacant plots on sites that were 1.9 km away from residents. And that **“no guidance is given by the acts on recommended distances to sites”**

The inspector at the UDP inquiry accepted the council’s view that distance to sites was not a factor. **IN MY OPINION THE INSPECTOR WAS NOT REALLY INTERESTED IN THIS ISSUE.** The evidence regarding vacant plots was inaccurate at the time a now it is out of date. My site at Pandy road has a waiting list of 20. for a site with 44 plots. Since 2000 the council have sold off statutory allotments land adjacent to the site ,which they allowed to get overgrown. The Welsh assembly inspector who allowed the sale of this land said in his report the council had not followed the correct procedures and made an effort to let the land for allotments but allowed the sale anyway!

I have also raised a similar objection in the forthcoming Caerphilly LDP inquiry.

COULD THE W.A.G. ISSUE SOME GUIDANCE TO THE LDP INSPECTORS AS TO WHAT WOULD BE REGARDED AS A REASONABLE WALKING DISTANCE AN S THEY DO NOT SEEM TO BE ABLE TO JUDGE THIS FOR THEMSELVES.

To give you some help, at least 5 of the plot holders are over 80yrs old. One in particular (fought in the Second World War so must be nearly 90) and walks to his allotment .How far would you expect him to push his wheelbarrow full of potatoes?

The impression I have is that many councils and politicians regard the provision of allotments as an imposition .They treat allotment keeping as a “bit of a joke”.

I will send you copies of Evidence I presented to the UDP inquiry etc.

[REDACTED]

APPENDIX A.

Brian Gibbons FRCGP
Owen John Thomas MA
Cynog Dafis
Gareth Jones
Dai Lloyd MBBCh MRCGP Dip.Ther
Janet Davies
John Griffiths LLB
Alison Halford
John Marek

Mae'r Cynulliad hwn yn credu fel mater o egwyddor na ddylid caniatáu safleoedd niwclear newydd yng Nghymru.

This Assembly believes as a matter of principle that there should be no new nuclear sites located in Wales

OPIN-2000-0014 Pwysigrwydd Rhandiroedd yng Nghymru/ The Value of allotments in Wales

01 Feb 2000 Raised by Jonathan Morgan

22 Subscribers:

John Griffiths LLB
Richard Edwards
Janet Davies
Alun Pugh
Rhodri Glyn Thomas
Kirsty Williams
Helen Mary Jones
Jenny Randerson
Peter Black
Janice Gregory
Lynne Neagle
Christine Humphreys
Christine Chapman
Owen John Thomas MA
Gareth Jones
Dai Lloyd MBBCh MRCGP Dip.Ther
Jocelyn Davies
Ron Davies
Nicholas Bourne LLB LLM

*NB 01/02/2000

AND - A.M.S

ARE STILL TALKING

David Melding
Michael German OBE
Alun Cairns

Mae'r Cynulliad hwn yn:

- llwyr gydnabod rôl a budd rhandiroedd o safbwynt cymunedau lleol;*
- cydnabod potensial rhandiroedd, ar hyn o bryd ac yn y dyfodol, wrth helpu i hybu'r manteision corfforol a therapiwtig a ddaw yn sgil tyfu bwyd y gellir ei fforddio;*
- gwerthfarwogi'r cyfraniad y mae rhandiroedd yn ei wneud wrth ddiogelu'r amgylchedd, amddiffyn bywyd gwylt, cadw lleoedd agored, darparu adnoddau cynaliadwy, a'u rôl posibl wrth helpu i gydymffurfio ag Agenda 21;*
- gwerthfawrogi gwaith Cymdeithas Genedlaethol y Garddwyr Rhandiroedd a Hamdden wrth helpu i gyflawni'r amcanion hyn;*
- galw ar y Senedd i ddiwygio hen ddeddfwriaeth sy'n effeithio ar rhandiroedd.*

This Assembly:

- Acknowledges fully the role of allotments in benefiting local communities;*
- Recognises the current and future potential of allotments in helping to promote the physical and therapeutic benefits of growing affordable food;*
- Appreciates the contribution allotments pay in protecting the environment, sheltering wildlife, conserving open spaces, providing sustainable resources, and their potential role in assisting Agenda 21 compliance;*
- Values the work of National Society of Allotment & Leisure Gardeners in helping to achieve these objectives;*
- Calls on Parliament to reform outdated legislation that affects allotments.*

OPIN-2000-0002 Diwrnod Martin Luther King/ Martin Luther King Day

26 Jan 2000 Raised by Lorraine Barrett

5 Subscribers:

Peter Black
Richard Edwards
Ann Jones
David Melding
Karen Sinclair

*PLEASE NOTE PREVIOUS ALLOCATED REF NO OPIN-1999-0085
Codwyn/Raised 17 January 2000*

Mae'r Cynulliad hwn yn talu teyrnged i'r hyn a gyflawnwyd gan Martin Luther King a diwrnod

DOCUMENT TITLE **--ORAL REPRESENTATION-PROOF OF EVIDENCE**

FOR

CAERPHILLY GREENDOORSTEP ----REF NO GD 26

OBJECTOR NO./OBJECTION NO.----**DO/5460/1656**

DOCUMENT NO.----- One, Appendix A and B.

TOPIC. -----**LEISURE-ALLOTMENTS**

POLICY. -----**ABSENCE OF ALLOTMENT SITES**

PROPOSAL-----

THE LACK OF ALLOTMENT SITES TO SERVE THE SOUTH WEST AREA OF CAERPHILLY (WESTERN PART OF ST.MARTIN'S WARD).

We have objected to the UDP because it makes no provision for allotment gardens to serve the above area.

The UDP should ensure that land is available for leisure purposes. This includes allotments. See Appendix A para 12.2. Which is an extract from Planning Guidance (Wales)-Core Document CD52.

The populated area we have identified as having a deficiency in allotments, is the Western part of St Martin's Ward and the Southern Part of the Hendredenny Ward. This area contains a population of approx.6, 000 people.I.E. Watford area,Lon-y-llyn,Cwrt Rawlin ,Glenfields and St.Martin's estates. There are **NO** allotment sites within this area at all. The nearest sites are at Heol Trecastell and Nant y Calch. They are approximately 30 minutes walk from most of the homes in the area,so are beyond a reasonable walking distance for most people. The Heol Trecastell site is very small and has an insignificant impact.

PEOPLE WITHOUT THE USE OF A CAR ARE DENIED THE USE OF ALLOTMENT GARDENS.

We identified three sites which could have been allocated for allotments ;

- 1.The field adjacent to Caerffili Miners' hospital. Near T7 (4).
- 2.Open Land near Cwrt Rawlin School.
- 3.Land near the junction of the Black Cock lane and Heol Cae Barrau.

Land at 2 above is now being developed so can be discounted.

No 3 could still be used but is small and can only serve a peripheral part of the area. However, it could still be useful if the soil was suitable.

The field adjacent to the hospital. (No 1 above)

This site (or part of) is ideally suited for allotments for the following reasons;

1.The soil is good, having sometimes been used in the past for growing potatoes commercially as part of an agricultural holding.

2.The site is central to the population of the area.

3. The site is owned by the Local Authority. Only a small part of the land is required for a transport scheme.


4. We have been assured by Caerphilly County Borough councillor Newman that the Glan Hafren Hospital Trust has informed the council, it **does not** require this land for the expansion of the adjacent hospital.

5. The site is enclosed by hedgerows on all sides. Therefore development of the site for allotments could be done at minimum cost. In fact our group contacted (verbally) the land department of the council in 1997 with a view to renting part of the site for allotments (Developing the site ourselves). We were told that the site was not available for rent and was required for educational purposes. This is not now the case.

6. If assembly guidelines are adhered to, and then the land must be protected from development. See appendix B. Part of TAN 16. Core doc. CD-66.
This area has a massive deficiency in public open space (subject of scrutiny at another UDP objection)

7. The site is large enough for allotments **and** some other leisure uses such as a children's playground.

8. The Local authority has derived no income from the land for a number of years and the land has not been officially been used.


For Caerphilly Greendoorstep. 12/01/01



APPENDIX C

LPA PoE 027 B

Proposed new Allotment site L99(18)

**Unitary Development Plan 1996 – 2011
Public Local Inquiry 2001**

**PROOF OF EVIDENCE OF THE COUNCIL
Lynda Healy**

Topic Leisure & Tourism
Policy L99(18):Proposed New Allotment Site

Strategy Area Consolidation

Attachment(s) Attached as PoE27/Appendix 1 - Map identifying allotment sites

Objection(s)
DO/5460/1656 Greendoorstep (Caerphilly) L99(18)

Objection(s) Conditionally Withdrawn
None

Support
None

INTRODUCTION

My name is Lynda Healy and I have been employed by Caerphilly County Borough Council as a Principal Planner (UDP) for 4 years. I have an MA in Town Planning and have 19 years experience in planning and development.

SUMMARY OF THE OBJECTION

1.1 No allotment provision is made in the Watford / Cwm Farm / Glenfields area. The nearest allotment site is at least half an hour away. The objectors contend that a site at the rear of Caerphilly Miners Hospital would be suitable.

THE COUNCIL'S CASE

2.1 The Local Authority's responsibility for the provision of allotment land is outlined in the Allotment Act (1908) as amended by the 1922 and 1950 Acts. The Allotment Act (1908) only requires council's to provide allotments if "they are of the opinion that there is a demand for allotments". There is currently a 20% spare capacity in the County Borough. In view of this surplus of provision the council does not consider there to be a demand for the provision of further allotments. As a result of this no sites have been identified in the Plan.

Spare Capacity of Allotments in Caerphilly Area

2.2 In the Caerphilly area there is a spare capacity of 16.33%. This is shown in Table 1 below:

Table 1: Vacancy Rates in Allotments (Based on returns for 2000)

	No. of Plots	No. of Vacant Plots	Vacancy Rate
Trecenydd	11	0	0%
Pontygwindy Road	44	2	4%
Pandy Road	44	13	29%
Railway Terrace	35	9	25%
Van Ward	60	13	21%
Penyrheol	42	8	19%
Total	236	45	16.33%

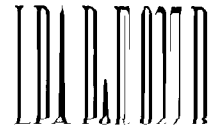
* NB VERY SMALL SITE WELL KEPT CLOSEST TO AREA WITHOUT ALLOTMENT NO VACANCIES.

MANY OF THESE PLOT WERE INCAPABLE OF CULTIVATION

NB WAITING LIST OF 20 people ON THIS SITE 24/03/2010

I SUSPECT THIS FIGURE IS NOW 0%

2.3 The nearest sites are with vacant capacity are 1.8 km and 1.9 km away and have 9 and 10 plots available respectively. A plan identifying the sites is attached as PoE 027 Appendix 1. No guidance is given by the Acts on recommended distances to sites.



Proposed new Allotment site L99(18)

Land adjacent to Caerphilly Miners Hospital

- 2.4 On investigating the objectors' suggestion, to use this site for leisure at the Deposit consultation stage it was found that the land was required for the provision of a bus link (See T7(4) Castel Park Estate bus link, Caerphilly CD-001) and car parking for the Caerphilly Miners Hospital. Although the objector believes the site is no longer required by the hospital according to the council's property department the hospital is still considering the proposal.

National Guidance

- 2.5 Government Guidance advises that the planning system should not be used to secure objectives achievable under other legislation. *"The principle of non-duplication should be maintained even though the powers and duties resulting from other legislation may also be the concern of local authorities"* (Planning Guidance Wales: Planning Policy First Revision (1999) para 3.6.1 CD052). An application for a new allotment site should be dealt with through the allotment legislation.

Conclusion

- 2.6 The Leisure Services Division advise that there is a surplus in provision and therefore no need for a new allotment site to be allocated in the Plan.
- 2.7 The provision of allotment sites is achievable through legislation under the jurisdiction of the Leisure Division. Therefore the principle of non-duplication should be maintained.

RECOMMENDATION

- 3.1 **The Inspector is respectfully requested to recommend that no modification be made to the Deposit Unitary Development Plan in response to this objection.**

Appendix 1

Map identifying allotment sites in Caerphilly

PROOF OF EVIDENCE OF THE COUNCIL



**GREEN DOORSTEP RESPONSE TO PROOF OF EVIDENCE OF COUNCIL
POE 027B L99 (18) proposed new allotment site.**

2.1

We have objected to the plan due to the lack of allotments in a particular area not the provision in the whole of the County.

The spare capacity exists remote from the heavily populated area in South West Caerphilly. The areas including all The Cwrtrawlin, Bryngwyn, Watford, Glenfield, Ion-y-llyn and part of the Hendredenny estates.

This area contains a population of at least 7,000 people who live more than 3/4 mile from the nearest allotment site(we have not included The Heol Trecastell site because there are only a very small number of plots that rarely become vacant, most of the 7,000 people quoted above live beyond 3/4 mile). I.E along the public footpath/footway network.

We have used the figure of 3/4 mile as a reasonable walking distance .

The detr seem to think that 3/4m is a reasonable distance for replacement sites.

**Department of the Environment,
Transport and the Region
The Government's Response to the Environment, Transport
and Regional Affairs Committee's Report
The Future of Allotments**

Introduction

This paper sets out the Government's response to the Environment, Transport and Regional

Affairs Committee's report 'The Future for Allotments'. We welcome the detailed

consideration which the Committee gave to allotments policy.

Within the context of other measures to encourage greater demand for allotments generally, we recommend that every endeavour should be made to provide

a replacement site. The alternative site should be:

of similar size and quality;

within reasonable walking distance of existing plot-holders' houses; and

22. Replacement sites are required to be not normally more than three quarters of a mile from

the centre of demand, although this distance may be increased if the plot-holders are willing to

travel further.

In our experience(3 of our members had plots on the nant-y-calch site)

Most of the long term plot-holders live within 500m of the Nant y Calch site. The plot-holders living beyond that distance tend to use their cars or suffer a high drop out rate. Many of the plot-holders are retired people. Many plot-holders need to carry tools etc from their homes to the sites. For these reasons Allotments should be

placed closer to peoples homes than 3/4mile.

We believe that allotments will often form a component part of healthy neighbourhoods. Given the undisputed health benefits of allotments, we strongly recommend that allotment provision be explicitly noted in national public health Strategy and be integrated into the local delivery of that strategy, particularly for the

Over 50s age group which traditionally dominates the profile of allotment holders.

With regard to the demand issue. In a population of 7,000 people it is inconceivable that there is not the demand for allotments. The Thorpe committee recommends 3.5 acres for 7,000 people.

We believe that the council show a negative attitude towards localised allotment provision .We get the impression that they would prefer not to provide allotment sites rather than advertise the opportunities and encourage people to take up plots.

Further extracts from DETR committee report.

Demand for Allotments

Witnesses have told us that the demand for allotments is set to increase and this assumption underscores the recommendations made in this Report. (Paragraph 36 Local Issues

From the evidence we received, it is apparent that the performance of local Authorities with regard to allotment provision is best described as patchy. Some authorities pursue an active approach to maintaining vibrant and fully-occupied Allotment sites whilst others appear at best lethargic and at worst to be instrumental

In encouraging the decline of interest in allotments. Without a positive local approach, it seems likely that much of the demand for allotments will always remain

latent. (Paragraph 40)

2.2 2.3

As we said previously the sites shown are beyond walking distance. The council agrees that the sites are 1.8 and 1.9 km away. Many people living in the area are 2.5 km away from these sites.

From our experience some of the vacancy rates are misleading. E.g when some of our members had plots on the Nant-y-Calch site(Railway tce) there was a waiting list for plots but at the same time there were vacant plots that no-one would take on, due to the poor soil conditions on those particular plots.

2.4

Land adjacent to Caerphilly miners' hospital.

This land is owned by Caerphilly County Borough council who has a responsibility to provide land for recreation for its inhabitants. It has no responsibility to provide land for the health authority. The long-term future of the hospital is in doubt. If the hospital is retained the indications are that it will re-locate elsewhere. To use badly needed open space for a car park, which may only be used for a short period, is shortsighted. Once a car park is built it can never be returned to the use we propose. I.e. allotments.

It is arguable that there is a need for a car park. I have seen cars parked on the road outside the hospital when there were empty spaces in the hospital car park. There is also scope for expanding the car park in the vicinity of the incinerator or building 2 storey car parks .At least 4 buses per hour run past the hospital from Caerphilly town Centre.

NB we have proposed that this site be allocated for allotments and a children's playground. Both of these uses could be accommodated on the site as well as the road link. I would also refer to CD-066 TAN(W) 16.para 9 page 2 RE-local authority land.

"undeveloped land which has recreational or amenity value should be protected if it can be demonstrated that there is (or would be) a deficiency in accessible public open space"

This area has been shown to have a desperate lack of open space . The case for retaining this land for recreation is overwhelming.

2.5.

We do not understand the relevance of this statement .Allotments need land, the udp is mainly concerned with land allocation. Without safeguarding land for community uses in the udp there may be no opportunities to acquire allotment land using other legislation. No allotment land has been provided during the last 30yrs within walking distance of the newly built estates. Therefore whatever the "other legislation " is it has failed to provide the land.

2.6 and 2.7

these points have been dealt with.

The surplus is in other areas and the other legislation has failed.