



Response to the Strategy for Allotments in the Parks and Green Spaces Strategy Proposal and proposed changes to the allotment agreement

We urge the Bristol City Council Cabinet to reject the current draft. More nuanced rules, that meet identified real needs, need now to be developed following a proper consultation with Bristol's allotmenters. The PGSS must be also integrated into the new Local Plan so that all the sites that have been identified are protected either as Local Green Space or as Reserved Open Green Space and given proper planning weight when future decisions about their future use and development are made.

We are particularly concerned that the draft rules relating to trees on allotments are too narrowly drawn and will result in the loss of allotment tenants' ability to make the best use of the particular conditions of their plot. We urge the relaxation of these proposed limits on the number and types of trees which can be planted.

1. Food growing as part of the draft Parks and Green Spaces Strategy

We are concerned that the Strategy for Food Growing and Allotments has been included as [Chapter 6 of the draft Parks and Green Spaces Strategy \(PGSS\)](#). This is a departure from the [2008 PGSS](#), which makes it clear that such spaces are not included, since they are not public spaces: *'The Strategy does not consider green spaces that are not freely accessible to the public, including allotments, city farms, school grounds, or Sites of Nature Conservation Interest in private ownership.'*

The proposed PGSS recognises that: *'There are other green spaces managed by the council that are not included because they do not offer full public access for recreation ...'* [our underlining]. Given that allotments and other land used for growing food (including grazing land) are subject to private tenancies, with rental payments and mutual rights and obligations agreed between tenant and Council, it is hard to understand why they have been included in the strategy proposal.

We need to recognise the importance of this specific type of land use and ensure that it is not made an ancillary element in the PGSS. It deserves greater attention, which is why we suggest that it should have been integrated into and protected by the [current proposals for the new Local Plan](#) (as, indeed, Parks and Green Spaces should also be) rather than treated as an add-on to the proposed PGSS.

In particular, the current status of and strategy for market gardens, smallholdings and grazing land (and other land not used for food growing), which have an area greater than all current allotments combined, get only passing consideration. Little or no thought is given to the opportunities these sites present for nature recovery, biodiversity enhancement and other environmental gains.

Instead, we are told that these sites:

... have limited benefit beyond the individual users ... and many smallholdings tend to use less than 10% of their site for food growing ... we now need to review our current



landholding agreements so that we can start to explore opportunities to repurpose land to diversify our food growing spaces and ensure land is being used effectively to meet Bristol's food growing targets. ... Once suitable land has been identified we will review how these opportunities are promoted to ensure that the system of securing land is fair and equitable. We are particularly interested in opportunities that will not only ensure land is being sustainably and efficiently managed but that also delivers social value and benefits the residents of Bristol.

In the face of the demand for allotments and the need to increase local food production, which has led at least in part to the proposed changes in the tenancy agreement, these areas must surely warrant greater protection than is given them in the proposed PGSS. These areas also contain many trees (often veterans) and other ecologically sensitive habitats, and many are in SNCIs. It is vital that these matters are properly considered when planning any change of use of such land. This ought to be addressed properly in the proposed new Local Plan, not in this draft strategy.

2. Trees on allotments

Trees on allotments fall into two categories: those within allotment plots and those on allotment sites but outside the plots.

2.1. Trees outside allotment plots

From our analysis of data on the Council's [Open Data site](#), we estimate that allotment sites total some 105 hectares when community orchards are included. However, only about 87 hectares of these sites are productive. This means that around 17% of allotments, some 18 hectares, are unproductive. We welcome the clarification in the new tenancy agreement that trees in these unproductive areas remain in the care of the Council and may not be damaged by tenants.

2.2. Trees within allotment plots

Proposed allotment **Rule 4.0 Trees** deals with trees growing within allotment plots. We distinguish between newly planted trees and existing trees below.

2.2.1. New trees

Regulation 4.4 limits the height of trees to 2.5 metres (a common constraint in other councils). The limit in Regulation 4.3 of one tree per allotment sized between band B and band C is far too restrictive, particularly since the majority of plots fall within these bands.

Rule 3.1 requires that the tenant uses at least 75% of the plot for '*a cultivated crop of vegetables, fruit bushes [not fruit trees], ornamental flowers, and herbs.*'

Rule 3.3 states that fruit trees will occupy the non-cultivated area of the plot (which may be no more than 25% of the plot) unless they are underplanted with a productive crop, in which



case they will be counted as being part of the cultivated area. No trees are permitted on band A or Micro Plots, nor is any consideration given to whether it is possible to underplant ‘a productive crop’. This implies that the food value of the tree does not warrant the space they occupy. [According to the RHS](#), having fruit trees on an allotment adds both structure and permanence, while fruit tree crops have a higher value than many other allotment crops and are easier to manage.

The [transitional arrangements](#) require that all trees, except the permitted dwarf rootstock fruit trees, be removed from plots within three years, though mature trees may be permitted.

These rules devalue the role of trees on allotments, not only for their contribution to the ecology of the area but also their food production value. These rules also effectively exclude such fruit-tree-growing techniques as cordons, espaliers or step-over planting.

Regulation 4.3 also constrains the type of fruit trees that may be grown. Since only rootstocks M27 and M26 are allowed (though not the intermediate M9 rootstock), it seems that that only apple trees may be grown, even though dwarfing rootstocks are available for a number of other fruit trees such as Pear, Quince (Quince C), Cherry (Gisela 5), Plum (including Gages and Damsons), Peach and Apricot (VVA-1, Pixy).

The exclusion of hazel and other non-fruit trees (most trees bear fruit) removes the ability of tenants to grow valuable nut crops or to provide locally grown stakes through coppicing - a good way to reduce our carbon footprint. This restriction also precludes the use of allotment space for growing trees from seed with a view to planting them out elsewhere, at a time when there is a great need for locally grown trees for local tree planting.

2.2.2. Established trees

2.2.2.1. Fruit trees

Many fruit and other trees are already growing on many allotment sites. They provide not only good-value food, but they also provide biodiversity, a rich ecological resource for insects, birds and mammals and are important legacy features of the site. The allotment and its users have adapted to the presence of these trees and their removal would not only be counterproductive to the value of the site and cause distress to tenants but would also risk damaging the soil and the allotment more broadly.

2.2.2.2. Non-fruit trees

Although such trees may not have obvious value for food production, other considerations apply. We agree that allotments should not be taken over by trees, resulting in the reversion of productive land to woodland and the attendant loss of statutory allotment protection for such land. However, it would be a mistake to create rules which put biodiversity, nature and ecology in conflict with food production; trees are crucial for biodiversity, which in turn is essential for the productivity of the places where we grow food.



3. Site-appropriate regulations

Allotment plot conditions both within allotment sites and across Bristol vary widely. The gradient and aspect of each plot, its soil type, soil depth and historical development all pose different challenges to tenants, requiring a localised approach to the best way to utilise a site. Imposing a one-size-fits-all set of regulations, based on some notional idealised allotment plot, will not provide sufficient scope to allow for these variations. Tenants' associations also need to be able to vary the regulations to fit their local conditions. Indeed, arguments in favour of the distribution of local decision making, which we endorse, [have recently been made by the Bristol Mayor](#).