



1. Introduction

- 1.1. The National Trust welcomes the opportunity to comment on allotment provision in Wales. The Trust owns 50,000 ha of land in Wales which it manages for the benefit of the nation. The Trust is also Europe's largest conservation organisation, managing natural and historic heritage for conservation and public access.
- 1.2. Food is the National Trust's priority campaign for 2009 and 2010 with the aim of inspiring supporters to eat local, seasonal food and to grow their own. We announced our intention to create 1,000 new growing spaces by 2012. Last year we ran 800 *Food Glorious Food* events across almost 200 properties, giving people a chance to see where food comes from and to learn growing skills. Our 'Big seed giveaway' reached around 1 million people. We were also a lead partner in the Eat Seasonably¹ coalition which provided advice, skills sharing and special offers on the theme 'Grow your own'. This campaign was aimed at people thinking about growing something for the first time, but who aren't sure where to start.
- 1.3. This submission is based on our experience as a private landowner offering land for community food growing. We use the term growing spaces rather than allotments to avoid confusion with sites provided by local authorities and covered by the Allotments Act.

Case Study: Craflwyn, Near Beddgelert

For 40 years the kitchen gardens at Craflwyn lay forgotten and derelict until the Trust decided to transform the area into six pristine allotments for the local community. The terrain in the local village means that few houses have the space to grow vegetables. Work started in 2005 to restore the walls, beds and paths. Early in 2007 children from the local school helped to replant the fruit orchard. Three years in and the plots are a riot of produce and there is a healthy waiting list. The site is one of the most beautiful allotment settings in the UK.

2. The demand for allotment sites in Wales and availability of sites

- 2.1. In 2009 the National Trust committed to create 1,000 new growing spaces by 2012. Great progress has been made towards this target and we currently provide 350 plots for people to grow their own food on our land. We already provide allotments for local communities at Craflwyn near Beddgelert (see above), Egryn near Barmouth and Dinefwr near Llandeilo. Vegetable gardens used by youth groups have been created at our Carneddau office near Bethesda and at Erddig near Wrexham. We lease the walled garden on the Stackpole Estate, Pembrokeshire to

¹ www.eatseasonably.co.uk

the local Mencap group who provide training and work experience for people with learning difficulties (see below).

- 2.2. In the year ahead we will create new plots at Tan y Celyn near Bethesda which will be managed by local schools. We are looking for other opportunities in Wales and also hope to develop at least one new community orchard. Our main aim is to help those who are new to growing to find the space they need but we also want to help them learn how and what to grow. National Trust gardeners and volunteers will be able to pass on their skills and knowledge.
- 2.3. Our target for creating new growing spaces was driven by recognition of the current shortage and lengthy waiting lists for many local authority sites. A majority of the National Trust's land is in rural areas which have traditionally been poorly served by public allotment sites. Each new site has been filled with plot holders remarkably quickly, and some already have waiting lists. In certain cases we have been directly approached by the local community asking if we can offer them land, or have worked with the Federation of City Farms and Gardens to meet a community need.
- 2.4. We have been working with the Landshare² network to promote availability of growing spaces. This is a useful service for matching demand to availability. It also provides some indication of the level of demand for allotments in Wales.

3. The barriers/constraints for providers

- 3.1. The National Trust has the benefit of a team of expert advisors who have been able to guide colleagues through the process of creating new growing spaces with confidence that we are adhering to planning guidance, regulations and tenancy law. We have also provided guidance for site managers to help them understand issues such as public liability, and provided resources such as model tenancy agreements. We recognise that not all land owners have ready access to such resources and expertise, and believe that this could deter them from making land available.
- 3.2. In our experience there is some confusion as to the interpretation of planning law in creating new allotments: we were incorrectly told by one local authority that we would need planning consent to convert a piece of land to community growing plots. Our advisers consider that allotments themselves are an agricultural use of land as defined in section 336 of the 1990 Planning Act and so the use of land for allotments is excluded from being development by virtue of Section 55 of the Act. The same view is taken by advisers to the National Society of Allotment and Leisure Gardeners.
- 3.3. Given such experiences of confusion and incorrect interpretation of planning law we recommend that the Government issue a circular letter to clarify that no planning consent is required for turning land over to community food growing. We recommend that the circular reinforce the value of allotments as stated in Technical Advice Note 16.
- 3.4. Planning permission would normally be required for the building of sheds on an allotment site. To avoid placing unnecessary burden on applicants or local authorities, we suggest this could be better covered through a general allotment

² www.landshare.net

planning permission specifying generic requirements for such things as materials, maximum dimensions and locations rather than requiring each shed to be individually approved by the council.

- 3.5. There are particular issues for farmers who will be concerned about loss of Single Farm Payment if they hand land over to the community.
- 3.6. There are costs involved in creating growing spaces and preparing a site for plot holders. In some cases Environment Wales grants have helped this work. We are aware that specific funding sources which have supported National Trust 'grow your own' activities and the creation of new growing spaces in England, have no counterpart in Wales. This includes the Big Lottery Fund Local Food Programme and Defra's Greener Living fund.

4. Innovative approaches to the provision of land for allotments

- 4.1. We are working to make more of our land available for community food growing. Despite the challenges that so much of the land in our care of special natural and historic significance the National Trust has found innovative approaches to providing land for growing. We believe there is potential for other land owners to be similarly innovative, and we are happy to share our experiences to encourage this.
- 4.2. There are some innovative approaches which could be adopted to encourage landowners to make space available, as recently announced by Defra³. "Meanwhile leases" would make it easier for communities to take on pieces of land awaiting development, and local authorities could also offer special leases to allow groups to make use of abandoned or unused land. We would welcome cooperation between WAG and the Federation of City Farms and Community Gardens to extend the land bank principle to Wales, to provide a brokerage system between land holders and community groups.
- 4.3. We would encourage the Committee to consider a range of options for encouraging individuals and communities to grow their own food, beyond the traditional allotment model. Initiatives like Capital Growth⁴ demonstrate the potential for innovative solutions to encourage growing in urban areas. There are a variety of less traditional opportunities for community growing at a range of scales: window boxes, roof gardens, container gardening, urban orchards and edible landscaping. Even a small space can provide a chance to try food growing – see Carneddau case study below. Many of these have been promoted by social housing providers, alongside more typical plot provision on housing sites⁵. Promoting these alternatives to allotments allows for people's varying needs such as those who only want to commit a small amount of time.
- 4.4. In some cases people will have their own garden available for food growing but lack the skills or confidence to get started. Our food themed activities and the Eat Seasonably campaign are aimed at addressing this need. We would welcome support to allow third sector organisations to extend and continue this approach.

³ <http://www.defra.gov.uk/news/2010/100303d.htm>

⁴ www.capitalgrowth.org

⁵ http://www.sustainweb.org/pdf/food_growing_&_social_housing.pdf

Case study: Carneddau Carers, Gwynedd

A group of ten young carers from Gwynedd aged between 7 and 12 years are working with our estate team based in the Carneddau Mountains near Bethesda. They are learning how to grow fruit and vegetables on a piece of land next to the estate office. Local businesses donated materials to create raised vegetable beds and plant boxes as well as seeds and plants. The aim is to show children how much fun it can be growing fruit and vegetables. The children make fortnightly visits to tend to their produce which offers them relaxing respite from their responsibilities as carers.

4. Evidence of the wider benefits allotment gardening can bring and opportunities for allotment holders

- 4.5. In 2008 we conducted focus group research to understand how to reach families with green living messages. This showed that many supporters do not react positively to 'eco-friendliness' as a focus. However, they hugely appreciate its inclusion in more compelling propositions to do with food and nature, demonstrating that food can be the key which unlocks greener living behaviour. This research and evaluation of previous programmes have demonstrated that food is one of the best ways to communicate green living messages - especially to families.
- 4.6. The National Trust's approach focuses on providing tangible, inspiring experiences at our properties, where people can gain firsthand practical information, ideas and support to enable them to eat and grow locally in-season food at home; and we can harness the expertise of hundreds of gardeners, farmers and cooks. Our research suggests many of our supporters, especially families, respond well to encouragement and enthusiasm as well as face to face contact, supported by credible information. Once confidence is built through food, supporters are more likely to develop an interest in other aspects of living a greener life.
- 4.7. This demonstrates that programmes aimed at changing food-related behaviours are a good first step towards a more environmentally friendly lifestyle. Food can be used to explore and motivate wider sustainable lifestyle changes for example reducing food waste, composting, water saving, energy saving, re-use of materials and transport. Research has told us that changing people's values encourages behaviour change – if we can change people's values with regard to food, including where it comes from and its impacts, then we can start to change people's wider values which in turn will lead to wider sustainable lifestyle changes. We believe this process has huge potential to deliver the behaviour changes which are vital to achieving the Welsh Assembly Government ambitions for sustainable development and tackling climate change.
- 4.8. Research has shown that physical activity in green spaces such as allotments and gardens is effective in treating clinical depression and can be as successful as psychotherapy or medication⁶. The mental health charity Thrive has found that nearly one in three disabled people believe that gardening has ongoing health

⁶ http://www.nationaltrust.org.uk/main/w-space_to_grow_reportl.pdf

benefits, and one in five report that it has helped them through a period of mental or physical ill health- see case study below. Gardening is an excellent form of exercise: just 30 minutes of gardening can burn as many calories as aerobic exercise, greatly reducing the risk of coronary heart disease and other chronic illnesses. It can have broader health benefits too, for example helping older people maintain stronger and nimble. Doctors are beginning to see 'green exercise' and 'horticultural therapy' as effective treatments for many mental and physical conditions.

The Walled Garden at Stackpole, Pembrokeshire

The six acres of walled gardens on the Stackpole Estate are leased and managed by Pembrokeshire Mencap Ltd on a 40-year lease. The focus is on providing opportunities for people with learning difficulties to gain horticultural skills and work experience. 45 students come to the garden from their home or care unit during the week to take part in pre-NVQ courses in Horticulture and Life Skills, funded by WAG. Funding is also received from Pembrokeshire Social Services. Students, staff, volunteers and visitors value the gardens for the experience it offers them. Under expert guidance, the students take responsibility for their own growing spaces and crops. Friendly and welcoming staff and volunteers are committed to providing students with the very best interaction the garden presents. Visitors are also encouraged to enjoy the space and to take advantage of the availability of delicious, fresh, local produce through the shop. Schoolchildren also visit to see how vegetables are grown and what they taste like freshly picked. The environment of the Walled Gardens encourages students to feel comfortable and be themselves.

5. The need for and suggested areas of intervention from the Welsh Government

- 5.1. We recommend the following areas for Government intervention in order to remove the barriers to land owners making land available and to make it easier for people to grow their own food:
 - a. Produce of a resource pack including advice, good practice guidance, model tenancy agreements and case studies. The pack should include advice on how to ensure that projects do not damage valuable habitats, and good practice on making growing spaces wildlife friendly. This should build on resources and expertise of experts such as the Federation of City Farms and Gardens and Allotments Regeneration Initiative.
 - b. Establish a dedicated grant fund to support 'grow your own' and a range of community food growing activities. This should recognise the multiple benefits of these activities in terms of sustainable development and well-being.
 - c. Create community food development officer posts to support community groups wishing to establish growing projects, and facilitate liaison with land owners based on the model operated by the Federation of City Farms and Community Gardens.
 - d. Set a target for the creation of growing spaces on land owned or managed by public bodies such as NHS, MoD and Forestry Commission and establish a land bank to broker agreements between land holders and community groups.
 - e. Establish "meanwhile" leases to allow community groups to use land on a temporary basis.

- f. Produce advice to landowners to help make land available for community food growing to address issues of specific relevance to farmers and land owners e.g. SFP entitlements, public liability. It could also include model tenancy agreements and other useful resources which would make it easier and therefore more appealing for landowners to offer land.
- g. Establish a discussion forum for private landowners and their representatives to examine opportunities for making land available, and agree how this can best be encouraged.
- h. Publish authoritative advice and guidance on regulatory issues so land owners are clear as to the implications of providing land for allotments.
- i. Issue a circular to clarify the application of planning law to the creation of allotments and community gardens.