

Note on allotment provision in Glasgow July 2024, Glasgow Allotments Forum

Introduction:

There have been two reports to Glasgow Council's Environment and Liveable Neighbourhoods Committee this year on matters to do with allotments as part of food growing in Glasgow. In March the first report to the Committee concerned proposed Allotment Rules and Regulations. The second report in June centred on the implementation of the Food Growing Strategy Action Plan with an accompanying Allotment Officer's Report and Action Tracker in the Appendices.

Both Reports show the focus of the Council has been to deliver the letter of the law with regard to the Community Empowerment Act rather than the spirit of it so that the Officers approach has not taken full account of the Guidance that accompanied Act. The Rules and Regs. report details a consultation which was a hierarchical process resulting in 17 pages of overly detailed and prescriptive rules which will be impossible to implement. Allotment associations are identified in the opening glossary in these Rules and Regs. as agents of the GCC without any clarification as to what relationship this agency comprises.

Following the Democracy Matters Consultation, Glasgow Allotments Forum is engaging in discussions on 'Growing a Good Allotment Community'. The participants are collecting examples of present policies and governance on existing sites, the diversity of needs felt by Association committee members and individual plot-holders and the different ethos in sites across the city. We suggest that before new Rules and Regs are implemented the Council should work with GAF to set up a network of local site visits and discussions in which all plot-holders would be involved. The Scottish Government agenda including well-being, duty of care, biodiversity and climate change should inform actions and decision making on an appropriate and practicable set of arrangements for the management of allotments in the current context. Subsidiarity begins from people's experience, interests and needs. We need a cultural change where people share advice, support and wisdom, acting in self-organising communities rather than the continuation of a top-down approach which has characterised practice in the past.

Data from Reports:

1. Waiting lists, size plots and new growing spaces - data from Report on Food Growing Strategy to Glasgow Environment Committee June 2024

There are 1823 on the waiting list for 1623 plots. The published list is divided into wards with some wards without any applicants. The waiting list has been compiled by "*information based on current waiting list data which has been provided to the Local Authority.*"

Since this is mainly from the waiting lists of existing sites there is a correlation between where sites are situated and the number of applications. It notes that 12 allotment associations out of the 34 designated as 'growing spaces' have not responded. *Discussions are ongoing with a software provider to develop additional functionality to provide a coherent universal application form for use by all individual applicants that will link them to the relevant available plots for letting in a clean and efficient manner.* This discussion has been going on for over seven years.

There is no analysis of the responses to the application form on the Council's web site which includes information about *What are the main reasons for wishing to rent an allotment plot? (choose up to 3) 'Would you be interested in taking over an area of ground to develop as an allotment site? Would you be interested in attending a meeting with others who have shown interest in developing a new site?* There is no mention of the Act, the benefits of allotments or any encouragement to want a plot.

The Report highlights *growing spaces delivered and intending to be delivered over the duration of the Food Growing Strategy as resources become available.* Again there is no data on size of plots available. In the current year they have provided 'growing spaces, in Greyfriars 57, Sighthill 20, Rodney street 6. However they state *Greyfriars Community Biophilic Garden offers a case study which could inform the approach to other smaller areas of open space and vacant and derelict land that may not be suitable for the traditional allotment format to be brought forward for consideration as Growing Spaces.* - the 'plots' on Greyfriars are raised beds 27m². Estimates from Table 1 give Rodney st average plot size about 53m² and in a new site at Sighthill average size of 84m². Table 4 details the land availability in each ward covering the waiting list, area of existing Council 'growing spaces', 'public proposed growing spaces' and estimates the area required to satisfy

50% of waiting list as requiring 250m² each. In response to a question about the projected size and location of proposed plots from Councillor Bostani from the Landscape Design & Development Manager Neighbourhoods, Regeneration and Sustainability

I should be clear that the land referred to in this section [4] is considered potentially suitable for growing, in line with the wording of the Community Empowerment (Scotland) Act, rather than secured for this purpose, and contains land with a range of ownerships and potential land uses. In line with the wider aims of this Act, this information is aimed at empowering growing communities by providing information which allows communities to take action. Communities across Glasgow have submitted a wide range of PMGC enquiries allowing them to take a greater role in how local facilities are managed, and it is considered that this approach is well aligned to both the wider aims of the Act, the resources currently available to this service, and to the broader context of Glasgow City Council policy and strategy."

Appendix **Allotment officers report**-. Description Full plots -125 - 250m² Half plots: 50 - 125m² Micro plots and raised beds Less than 50m² . However in Table 1 on current plot sizes and distribution no areas of plots are given. The data does not seem to have been checked since there are obvious discrepancies about the areas of land particularly that not used for cultivation.

Appendix **Tracker information**: Table 3: Additional Food Growing Opportunities Developed beyond Waiting Lists - *over 700 people in the community were engaged and/or supported to access food growing opportunities. 154 growing spaces, covering an area of 357 m² were created* We note that these 'growing spaces' are only 2.3m² so will have little impact on food growing in Glasgow especially since there seems to be about 5 people engaged with each bed.

Recommendation for Scottish Government:-

- (i) ask for **areas** of new growing spaces and data from waiting lists on areas requested in the Allotment Officers Report.
- (ii) Catalyse local self-organising actions by encouraging Councils to disseminate information about **Act** and **Guidance** to the housing associations, public bodies, community councils and encouraging them to link with nearest community gardens, allotments, orchards to form groups to build on skills and experience to develop viable growing spaces on land in their area.
- (iii) Work with professional bodies of planners and the relevant University research funding to ensure information about the myriad benefits of allotments and other community growing areas are understood and included in all planning policies and decisions. .

2. **Delegation of duties -**

In the final revision of the Allotment Rules and Regulations for Glasgow City Council a new definition was added to the list in part 2 of the document, headed **Interpretation**. In 2.1, which consists of a glossary of various terms used in the document. The new item was "Council" :

"Council" means Glasgow City Council, having its principal offices at City Chambers, George Square, Glasgow G2 1 DU and shall include its employees, agents and all others duly authorised by it to act on its behalf.

Following on from 2.1, 2.2 states that:

References to "permission of the Council" or words to similar effect mean a permission in writing signed by or on behalf of the Council and "approved" and "authorised" or words to similar effect mean (as the case may be) approved or authorised in writing by or on behalf of the Council.

As of now allotment associations on GCC sites are largely unincorporated (only one having this status so far) and carry out the functions that the CEA lists as delegable in section 123 of the CEA. They do so with no recorded authorisation from the local authority i.e. without any written documentation which clarifies to association committees or their members what the relationship between the local authority and the associations is when it comes to issues of governance. This has proved to be particularly problematic when it comes to disputes over tenancies and behavioural issues on sites.

Glasgow City Council's latest Annual Allotments Report claims that the delegation process will be based on capacity building arrangements under the aegis of People Make Glasgow Communities. In April allotment association committee members were encouraged to attend training sessions on the grounds that they needed to prepare for delegation citing in the invitation to attend that:

"there is a desire among many associations to deliver devolved functions with several associations expressing their desire to enter into discussions around schedules of delegation." (something that GAF has been raising with officers since 2019.) (April 5th)

A further letter to associations (April 20th) confirms that associations are already carrying out these functions (with no clarity as to exactly what this means and no written authorisation from the authority):

"Please note that those participating in these workshops will provide the capacity to enter into schedules of delegation discussions from an informed position and it would be remiss not to remind associations should they wish to continue to deliver devolved functions, the legislation requires each association to advise the Local Authority of their intentions in writing."

Presumably the claim that an association can be defined as an agent of the GCC is assumed to be sufficient to cover this non-arrangement.

Several of those who attended the first of these capacity building workshops were disappointed that, despite the wording of the invitation, there was no mention of section 123 of the Act or its implications for Glasgow's allotment associations. According to one participant *'It was suggested that each allotment Association should have a series of policies on things like privacy, security, safeguarding etc and I feel that it would be sensible for all the Council allotments to get together on these, and share best practice, rather than everybody inventing their own from scratch.'* Another wrote: *The presenter actually stated he knew nothing about allotments and didn't appear to have made any efforts to examine the relevance of the course content to his audience.'*

One allotment committee who wrote to the relevant officer at their invitation to apply for a devolved management agreement has received no further response despite several requests for information in next steps. The GCC's Annual Allotment Report 2024 makes it clear that progress on the matter is reliant on resources and that very little is likely to be achieved in the near term as a result (i.e. the matter has been 'kicked into the long grass' for the foreseeable future).

Recommendation: clear and agreed documentation which clarifies the relationship between the local authority and allotment associations. This should apply to all associations.

3. **Land and Network** - No substantial areas of land have been developed for new allotments apart from 0.2 Ha at Sighthill development. Suitable land for growing, for example bowling greens in Finneston and Jordanhill have been put up for sale.

The 'reasonable steps to increase provision' outlined in the Allotment Officers report are yet more proposals for talking shops without any evaluation or concrete actions emerging. For example

- *Develop the Let's Grow Together Storyboard to provide information, advice guidance and support for those on waiting lists and those keen to start food growing.* - how many people have accessed this and what outcomes?
- *Support other landowners such GGCNHS, Faith Groups, Colleges, and Universities to provide land for Allotments/Food Growing Spaces.* Again no strategy for action, linking with local people in local places
- *Provide funding via The Let's Grow Together Fund to encourage the development of food growing opportunities by grassroots community organisations.* This is only £50K and was shared among 14 existing organisations mainly for composting, recycling and maintenance activities ,

Recommendations: Funding for network community gardens, allotments to visits and talk together.