

Comments on Draft New London Plan from Ealing Dean Allotment Society

Chapter 7: Green Infrastructure

Existing allotments are afforded protection in the new draft plan in Policy G8, but their benefits are treated only superficially. Not all allotments are protected under the allotment acts and privately owned allotments are bound to come under pressure for development, given the targets for new high density residential development.

Allotments sit somewhat uncertainly in the hierarchy of 'green and open space'. Policy G4 calls for the protection of local green and open spaces, but in Policy G4 C which requires boroughs to carry out a needs assessment for such spaces, the draft plan refers to *public* green and open space, as categorised in Table 8.1. It is not clear whether the semi-public nature of allotments deems their inclusion in or exclusion from this table. In this table, Local Parks and Open Spaces and Small Open Spaces include "other areas of a specialist nature, including nature conservation areas".

Table 8.1 should be amended to "including nature conservation areas and allotments" within appropriate categories.

Alternatively, it may be appropriate to include allotments in the category of Linear Open Spaces in the same table, as the description refers to features which may not be fully accessible to the public (although allotments are not necessarily linear). It would strengthen the protection afforded to existing allotments if they were explicitly included in table 8.1 and therefore clearly within the scope of Policy G4.

In the GLA Assembly's own report of 2006, "A Lot to Lose: London's disappearing allotments", it states that 32 or 4.2% of London's allotment sites were lost in the previous ten years and that the rate of loss of allotment plots was even higher at 6.8%. This is because allotment sites tend to be chipped away rather than lost altogether. In the words of that report: "It is this insidious loss of five plots shaved off at the periphery that is the real threat to allotment provision in London". This kind of loss can only be prevented if there is a requirement to replace the land lost with an equivalent area of new allotments. It is not enough to compensate the loss with green roofs, tree planting or other unspecified greening measures. Financial contributions in lieu, must be adequate to purchase equivalent areas of land and banked by the local authority strictly for that purpose.

The Draft New Plan treats allotments as spaces for food growing, which is a correct but narrow definition of the purpose of allotments. They are only referred to by name on a single occasion in the draft plan and that is in Policy G8. Paragraph 8.8.1 devotes one sentence to the additional benefits - other than directly food related - that community food growing can have for social integration, community cohesion, and improved mental and physical health. It is certainly true that allotments can enhance local residents' quality of life by providing a location for healthy physical activity and social interaction but that is not all that allotments contribute. Like the various categories of public open space in Table 8.1, allotments conserve and enhance the open green environment, providing a local visual amenity, assist in combating air pollution, provide wildlife habitat and support bio-diversity. In many cases, allotments are also a heritage asset, although they are rarely given that formal status. Most have been in existence for a long time, in our own case since 1832. They can be important reminders of our social history and often conserve an element of an older landscape, in our own case former common land.

The demand for allotments continues to grow. The GLA report of 2006 showed that across London waiting lists stood at 4,300 applicants compared with 3,000 a decade earlier. In some boroughs it would apparently take ten years to get an allotment. On many sites including our own, full size plots are divided in half so that more people can gain access to them. It goes without saying that if London is to house an additional 1.9m people by 2041 the demand for allotments will only increase further. The housing target for LB Ealing is a massive 28k new homes to be built, implying an approximate 25% increase in population. By comparison to the housing section, the poli-

cies and objectives for Green Infrastructure are weak and aim at best to stand still. This huge increase in population will need more amenities and an enhanced green environment to offset the lack of private space in high density residential development. Existing provision must be given strong protection but also boroughs should be actively investigating the provision of additional land for open green areas and recreational facilities, including allotments.

The requirement to identify other potential spaces that could be used for food production, including allotments, in Policy 7.22 C of the current London Plan has been changed in Policy G8 A of the Draft New Plan, to include only sites for commercial food production. The current policy should be retained in the new plan.

Proposed Amendment

- A In Development Plans, boroughs should:**
- 1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments**
 - 2) ensure that any unavoidable loss of allotment plots is replaced with new provision of equivalent area and quality**
 - 3) identify and bring forward new sites to be used for commercial food production, allotments and community gardens**

Policy G8 Food Growing

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