

Draft Developers Contributions SPD.2025

Comments of the Bath Allotments Association.

General comments.

The Bath Allotments Association (BAA) represents allotment holders and other growers primarily within the City of Bath. There is an acknowledged shortfall in the provision of Allotments Green Infrastructure as shown by long waiting lists for almost all sites in the City. Although money has been secured through S106 and CIL for more allotments to satisfy the demand from incoming residents of new developments, the Council has been unable to find any new sites. Developers (for example at Hartwells, Mulberry Park and Holburn Place) remain reluctant to provide adequate GI on site, but no alternative sites are identified.

The Council requires that all occupants of new residential developments have a good standard of Green Infrastructure (GI). The appropriate provision of allotments GI, as set out in the Green Space Strategy (2015) has not been achieved despite money being given to the Council through S106 legal agreements/undertakings. The majority of sites have long waiting lists. The Council is also about to lose a large site at Combe Down, which has already increased the pressure on existing sites. In accordance with the requirements of the current Green Space Standards (as set out in the Green Space Strategy 2015) the area for allotments in the City of Bath (population estimated at 94,782 in 2024) should be 28.43 ha. The current allotment provision is 19.83 hectares. Minus Combe Down it would be 18.56 ha. So the current provision is already significantly below the required level.

Policy LCR 9 (3) and (5) are simply not working. The BAA has submitted changes to LCR9 as part of the New Local Plan Options Consultation, now delayed. If these changes are accepted this SPD could potentially be in conflict with the New Plan. This is a *cart-before-horse* situation, which implies that our suggested changes to LCR9 will not be properly considered through the Plan process.

The BAA is not aware that The Green Infrastructure Framework referred to 3.4.2 is even remotely ready for consultation or adoption, as stated in the footnote 1. This could cause compatibility issues.

Specific comments.

3.4.8. Table 3.4B is flawed, because offsite provision doesn't work unless there is a deliverable site identified. It's the same issue for bigger developments where money is taken in lieu of on-site provision.

3.4.9. There is a conflict between the prescriptive approach as set out in Table 3.4.8 (from the Green Spaces Strategy 2015) and the site specific approach as set out in 3.4.9. Whilst it may on the face of it seem reasonable to take into account what allotment sites are near a development in real terms, nearly all the sites have long waiting lists. This just pushes the demand elsewhere, as people are offered a second choice (often needing a car).

3.4.11 The BAA maintains that informal food growing should not be a substitute for allotment provision for permanent residents, especially social housing, as there is no long term security and informal schemes have a high failure rate. In such places as care homes, food growing can be imaginatively incorporated in amenity gardens with great success.

Off site contributions are clearly not working – this is seen as an easy get-out. The BAA considers that off-site provision should only be accepted where a deliverable alternative site has been identified.

3.4.12 The wording is not strong enough. Management plans should be a requirement and at the minimum embedded in a legal agreement or made the subject of a condition, just like for landscaping.

3.4.16 “may be offered” is too weak. It should say “must be offered”.

3.4.18 Why “no obligation”? it should be Council policy that all new sites are brought into Council or Parish control (with appropriate maintenance contributions) to secure their long-term future. This is the only way to permanently secure the GI Allotments. These sites then would become statutory, under the Allotments Acts, which would give them better protection.

If an allotment under private ownership fails, due to bad management, or is even deliberately closed, the Council would have no practical recourse to correct this. Under private management, there is no guarantee that the people who need the allotment would get one at a reasonable price. S106 agreements can be used but the BAA is concerned that the Council would not have the resources or the will to enforce them. Why is it that public ownership of other types of infrastructure is accepted as normal, but not allotments?

Section 3-6 Biodiversity net gain. This section exhibits a silo approach to infrastructure. Green Infrastructure could provide opportunities for BNG. Existing allotments could be enhanced or new ones designed in such a way that BNG is incorporated. This could be an imaginative approach, which in Bath, could significantly enhance urban biodiversity and green links within the city.

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