

BATH & NORTH EAST SOMERSET COUNCIL DRAFT ALLOTMENTS STRATEGY

FOREWORD BY CABINET MEMBER FOR THE ENVIRONMENT

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SECTION 1 INTRODUCTION

1.1 Background

The Allotments service sits within the Parks and Estates Section of Customer Services which includes Parks & Green Spaces, Tree & Woodland Management, Conservation and Children's Play as well as Allotments. The Allotment Strategy has been developed as a way to improve the management of the Allotments Service.

Its key aim is to maximise participation in allotment gardening. The Strategy recognises the importance of allotments as a leisure and recreational facility and for their benefits to communities, green spaces, health and well-being and wildlife, as well as in producing low cost locally produced food in a sustainable way.

This Allotment Strategy sets out to achieve a high quality service provision over the next 5 years to 2017 and then beyond. It has been decided that this needs to be a 5 year Plan, with a possible extension beyond this, as the targets set are dependent upon the finances available, especially in relation to capital investment through increased allotment rents, Community Infrastructure Levy, or other planning gain. It is intended that the Allotments Strategy will link as a sub-strategy to the wider Parks and Green Spaces Strategy, Green Infrastructure Strategy and other Corporate Agendas which are also being developed at the present time.

Over recent years there has been an increasing demand for allotments, even with new allotment sites being created there are long and increasing waiting lists for all the sites which further justifies the need for efficient and effective management of a valuable scarce resource.

This Strategy has been developed in partnership with Bath & North East Somerset Allotments Association whose primary objective is to promote the establishment and use of land in the Bath area as allotments. It provides its members with regular newsletters and near cost-price seeds and gardening items via the Trading Hut which it runs jointly with Bath Organic Group.

Allotments in Bath city are the responsibility of B&NES' council, and the town and parish councils have responsibility for allotments elsewhere in the District. This strategy has been written for the Bath city allotments, but it is hoped that the quality standards developed in the strategy will be relevant for allotment management throughout the District.

Appendix C lists internal and external stakeholders involved in the provision of this service. Council departments outside Parks and Open Spaces include Property Services and Legal Services.

Legal Services have produced the standard documents and will keep these under review as well as producing guidance from a legal point of view.

Property Services is responsible through the Corporate Repairs & Maintenance Budget (R&M) for all aspects of physical maintenance of structures including boundaries, gates, pathways, water supplies and drainage. Close liaison with Parks and Open Spaces is maintained in order to prioritise R&M in a corporate manner. This prioritisation is achieved through a programme of 5 yearly Condition Surveys which produce items of outstanding R&M which in turn form the starting point for the production of programmes of work on a financial year basis. Finalisation of these

programmes follows consultation with all stakeholders including Parks and Open Spaces as well as the Bath Allotments Association.

B&NES COMMITMENTS 2012 - 2017

B&NES is committed to an environmentally sustainable, low carbon and climate resilient future. It recognises the importance of allotment gardening in local food provision, recreation and sustainable regeneration. It believes that the benefits of allotments are to the whole community and not just to the individuals who use them.

B&NES is committed to –

- To endeavour to provide an adequate number of allotment plots in Bath.
- Encouraging and promoting the use of organic and environmentally friendly sustainable methods of cultivation and plot management.
- Working with the Allotment Association, site representatives, individual tenants and interested groups to deliver efficient, effective and equitable distribution of plots and to maximize occupancy.
- Maintaining safe and secure sites ensuring that maintenance and repairs are carried out efficiently and promptly
- Managing boundary hedges, trees and shrubs in an appropriate manner maintaining common areas in a good and safe condition including communal paths and entrance areas
- Providing water to all sites through water troughs or stand pipes.

1.2 Structure of Strategy

Allotment provision is (a) historical and (b) set out in legislation and guidance on allotment management is provided by the Department of Communities and Local Government, through various policy documents. The legislation and national policy, and their implementation in local policy, are set out in Appendix A. Existing allotment provision is set out in Appendix B, and the Council's partner organisations are listed in Appendix C.

This document starts by stating Bath & North East Somerset Council's vision for allotments, and then sets out objectives to achieve this (Section 2). Each objective is broken down into specific recommendations/actions identified as necessary to implement them (Section 3).

The strategy is a working document, to be monitored annually and fully reviewed every five years in order to maintain its currency with regard to policy and recognised good practice. The framework for its review is set out in the section 4 [Terms of reference for allotment forum, annual reporting, annual feedback from site reps, three yearly consumer surveys].

SECTION 2 AIMS AND OBJECTIVES

2.1 AIMS FOR ALLOTMENT PROVISION

National policy and guidance on allotments is set out in Appendix A.

B&NES Council's *vision for allotment provision* is:

to provide, facilitate, improve and maintain well-tenanted allotments, managed in an open and accountable manner.

It will maximise the opportunities for its residents to enjoy the experience and benefits that allotment gardening can bring, ensuring that sites are safe, celebrate cultural diversity, and provide opportunities for learning and socialising. It recognises that allotments have an important role to play in promoting local food production to meet the challenge of climate change.

In the emerging Core Strategy, new allotment provision is primarily funded through developer contributions (Policy CP13) as part of the District-wide spatial Strategy (DW1, IDP reference DW1.10). Policy CF.8, which protects allotments and land last used for allotments, is one of the policies saved from the Adopted Local Plan 2007.

The Strategy is intended to set a standard for the supply of allotments, to improve the standard of service provision and to consider the demand for allotments both now and in the future. Without an effective strategy the process of managing allotments becomes one of merely reacting to events. It is important to maintain a strategic direction, a continuing and evolving sense of what is to be achieved and to be able to explain the agenda to others including raising awareness of the benefits of allotments for all.

2.2 OBJECTIVES

The following objectives form a 'good allotment charter' for allotment management in the city of Bath.

2.2.1 To provide enough allotments

The Council has a statutory duty under the Small Holdings and Allotments Act 1908 (Appendix A1) to provide allotments where there is a demand. The law is not clear on whether there is a duty to meet demand. However, guidance suggests 17 plots per 1000 households is a 'reasonable' standard.

The Council will endeavour to ensure that there is a sufficient number of allotment plots in the City to enable all sections of the community to enjoy the health, education and social benefits of allotment gardening. (On current demand this would require a further 600 or more plots costing in the order of £600k - £1m (This does not include purchase of land)

The Council will safeguard existing allotment sites from redevelopment for other use. Noting that any development should result in a net increase of Full Plot Equivalents (FPE's) through Community Infrastructure Levy (CIL) or Section 106 agreements.

2.2.2 To promote allotment use and food growing

The Council recognises that allotment use plays an important role among a range of methods for local food production which will help mitigate, and prepare for, climate change. The Council will promote allotment use for food production and will encourage tenants to use organic gardening methods. Where demand dictates this will be with the creation of 'organic' sites or sections of sites.

2.2.3 To provide an effective management and administration process

The Council is responsible for the management of all the statutory allotment sites in the city. It will ensure that allotment management is effective, efficient and equitable.

The Council will develop strong partnerships with allotment associations, site representatives, individual tenants and other organisations to help provide effective management, working towards sustainable local food production, so that they can help shape policy and practice.

2.2.4 To provide a high quality standard of service provision

The Council will ensure that sites are safe in terms of health, safety and security that maintenance and repairs are carried out in a timely and efficient way, involving allotment representatives in decision-making and work plan formulation where this is appropriate.

2.2.5 To promote environmental sustainability

Allotments have the potential to provide a source of fresh, low-cost food with a very low carbon footprint. The Council will encourage organic gardening methods, on-site composting, the use of sustainable materials and will discourage the use of peat and pesticides. It will encourage biodiversity, particularly for beneficial insects, seed collection, use of green manures and water conservation.

2.2.6 To provide adequate resources to supply and manage allotments

Good management results in improved income, by maximising occupancy rates. Where possible, the Council will maintain a forward programme of investment in new plots, improved infrastructure and maintenance. It will provide sufficient staffing for efficient management and maintenance subject to available resources.

Each of these objectives is examined in more detail in Section 3.

SECTION 3

OBJECTIVES and ACTION PLAN

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
3.1 To provide enough allotments					
3.1.1	Improved data collection and analysis on existing provision, waiting lists and future demand.	Maintain a relational database by site, plot, tenant and applicant to provide management data. (See section 4 also)	Staff	GIS Team, Allotments Officer, Business Support	Setup 1 Maintenance ongoing
		Analysis of waiting list figures by ward and by proximity to residence. To inform Planning provision process and for presentation to the Forum	Staff	Parks & Estates Manager,	1 See VW comments
3.1.2	All sections of the community including disabled, elderly, families with children, BEM	Promote the benefits of allotment gardening across the community balanced against supply and demand	Staff/ Volunteers	Allotments Officer, Allotments Forum	3
		Identify constraints to allotment gardening experienced by any particular section of the community. Carry out accessibility audit	Staff	Equalities Unit, Parks & Estates Manager,	3
3.1.3	Ensure requirements for allotments are included in planning policies.	Define a clear strategy for allotment provision and enhancement within emerging policy. To be included within the Green Infrastructure Strategy	Staff	Parks Planning and Strategy Officer	1
		Review how allotments should be considered in relation to other forms of green space. Included in Green Spaces	Staff	Parks Planning and	2

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		Strategy and its review		Strategy Officer	
3.1.4	Provide a sufficient ratio of allotments to households to meet demand.	Review B&NES decision that its standard plot size will be 125sqm. This is at least 50% smaller than the national norm, which is 250-300 sq.m. Consideration will be given to multiple plot tenancy	Staff/ Volunteers	Parks & Estates Manager,	1
		Monitor the ratio of plots/household/proximity set out in Green Spaces Strategy.	Staff	Parks & Estates Manager,	1
3.1.5 Cf 3.6.4	Maximise the investment potential from new developments.	Confirm current system Ensure that all opportunities for collection of developer contributions, via planning approvals and S106 agreements, etc., are exploited.	Staff	Parks Planning and Strategy Officer	1
		Include allotments within Community Infrastructure Levy CIL		Parks Planning and Strategy Officer. Planning Dept	1
		Establish systems for effective coordination with the Planning team.	Staff	Parks Planning and Strategy Officer	1
3.1.6	Optimise opportunities for new allotment sites and 'meanwhile'	Maintain a register of sites with potential for use as allotments, working in close collaboration with Property Services	Staff	Parks Planning and Strategy Officer	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
	gardening on council-owned land.	Identify opportunities for informal gardening within Parks & Open Spaces or other authority owned open space, such as 'guerrilla gardening', demonstration plots.	Staff	Property Services, Allotments Officer	2
		Work with Property Services to find opportunities for temporary allotments and alternative growing opportunities, e.g. raised beds, sanctioned 'guerrilla gardening'.	Staff	Property Services, Allotments Officer	2
		Establish/improve systems for collaborative working with the Property Services team. Asset Management Working Group to determine	Staff	Parks & Estates Manager, Property Services	1
3.1.7	Encourage allotment development in rural areas.	Work with parish councils to promote and develop allotment sites.	Staff	Allotment Association, Policy & Partnerships	2
3.1.8	Encourage private landowners to establish temporary allotment sites (with guidance on legal constraints)	Compile and issue guidance notes on the legal issues relating to temporary (non – statutory) allotments.	Staff	Property Services, Legal Services	3
		Refer private landowners to the Allotments Regeneration Initiative for guidance on the design of allotment sites	Staff	All	1
3.1.9	Prevent encroachment onto	Coordination with Property Services, to stop encroachment by neighbouring properties.	Staff	Parks & Estates	Immediate

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
	allotment sites from neighbouring properties, and erosion of boundaries by inadequate demarcation and fencing.			Manager, Property Services	
		Keep boundaries clearly defined, filling in any breaches.	Staff	Allotments Officer, Property Services	1
3.1.10	Reduce the number of uncultivated allotments within the city.	Clarify and improve the enforcement process to reduce the number of uncultivated plots.	Staff	Allotments Officer	1
3.1.11	Minimise illegal tenancing of allotments.	Administrative procedures to ensure that tenancies are not transferred to third persons, either by unauthorised proxy gardening or by handing on tenancy when accommodation is sold or rented out.	Staff	Allotments Officer	2
3.2 To promote allotment use and food growing					
3.2.1	Mainstream support for local food growing, including allotment provision, across Council departments.	Build allotment gardening into sustainable community policy, including biodiversity, green spaces, green infrastructure, food, health and well-being, waste management and culture and locality. Strengthen support for local food production policy, including allotments, implementing it across Council departments.	Staff	Parks & Estates Manager,	2/3

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		Include within emerging Environmental Sustainability & Climate Change Strategy			
		Improve promotional support for local food/allotments in council publications (electronic and public space).	Staff	Parks & Estates Manager,	2
		Enhance partnership with other organisations focusing on local food production.	Staff/ Volunteers	All	2
3.2.2	Develop the allotments service as an education resource to support life-long learning.	The traditional skills of growing and preparing fruit and vegetables are not widely handed down generation to generation; this requires improved education of children and adults, via gardening courses, links with schools and colleges, promotion via health centres and other community spaces. There is likely to be demand for courses in the evening or at weekends.	Staff	All	2
		Work with partner organisations to provide gardening training.	Staff	Allotments Officer	2
		Encourage and create opportunities for volunteer gardening.	Staff	Allotments Officer	2/3
		Allotment gardening provides a useful introduction to horticulture and will contribute to the District's long-term sustainability in local food production. Therefore include in all relevant strategies and initiatives	Staff	Parks Planning and Strategy Officer	1
3.2.3	Ensure that	Maintain secure boundaries by ensuring that there are no	Staff	Property	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
	allotment sites are safe and pleasant spaces for gardeners of all ages and abilities to enjoy.	gaps in fencing or hedging and that all gates are secured by padlock.		Services	
		Calculate resource costs	Staff	Property Services	
		While allotment sites overlooked by houses may be monitored by neighbours, they may be subject to vandalism, theft and dumping of rubbish. Work with the police to monitor and reduce damage. Other allotment sites are some distance from housing and isolated gardeners may feel insecure from trespass	Staff	Allotments Officer	1
		Encourage use of allotments as social spaces, with communal areas and space for children to play, to maximise social interaction and thus improve security.	Staff	Allotments Officer	2
3.2.4	Use public space for other forms of food growing.	Provide space for community gardens and orchards; encourage edible landscapes e.g. via 'guerrilla' gardening.		Parks & Estates Manager, Allotment Association	2/3
		Reassess the priority given to ornamental gardening in public spaces in terms of time and space, and maximise opportunities for incorporating edible plants, fruiting shrubs and trees.		Parks & Estates Manager,	2
3.2.5	Encourage workplace gardening.	Encourage public and private sector employers to offer opportunities for growing fruit and vegetables in the workplace, by utilising forecourts, landscaped areas, window boxes, balconies, living walls and roofs.		All	3

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
3.3 To provide an effective management and administration process					
3.3.1	Set out an accountability structure to deliver effective and efficient allotment management.	Set out organisational structure with responsibility for allotment provision and management.		Parks & Estates Manager,	Immediate 1
3.3.2	Establish an Allotments Forum	Allotments Forum to meet twice a year, its members to include members of the council, officers and allotment tenant representatives.		Parks & Estates Manager,	On-going
		Consult on the Terms of Reference for the Allotments forum, defining responsibility for monitoring performance, strategic thinking and policy formulation.		Parks & Estates Manager,	done
		Effective communication and consultation is an essential component of good practice; the Allotments Forum will have responsibility for effecting this, both directly by its own actions and by monitoring the Council's performance		Parks & Estates Manager,	1 Ongoing
		The Forum will monitor, advise and lobby for allotment provision and budgeting, thereby replacing the current planning issues and budget liaison sub-groups of the Allotments Association.		Parks & Estates Manager,	Immediate 1
3.3.3	Improve information gathering and analysis.	Create a relational database with linkages between site, plot, tenant, waiting list, maintenance and repair, to act as both a management and a monitoring tool.		GIS Team	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		Require proof of residence annually, when the rent is due, to deter informal transfer of tenancies.		Business Support	2
		Investigate an integrated software system incorporating a Geographical Information System (GIS).		GIS Team, Allotment Officer	1
		Provide greater clarity of budgeting, accounting and decision-making processes.		Parks & Estates Manager,	1
3.3.4	Clarify, and where necessary consult on, procedures for the day-to-day management of allotments, in order to increase coherence and transparency and thus improved customer service. Ensure equitable provision/manage ment across all council-owned sites.	<p>Create an Operations Manual for allotment management, setting out:</p> <ul style="list-style-type: none"> ▪ Procedure for administering applications/waiting lists ▪ A fair and equitable lettings policy, set out procedure for letting plots (First come basis) ▪ Allocation and replacement of keys ▪ Procedure for inspections and enforcement ▪ Rules defining cultivation rates, i.e. percentage cultivation in relation to time since start of tenancy, and nature of cultivation, i.e. food productivity, flowers, biodiversity practices ▪ Procedure for managing plot in the event of a tenant's acute ill-health lasting up to 12 months. ▪ Clearing plots before letting ▪ Acceptable weed control (extent, methods) ▪ Guidelines on wildlife, bonfires, seed saving, green manures, bees and hens ▪ Policy on sheds, what constitutes a 'structure' ▪ Policy on fruit trees (incl. cordons) 		Parks & Estates Manager,	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		<ul style="list-style-type: none"> ▪ Health and Safety: standards, procedures/audits ▪ Repair/maintenance: procedure and standards ▪ Procedure for recording and handling complaints ▪ Procedure for moving from a starter plot up to a half or full plot, or downsizing, or temporarily vacating; maximum 1 plot equivalent per person (natural wastage removing 2+ plot tenancies) ▪ Procedure for authorised sharing, handing tenancy over to the sharer or to a relative ensure this equitable for those at top of waiting list <p>Copies of the Operations Manual will be made available to tenants' representatives.</p>			
3.3.5	Tenancy agreement revised to be more specific about council and tenant's responsibilities and enforcement procedures	Revise tenancy agreement in consultation with allotment representatives.		Parks & Estates Manager,	2
		Incorporate "rules" as set out in the Operations Manual (see 3.3.4)		Parks & Estates Manager,	2
		The tenancy agreement to be reviewed every five years.		Parks & Estates Manager,	1 ongoing
3.3.6	Encourage respect and tolerance on allotment sites.	Create a code of practice to include respect for other plot holders who may be less experienced, from different cultural backgrounds, or practicing different growing methods.		Equalities Unit	2
		Include a framework for resolving differences of opinion, and provide links with the complaints procedure in the		Parks & Estates	2

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		Operations Manual. [Include Allotment Handbook 'dignity statement']		Manager,	
3.3.7	Improved information and support for new tenants	Before applicants take on a tenancy, provide written information and site visits/introduction via the site rep.		Allotments Officer/ Allotments Association	1
		Ensure that applicants sign the tenancy agreement <u>before</u> taking on the tenancy, so that they are aware of their responsibilities.		Allotments Officer	1
		Offer new tenants a range of support: gardening workshops; starter plots [requires a review of the use/success of starter plots on Bloomfield Road].		Allotments Officer	2
		Explore the possibility of introducing a mentor/buddy system.		Allotment Association	2
		Work with the Allotment Association and other partner organisations to write an "Allotment Gardeners Beginner's Guide", to include advice on: weed control, soil fertility, organic gardening, non-chemical weed and pest control, rat control, the dangers of introducing non-biodegradable or toxic substances, wildlife gardening, companion planting .		Allotments Officer	2
		Monitor new tenants' progress via regular inspection and early identification of 'failing' newcomers who need additional support.		Allotments Officer	1
3.3.8	Improved information for	Provide applicants with information about their position on the waiting list		Business Support	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
	prospective tenants.	In view of the length of the waiting list, applicants should be asked to re-register annually to confirm their contact details and their continued interest in acquiring an allotment.		Business Support	1
		Provide applicants with information about tenants' responsibilities and about the time and effort involved in re-establishing and maintaining a productive plot, so they can make an informed choice about the size of plot to start.		Business Support	1
3.3.9	Improved communication with tenants.	Make greater use of electronic communication with tenants.		Allotments Officer	1
		Systems for dealing with enquiries including logging telephone calls and e-mails, and complaints procedure		Parks & Estates Manager,	Immediate 1
		Improve the quality of web-based information on allotments and their management.		Parks & Estates Manager,	2
		Develop strong partnerships with site representatives, the allotments association and other complementary organisations		Allotments Officer	1
3.3.10	Explore options for self-management (see Appendix A, Growing in the Community); and its incentives and disincentives	Provide support and advice to groups who wish to move towards self-management either wholly or in part. This would have to be with strong support of the allotment site plot holders and demonstrable commitment and ability to fulfil the role.		Parks & Estates Manager, Policy & Partnerships	2/3
		Encourage the participation of allotments associations and allotment tenants in the management of allotments		All	2/3

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
3.3.11	Memoranda of Understanding with Allotments Association (and any other tenants' organisations) re commitments/ responsibilities on both sides	Consult the associations in the prioritisation of available funds for improvements and essential maintenance.		Allotments Officer, Property Services	2
		Develop a system for giving advance notice to site representatives of proposed works on site. Property Services re. Minor works		Allotments Officer, Property Services	1
3.4 To provide a high quality standard of service provision					
3.4.1	Establish quality parameters for each site.	For each site establish a site management plan, which will include type of provision, occupancy target, security, facilities and service levels.		Allotments Officer	1/2
		Review site management plans annually with tenants and/or their representatives.		Allotments Officer	2 ongoing
		A rolling programme of capital funding is required to maintain/upgrade allotments will be maintained, with bids prepared for additional capital funding and opportunities for grant funding. This will funded through capital programme, increased rents or S106.		Parks & Estates Manager, Property Services	Annually prior to August
		The allotments officer will carry out a joint site inspection with the site rep annually, in April, so that analysis of the site plans is available for the Forum in May. Timings will be adjusted to optimise the benefits of the joint inspections		Allotments Officer/ Allotment Association	annual
		The allotments officer will draw up and agree a summer maintenance plan and a winter maintenance plan (see 3.4.5		Allotments Officer/	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		and 4.2.2 below).		Allotment Association	
		Improved service will require collaborative links between the internal stakeholders, e.g. Property Services, Waste Management, Finance and Parks & Open Spaces.		Allotments Officer	1
3.4.2	Ensure freedom from neglected plots.	Ensure tenants are not inconvenienced by nuisance weeds, overgrowth, rubbish, creeping or seeding weeds.		Allotments Officer	1
3.4.3	Ensure good quality facilities on site.	Cost estimate and feasibility for capital funding to establish: Good access, effective security, well maintained central pathways, adequate water supply, sufficient storage facilities and adequate site drainage.		Property Services	2
		Cost estimate and feasibility for capital funding: The changing gender and age structure of allotments demography and the need to ensure social equality means that basic on-site facilities should include toilets. There are currently no toilets on any of the allotment sites Therefore to this end the installation of compost toilets will be promoted. Complete Access Audits.		Property Services, Allotments Officer	3
3.4.4	Access and boundaries will be safe in terms of security, health and sustainability.	Access to the site should be safe, secure and not in itself a barrier against any group of users, such as people with disabilities.		Property Services, Allotments Officer	2
		Secure and well-maintained fencing/hedging ensures the security of the site and prevents access by trespassers, dogs and deer where reasonably practicable.		Property Services, Allotments	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
				Officer	
3.4.5	Efficient maintenance programme	Maintenance will include: <ul style="list-style-type: none"> written action plan for each site, formulated as a result of joint site visit with site rep; timely repairs, with monitoring response rate dedicated maintenance staff to build on experience and commitment 		Allotments Officer	1
		Clearing vacant plots within one month for re-letting (removing rubbish, retaining fruit bushes/canes, removing saplings of non-fruit trees and ornamental shrubs, strimming remainder of plot.		Allotments Officer	1
		Investigate collection of a deposit prior to occupation to ensure plots are left in good order		Parks & Estates Manager,	2
3.4.6	Action to be taken to support improved management of sites.	Re-mapping of sites/plots		GIS Team	1
		Re-marking plot numbers/boundaries		Allotments Officer	1
		Clearing derelict plots		Allotments Officer	1
		Confirmation of applicants on waiting list			1
		Checking that no tenancies have lapsed because tenants have moved away/died/given up or failed to pay their rent.		Business Support	2
3.4.7	Preventing encroachment onto allotments of trees and non-fruiting shrubs	Saplings of non-fruiting trees on the perimeter of allotment sites or elsewhere on the site will be removed before their trunks measure 3" in diameter.		Allotments Officer	2
		If saplings are not removed in time, application will be made by Parks staff for permission to remove the trees.		Allotments Officer	2

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		Non-fruiting bushes, such as ornamental shrubs, will be removed where they form a nuisance e.g. blocking pathways, causing shade or taking up disproportionate space. By the tenant or at their cost.		Allotments Officer	2
		Tenancy agreement to include a condition prohibiting the planting of non-edible ornamental shrubs			1
3.5 To promote environmental sustainability					
3.5.1	Allotments contribute to overall environmental sustainability and to health and well-being.	Allotments as 'locality', as opportunity for food production and source of health, activity and enjoyment.		Parks & Estates Manager,	2/3
		Provide opportunities for children to 'play' within allotment sites		Parks & Estates Manager,	2/3
3.5.2	Promote organic gardening.	The Council will encourage and support organic methods of growing.		All	2
		The use of organic methods to be monitored and future consideration given to voluntary or statutory designation of sites as 'organic'		Allotments Officer	2
3.5.3	Define acceptable methods of weed control.	Non-organic methods of weed control, i.e. chemicals be discouraged.		Allotments Officer	1
		Use of carpets made from inorganic materials, to be banned		Allotments Officer	1
		Guidelines will be included in the Operations Manual (see 3.3.4) and rules will be set out in the revised tenancy		Parks & Estates	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
		agreement (see 3.3.5).		Manager,	
		Guidance on acceptable methods of weed control and suppression will be developed with advice from Bath Organic Group and similar organisations.		All	2
3.5.4	Encourage on-site composting	The Council promotes on-site composting by providing advice and, from time to time, subsidised compost bins.		Allotments Officer	2
		The introduction of non-biodegradable items is discouraged; rubbish will be removed from derelict plots before they are re-let		Allotments Officer	1
		. Consider the most cost effective method of providing a service of one rubbish collection per year per site.		Parks & Estates Manager,	2
		Guidance will be given on the composting of (i) perennial weeds, (ii) annual weeds.		Allotments Officer	2
3.5.5	The Council will support the environmental sustainability of its green infrastructure by recycling leaves and other green waste	The Council will deliver leaves and woodchip to allotment sites as it is available as part of parks management operations. Distribution will be as equitably as possible between the sites as resources allow.		Allotments Officer	1
		Each site will have space for communal manure, leaves for leafmould and woodchip supplies.		Allotments Officer	1
3.5.6	Improved water conservation.	The Council will control the use of water by not allowing the use of hosepipes directly from the mains supply.		Allotments Officer	2
		Determine a standard for water provision.		Allotments	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
				Officer, Property Services	
		Support plot-based water harvesting, storage and conservation.		Allotments Officer	1
3.5.7	Ensuring soil quality	Soil quality on allotments should be equivalent to that present on good agricultural land. Soil must be free of toxic wastes and residues, and have a satisfactory depth of topsoil (250 mm). Soil testing procedures need to be based on expert advice, yet to be obtained. Actions to be determined on an individual basis.		Environmental Protection Team / Parks & Estate Manager	1
3.5.8	Hedges as boundaries.	Well-kept thorn hedges can be excellent boundaries and provide a haven for birds. Hedging is therefore considered better than other forms of fencing both for environmental sustainability and for security, but requires appropriate management on a site by site basis.		Allotments Officer	1
3.5.9	Keeping chickens and bees.	The 1950 Allotments Act allows tenants to keep chickens (but not cockerels) on their plots. The Act also allows tenants to keep bees. Hives must be situated with due consideration to other tenants and neighbours.		Allotments Officer	statement
		Produce guidance in consultation e.g. with local bee-keeping associations. Council Connect number is displayed for use in the event of a swarm.		Allotments Officer	2

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
3.5.10	Biodiversity and wildlife	Animal pests on allotments include: deer, badgers, rabbits and rats. Apart from maintaining the patency of fences/hedges, there is little that can be done to deter deer, badgers or rabbits, but good husbandry can reduce the number of rats. Produce with appropriate guidance.		Allotments Officer	2/3
		The encouragement of birds and beneficial insects helps reduce the number of insect pests, by the growing of colourful flowers, dry seed heads and some grasses.		Allotments Officer	2/3
		Encourage the use of green manures, including rye grass and clover, allowing the use of nettles and comfrey as fertilisers.		Allotments Officer	2
		Ponds contribute to biodiversity; the parameters for ponds on allotments will be defined as part of 'rules'			2
3.5.11	Encourage micro-generation experiments to assess potential.	Allotment sites may provide opportunities for solar and wind power generation, if only to power tools or irrigation pumps.		Allotments Officer	2/3
3.6 To explore methods of resourcing the supply and management of allotments					
3.6.1	Allotment budget and accounts will be open for inspection.	Make the accounts easier to understand with information set at a level to produce optimum clarity.		Parks & Estates Manager, Finance	1
		Budgeting and expenditure will be reviewed regularly by the Allotments Forum.		Parks & Estates Manager, Finance	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
3.6.2	Forward programme of investment, where possible in (i) new plots, (ii) improved infrastructure and maintenance will be maintained.	Sufficient officer resources will be allocated to ensure that there is a coherent plan with risk analysis for the expansion and improvement of allotment provision. This could be achieved by the releasing of capacity in the service.	£20k	Parks & Estates Manager,	Ongoing
3.6.3	Income will be improved by maximising occupancy rates through the use of good management and efficient administration.	<p>The higher the vacancy rate, the lower the income and the greater the resources needed for weed control, promotion and letting.</p> <p>The following list of tasks are needed to administer the service effectively and dealt with within the Procedures Manual:</p> <ul style="list-style-type: none"> ▪ Record/recall all information regarding a plot and a site ▪ Control all aspects of plot letting ▪ Conduct and control site/plot inspections ▪ Flag and produce automatically required notice letters ▪ Raise, track and acknowledge repair instructions to completion ▪ Control budget expenditure for each cost centre ▪ Identify outstanding debtors quickly ▪ Produce comprehensive management reports quickly ▪ Map plots/sites with GIS mapping links ▪ Link to corporate finance systems for invoicing ▪ Provide clear, definitive and easily accessible information ▪ Processes should be well-defined and coherent 		Parks & Estates Manager, Allotments Officer, Business Support	1

Ref.	Objective / Sub-objective	Action	Resource / Cost	Responsible Officer or Department	Timescale Year
3.6.4 Cf 3.1.5	Maximise income from developer contributions.	Ensure allotment provision is included in Section106, Community Infrastructure Levy (CIL), Green Infrastructure Strategy and any other development opportunities. Planning staff.		Parks Planning and Strategy Officer	Ongoing
3.6.5	Adequate staffing levels will be provided	Set out staffing levels for (i) management, (ii) maintenance, (iii) administrative support.		Parks & Estates Manager,	1
3.6.6	Monitoring allotment rents	A procedure will be established for reviewing allotment rents; this will include scrutiny by the Allotments Forum.		Parks & Estates Manager,	2
		Loss of potential income from vacant plots will be monitored.		Parks & Estates Manager,	2
		Causes of loss of potential income from non-payment should be identified.		Parks & Estates Manager,	
3.6.7	Explore opportunities for grant-funding outside the Council's responsibility to provision and effective maintenance.	Grant funding may be available for facilities/improvements which are outside the Council's remit but which would contribute to raising the overall quality of allotments and their enjoyment.		Allotments Association	2/3

SECTION 4 MONITORING AND REVIEW

4.1 Allotment Forum

Effective communication and consultation is an essential component of good practice; the Allotments Forum will have responsibility for effecting this, both directly by its own actions and by monitoring the Council's performance.

The Council will consult on the Terms of Reference for the Allotments Forum, which will define responsibility for monitoring performance, strategic thinking and policy formulation.

Draft Terms of Reference

Allotments Forum to meet twice a year.

It will be chaired by the Cabinet member with responsibility for the Environment.

Its members will include councillors (numbers in proportion to elected Council), officers, allotment tenant representatives and a representative from the allotment waiting list. Additional expertise may be co-opted onto the Forum.

The Forum will

- monitor and advise on allotment provision
- monitor and advise on the allotment budget and expenditure, and on future requirements for capital investment
- receive and consider management reports (analysis of plot occupancy rates, annual site reports and the complaints log, and any other reports identified as useful by the Forum)
- monitor the delivery of the Allotments Strategy and fulfilment of the Council's vision for allotments
- consider methods of monitoring customer satisfaction [other authorities conduct regular customer satisfaction surveys]
- bring to the attention of the full Council issues of concern relating to allotment provision and management
- assist in the development of policies for Green Infrastructure, Waste Management, and Climate Change mitigation.

4.2 Monitoring Data Collection

4.2.1 Tenancy data

There appears to be an absence of quantified information and physical identification of derelict plots; it is therefore important to establish the current baseline and then set a timetable of targets to reach the optimum level of tenancy (100% less a turnover/minimum vacancy figure).

Focus to increase plot occupation and reduce the waiting list:

Number/percentage of vacant plots

- Number vacant for more than 3 months, 6 months, 9 months, 1 year+
- Derelict/unworkable plots

- Number/percentage of tenanted plots
- Turnover
- Length of tenancy
- Proximity to residence
- Reason for termination of tenancy

Analysis will determine how closely the waiting list and the number of actual plots match the standard of provision in the Green Spaces Strategy.

Improved tenant satisfaction with the allotments service and the value for money it provides are likely to increase tenants' interest in devolved management.

4.2.2 Facilities/maintenance on allotment sites

Annual joint reports, with separate sections completed by the Council officer responsible for allotments and the site representative, with an agreed action plan will be prepared within one month of the annual joint site inspection (currently March/April). Each site will be rated against the minimum agreed standard and an estimate of the expenditure required to bring it up to standard. This information will be monitored by the Allotments Forum.

- Water supply
- Secure boundary fence
- Non-compostable rubbish removal
- Paths cut
- Hedges cut
- Weed control
- Overgrown trees and shrubs
- Quiet environment
- Vehicle access to site
- Access for the disabled
- On-site information board
- Access/carparking
- Freedom from theft, vandalism and graffiti (register of crime)
- Repair response time.

4.3 Overview of site management

Information from the annual site report, analysis of plot occupancy and the complaints log will be combined to give an overview of allotment management for each site.

4.4 Performance Management

Annual joint site reports and minutes of the Allotments Forum will form part of the officers' annual performance review. Review and positive feedback would be welcome.

The Allotments Strategy will be monitored annually and fully reviewed every five years. Progress against the Action Plan will be reviewed at Allotment Forum Meetings.

Appendix A

A.1 National Legislative and Policy Framework

The Small Holdings & Allotments Act 1908

This consolidated all previous allotment legislation. It placed a duty on local authorities to provide sufficient allotments according to demand.

Section 22 of the Act covers use. It defines an “allotment garden” as “not exceeding 40 poles (1,012 square metres) in extent, which is wholly or mainly cultivated by the occupier for the production of vegetable and fruit crops for consumption by himself or his family.” This precludes the use of an allotment garden for carrying out any trade or business, but provided that it is cultivated mainly for growing fruit and vegetables, other activities are not prohibited.

These include:

- The use of a plot as a leisure garden – There is no legal restraint on using part of the plot as a leisure garden for recreation or for growing flowers or crops that take longer than 12 months to mature.
- Limited sale of surplus produce – provided that the allotment is mainly cultivated for consumption by the plot holder and their family there is no legal constraint on selling surplus produce.
- Use of part of a plot for keeping livestock – permitted by section 12 of the Allotments Act (1950), but not in such a manner as to create a nuisance. The 1950 Act also allows for the construction or erection of shelters for hens and rabbits.

Section 23. This requires that authorities are duty bound to provide allotments for residents if they consider there is a demand for them.

Section 27. This provides for the temporary use of allotment land for other purposes if it cannot be let as allotments. However, if the land is subsequently required for allotment use, the authority must be able to regain possession by giving no more than 12 months notice.

Section 32. Revenue obtained from the sale or exchange of statutory allotment land must be spent on discharging debts associated with the acquisition of allotment land, acquiring new land for use as allotments, or improving the existing stock of allotments. Only the surplus may be used for other purposes.

The Allotments Act 1922

This Act covered the release of land requisitioned for allotment use during the First World War. The Act also gave some measure of security of tenure to tenants of allotment gardens and improved rights of tenants to compensation on termination. The Act has since been amended by the Local Government Act 1972. Allotment committees are no longer compulsory for urban authorities.

The Act limited allotment size to a quarter of an acre and that they should be “mainly cultivated by the occupier for the production of vegetables and fruit crops for consumption by himself or his family.” This implies that only a limited proportion of a plot may be used for growing flowers and no commercial use may be made of produce.

Continued/

(The Allotments Act 1922 continued)

The act protected tenants in terms of laying down periods of notice and requiring compensation for terminating tenancies. This act has since been amended by the Local Government Act 1972.

Any revenue obtained from the sale of land or exchange of statutory allotment land should be spent on discharging debts associated with the acquisition of allotment land, in acquiring new land for use as allotments or improving the existing stock of allotments. Only the surplus may be used for other purposes.

Allotment Act 1925

Allotments are protected by Section 8 of the Act, which requires that local authorities seek the Secretary of State's consent, via the relevant local office for disposal or appropriation to other use. Consent cannot be given unless the secretary of state is satisfied that:

- the allotment in question is not necessary and surplus to requirements
- adequate provision will be made for displaced plot holders
- the number of people on the waiting list has been effectively taken into account
- the authority has actively promoted and publicised the availability of allotment sites and has consulted the National Society of Allotment and Leisure Gardeners.

Smallholding and Allotment Act, 1926

This Act made a number of improvements to the 1925 and preceding acts.

- The provision relating to rents that may be charged for allotments was amended.
- The period of notice to quit was extended to 12 months as far as allotment gardens were concerned.
- Compensation should be payable to an allotment holder at whatever season of the year a tenancy terminates.
- Allotment holders who have allowed their allotment plot to deteriorate through neglect should be made liable to pay compensation for dilapidation and quitting.

Allotment Act 1950

This strengthened the requirements on councils to provide allotment gardens. Provisions relating to rents were also affected; it has provision for reduced payments of rent in special circumstances, which might include retired, elderly, unemployed, or disabled tenants, or tenant of long standing, or any other circumstances the authority may see fit. This Act included issues relating to notices to quit and compensation.

Occupiers' Liability Act (1957)

Places a common duty of care on anyone involved in allotment management to ensure their allotment site(s) is run in as safe and appropriate manner as possible.

Town and Country Planning Act 1971

Removed requirement made in 1925 Act for town planning authorities to consider allotment provision within town planning schemes.

Continued/

The Local Government Planning & Land Act 1980 and the Local Government & Planning (Amendment) Act 1981

Consolidated planning legislation which has further influenced the forward planning of allotments. The council must safeguard existing land used as allotments. Development proposals resulting in the loss of allotments should only be considered where:

- There is evidence of long-term insufficient demand for continued use of land as allotments
- Suitable land is made available, either by retention or relocation, to replace allotments that are in use
- Where it is necessary to develop a site for other purposes, suitable sites are made available to relocate tenants
- Any proceeds from land sale is re-invested in developing the allotment service.

Planning Policy Guidance Note (PPG) 17 (2002)

Planning Policy Guidance note (PPG) 17: Sport, Open Spaces and Recreation

Annex 3 of PPG 17 includes allotments as a specific category in the classification of open space. PPG 17 places an obligation on local authorities to undertake assessments of need for all open space classifications, combined with an audit of existing provision, incorporating both quantitative and qualitative criteria. These should feed into the establishment of local standards for provision, and the preparation of a strategy ensuring these local standards are met before any surplus land can be released. Plots that are well maintained and in full use, delivering the full range of benefits to the local community are likely to enjoy strong protection under the planning system. Development that would result in the loss of allotments should not be permitted unless replacement allotment sites are provided, and these should be of acceptable quality:

- Be comparable in terms of size, accessibility and convenience, and should not normally be more than three quarters of a mile from the centre of demand
- Have a soil quality and condition comparable or superior to that of the existing allotments
- Avoid detrimental impact on landscape character and other landscape features.

The Revised Planning Policy Guidance note (PPG) 17: Sport, Open Spaces and Recreation recommends the following criteria against which applications for consent to dispose of statutory allotments are determined. The revised criteria are that:

- The allotment in question is not necessary and is surplus to requirements.
- Consent of the secretary of state is required for the erection of any dwellings (but not sheds or greenhouses) by the council on allotment land (Land Settlement (Facilities) Act 1919).
- Adequate provision will be made for displaced plot holders, or that such provision is not necessary or is impracticable.
- The number of people on the waiting list has been taken into account.
- The authority has actively promoted and publicised the availability of allotment sites and has consulted the National Society of Allotment and Leisure Gardeners
- The implication of disposal for other relevant policies, in particular development plan policies, has been taken into account.

Assessing needs and opportunities: a companion guide to PPG17 (2002, DLTR, now CLG)

The number of allotments required in any area is a function of demand and there needs to be a demand-led methodology based on local authority records. Local Authorities should provide and rent allotments and keep a waiting list. There is likely to be a need for a population based provision standard, coupled with an accessibility standard or distance threshold. Waiting lists should not be treated as the only indicator of demand.

Planning and Compulsory Purchase Act 2004

Has considerable influence on the forward planning of allotments and are relevant to the council's Unitary Development Plan and the emerging Local Development Framework.

Planning Policy Statement (PPS) 3 (housing) (revised 2006)

Annex B explicitly excludes allotments and associated buildings from the definition of 'previously-developed' land which should be the subject of ongoing search for suitable new sites for housing

Legislation and policy overview taken from

(i) North Tyneside Allotments Strategy, 2009-2015:

http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=50980 [accessed 19.09.10]

(ii) Allotment Strategy for Canterbury District, 2010-2014

<http://www.canterbury.gov.uk/assets/outdoorleisure/adopted%20allotments%20strategy%20/allotment%20strategy.pdf> [accessed 19.09.10]

A.2 Local Policy

[Develop from

Existing: Adopted Local Policy
Community Strategy
Green Spaces Strategy

Emerging: Core Strategy (cf. climate change and mitigation)
Green Infrastructure Strategy

A.3 Recent Guidance from Department for Communities and Local Government (DCLG)

A.3.1 'Growing in the Community'

[a major part of this relates to different forms of self-management]

A.3.2 'A Place to Grow'

Further increased demand for allotments compelled DCLG to produce guidance on the more efficient use of land for allotments, in particular:

Managing the existing allotment portfolio

(a) Non-cultivation

- Having a publicly-available management plan which deals with non-cultivation (a) assists existing tenants and (b) reduces the concern of allotment applicants that existing plots are being wasted.
- Weed control: removal of weed seed-heads before the seed had set; control of pernicious weeds such as couch-grass and bind-weed; removal of long grass or detritus likely to harbour slugs and snails; keeping paths trimmed and free of hazards.
- The establishment of standards for productive cultivation of plots¹ and the provision of advice to new tenants on the amount of work required
- Record kept of the quality of the plot before it is let to new tenants, to ensure expectations of cultivation of reasonable²
- New tenancies should be monitored frequently to detect problems in working the plot at an early stage and to enable the provision of adequate advice.
- Tenants failing to cultivate their plot should be offered the opportunity to reduce its size or to relinquish a plot temporarily until they have more time.³

(b) Waiting lists

- The guidance suggests that waiting list data be kept up-to-date by an annual verification that applicants contact details are current and that they have a continued interest in obtaining a plot.
- Accurate waiting list data enables more efficient management through regular analysis
- Applicants on the waiting list should be kept informed of their position on the list and the amount of time they are likely to have to wait for a plot to become available.
- Covert exchange of tenancies or assumed inheritance of an informally shared plots deflects from the equitable allocation of plots to applicants who are at the top of the waiting list.
- Allotment authorities should minimise the length of time plots are left untended, by establishing efficient procedures.

(c) Working with Allotment Associations

¹ The guidance notes that, in the past, these have often not been made explicit in tenancy agreements and that local authorities' should recognise their responsibility for this.

² The notes suggest that digital cameras are used to keep a record of plot cultivation

³ In those circumstances, the former tenant would 'jump' the waiting list when they are ready to take on a plot again.

- The guide advocates devolution of management responsibilities to Allotment Associations wherever they have the capacity and enthusiasm to accept them. What is the AA view on this?
- LAs should develop a co-operative approach with allotment associations. A system of periodic joint reviews is recommended, to allow development of good practice and sharing of information.
- Good practice for managing waiting lists requires (i) adequate data, and (ii) support to ensure a common standard of service.
- It is important for LAs to reach agreement with allotment associations in respect of cultivation standards, plot sizes, management of waiting lists and other aspects of good practice.

Provision of new allotment sites

(d) Legislation

There is a body of legislation covering allotment provision and management, but the key legislation on provision remains the 1908 Small Holdings and Allotments Act (section 23). Having determined that there is a demand (from six or more local taxpayers or electors), the LA must be able to demonstrate that it has a strategy in place to meet that demand.

(e) Allotments and Green Space Strategies

The guidance “strongly advocates” that LAs prepare allotment strategies, which will guide the development of the allotments service, but also form part of the broader strategic policy for green spaces.

Calculating the need for new allotment sites should be based on a ratio of plots per household, with the size of a standard plot is defined. However, demand for differently sized plots allow for flexible use of green space, including shared space e.g. communal gardens, or shared use of space, e.g. allotment sites adjacent to other recreational space.

The design of new sites should take sound environmental practices and sensitivity to visual impact into account. Design should include: palisade fencing with hedging to encourage biodiversity, vehicle access for manure deliveries and access for ploholders with restricted mobility; the provision of piped water via water tanks, of a sufficient number to meet the needs of gardeners with physical impairment.

As well as the specification of maintenance and cultivation standards (see (a) above), allotment strategies should include policies on composting and waste disposal, greenhouse, shed and polytunnel design and size. Specified areas for organic gardening should be encouraged.

‘Meanwhile’ gardening

The provision of alternative opportunities to grow fruit and vegetables can (a) help allotment plot applicants to gain experience in growing, (b) alleviate temporary demand, and (c) provide opportunities for communal gardening. The guidance makes clear that LAs should not regard such alternative opportunities as a substitute for addressing allotment provision.

Alternative opportunities include the temporary use of other land, e.g. intended for cemeteries, for allotments; small areas of land too small for permanent allotment sites, or land intended for development - using raised beds where the soil might be contaminated.

**APPENDIX B
EXISTING ALLOTMENT PROVISION**

Location maps

Site maps [NB currently out-of-date]

Aerial photos [Google]

Description

List of facilities

Staffing (Structure, management, operatives, administrative staff WTEs)

Budget

[Other Authorities have carried out 'site audits' as part of the strategy]

Current tenancy agreement

APPENDIX C PARTNERS AND STAKEHOLDERS

External:

B&NES Allotments Association
Bath Organic Group
Somerset Housing
Transition Bath
Allotments Regeneration Initiative
National membership organisations (e.g. NSALG, SWCAA)

Internal:

Other council departments, e.g. Property Services, Environment and Sustainability Policy, Legal Services, Planning Policy.

Community:

B&NES Council is the authority responsible for allotment provision within Bath city (town and parish councils have responsibility for the rest of the B&NES administrative district). Stakeholders within the community include any six individuals (cf. 1908 Act), residents' associations, community groups, local ward councillors