WEST BRISTOL CLIMATE ACTION

31 January 2024

Atten. BCC officers Lerraine Smith, Richard Fletcher, Becky Belfin; Cllrs. Ellie King, Kye Dudd, Katy Grant, Heather Mack, David Wilcox, James Crawford, Guy Poultney.
Cc'd to Avon Wildlife Trust Chief Executive Ian Barrett; Secretary, Avon Organic Group; Pete Dawson; Nikki Jones; Nicky Hodges; Judy Furber.

I write on behalf of West Bristol Climate Action (WBCA)[1] – a local voluntary group inspiring environmental action around west Bristol – to contribute to the current Allotments Consultation.

We at WBCA broadly support Avon Wildlife Trust's (AWT) response[2] to the current Bristol City Council (BCC) proposed changes to Bristol Allotment Tenancy Agreements.

We appreciate that allotments are rightly focused on food production, but absolutely refute the implication in the consultation documents that supporting biodiversity is in conflict with this aim.

Like AWT, we view Bristol's allotments – rich and diverse in nature and wildlife – as key to tackling our climate and ecological emergencies. Certainly AWT's work to plant more trees, promote biodiversity, protect wildlife habitats and support local food production, all contribute to the healthy and sustainable city that WBCA aspires to help create.

BCC talks of protecting wildlife habitats, supporting wildlife corridors and promoting biodiversity, but many of its self-contradictory draft allotment rules will make it impossible for tenants to maintain and improve crucial biodiversity and biomass on these vital green areas.

Our view is that the consultation was poorly conceived, is internally inconsistent in its rules – some of which will adversely impact many plot tenants – and has allowed insufficient time over the winter holiday season for a genuine consultation process, even with the final date extension.

Taking account of the weight and content of adverse criticism it has provoked, we believe it should be withdrawn, put through a thorough consultation process with the many expert local contributors, experienced stakeholders and community groups keen to be involved, and redrafted.

Why does 'consultation' apparently mean 'spend months devising a policy and then give those impacted only a few weeks to respond in a dysfunctionally constrained timescale and format'?

Why, for instance, was input from volunteer authors of the *Tenants Handbook* [3] – an impressive work that took two years and huge amounts of experience to compile – not sought in the preparation of this draft consultation?

And with food production a priority, why was Bristol Food Network involved only on the wider Food Growing & Allotments Strategy document? We're told they were disappointed and frustrated not to have been involved in the allotment fees/rules piece before it was released.

And why was the carefully compiled, expert submission of ecologist Pete Dawson rejected on receipt by the Allotments Office, despite his being well-known to many Bristol City Councillors and others involved in this process? Hopefully his re-submission via the consultation form was successful and is being given due consideration.

In BCC's very long, detailed and internally contradictory draft proposal, so many rules jar with the experience, expectation and comfort of allotmenteers that their shocked and appalled reaction – and the ensuing passionately negative campaign – surely cannot have surprised officers…? Perhaps use of a 'crowd wisdom' AI tool, such as pol-is [4], could help reach positive consensus.

Hopefully an appropriate reassessment and redrafting could enable a more positive and productive relationship between BCC Allotments Office and its plot tenants than the dire outcome threatened by what has been described as these 'draconian' new rules.

WBCA is also very worried about the negative effects both of some of BCC's hugely increased rents and of extra charges – such as for water use – especially on low-income tenants and community food-growing projects, which will be severely negatively impacted by costs incurred.

WBCA's specific concerns include the forced removal of flowering and berry-bearing trees, native hedging and some areas of carefully nurtured wildflower habitats – plus restrictions on the size and depth of wildlife ponds – unnecessarily damaging the rich biodiversity and biomass of Bristol allotments.

For instance, vital wildlife ponds are to be constrained, as in para 6.1, and: '*must not exceed 1x1 metres max 50cm depth…The edges of the pond must be sloping, clearly visibly marked and the liner must be made of strong flexible rubber. Plastic liners, bathtubs and the like are not permitted.'* Unrealistic constraints like this, detrimentally impacting the habitat of newts and frogs that manage slug numbers – plus a charge for permission to install a pond – make a nonsense of the permaculture principles we're encouraged to follow.

How can you possibly expect site reps to 'police' and attempt to enforce such proposed rules?

Since lengthy waiting lists are an oft-quoted justification for some of these changes, WBCA also questions the accuracy of current waiting list numbers, and would press for an urgent and effective review to establish how many of the listed names are of people who:

- currently want a plot;
- understand and accept the commitments of allotment growing; and
- are unduplicated on several site waiting lists.

1. WBCA has several current and ongoing green-space wildflower (and fruit-tree) planting projects in the wider city area: https://docs.google.com/document/d/1GJ_AMPXsdRyruIU-e5w9VBxjLqqDA_wv6k2q1icGvok/edit
2. See: https://www.avonwildlifetrust.org.uk/blog/george-cook/changes-bristol-allotment-tenancy-agreements
3. See: https://www.bristol.gov.uk/residents/museums-parks-sports-and-culture/allotments-and-gardens/guide-to-using-your-allotment
4. See: https://www.crowdwisdomproject.org/polis-as-digital-democracy-tool/

Thank you for your attention,
Pippa Vine,

Committee Member, West Bristol Climate Action,
[Downend Road Allotments site rep]