



2/09/14

Dear BHCC Planning team

### **Re Urban Fringe Assessment**

The Brighton & Hove Allotment Federation (BHAF) is run by allotment holders to promote allotments in Brighton & Hove and to represent the plot holders interests.

The Brighton & Hove Food Partnership (BHFP) is a membership organisation open to anyone who lives or works in the city who supports work to achieve a health, sustainable, fair food system. BHFP has 4500 members.

We are providing this joint response because members of both organisations have expressed serious concerns about the recommendations related to allotments in the recently published Urban Fringe Assessment undertaken as part of the City Plan process.

Additionally both organisations are champions of two city strategies that have relevance – Spade to Spoon: Digging Deeper: a food strategy and action plan and the Brighton & Hove Allotment Strategy.

Aim 9 of the food strategy includes the action to:

Ensure the City Plan supports a sustainable food systems planning approach, recognises the need for land for food growing (especially on the urban fringe), space for food infrastructure and the importance of urban design that encourages healthy behaviour.

And the Allotment Strategy commits Brighton & Hove City Council to working co-operatively with plot holders on the way the service is run and on decisions that impact plot holders.

Within the Urban Fringe Assessment there are two allotment sites identified as potential for development:

Craven Vale

Mile Oak

The first point is that we are disappointed that the report suggests that allotment sites can be 'moved' as a mitigation measure. Moving an allotment isn't like moving a park bench people invest huge amounts of time and resource over many years into improving site fertility and planting fruit trees and perennials which take years to establish and can't just be shifted to somewhere new. Allotmenters have an emotional and social connection with their plot and the community on site. As the research with 800+ plot holders that underpins the allotment strategy so powerfully demonstrated allotments are an important component in mental and physical wellbeing for the city (full documentation at [www.bhaf.org.uk](http://www.bhaf.org.uk)). If sites were moved there would be questions asked about the quality of any moved plots in terms of soil, aspect, facilities and accessibility. In both cases we question the suitability of the land identified as suitable for allotments in the mitigation options.

In the case of the Craven Vale allotments the document states that

*"an inevitable net loss of allotments on site 31 could be mitigated by expanding the allotments westwards on to the lower slopes of 31b to the west."*

However, the idea of using this area for allotments was rejected in a widely-publicised consultation on the future of Whitehawk Hill two years ago (consultation was led by the Ranger service). One clear reason being that it is designated 'open access land' under the CROW Act (countryside and rights of way act) of 2000. Compensatory allotments on the proposed replacement site would have to be unfenced with members of the public free to wander at will across people's plots. This area is extremely well-used by the public – for dog walking, picnicking and enjoying the spectacular views across the Bay of Sussex to the Isle of Wight.

If the land is further west still (there is no mark on the map on 31b so it isn't possible to know exactly where the proposed move would be to) this then takes us to Craven Wood. This is steeply sloping and was dominated by dense, out-of-control sycamore poles until a few years ago when the 'Friends of Craven Wood' was formed. The group has done some excellent woodland management work taking out the unwanted sycamores, planting native species woodland trees & fruit trees, creating a rustic outdoor gym from felled wood. Some rare woodland butterflies are now found there due to their work. The area is managed by them under the supervision of ranger Paul Gorrington and is being designated a local wildlife site.

With regards to the Mile Oak site it is hard to understand from the study how the various constraints and mitigations would be taken into consideration (so it is hard to be as specific as with Craven Vale) although we understand that a MasterPlan for the site would need to be produced to answer these questions. If this is the case we would appreciate information on the Master Planning process.

The publication of this document without any additional communication from the Council about what this means has caused considerable alarm amongst plot holders who perceive this document as being a green light to build on these sites. Whilst we recognise the importance of having a City Plan and are keen to get one agreed the technicalities of the planning process isn't something that most plot holders understand and we would welcome a statement from the Council about the next steps that we can share with members. We know that if the timescales for consultation and processes for decision making aren't communicated that people start to assume things are happening behind closed doors – even if nothing actually is.

We would also ask that both the Food Partnership and Allotment Federation are involved at an early stage in any formal consultation so that we can offer advice on how best to reach the maximum number of affected people.

We would be happy to publish via the Allotment Federation and Food Partnership any response to this letter as part of work to communicate with stakeholders about the urban fringe assessment.

Thank you for your time

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and  
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