Housing, Neighbourhoods and Leisure Committee



06 July 2023

Title	Allotments – Consultation - Fees & Charges Review		
Purpose of the report	To make a decision		
Report status	Public report		
Report author	Graeme Rasdall-Lawes, Neighbourhood Services Manager		
Lead Councillor	Karen Rowland, Environmental Services & Community Safety		
Corporate priority	Healthy Environment		
Recommendations	That Members note the proposed rationale for increasing allotment rents and reducing related discounts. That Members approve the Allotment Rent & Discounts		
	Consultation Plan to commence in August 2023. 3. A further report will be brought back to a future HNL Committee for approval on the new proposed Allotment Rent & Discount structure following the consultation exercise being completed. This is required to give plot holders 12 months written notice of the new rent/discount structure to be implemented.		

1. Executive Summary

1.1. To update Members of the Committee of progress on the Allotment Rent Review, seek approval to consult on changes to Allotment discounts and rent.

2. Policy Context

- 2.1. This proposal is written in context with the Council's Medium Term Financial Strategy, to permit delivery of a balanced and affordable budget that ensures the Council's finances are sustainable over the medium and longer term. The Strategy is informed by the Council's Vision: "to ensure that Reading realises its potential and that everyone who lives and works in Reading can share in the benefits of its success", as well as its Corporate Plan themes:
 - Healthy Environment
 - Thriving Communities
 - Inclusive Economy.
- 2.2. The provision of allotments is a statutory service. Under Section 23 of the Small Holdings and Allotments Act 1908, a Council has a statutory duty to provide sufficient allotments, to be let to residents who want to cultivate, and harvest produce from them.
- 2.3. The Council continues to meet its duty and to support social, health and environmental benefits of allotments through the provision of allotment sites.
- 2.4. The Council's Corporate Plan 2022–2025 'Investing in Reading's Future' sets out the Council's priorities, which include promoting healthy lifestyles, as well as good education, leisure, and cultural opportunities for people in Reading.

2.5. In view of the declared climate emergency and against the backdrop of a cost-of-living crisis, the provision and use of allotments remains important to those residents who use them and needs to be supported as a cost-effective, local, sustainable food source.

3. The Proposal

3.1. Current Position

- 3.1.1 The Council owns and manages 20 allotment sites, currently with 1,413 worked plots across 41.5 ha of land. Half are Statutory sites and thus have some protection under the Allotments Act 1925. 'Temporary' sites have no security beyond planning system requirements.
- 3.1.2 Allotment rental income for the calendar year 2023 is projected to be £39,500. The annual cost of providing services in a normal year is approximately £85,000.
- 3.1.3 Rents vary by site depending on whether a water supply is present. Rental income is also variable depending on whether the tenant receives one of the two available discounts offered. These discounts are either General or Concessionary available to tenants with a "Your Reading Passport" (YRP) as detailed in 3.2.1.

Table 1 below sets out the current Rent Matrix for plots of 125sqm.

		General YRP Discount	Concessionary YRP
Site Category	Full Fee	– 10%	Discount – 84%
Α	£40.50/year	£36.50/year	£6.48/year
Water supply	•	_	•
across site	£0.78/week	£0.70/week	£0.12/week
В	£30.00/year	£27.50/year	£5.00/year
Partial water	•		•
supply on site	£0.58/week	£0.53/week	£0.10/week
С	£20.50/year	£18.00/year	£3.50/year
No water supply	£0.39/week	£0.35week	£0.07/week
Tenants on full fee or discount	904	170	339
Total No. of Tenants		1,413	

- 3.1.4 Plot sizes were reviewed in 2017, the mean size of newly let plots has been reduced from 180sqm to 125sqm.
- 3.1.5 Since August 2020, the service has sought tenant's opinion on potential rent and discount changes through the August 2020 Allotment Consultation and ongoing work on the Allotment Self-Management Project whilst calculating what changes would meet service needs without causing major hardship to low-income tenants.
- 3.1.6 A key aim of the Allotment Self-Management Project was to reduce service running costs. Examples of improved service efficiency arising from uptake of self-management ideas were set out in the HNL report of January 2023.
- 3.1.7 Site Liaison Representatives on sites where whole-site improvements have been carried out report that they feel tenants will now be amenable to rent increases because they have witnessed the Council's renewed commitment to allotments.

3.2 DISCOUNTS

- 3.2.1 There are two levels of discount, based on the Your Reading Passport (YRP), that plot tenants can claim. The discounts are General or Concessionary categories:
 - General Discount (10%). Tenants can claim the 10% discount by virtue of residency in the Borough being a YRP holder.
 - Concessionary Discount (74%). In addition to the General discount, YRP holders who are aged 60+, on low income or with a disability can claim also claim for this additional discount giving them a total discount of 84%.

It is not possible to analyse YRP data to see how many of these relate to either age, disability, or low-income criteria.

Of the Council's 1,413 current allotment tenants, 509 (36%) claim one of the two discounts.

- 3.2.2 The aims of reviewing allotment discounts are as follows:
 - To continue to use Discounts to support tenants in financial hardship.
 - To simplify the Rent Matrix. Removal of the 10% General Discount will cut three lines from the Rent Matrix and simplify the application and billing processes.
 - To standardise the number of Discount levels with other Council Discount schemes, which only offer a single level of discount.
 - To align Discount levels with national averages.
 - To contribute to the Council Medium Term Financial Strategy.
- 3.2.3 The Association for Public Service Excellence "State of the Market" Report 2022 states that 56% of allotment providers offer some form of discount. There was a 10% fall in providers offering any discounts over the previous period. 40% of all providers offer discounts for pensioners, over 60's and/or retired people, 32% for unemployed or low-income households, 21% for people with disabilities, and 18% for students. The national average discount offered is 40-50%.
- 3.2.4 In relation to the "State of the Market" report, the Council's current Concessionary Discount rate of 84% is generous. Tenants on Concessionary Discounts currently pay between £3.50 and £6.50 rent per year for a 125sqm plot. These rent levels are lower than the cost of allotment administration (postage, billing, processing enquiries and complaints) for plots subject to discount.
- 3.2.5 All tenants who are Reading residents can claim the 10% General Discount. Tenants who are not Reading Borough residents pay full charge because they cannot qualify for YRP.
- 3.2.6 The General Discount adds three lines to the Rent Matrix. It also means that the service offers more levels of Discounts than other Council services. It is therefore proposed to remove the 10% General Discount all together to bring in line with other Council services and also to simplify the rent matrix for easier understanding.
- 3.2.7 There is no statutory duty to consult on changes to rent/discount levels but there is a duty to give tenants 12 months written notice of changes. Case law suggests that it is for the Local Authority, and nobody else, to decide on rent/discount levels, but states that Councils should "listen to representations made by or on behalf of its allotment tenants" (Harwood v Borough of Reigate and Banstead 1981).
- 3.2.8 The Council will not only "listen to representations made by or on behalf of its allotment tenants" but will use the stakeholder feedback to inform the final design of the fee and discount structure for future HNL Committee consideration and approval.
- 3.2.9 The Rent Review Consultation followed the same successful method of the 2020 Allotment Consultation. Site Liaison Representatives and volunteers who were not in place in 2020 enhanced the reach of consultation.

3.2.10 The following four options were considered:

	General Discount	Concessionary Discount	Assumed Rent Increase per Year
Option 1 No Change	10%	84%	4%
Option 2	10%	40%	4%
Option 3	Withdrawn 0%	40%	20% (2024) 4% (2025)
Option 4 2017 Proposal	0%	84%	100% (2024) 4% (2025)

- 3.2.11 The changes in rent levels and the change in total annual rent income by Option are set out in table below. Options 1 and 4 are not considered, only included for comparison:
 - Option 1 Does not raise rent income enough to improve the service.
 - Option 4 Results in Full Charge tenants paying rents at a level unacceptably higher than the national average. The retention of the 84% Concessionary Discount rate does not reflect the national picture and the increases in this model raise only minimal funds for service improvement.

OPTION 1. BUSINESS AS USUAL.

- Keep 10% YRP General discount.
- Keep 84% Concessionary discount.
- Assume 4% Rent increase/year

PROS.

Simplicity as no change.

Discounts continue to protect low-income households.

CONS.

Below inflationary rent increase when set against increased service running costs equates to a reduction in budget that negatively affects service quality and the ability to support the drive toward self-management. Does not address the present subsidy level of allotments. Will not fund service improvements, including reactive and planned site maintenance, tenancy management issues or the cost and efficiency of administrative functions, the most pressing being a new allotment data management system.

- Rents remain below benchmarked average.
- Discounts remain considerably above national average.
- 2025 annual rent income is £4,000 higher than in 2023

The effect of this increase on the highest and most discounted rates is set out below. Full Charge tenant on a Cat. A site pays:

- £40.50/year for a 125 sqm plot. (£0.78p/week) in 2023.
- They would pay £43.80/year, (£0.84/week) in 2025 after receiving 12 months' notice.

Concessionary Discount tenant on a Cat. C site pays:

- £3.50/year for a 125 sqm plot. (£0.07/week).
- In 2025 they would pay £3.80 /year (£0.07/week).

OPTION 2. REDUCE CONCESSIONARY DISCOUNT TO NATIONAL AVERAGE.

Keep 10% YRP General discount

- Reduce YRP Concessionary discount from 84% to 40%.
- 4% Rent increase/year

PROS.

Simple administrative change to Concessionary Discount.
Low-income tenants still receive Concession

CONS.

Below inflationary rent increase only partially addresses current subsidy level and will not fund service improvements, the most pressing being a new allotment data management system.

Low-income tenants will see their rents treble, costing them extra annual rent of between £9 and £19.

Rents remain below benchmarked average.

Discounts match national average.

2025 annual rent income is £11,000 higher than in 2023

The effect of this increase on the highest and most discounted rates is set out below. Full Charge tenant on a Cat. A site pays:

- £40.50/year for a 125 sqm plot. (£0.78/week) in 2023.
- They would pay £43.80/year, (£0.84/week) in 2025.

Concessionary Discount tenant on a Cat. C site pays:

- £3.50/year for a 125 sqm plot. (£0.07/week).
- In 2025 they would pay £13.30/year (£0.19/week).

Note that those on Concessionary Discount would experience rent increases of around 300% though the increases differ according to Site Category.

Those on Category A sites would need to pay an extra £0.39/week for a 125 sqm plot in 2025, and for a Category C site, they would need to pay an extra £0.19/week.

OPTION 3. REDUCE CONCESSIONARY DISCOUNT & INCREASE RENT BY 20% IN 2024 AND 4% IN 2025

- Scrap 10% YRP General discount.
- YRP Concessionary discount reduced to 40%.
- 20% rent increase 2024. Assume 4% increase in 2025

PROS.

Low-income tenants receive a Concession that aligns with national benchmark.

Increase in annual rent income from 2025 reduces current subsidy level.. Reduces number of lines in rent matrix by 30%

Would fund a new allotment data management system that officers believe will generate further efficiency savings and allow the service to apply discounts at application stage. CONS. All tenants' rents increase by 25%, but low-income tenants will see their rents more that treble, costing them extra annual rent of between £12 and £24. This may dissuade lower-income households from retaining or applying for plots.

Increase in rent income contributes toward savings target, but too little for significant service improvements.

Rents reach projected 2025 benchmarked average.

Discounts match national average.

2025 annual rent income would be £18,000 higher than in 2023

The effect of this increase on the highest and most discounted rates is set out below. Full Charge tenant on a Cat. A site pays:

- £40.50/year for a 125 sqm plot. (£0.78/week) in 2023.
- They would pay £50.50/year, (£0.90/week) in 2025.

Concessionary Discount tenant on a Cat. C site pays:

- £3.50/year for a 125 sqm plot. (£0.07/week).
- In 2025 they would pay £15.40/year (£0.23/week).

Note that those on Concessionary Discount would experience rent increases of between 339% and 386% as rates differ according to Site Category.

Those on Category A sites would need to pay an extra £0.46/week for a 125 sqm plot in 2025, and for a Category C site, they would need to pay an extra £0.23/week.

OPTION 4. THE 2017 Allotment Review PROPOSAL

- Scrap 10% YRP General discount.
- Keep 84% YRP Concessionary discount.
- 100% rent increase 2024. Assumed 4% increase in 2025.

PROS.

Retaining the 84% Concessionary
Discount protects low-income tenants,
though they would pay between 6 and 13
pence per week more than currently.
Reduces present subsidy level. Allowing
for service improvements, most
importantly a new allotment data
management system.

All tenants whether paying Full Charge or Concessionary rate experience the same percentage rent increase.

CONS. 100% increase in rents across the board takes the average Full Charge rent significantly above the benchmarked average rent.

Tenants paying Full Charge continue to 'subsidise' low-income tenants' rents with Concessionary

low-income tenants' rents with Concessionary Discount being more than double the national average.

All tenants' rents increase by 25%, but low-income tenants will see their rents more that treble, costing them extra annual rent of between £12 and £24. Increase in rent income contributes toward reducing the present subsidy of allotments, but too little for significant service improvements.

Rental income for one Concessionary tenant is covers 15 minutes of officer time in a year.

2025 annual rent income would be £18,000 higher than in 2023

The effect of this increase on the highest and most discounted rates is set out below. Full Charge tenant on a Cat. A site pays:

- £40.50/year for a 125 sgm plot. (£0.78p/week) in 2023.
- They would pay £84.20/year, (£1.62/week) in 2025.

Concessionary Discount tenant on a Cat. C site pays:

- £3.50/year for a 125 sqm plot. (£0.07/week).
- In 2025 they would pay £6.80/year. (£0.13/week)
- 3.2.12 Options 2 and 3 are 'preferred' because they "take into account all relevant circumstances in a broad common-sense way" per the principles of Harwood v Borough of Reigate and Banstead 1981. To 'come to a right and fair conclusion" about future rent/discount levels, the Council will consult tenants on the preferred options and give appropriate weight to stakeholder feedback.
- 3.2.13 A further report will be brought back to a future HNL committee to seek approval for tenants to be given 12 months written notice of the decision of the consultation outcomes. Greater awareness of the decision will be broadcast via Site Liaison Representatives and their social media outlets, signage on allotment gates, and posting the decision of the Council's website.

3.3 RENT LEVELS

- 3.3.1 It is now proposed that Rent Review will be subject to tenant consultation from July to August 2023, put before HNL Committee in November for approval and then subject to the 12-month written notice period before being applied from April 1st, 2025. All consultation documents will be finalised following input from the Lead Member for Environmental and Community Safety and the Council's communication team.
- 3.3.2 For calendar year 2023, allotment fees were increased by 4% in line with the annual DEGNS Fees and Charges Schedule for 2023/24. The Rent Review originally planned in 2022 for implementation in 2023 was postponed a year to reduce financial hardship during a period of high inflation, the cost-of-living crisis. However, the service can no longer afford to postpone a 'significant' (above inflation rate) rent rise without reducing the quality of service and compromising the progress being made under the Self-Management Project.
- 3.3.3 BENCHMARKING. In calculating reasonable rent for allotments, landlords are recommended to benchmark rates against other providers. Rent levels for 2021/22 have been assessed at sites managed by Local Authorities in the Southeast, Parish and Town Councils in Berkshire, and private providers within Reading Borough. The exercise found a mean rent level charged for standard (non-discounted) plots in 2021/22 to be £8.60 per 25 sqm, £0.40 higher than charged by Reading Borough Council in 2022. The landlords studied were:

Managing Authority	Avg. Cost for 25 square metre per year
Reading Borough Council	£8.20
Slough, Windsor & Maidenhead, Basingstoke, Guildford, London Councils, Milton Keyes, & Southampton Councils.	£9.00
Parish & Town Councils in Berkshire	£7.50
Tilehurst Poor Lands (private charity-run site within Reading Borough)	£12.00
Roots Allotments	£138.00*

*For reference only and not included in benchmarking exercise, Roots Allotments charge £138.60 per 25 sqm. Roots Allotments are a new business that offers a more expansive service than traditional allotment providers. They have sites in Bath and Bristol, are planning a new site in Wokingham and have expressed interest in setting up a site in Reading.

- 3.3.4 The Association of Public Service Excellence (APSE) reports than in 2022, two-thirds of allotment providers were continuing to or plan to increase rents. Based on benchmarking, and considering service needs, it is not proposed to set new rents higher than the current benchmark average or the expected 2024/25 benchmark level.
- 3.3.5 The principles of Harwood v Borough of Reigate and Banstead 1981 as follows apply when considering changes to rent levels.

The Local Authority should:

- a) listen to representations made by or on behalf of its allotment tenants.
- b) consider all relevant circumstances in a broad common-sense way.
- c) give such weight as it thought fit to various factors in the situation; and

d) come to a right and fair conclusion.

In advance of the consultation (a - above), the following factors and circumstances (b and c - above) are being taken into consideration.

- 3.3.6 Whether an increase is 'significant' would be subject to consideration under section 10 of the Allotments Act 1950 and the Consumer Rights Act 2015. s10 Allotments Act 1950 states that allotments shall be let at such rent as a tenant may reasonably be expected to pay.
 - Increasing rents above the inflation rate is considered "significant". However, this must be viewed in the context of their current below market position.
 - Current rents are below the local benchmark rents.
 - Current allotment rents are considerably lower than or comparable to other recreation/leisure activities.
- 3.3.7 Mitigating the negative impact of rent increases on the least able to pay.
 - The current 84% Concessionary Discount is double the national average discount.
 Retaining this discount but at a reduced level affords financial relief to those on lowest incomes.
- 3.3.8 Timing of agreed rent increases in terms of the required notice period and the current cost of living crisis.
 - To implement the new rent levels in April 2025, the decision to increase rents will be taken after consultation and must be taken before April 2024.
- 3.3.9 Setting the service on a robust financial footing and contributing to service savings needed, especially when combined with efficiency derived from self-management.
 - Rent income is normally 46% of service running costs. Given the massive increase in site works and service improvements, rent income is currently just 29% of service running costs. Increasing rent income and generating savings through selfmanagement will help to the service return to an acceptable level of subsidy.
 - The average cost of running an allotment service across the country was £96,000/year in 2022 (APSE 2022).
 - Two thirds of Local Authorities implement charges which cover most of the cost of allotment maintenance.
 - The Council does not cover site maintenance costs (a minimum of £45,000 per year but costs have increased to £85,000 in the last two years due to all the delivered site improvement works carried out).
 - The service is faced with a choice of reducing service running costs or increasing income levels. Reducing costs would lead to a deterioration of plots and sites that would increase maintenance costs in the long term, and would undermine the Self-Management drive, as stated by Site reps and tenant bodies.
 - There has been a general deterioration of many allotment sites through underinvestment, with current site conditions also reflecting a lack of allotment supervisor for many years which has been steadily addressed since the 2002 consultation. Outdated and inefficient allotment data systems have resulted in tenant concerns not being responded to in a timely manner which led to customer dissatisfaction and an increase in complaints about service.
 - Further investment is required to maintain an acceptable standard level. Increased
 income generation through rent increases would provide the Council the finance to
 make delivering the service more efficient and help to reduce the need for further
 significant rent increase for years to come.
 - The rate of increase in rents falls is historically lower than the increase in service costs, in effect leading to a reduction in budget. This in part explains the deterioration of the service in the last decade. There is a need to reset rent levels so that the level

that the income/running costs/subsidy level that do not cause any further reduction in service offer.

- 3.3.10 Valuation of Allotments to decide what tenants would be expected to pay. Use of 'agricultural rent' as a comparison.
 - The Council values allotment sites at £0.
 - DEFRA value "Informal General Cropping" agricultural rent across England at £80 per 125 sqm. Note that DEFRA values are based on large land areas without the maintenance costs of allotment sites.
 - MHCLG values "Agricultural land in the Southeast at £312 per 125 sqm and residential land at £60,000 per 125 sqm.
- 3.3.11 Benchmarking against rent levels at other sites.
 - Current rents are below local benchmark average (see 4.3.4 below)
 - Investigation of other providers' consultation feedback suggests that plot holders, when presented with a need for significant rent increases, have stated they would accept a given increase if it is not followed with another the next year. It is good practice to commit to a low rent increase in the year (or two) after a significant rent increase is introduced. The Council is therefore proposing that in Year 2, rent increases are fixed at no higher than RPI level or 4%, whichever is the highest.
- 3.3.12 Considering the level to which the Council subsidises the service and comparing that level to other subsidised Council services.
 - The APSE 'State of the Market report 2022' found that two-thirds of providers continue to subsidise allotment services from other budgets. *Harwood v Borough of Reigate and Banstead* (1982) held that Local Authorities did not have to subsidise the provision of allotments.
 - Reading's allotments are heavily subsidised with annual allotment income of £39,000 and normal running costs of £85,000. Costs have been higher from 2021 till now because of the recruitment of the Project Officer and because of waste costs arising from the programme of whole-site overhauls. Rent increase, uptake of self-management and proposals to reduce waste disposal costs will all combine to shrink the subsidy gap but will not result in a cost-neutral service.
 - There are few other comparable subsidised Council services. Allotments offer a mix of leisure/hobby/well-being/exercise/community plus produce. Some may view allotments to produce better quality and cheaper produce than the shops, though only the most dedicated plot holder with the best ground that remains free from pests, diseases and bad weather will save significant sums by growing their own. The overall running cost of a 'properly cultivated' plot can include tools, seeds, plants, fuel, crop protection, fertiliser, and travel. These generally exceed the average rent paid for a plot.
- 3.3.13 Reinvestment of increased rent income in allotment infrastructure and support for Allotment Societies as part of the Allotment Self-Management Project aims.
 - Tenants have been explicit that their further contribution towards self-management are wholly dependent on the Council bringing sites up to standard and making ongoing commitment towards the future maintenance and upkeep of the Council's allotment sites.

3.4 STAKEHOLDER CONSULTATION

- 3.4.1 The consultation will follow the same plan as the highly successful Allotment Self-Management Consultation of Autumn 2020 with the following changes, but seek opinion on options for rental rates.
 - The 2020 consultation took 13 weeks to set-up, run, and collate. It had been the first time the service had carried out such a comprehensive consultation and required significant groundwork to set up. Furthermore, the officer devoted significant time to developing good rapport with tenants and sites who were not used to having their opinion sought. It required efforts to overcome cynicism and scepticism. This consultation does not need the same time preparing the ground because productive relationships have developed out of that consultation and through the ongoing Allotment Project.
 - Council to tenant and on-site communication is much improved since 2020 with the
 emergence of Site Liaison Representatives (SLRs), Allotment Societies/Committees
 and their own social media. SLRs and Societies/Committees are more engaged than
 before and are appraised of the rationale for changes to rents and discounts. They
 are also highly effective at disseminating information and gathering feedback from
 their own stakeholders.
 - The coverage of on-site meetings in 2020 by the Project Officer cannot be replicated as the officer was full-time in 2020 and is now on a 2-day per week contract. A single site visit will be arranged for each site, instead of two or three as per 2020.
 - In 2020, equal weight was given to each response, be it from an individual tenant or
 from a site's collective response. This year, more weight will be given to whole-site
 responses. This will enhance collective working of each sites' community and it
 reflects the Council's recognition of those sites that are taking more responsibility for
 their own community development.

3.4.2 The consultation plan is as follows:

6 th July 2023	HNL Committee approval of proposals.
July 2023	Start 6-week consultation phase.
August 2023	Consultation ends. Analysis and weighing up commences.
September 2023	Outcomes and proposals for final preferred rent/discount model are collated.
November 2023	Further update report brought back to HNL advising of consultation outcome and recommending rents and discount to be applied from 1st April 2025
1st April 2024	The Council gives all tenants 12 months written notice of changes to rent and discounts.
1 st April 2025	New rents and discounts can be implemented.

3.4.3 Information about all four Rent options will be presented to stakeholders (current tenants and those on waiting lists), but that consultation material makes it clear that options 1 and 4 have been considered and rejected. Consultation material will provide the rationale and pros and cons (to plot holders and to the service in the context of wider Council financial considerations) so that stakeholders can make informed choices.

4. Contribution to Strategic Aims

4.1. Reading Borough Council's vision is:

To help Reading realise its potential – and to ensure that everyone who lives and works here can share the benefits of its success.

4.2. The Council's new Corporate Plan has established three themes for the years 2022/25. These themes are:

Creating a healthy environment.

 Allotments provide residents with an opportunity to produce food locally and to reduce food miles. Access to nature in urban settings contributes to improved mental and physical health and a healthy lifestyle.

Creating thriving communities

 Allotment gardening offers benefits to all residents, that help to improve the lack of social capital embodied by loneliness and enables citizens to contribute to society, especially beyond retirement as part of like-minded communities with a shared goal and shared achievements.

Creating an inclusive economy.

- Allotment gardening offers informal learning opportunities for users of all ages.
- Allotment grown produce can be sold and offers a cheap source of healthy food to residents.

5. Environmental and Climate Implications

5.1. The Council has made commitments relating to climate change and the UK Government declared a Climate Change emergency in 2019. As a result, a high-level assessment has been undertaken on the switch from Council management to self-management of statutory allotments on carbon emissions.

Energy Use – No known impacts.

Waste Generation – Residents will be encouraged to compost more arisings and dispose of non-compostable items themselves. Management groups will check materials brought onto site which will reduce the frequency of fly-tipping. These factors will result in less waste being generated and removed form sites by the Council. Calculating site waste tonnage and potential pro-rata Waste Levies will continue through 2023. However, as tenants take responsibility to dispose of their own waste, it is likely tenant trips to recycling centres may increase.

Transport – As maintenance is gradually taken over by tenant's self-management groups this will result in fewer journeys to allotments for Council vehicles.

It has also been assessed whether the decision will improve resilience to climate change impacts.

- Heatwaves No known impacts
- Drought No known impacts
- Flooding No known impacts
- High Winds/Storms No known impacts
- Disruption to Supply Chains No known impacts

The overall rating assigned to this decision is a low positive one.

6. Community Engagement

- 6.1. The foundation for this report and direction of the Allotment Plans is the 2020 Allotment Consultation Report and is updated through ongoing dialogue with existing and emerging allotment committees and societies.
- 6.2. The foundation for this report and direction of the Allotment Plans is the 2020 Allotment Consultation Report and is updated through ongoing dialogue with existing and emerging allotment committees and societies.

- 6.3. Ongoing feedback is gathered through service requests, site meetings and discussions with Site Liaison Representatives (in person, phone and through the SLR e-mail group).
- 6.4. Site Liaison Representatives have reported that Council input to date has helped them develop more on-site collaborative approaches and goodwill towards the service. They also convey their gratitude for the Project and for what the Council has achieved given resource constraints.
- 6.5. Site Liaison Representatives, Committees and elected Allotment Societies are growing in confidence and now offer suggestions and solutions to problems and are more willing to develop and trial their own policies and approaches.
- 6.6. Though the overhaul of the Allotment webpage is delayed, it will be operational before January 2024 and will become another conduit for two-way engagement through a suggestions section and through direction to on-line consultation material.

7. Equality Implications

- 7.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
 - eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.2. The Council has reviewed the scope of the project as outlined within this report and considers that the proposals have no direct impact on any groups with protected characteristics.

8. Other Relevant Considerations

8.1. None.

9. Legal Implications

9.1. Rights and responsibilities relating to allotments provision are defined in the Small Holdings and Allotments Act 1908.

10. Financial Implications

10.1 Where available, bids will be made for funding in to make improvements to infrastructure are identified in this report.

11. Timetable for Implementation

11.1. Detailed in 3.4.2.

12. Background Papers

12.1. There are none.

Appendices – delete if there are none

- 1. Appendix A Allotment Action Plan 2022
- 2. Appendix B Allotment Self-Management Plan and Case Studies