



London Food Link's Response to the Consultation on the London Plan

January 2010

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1. About London Food Link

London Food Link (LFL) runs a network of organisations and individuals who want to make London's food system more sustainable. Membership includes farmers, food writers, caterers and community food projects. The specific aims of LFL are to increase the availability of sustainable food in London, tackle the barriers preventing access to healthy and sustainable food for Londoners and to protect and celebrate London's diverse food culture. LFL is part of Sustain: The alliance for better food and farming. This response is submitted following a consultation with colleagues and members of the London Food Link and represents the general, rather than detailed views of members of that network. LFL has already submitted:

- an initial response to the London Plan
- a response to the London Assembly's Planning and Housing Committee reviews of commercial growing around London,
- and a paper on the role of neighbourhood shops.

These can be found on our website at http://www.sustainweb.org/localactionfood/food_and_planning/

2. Planning and food

In a city of over six million people it is remarkable how little attention is paid to one of the few activities that all Londoners do every day - eat. Spatial planning affects whether, and if so, where we can grow our own food, where food is available for us to buy and also the type of retail outlet that sells us our food. These factors, in turn, affect what we eat, how we eat it and our long-term physical and mental well-being.

The Commission on Social Determinants of Health (WHO) recognises that our environments must be better designed to encourage healthy eating¹. London Food Link believes that if sustainable and healthy food was better integrated into the planning system it could:

- a) **support jobs in the food sector**, especially in small and medium-sized enterprises (SMEs) by encouraging enterprises such as markets, and commercial food production in London and in the Green Belt. Employment initiatives may need to be combined with crime reduction policies (to protect businesses in deprived communities), and training in a range of food skills, including on health and sustainability, in order to achieve maximum benefits.
- b) **improve access to food for deprived communities** by ensuring sufficient diversity of food retail outlets across London, and within easy walking distance of communities. Diversity would include scale (small to large), ethnicity, and affordability.
- c) **ensure green spaces** in and around the capital are being used. This could increase the amount of food being grown and distributed in London by, for example, allotments, community growing spaces and a range of other under-utilised public and private space.
- d) **reduce greenhouse gas (GHG) emissions, and increase food security**. Food produced locally and in season, using sustainable growing methods such as organic, can reduce GHG emissions and reduce our reliance on “just-in-time” and oil-dependent supply chains.

Thus London Food Link believes food needs to be incorporated more centrally into the London Plan and also into London’s housing, and economic development strategies. We propose that the London Plan includes the following four food policies and practices:

- Encourage and protect diverse food retail outlets across London, within neighbourhood centres or within easy walking distance of communities. Support appropriate projects to encourage healthy, affordable food retailing and to help address diet-related ill health and health inequalities.
- Promoting and protecting non-commercial growing spaces, including allotments, in London for health and community benefit;
- Protecting the Green Belt and the best and most versatile agricultural land around London and promoting commercial agriculture in and around London;
- Developing sustainable food policies and practices in response to the challenge of climate change.

London Food Link’s more detailed response is below and follows the structure of the London Plan consultation.

3. Food access in London (*corresponds to Chapter 3 of the draft replacement plan; “London’s People”*)

The Mayor has a duty to promote social improvement and to reduce health inequalities between people living in London. It is acknowledged by the GLA that not all Londoners are able to obtain healthy and affordable food².

Food access is a complex problem influenced by many factors and research has shown that accessibility to a healthy diet may be influenced by the socio-economic status of the person, by the location of shops, whether the food is affordable and good quality, and personal choice.

¹ Closing the gap in a generation: Health equity through action on the social determinants of health, World Health Organization, 2008

http://www.who.int/social_determinants/thecommission/finalreport/closethegap_how/en/index1.html

² The London Health Inequalities Strategy; Draft for Public Consultation (August 2009), Greater London Authority <http://www.london.gov.uk/mayor/priorities/health/docs/health-inequalities-strategy-draft-consult.pdf>

The general consensus is that poorer people are less likely to eat as well as richer people³, people on lower incomes might end up paying more than the better-off for healthier food⁴ and that in deprived areas there is more likely to be diet-related ill-health.

Neighbourhood shops and diverse food retail can help promote not only healthier eating, but healthier places to live in so should be promoted and encouraged by planning policy for the following reasons:

- Food retail outlets in neighbourhood shopping centres are an important access point for many Londoners, especially the elderly, socially isolated, and people who find it difficult to use transport to go out of their area for shopping.
- Neighbourhood shops can offer price competition, opportunities for alternative supply chains and a greater variety of food for people who cook with a wider cultural range of food.
- Local shops may be more practical for Londoners who live on their own and find it difficult to carry large amounts of shopping in one shopping trip.
- In some areas neighbourhood shops are the most realistic way of buying food as there are no supermarkets nearby.

London's population is expected to rise and, according to the revised London Plan, 50,000 new houses are projected to be built. There is also likely to be a higher proportion of elderly people in the population, and malnutrition and diet-related ill-health is an important factor in their healthcare. It is essential that local authorities have the framework and tools to take action on food access issues that could worsen in the coming years. For example, an emerging problem across London is the over-abundance of fast food takeaways. The low-cost, hot food that is sold at these outlets is eaten by many Londoners, particularly men and young people and will have a significant impact on their health in years to come. Local Authorities are exploring ways that they can limit these outlets for public health and environmental benefits, but they also face pressures to give licences to these businesses because of their important economic benefits (most are small to medium enterprises, run by BAME owners). The London plan should provide Local Authorities with stronger guidance on these issues.

London Food Link believes that the London Plan should include the following points to support local authorities' work to improve food access:

- a) Policy to protect a **diversity of food retailers** to meet the needs of local residents. This means that local authorities will need to examine the types of food retailers and their size and potential impact on other shops, look at licensing issues for street markets and explore rent/rates subsidies for community food initiatives such as food co-ops.
- b) Support for appropriate **projects that improve London's food retail** offer to reflect cultural diversity and contribute to the health and well being of Londoners' This may include support for street markets, initiatives that encourage retailers to offer healthier options.
- c) **Food mapping**, both to assess the extent "food deserts" and to engage local communities in deciding what action needs to be taken, with council departments and the local NHS to tackle diet-related health inequalities.

³ The London Health Inequalities Strategy; Draft for Public Consultation (August 2009), Greater London Authority <http://www.london.gov.uk/mayor/priorities/health/docs/health-inequalities-strategy-draft-consult.pdf>

⁴ "Inequalities in food and nutrition challenging "lifestyles"" (Dowler, Caraher, and Lincoln) in Challenging Health Inequalities: from Acheson to Choosing Health (Dowler & Spencer) (2007), Policy Press http://books.google.com/books?id=IpangCPsvoAC&pg=PA127&lpg=PA127&dq=liz+dowler+et+al+2001&source=bl&ots=Bob9EwKOV_&sig=u9yWrPBjtZSe_uflx2UrYyfSjAQ&hl=en&ei=ZUbwSqHOLomNjAeI9fi7CA&sa=X&oi=book_result&ct=result&resnum=1&ved=0CAoQ6AEwAA#v=onepage&q=&f=false

- d) **Support personal and community food growing opportunities in London.** We welcome the text supporting community food growing (7.22) and believe that this could lead to healthier diets⁵ as well as have a wide range of other positive social, health, community, environmental and financial benefits⁶.

4. Food and the economy (corresponds to Chapter 4 of the draft replacement Plan; “London’s Economy”)

Food contributes substantially to London’s economy and, as noted above and in the revised plan, is one of the fastest growing sectors of London’s economy. We have seen whole areas of London regenerated through food (e.g. China Town and Brick Lane) and believe that the London Plan needs to encourage this in more areas by supporting commercial growing in London (see section 5 below) and giving local authorities the support to introduce measures to encourage local food businesses such as:

- rate relief,
- encouraging street markets and local food markets such as farmers markets,
- allowing vacant premises to be used for retailers or community food projects such as food co-ops,
- allocating temporary parking spaces for low-carbon delivery vehicles,
- increasing the number of public transport routes,
- and providing more public toilets.

5. London’s living places and spaces (corresponds to Chapter 7 of the draft replacement plan “London’s Living Places and Spaces”)

Commercial Food Growing (Heading 7.22 of the London Plan Consultation)

London Food Link is concerned that the text in the proposed London Plan has been significantly weakened and could result in more potential farmland around London being lost. The current text (Policy 3D.18) mentions the following:

- a) Supporting a thriving agricultural sector.
- b) Policies in Development Plan Documents should provide for the protection of the best and most versatile agricultural land in accordance with national guidance.
- c) Support appropriate projects for farm diversification and other measures to meet the needs of farming and rural business development.
- d) Presumption against inappropriate development in the green belt.
- e) Recognises the importance of the currently declining farming industry in managing and maintaining an attractive landscape, protecting and enhancing wildlife habitat, natural resources and historic features, providing opportunities for recreation and education, contributing to a sustainable source of food, improving air, soil and water quality and promoting sustainable urban development.
- f) Land management schemes and environmental improvements should be promoted.

⁵ Low Income diet and nutrition survey, Volume 3. (2009) On behalf of the Food Standards Agency
<http://www.food.gov.uk/multimedia/pdfs/lidnsvol03.pdf>

⁶ A Lot to Lose: London’s Disappearing Allotments (2006). Environment Committee, The London Assembly
<http://www.london.gov.uk/assembly/reports/environment.jsp>

The proposed text is as follows;

The Mayor will seek to encourage and support thriving farming and land-based sectors in London, particularly in the Green Belt.

Clearly the tone and content of the guidance for the London Plan on commercial agriculture around London has changed. Andrew Barry-Purcell, was questioned by Suzanne Natelson (London Food Link Project Officer) at the London Plan Consultation event on Monday 7th December 2009 at City Hall and stated that there was no intention for the text to be weaker.

We are not reassured and remain concerned that if the text is unchanged:

- local authorities will come under increasing pressure to encroach on Green Belt land;
- insufficient protection will be available to preserve the best and most versatile agricultural land;
- Green Belt land will be used for other (non-agricultural) uses including land banking;
- important opportunities will be lost to support commercial agriculture around London and help to localise food systems and mitigate climate change. Local authorities can provide an ideal entry point for new entrants into farming and play an important role in maintaining the extent of food production in London.

We propose that the current text in 3D.18 be put back into the London Plan.

London Food Link supports the text on community and non-commercial food growing in 7.55 and hopes it will give local authorities the necessary support for encouraging and designating space for community and personal food growing.

30th June 2009

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Appendix A: Food in London

The following summarises the impact of food on a variety of social, environmental and economic factors.

Climate change: Between 20-30% of UK greenhouse gas emissions result from our food system. In London, food creates 19 million tonnes of greenhouse gas emissions per year – more than from all of London’s transport, or all of London’s houses⁷.

Health: Diet-related illnesses cost the NHS £7.7 billion per year.⁸ In London, 23% of women and 18% of men are obese and a further third are classified as overweight⁹.

Community well-being: A thriving local food system, including markets, food-growing and celebrations can contribute to community cohesion and overcome isolation.

Employment: In London the food and drink sector employs nearly 500,000 people and is the capital’s second largest and fastest growing manufacturing sector. Some 80% of food manufacturing businesses employ fewer than 20 people, and around 25% of all London businesses sell food¹⁰.

Waste: It is estimated that we throw away a third of the food we buy: London’s food waste represents 6.3 million tonnes of greenhouse gases¹¹.

⁷ London’s Food Sector: Greenhouse Gas Emissions: A report for the Greater London Authority. (2008)
<http://www.sustainweb.org/pdf/food-emissions.rtf>

⁸ Food Statistics Pocketbook 2008 Defra 2008
<https://statistics.defra.gov.uk/esg/publications/pocketstats/foodpocketstats/FoodPocketbook2008.pdf>

⁹ Healthy and Sustainable Food for London: The Mayor’s Food Strategy (May 2006)
<http://www.london.gov.uk/mayor/health/food/docs/food-strategy.pdf>

¹⁰ Healthy and Sustainable Food for London: The Mayor’s Food Strategy (May 2006)
<http://www.london.gov.uk/mayor/health/food/docs/food-strategy.pdf>

¹¹ London’s Food Sector: Greenhouse Gas Emissions. A report for the Greater London Authority. (2008)
<http://www.sustainweb.org/pdf/food-emissions.rtf>

Appendix B: Images of some community food initiatives in London



A food co-op on Kidbrooke Housing Estate in Greenwich outside closed down shops. *For more information on food access projects in Greenwich contact Greenwich Co-operative Development Agency at <http://www.greenwich-cda.org.uk/>*



Cranbrook Community Food Garden in Tower Hamlets¹²
For more information on community growing sites in London go to Capital Growth Project website www.capitalgrowth.org



A view of Canary Wharf from Humber Road Allotments in Greenwich¹³

¹² Photograph by Dillon Toyne

¹³ Photograph by Pamela Troni (2009)