

## **Sustain response to the National Institute for Clinical Excellence (NICE) 'Spatial planning and health consultation'**

### **GENERAL**

Sustain: The alliance for better food and farming advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the living and working environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level (listed on our website [www.sustainweb.org](http://www.sustainweb.org)). This response is submitted following a consultation with colleagues and members of our recently established Local Action on Food network <http://www.sustainweb.org/localactiononfood/><sup>1</sup> and represents the general, rather than detailed views of members of that network.

We warmly welcome this NICE consultation and the expected guidance on spatial planning and health for local authorities and Primary Care Trusts (PCTs) that NICE is developing. We see this as a good opportunity to tackle some very important but often unrecognised factors in planning that affect human health and well-being. Although it is clear that planning affects human health in many areas including transportation, housing and access to green spaces, it is less often noted that the impact of planning on the food and farming system can also be significant. This response will focus solely on food, farming and planning because this is our area of expertise.

Planning affects the food system not only in how land for farming is, or is not protected, but also how food is bought and then disposed of. The Commission on Social Determinants of Health (WHO) recognises that our environments must be better designed to encourage healthy eating<sup>2</sup>. Sustain has also published various reports on planning and food (see below) and some of our key areas of work have been around food access and the importance of ensuring that a variety of food outlets are not only accessible to everyone, but also that a good range of fresh and affordable food is sold in these outlets.

### **Food Access**

*“The existence of thriving local convenience shopping is important, especially for less mobile people and those on low incomes for whom ready access to the components of a good diet are essential to support good health”.*<sup>3</sup>

Studies continue to confirm that people who eat plenty of fruit and vegetables and wholegrain foods, with moderate amounts of fish, lean meat and dairy foods are more likely to enjoy good health, and less likely to suffer from conditions such as cardiovascular disease, diabetes and certain cancers. The area where people live affects the type and affordability of food available and therefore consumed. In many areas of the country, especially economically deprived areas, there are few or no shops selling a good range of fresh and affordable foods – these are sometimes called food deserts. Large food retailers often prefer larger and more profitable sites, usually on the edge of towns and cities, which favours those who have access to cars, and with enough income to afford either private or public transport. However, local and regional planning also directly affects food availability in both rural and urban areas by protecting – or failing to protect – a diverse range of food retailing outlets within easy

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<sup>1</sup> Local Action on Food is a network run by Sustain and brings together a wide range of locally-based organisations and individuals working to improve the food system.

<sup>2</sup> 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](http://www.who.int/social_determinants/thecommission/finalreport/closethegap_how/en/index1.html)

<sup>3</sup> The London Plan, Spatial Development Strategy for Greater London, GLA (2004)

reach of population centres. For this reason Sustain has proposed<sup>4</sup> that local authorities and PCTs should work together to, for example:

- encourage street markets, especially for ethnically diverse populations and those in deprived areas
- contribute to crime reduction initiatives to ensure that smaller retailers, especially those providing good food and other health-promoting services to communities, are able to thrive in areas where there are high rates of anti-social behaviour.

#### **4.3.1**

Sustain welcomes an integrated approach, joining health and environmental expertise to manage food, and this approach extends to planning. We agree that both environmental and health factors need to be considered in planning assessments and that access to healthy food should be included in these assessments. Moreover Sustain promotes regular and participatory methods of collecting data in local areas with on food, health and related facilities such as shops and transport.

#### **Community mapping**

Sustain has had very positive experiences of engaging diverse communities in the process of assessing local assets and limitations, and developing proposals for ways to improve access to good food in local areas<sup>5</sup>. Without these processes of engagement there is a danger that important community issues will be overlooked and inappropriate plans not only developed, but implemented. Although engagement, through processes like community mapping, offer no guarantee of problem-free planning, they make it much more likely that developments will be both appropriate and accepted by the community, thereby contributing to well-being.

#### **Influencing planning frameworks and implementation**

Health, including access to healthy and sustainable food, should be enshrined in the Local Development Frameworks (LDFs) each local authority is obliged to develop, and appropriate funding and procedures need to be in place to ensure that this policy is implemented.

Some London boroughs already have integrated food into their LDF stipulating, for example, that food retailing is a service to the community and therefore people in the borough must have access to outlets selling fresh produce (this distinction is important, to promote genuinely healthy food, not more fast food outlets) within reasonable walking distance. Other boroughs have used their planning system not only to protect certain kinds of food outlets, but also to restrict other types. Waltham Forest Council, for example, has recently used their LDF to prevent new fast-food restaurants from opening within a radius of 400m from schools, recognising the influence of high and easy availability of 'junk' foods on young people's diets<sup>6</sup>.

Camden PCT recently responded to a consultation on the Local Development Framework in the London Borough of Camden recommending that people (especially those on low incomes) should have more opportunity to grow their own food in allotments, market gardens, private gardens, small-holdings and city farms, and space should be allocated and protected for growing as well as encouraging a diversity of retail outlets including farmers' and street markets<sup>7</sup>.

Other London boroughs are also showing interest in related issues. For example, the London Borough of Enfield is exploring promotion of land for individuals, families and smallholders to engage in larger-scale production, supported by local authority land use policies and provision of horticulture

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<sup>4</sup> How London's planners can improve access to healthy and affordable food. (Sustain 2004)

<http://www.sustainweb.org/publications/>

<sup>5</sup> Reaching the Parts; Community Mapping: working together to tackle social exclusion and food poverty (Sustain 2000) and Hunger from the Inside: the experience of food poverty in the UK (Sustain 2002)

<http://www.sustainweb.org/publications/>

<sup>6</sup> Council bans takeaways near schools, 8th December 2008

[http://www.thisislocalondon.co.uk/news/topstories/3958991.WALTHAM\\_FOREST\\_Council\\_bans\\_takeaways\\_near\\_schools/](http://www.thisislocalondon.co.uk/news/topstories/3958991.WALTHAM_FOREST_Council_bans_takeaways_near_schools/)

<sup>7</sup> Good Food for Camden: The healthy and sustainable food strategy. Draft for consultation, December 2008

<http://www.camden.gov.uk/ccm/navigation/council-and-democracy/having-your-say/consultations/>

training.<sup>8</sup> At a commercial scale, local authorities can make a significant contribution to improving access to local and sustainably produced food, and to improving prospects for farmers, by protecting farm land and promoting its appropriate use – for example through the County Farm scheme and protection of Green Belt land for farming. Unfortunately, across the UK, local authorities take a very piecemeal and inconsistent approach to such important land use issues. A review of UK County Farm policies across the UK, undertaken by Suffolk County Council in 2000, found that some local authorities are protecting and promoting County Farms – especially to encourage new entrants into farming – whilst others are busy selling off this precious national resource.<sup>9</sup>

#### 4.3.1

Some examples of food projects from England, Scotland, Ireland and Wales can be found in the report “SRBs to PCTs: Understanding local structures and area-based initiatives to tackle food poverty”<sup>10</sup>

#### 4.3.2

##### **Evidence and Precaution: The right balance**

Evidence contributes to policy making, but evidence showing cause and effect can be very difficult to collect. This is particularly the case when trying to assess the impact of environmental and social factors on health where it is rarely possible to control, in scientifically valid ways, for the “confounding variables” affecting real communities, not living in experimentally controlled conditions. “Softer” evidence can be collected (see Community mapping above) but is rarely conclusive. In the absence of “hard” evidence Sustain encourages local authorities and PCTs to be open to taking a precautionary approach to policy making. The precautionary principle is enshrined in European Law and states that if an action or policy might cause severe or irreversible harm to the public or to the environment, in the absence of a scientific consensus that harm would not ensue, the burden of proof falls on those who would advocate taking the action.<sup>11</sup>

An example of how this approach might affect food, health and planning would be assessing whether to accept an application to build a major new supermarket in a town centre. There is evidence, but it is not conclusive, that such a development is likely to have the following long term effects:

- closure of small shops in the area
- subsequent loss of employment, both directly and indirectly
- loss of choice of retail outlets, possibly leading to price rises (due to lack of local competition)
- environmental damage due to increased road transport (of both goods and people)
- reduction in health and well-being, due to unemployment and environmental damage.

Taking the precautionary approach would probably mean refusing the application, and this has been done by some local authorities. Suffolk Coastal District Council took a precautionary approach in their decision to refuse planning permission for a supermarket outside the market town of Saxmundham because they felt it was not needed. This was based on research commissioned by the council and later fed into the local development plan. Evidence was also provided by a community group who had undertaken some food mapping and they repeated the food mapping eight years after the planning decision was made. The evidence showed that local food businesses had flourished and increased in number and had also resulted in stronger links between local residents, increased support for vulnerable people in the community and cheaper fresh foods<sup>12</sup>.

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<sup>8</sup> Personal correspondence with local authority representatives and Sustain, May 2009

<sup>9</sup> Suffolk County Council, Consultation Feedback: tenant farmers, county councils and other organisations, 2000 – commissioned by the Strategic Management and Social Services Departments

<sup>10</sup> SRBs to PCTs: Understanding local structures and area-based initiatives to tackle food poverty (Sustain, 2002) <http://www.sustainweb.org/publications/>

<sup>11</sup> Raffensperger C. & J. Tickner (eds.) (1999) Protecting Public Health and the Environment: Implementing the Precautionary Principle. Island Press, Washington, DC

<sup>12</sup> The Real Choice: How local foods can survive the supermarket onslaught. A Report by Caroline Cranbrook and the Campaign to Protect Rural England (2006) <http://www.cpre.org.uk/library/results/local-foods>