sustain
the alliance for better food and farming

Draft London Plan: Sustain's response

Sustain is the alliance for better food and farming. We represent over 100 food and farming organisations both in London and nationally. Together, we advocate food and agriculture policies and practices that enhance health, improve the working and living environment, enrich society and promote equity.

This is Sustain's response to the Draft London Plan 2026. It has been submitted via the online portal with this document provided for more detail on our justifications and recommendations.

Sustain's position

The Draft London Plan 2026 is being consulted on at a time when London faces intense pressure to deliver housing, inclusive economic growth, improved public health and climate resilience. Sustain supports a plan-led approach to these challenges, but we are concerned that the Draft Plan weakens the strategic treatment of food growing, healthy food environments and community food resilience compared with the current London Plan. It is also not fully consistent with the NPPF because it removes or substantially weakens policy support for food growing, urban agriculture and local food production previously contained in Policy G8 of the London Plan 2021.

This is dangerously short sighted, given that the risks facing our food system are growing. Climate change is driving more extreme weather events. Geopolitical instability is seriously impacting food prices and imports, as well as availability of farm inputs that in turn affect crop yields. National assessments have highlighted the growing likelihood of severe ecosystem disruption depleting food production and food security – nationally and globally. In this context, we find much of the draft London Plan risks failing the tests of being effective, justified and positively prepared due to it's lack of consideration of London's food needs.

Our main concerns about the Draft London Plan:

- Food in all its contexts; infrastructure for distribution and storage, local retail and food markets, food growing and farming, receive little consideration in this plan.
- The G8 policy around food growing in the current plan has been dropped. So has E9 which means less visible strategic protection for food access, market diversity and healthy retail.

- Biodiversity and nature recovery have a greater focus in this new plan but in the absence of any mention of food production
- Green belt protections at risk of being weakened to make way for housing developments
- Restrictions on hot food takeaways have been diluted in relation to references only to town centres not all environments, and removing explicit references to existing concentration of takeaways near schools.

Sustain's planning framework treats a healthy and sustainable food environment as a connected system: food production; local processing, storage, wholesale and distribution; markets and healthy retail; management of hot food takeaways and other potentially harmful concentrations; suitable kitchens, food storage and dining space; drinking water and outdoor eating in the public realm; advertising; and circular infrastructure for surplus food and organic waste. These elements determine whether Londoners can access, prepare and eat healthy, affordable and culturally appropriate food.

The Draft Plan disperses these matters across broader design, economy, infrastructure, waste and place policies and does not provide an equivalent single strategic policy to the current Plan's E9 on retail, markets and hot food takeaways. This makes the policies identified in this response important consultation hooks, but they need explicit food-system wording, clear delivery requirements and consistent implementation across London.

Our headline ask is for the final London Plan to restore a coherent strategic approach to food. In the context of upcoming and well-documented threats to food security, spatial planning in London must factor in the essential infrastructure and land use that will enable community food response and a diversified supply chain. It should reinstate a clear commitment to food growing at least equivalent to current Policy G8 and strengthen policies that build a local and resilient food economy: protecting peri-urban farmland, existing growing spaces, markets and independent healthy food retail; providing affordable land and premises for growers, processors, caterers and community food enterprises; and safeguarding the infrastructure needed for local processing, wholesale, storage, refrigeration, distribution, community kitchens, food hubs and emergency food provision. Food growing and food-system assets should be planned as core green, social, economic, health and resilience infrastructure, not optional additionality.

Our response by section

Section 2. Making best use of land and achieving Good Growth

We support efficient use of land, but Good Growth must deliver healthy, inclusive and climate-resilient places. Section 2 should protect and provide accessible green space

and embed food growing, edible planting, healthy food access and community food infrastructure as core elements of high-quality design.

There is a soundness issue as the Plan is no longer fully reflecting NPPF objectives around healthy communities, food-growing opportunities, access to healthier food and sustainable land use.

Draft London Plan policy/section	**Comments/suggestions**	**Justification**
MBUL6 High Quality design	Require major developments to demonstrate how their design supports access to healthy food. Homes, workplaces and community facilities should provide adequate kitchen, food-storage and dining space. Developers should also be required to create green space within new developments.	The London Assembly's 2025 report *London: A Growing City?* highlights that more than half of London households live in flats, often with limited access to private gardens. Capital Growth's written evidence to the Assembly documents hundreds of active community gardens and substantial volunteer, trainee and employment activity. High-quality design should enable healthy and sustainable food practices in everyday life. This is a food-resilience requirement as well as a design standard: the UK Food Security Report 2024 treats household food security as depending on people's ability and agency to access the food needed for a healthy diet; Healthwatch 2025 found that limited cooking facilities can force families towards costlier takeaways and contribute to skipped meals or unbalanced diets.

MBUL8: Inclusive design	Require inclusive-design assessments and health impact assessments to test access to healthy food throughout the development. Homes and shared facilities should provide accessible kitchens, storage and dining areas; communal growing spaces should include step-free routes, raised beds and usable water points where appropriate; and management arrangements should support meaningful resident participation. Major public-realm schemes should also provide free, readily accessible drinking water.	Inclusive design should consider whether all Londoners can obtain, carry, store, prepare and eat healthy food. The London Assembly's 2025 report *London: A Growing City?* shows the importance of shared growing provision for households without private gardens. A synthesis of 24 school-gardening interventions found benefits for experiential learning, fruit and vegetable consumption, wellbeing and family engagement, particularly when programmes were sustained over time. A 2024 umbrella review also found overall positive effects of gardening and horticultural therapy on mental wellbeing, quality of life and general health, supporting inclusive access to growing spaces.
MBUL9: healthy streets and public realm	The Policy risks failing the test of being effective as it doesn't explicitly recognise the role of healthy food access as a vital aspect of healthy streets and the public realm. The policy should recognise that markets, edible landscapes, free drinking water and welcoming places to sit and eat can improve health, social connection and local food resilience, while poorly planned food-service concentrations, deliveries and waste can	UNECE's 2025 report *The Edible City: Why Food Trees Matter* identifies urban fruit and nut trees as multifunctional nature-based solutions that can strengthen food security, provide shade, support wildlife and create opportunities for education and community participation. Forest Research confirms that urban trees provide cooling, rainfall interception, infiltration and habitat connectivity. Sustain's *Food Resilient London* research

	undermine public health and town-centre quality. **Policy recommendation:** Require major public-realm schemes to provide free drinking water, inclusive places for outdoor eating and space for street, covered and farmers' markets where local need is demonstrated. Encourage edible landscaping, including fruit and nut trees, orchards, food forests and community growing, where it can be safely maintained, as an intrinsic aspect of inclusive design. Healthy-streets assessments should also consider access to affordable healthy food and the cumulative effects of takeaways, delivery-only kitchens, servicing, odour, waste and traffic, alongside positive support for healthier independent food businesses. Require public realm schemes to consider Food Resilient London platform data in planning the addition of or change in use of settings identified as critical food infrastructure in a major emergency event, or assess any existing Borough disaster food preparedness plans for priorities around the public realm built environment.	further identifies shorter supply chains, community-led settings and local distribution infrastructure as critical to effective community food responses during disruption.

Section 3: Delivering homes and neighbourhoods

We support delivering the homes London needs through a robust brownfield-first approach that fully assesses and optimises urban capacity before Green Belt release. New housing should also provide practical, inclusive space for residents to store, prepare and eat healthy food, with well-designed communal green space and opportunities for food growing wherever feasible.

Draft London Plan policy/section	**Comments/suggestions**	**Justification**
HN1 Increasing London's housing stock	Policy HN1 risks failing the tests of being justified, effective and consistent with national policy unless it introduces an enforceable brownfield first mechanism requiring the GLA and boroughs demonstrate that all reasonable sources of urban capacity have been fully assessed and optimised before Green Belt release is relied upon, in accordance with NPPF 2026 policies PM8, PM9, PM14, GB3 and GB4.	While the Plan's brownfield-first ambition is welcomed, the policy contains no effective safeguard preventing Green Belt sites from progressing before identified urban capacity has been exhausted. This concern is heightened by the reliance on the Strategic Housing Land Availability Assessment (SHLAA) 2026, which acknowledges that substantial potential brownfield capacity remains outside publicly identified sites.
HN8 Housing design C (5)	The reference to food growing in HN8 is welcome, but the wording "where appropriate" is too weak. In high-density housing, shared green space is often the main opportunity for residents to access nature, grow food and build social connection. Amend HN8 C(5) to read: "provide opportunities for food	The London Assembly has highlighted that more than half of London households now live in flats, often with limited access to private gardens, making well-designed communal growing space especially important. Sustain's previous evidence to the Assembly also identified hundreds of active community gardens in

	growing, edible planting and community-led productive landscapes wherever feasible, with appropriate design, access, maintenance and stewardship arrangements." Sustain also recommends that HN8 and supporting guidance require developers to demonstrate how communal food-growing spaces will be practically usable over time. This should include adequate growing space, sunlight, soil depth, drainage, water access, storage, composting, tool storage, accessible routes, child-friendly and inclusive design, and a management and maintenance plan developed with residents and local food-growing partners before handover. The Plan should also recognise that good housing design includes adequate space to store, prepare, cook and eat healthy food at home, alongside shared community kitchens and dining spaces where appropriate. Current Government guidance on emergency preparedness recommends that residents stock at least three days' worth of food. Facilities enabling supporting one's food needs, or accessing support close to home if they cannot, are especially important for residents in smaller homes, temporary accommodation,	London and significant volunteer, trainee and employment activity linked to them. This supports a stronger requirement for food growing in housing design, rather than optional provision. **London: A Growing City?** — London Assembly Environment Committee, 2025 states more than half of London households live in flats, often with limited access to private gardens: **Local Food Growing — written evidence** for London Assembly Environment Committee, 2025. This contains Capital Growth's submitted evidence as **LFG002**: **Local Food Growing in London — background report**, 16 October 2024. Paragraph 3.1 records the figures for active community gardens, paid workers, volunteers and trainees: **The Food Resilient London Report**, Sustain, 2026 outlines food access disruption as a result of an emergency or crisis as a significant threat for the London population, with adequate facilities and food infrastructure as part of the city's approach to resilience and preparedness.

	student housing and other settings where food storage and cooking facilities may be constrained.	

Section 4. Growing London's economy in a way that benefits all

London's food economy is essential to inclusive growth and resilience. Section 4 should protect food distribution infrastructure, provide affordable space and skills support for food enterprises, safeguard healthy local food access, and plan explicitly for food surplus and waste.

Draft London Plan policy/section	Comments/suggestions	Justification
GLE2 Supply of Industrial Land	Risks failing soundness test as it hasn't sufficiently assessed the needs of community food system and resilient, distributed supply chains. Must include food distribution infrastructure. Prioritise protecting existing industrial land over green belt Assess plans for change of use against the Food Resilient London mapping platform and existing Borough food resilience plans where they are drawn up, prioritising space for food storage and distribution.	Sustain, Food Resilient London (2026): Community food assets, storage, local distribution, shorter supply chains, skills and collaboration are essential to emergency preparedness and resilient neighbourhood food systems.
GLE6 Visitor infrastructure and advertising considerations	Visitor infrastructure should support a healthy, affordable and distinctive London food economy. The policy should avoid encouraging visitor-focused food and advertising growth at the expense of everyday food access for	The comparison table identifies a risk that visitor and hospitality growth could proceed without equivalent attention to cumulative health effects, affordability, waste, servicing and children's exposure to unhealthy food

	residents, independent traders or children's exposure to advertising for less healthy food and drink. **Policy recommendation:** Require visitor and advertising proposals to demonstrate how they protect affordable local food access, support independent and culturally diverse food businesses, and manage deliveries and waste. Maintain strong restrictions on advertising for less healthy food and drink on planning-controlled sites, particularly near schools and places used by children, and apply health impact assessment where major visitor schemes could materially alter the local food environment.	advertising. The document's wider recommendations on town centres and high streets also call for protection of convenience retail, neighbourhood shops, markets and affordable units so that regeneration and visitor activity do not displace low-cost food access or independent traders.
GLE7 Affordable workspace and GLE8 Access to employment and skills	The draft gives affordable workspace, employment and skills more explicit economic-policy hooks, but does not clearly identify community food enterprises, growers, processors, caterers, market traders or food training as intended beneficiaries. **Sustain policy recommendation:** Name food and farming enterprises within affordable-workspace and skills policy. Secure genuinely affordable, flexible and appropriately serviced premises, including shared commercial kitchens,	Decentralised and diverse networks of food suppliers are essential to a resilient food system. In times of crisis, large scale, just-in-time supermarket driven logistics are exposed to significant vulnerabilities, leaving London's food supply unstable. There is a structural mismatch between what small food enterprises need and what workspace and skills policy currently provides. GLA consultation evidence shows that most mayorally

	preparation space, incubators, training kitchens, growing-enterprise bases and low-cost market pitches, with long-term affordability and priority for social enterprises and locally rooted SMEs. Protecting low-cost kitchens, workshops, market units and light-industrial premises rather than assuming generic new workspace will meet food-enterprise needs.	referred schemes with affordable workspace provide only 10% of total workspace, while provision and rent discounts vary between boroughs. GLA, (*Planning for Affordable Workspace*) An OPDC/Ealing study found that even discounted new-build workspace can remain unaffordable once operating costs are included, and that provision can be mismatched with demand—particularly where high-specification commercial space is delivered instead of lower-cost, specialist premises. Older buildings can provide more affordable solutions (OPDC and London Borough of Ealing, *Affordable Workspace Study*)
GLE11 Circular Economy	We welcome the stronger circular-economy framework, but food requires explicit treatment because edible surplus and unavoidable organic material cannot be managed effectively through a generic materials approach. Planning should connect food-surplus prevention and redistribution with local growing, compost use, skills and community food infrastructure. **Policy recommendation:** Embed the food-use hierarchy in policy and guidance: prevent surplus first; redistribute edible	ReLondon's food-system research, cited in this response, finds that food accounts for more than 10 per cent of London's consumption-based greenhouse-gas emissions and estimates that a more circular food system could reduce food-related consumption-based emissions by 31 per cent, including through healthier and more sustainable diets and reducing and recycling food waste. Sustain's Food Resilient London (2026) research also identifies infrastructure, collaboration

	food; direct any remaining suitable surplus to appropriate uses; and recycle unavoidable inedible material through composting or anaerobic digestion. Major developments should identify space and operational arrangements for food redistribution, separated organic-resource handling and community-scale circular food activity, including links between locally produced compost and food-growing projects.	and shorter supply chains as important to resilient community food responses.
GLE12 Waste	The waste policy should recognise the distinctive design, hygiene, collection and land requirements of food surplus and food waste. If these needs are not planned from the outset, developments can make source separation, redistribution and local composting impractical and increase operational conflicts for residents, businesses and community organisations. **Policy recommendation:** Require residential, commercial, market and community developments to provide convenient and adequately sized space for separated food-waste storage and collection, with safe access for users and collection services. Protect and provide sites for food redistribution hubs, community composting and appropriate organic-waste treatment, and support the use	The comparison table notes that a generic waste approach can overlook the land, hygiene, collection and community requirements of food surplus and organic resources. ReLondon's finding that London can cut food-related consumption-based emissions through reducing and recycling food waste supports dedicated provision. The evidence elsewhere in this response on community gardens, urban farms and productive landscapes demonstrates a practical local use for quality compost, while *Food Resilient London* supports mapping and investing in the community infrastructure needed to maintain essential food functions during disruption.

	of locally produced compost in community gardens, allotments, urban farms and other productive landscapes.	

Section 5. Creating a greener, healthier and resilient city

Green infrastructure should strengthen nature, health and food resilience together. failing to recognise an important component of environmental resilience and public health.

This section omits any meaningful treatment of food systems and is inconsistent with the NPPF which recognises domestic food production, agricultural productivity, protection of agricultural land, healthier food environments, allotments and food-growing opportunities.

Section 5 should explicitly support edible landscapes, forest gardens and community food growing, with suitable design, resources and long-term stewardship.

Draft London Plan policy/section	**Comments/suggestions**	**Justification**
GHR6 Trees, biodiversity and geodiversity **5.71**	We welcome the stronger emphasis on trees, biodiversity, geodiversity and climate-resilient planting. However, the policy should go further by recognising food-focused nature-based solutions as part of high-quality green infrastructure.	When designed with food production in mind, nature-based solutions such as edible landscapes, food forests, orchards, fruit and nut trees in public spaces, community gardens, allotments, urban farms and rooftop farms can deliver biodiversity, shade, cooling, drainage, learning, wellbeing and local food resilience benefits at the same time. UNECE's *The Edible City: Why Food Trees Matter* identifies urban fruit and nut trees as multifunctional nature-based solutions that

		can strengthen food security, provide shade, support pollinators and other wildlife, and create opportunities for education, skills and community participation. Forest Research, Urban Forests confirms that urban trees provide cooling, reduce surface-water flooding and increase infiltration; and provide habitat and ecological connectivity. These mechanisms also apply to appropriately selected and managed fruit and nut trees.

Section 6. Place vision and place-based approaches

Place-based growth must protect healthy food access, productive land and community food assets. The current Plan's E9 expressly supports convenience retail, local and neighbourhood shops, the full variety of London's markets, affordable units where justified, and management of retail clusters. In the streamlined draft these functions sit within broader place-based growth and intensification provisions, with less visible strategic protection for food access, market diversity and healthy food retail. Section 6 should prioritise brownfield development, strengthen controls on unhealthy food environments, and support food growing across regeneration areas, Metropolitan Open Land and the Green Belt. Prime agricultural land should have the highest protection on the Green Belt.

Draft London Plan policy/section	**Comments/suggestions**	**Justification**
PV1 Brownfield First Opportunity Areas	Sustain supports a Brownfield First approach where it helps protect valued green spaces, Metropolitan Open Land, Green Belt and existing food-growing assets from unnecessary	Food growing on brownfield can support skills, volunteering, local enterprise, access to fresh food and community ownership, while also keeping land in productive

	development pressure. However, brownfield intensification must still deliver high-quality green infrastructure and should not be used to justify dense development with inadequate communal growing space, poor soil conditions or limited long-term stewardship. The Plan should encourage meanwhile and permanent food-growing uses on vacant, under-used or transition sites within Brownfield First Opportunity Areas, particularly where this can build local skills, improve access to fresh culturally appropriate food and support community ownership during regeneration. Food-growing uses should be actively encouraged as part of regeneration phasing, not treated as temporary decoration 2. Fix London's Brownfield data gap London cannot genuinely optimise brownfield land or be able to accurately assess delivery potential until Brownfield registers across London are consistent, transparent and up to date. The capital urgently needs a centralised, standardised, responsive and accessible brownfield data system for identifying and tracking opportunities to make better	social and ecological use before permanent development comes forward. Gaps in London's Brownfield data is supported by the findings of CPRE's State of Brownfield 2026 report, which highlights continuing growth of available brownfield capacity but significant inconsistencies and gaps in data.

	use of vacant or underutilised land and buildings. This would enable more accurate assessments of land availability, site viability and development capacity, improving decision-making, accountability and the effective prioritisation of previously developed land.	
PV3 Town Centre and High Street **B (5)**	Strengthen the references to a 400-metre (5 minutes walking proxy) school exclusion for hot food takeaways and uphold the healthier catering requirement. The London Plan should ensure local authorities are also supported to use planning powers to manage the proliferation and clustering of unhealthy food outlets, particularly around both schools, nurseries and other locations with high children's and young people presence, and in areas of high deprivation. Place greater emphasis on using planning powers to prevent ill health and support healthy communities in line with new National Planning Policy Framework. London should aim to be a trailblazer in supporting national government review of Use Classes Order, in order to provide local authorities with clearer and more effective tools to support healthier food environments. Add support for evidence-led borough controls on over-concentration and cumulative	A UK systematic review of 14 studies found good evidence that takeaway outlets are more numerous in deprived areas and that children spending time in deprived neighbourhoods tend to eat more fast food and have higher BMIs. Turbutt, Richardson and Pettinger, 2019. Fast food outlets now make up 1 in 4 places people buy food, rising to 1 in 3 in areas of high deprivation. Food Foundation, Broken Plate 2026. London-specific evidence also shows why action is needed: the GLA's hot food takeaway evidence paper reported marked inequalities in childhood obesity and a higher density of fast-food outlets in more deprived areas, supporting a consistent London-wide approach around schools. GLA, *London Plan topic paper: Hot food takeaways*, 2018. A 2021 qualitative study of planning and public health

	impacts of takeaways, delivery-only kitchens and similar uses, considering child health, deprivation, opening hours, odour, waste, traffic and town-centre vitality. Restrictions should sit alongside positive support for healthier independent food businesses rather than reducing access to affordable food. The London Plan could also recognise the role of local authority healthy food advertising policies in creating healthier environments.	officials revealed that planning policy adoption was appropriate and can successfully regulate takeaway food outlets with the intention to improve health. *Keeble, Burgoine et al, 2021* Planning controls can change the food environment: a 2024 natural-experiment evaluation found that school takeaway management zones in England were associated with substantially fewer new outlets than expected after implementation, while the authors cautioned that longer follow-up is needed to establish health effects. Rahilly et al., 2024.
PV6. Metropolitan Open Land (MOL)	We welcome MOL having the highest levels of protection and agree with it's separation from green belt. Regenerative and community-based food growing, including community gardens, orchards, forest gardens, market gardens and urban farming spaces, should be explicitly recognised as legitimate and valuable functions of Metropolitan Open Land where they protect openness, ecological value, public benefit and landscape character. Sustain recommends that PV6 should identify community food growing and nature-friendly horticulture as compatible with	Sustain, *Food Resilient London* (2026) research positions Community food growing provides skills, access to fresh food and collaboration, which are essential components to resilient neighbourhood food systems. Additional benefits of wellbeing, green skills, nature connection and active participation in land stewardship, as evidenced by spaces like the Wolves Lane Centre, a community food growing site with MOL designation in Haringey

	the protective purpose of MOL, particularly where projects improve public access, biodiversity, education, wellbeing and local food resilience.	
PV7 Sustainable development and enhancement of green belt E2	This policy risks failing the tests of justification, effectiveness and consistency with national policy unless Green Belt release is clearly a last resort. To support food security, climate resilience and sustainable land use, the Plan should protect agricultural land in line with NPPF policy N2. PV7 should recognise nature-friendly, community-connected food production as a positive Green Belt use and support peri-urban farms, access to land and local routes to market. We recommend: 1. Strengthen protection for farmland, especially Grades 1 and 2. Safeguard rural and peri-urban land suited to market gardening, orchards and small-scale agroecological production, particularly the best and most versatile land. Avoid development that threatens viable farms and provide long-term certainty for enterprises delivering climate, nature, health, education and local supply-chain benefits.	The CPRE Farming on the Edge: 2025 found that urban-fringe farms produced enough food in 2021 to meet 61 per cent of the food needs of 7.2 million people, while the urban-fringe farmed area fell by 3 per cent in the decade to 2021, with more than 80 per cent of that loss occurring in the Green Belt. Green belt land is of high quality and especially valuable for growing crops, containing 18% of all croplands **Sustain, *Fringe Farming* (2022)** research found that agroecological peri-urban farming can deliver multiple public benefits, including access to nutritious and culturally appropriate food, green jobs and training, outdoor education, community wealth-building, biodiversity gains and carbon sequestration. The research also estimated that converting just 1.4 per cent of land growing cereals and grassland around London to vegetables could produce an additional 1.3 million kg of food for communities. New research from CPRE, *State of Brownfield*, February

	2. Support nature-friendly farming enterprises in the Green Belt and wider urban fringe. Support essential infrastructure—such as educational space, volunteer facilities and routes to market—that helps sustainable farms diversify income while protecting openness, community participation and nature recovery.	2026 also shows that farming and housebuilding targets do not need to compete, as there is sufficient brownfield land in England for more than 1.54 million new homes, enough to exceed the government's entire 1.5 million target. The report found London has the highest brownfield housing capacity among all regions.

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Sustain is a powerful alliance of organisations and communities working together for a better system of food, farming and fishing, and cultivating the movement for change.
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