



## Sustain response to the Towards a London Plan document, June 2025

#### Table of Contents

1: Introduction	<u>2</u>
Section 2: Increasing London's housing supply	<u>2</u>
Section 3: Growing London's Economy	<u>2</u>
3.3 Town Centres & High Streets	3
3.10: Affordable workspace	3
Section 4: London's capacity for growth and design quality	<u>4</u>
4.5 Designing the homes we need	4
4.10 Designing for everyone	8
Section 5: London's infrastructure, climate change and resilience	<u>8</u>
5.4 Waste	10
5.6 London's Open Spaces	10
5.19 Healthy Communities	12

Sustain is the alliance for better food and farming. We represent over 100 food and farming organisations. Capital Growth is a programme of Sustain with over 25 London based organisations on its working party. It is London's largest food growing network, representing over 2000 food growing sites and was set up in partnership with the Mayor of London in 2008.

We welcome others to identify elements of our response which they support and to submit a response online by Sunday 22 June.

## **1: Introduction**

This document provides a summary of Sustain's response to the <u>Towards a New London Plan</u>, highlighting opportunities to improve the health, resilience and sustainability of London's food system. It has been developed through engagement with our network and key members of our working party.

The London Plan has a vital role to play in reducing food-related ill health; improving mental health; reducing food poverty and inequalities; tackling the climate emergency, increasing biodiverse and accessible green space; promoting good food jobs, training and enterprises; and improving London's reputation as a good food destination for tourists.

Sustain welcomes a refresh of the London Food Strategy and implementation plan to be developed alongside the London Plan, which together would provide a framework that integrates spatial, infrastructure and policy both for business and community resilience and recognises the complexity, scale and impact of food systems on the UK's largest urban population.

# Section 2: Increasing London's housing supply

Sustain have not researched the evidence on housing in detail but commend the Brownfield First approach. We would encourage more scrutiny on the house building targets and to explore evidence being put forward by CPRE London regarding this.

Their report seems to suggest compelling evidence that the Mayor's housing targets are not based on an assessment of need and will not lead to more affordable housing. The far-reaching implications of opening up the greenbelt for housing development contradict other elements of the Plan, and will be counterproductive to London's ambitious climate and biodiversity targets without guaranteeing that the housing built will meet the needs of Londoners. It will also threaten food security by driving land speculation and landbanking, forcing prices up further doing the reverse of alleviating pressure on land, making farming on the urban fringes even more precarious. This needs further research and careful consideration as this decision cannot be undone.

## Section 3: Growing London's Economy

This chapter states the mission to grow the economy and increase productivity, improve the lives of all Londoners and drive green growth. It aims to support prosperity in London and across the UK, highlighting London's key growth sectors: Financial, professional, and business services; Creative industries; Experience economy; International education; Life sciences; Climate and Nature.

We agree that planning has a role to play to support the development of these growth sectors but would recommend that London's food system is recognised as a major employer (it is the UK's largest manufacturing employer and also contributes significantly to the high number of SME's in the capital). As a complex multi-sector industry with significant positive and negative impacts on society, it deserves special consideration for its role in public health, economic fairness, waste, culture, ecosystems and climate emissions.

## **3.3 Town Centres & High Streets**

We welcome the consideration of new approaches to help reactivate high street properties if they are vacant for an extended time, to provide more opportunities for affordable business and community space.

We specifically encourage:

- Initiatives to support enterprises engaging in food growing, preparation, storage, selling, cooking and food surplus management – for example provision of low-cost business space for food related not for profit or social enterprises or those with community benefit.
- A stronger approach to increasing access to healthy food, via planning policies that encourage neighbourhood shops, market stalls and veg box schemes with a particular emphasis on those that sell fresh fruit and vegetables and other healthy items in deprived areas or 'food deserts', at affordable prices.

## 3.10: Affordable workspace

To support the small-scale and local food economy, (which are important components of a healthy resilient food system and support London's net zero strategy), affordable workspace is essential. We support your consideration to expand this to include other types of workspace for hospitality, food & drink industry. This should also include wider food infrastructure such as local processing and wholesale businesses, food markets and small independent retailers, food hubs and distribution networks. Affordable facilities and flexible and affordable workspace is essential for growing the good food economy, which often trades in smaller quantities and operates with lower margins as fair pay to producers is prioritized over profit and can therefore struggle to access workspace. Good food businesses can be identified by their accreditation with organisations such as the Soil Association, Living Wage Foundation, Better Food Traders and these policies should set out to prioritise or level the playing field for businesses that are set up as CIC's, Cooperatives and Not-for-profit constitutions, that provide multiple benefits for London.

We support the inclusion of provisions for food markets, recognising their role in providing more flexible and affordable retail space. Designs for the public realm could incorporate locations for mobile shops or market stall pitches in areas of otherwise poor access to food stores.

- Support temporary and permanent market stalls or alternative premises in areas of deficiency (food deserts);
- Recognise and support alternative forms of community retail such as community shops, food co-ops and community-based veg box schemes
- Protect food markets and identify sites for farmers markets in new developments

#### Case study: Sustainable food enterprise

The Better Food Shed (BFS) is a London-based not-for-profit wholesaler committed to supporting agroecological farmers and small businesses to help build a more sustainable food system. Established in 2019, they now have a £1.5M turnover, supplying 21 customers weekly, delivering to veg box schemes, food co-ops and schools across London.

When they started, finding affordable warehouse space was a challenge. They needed a large space as they were distributing several hundred tonnes of fresh produce every week but income was low as they prioritised paying their suppliers a fair price, thus ensuring the majority of income from sales went to farmers. Their success has relied upon chance encounters with community organisations providing meanwhile space. They wouldn't have been able to get their business off the ground if they weren't lucky enough to find an organisation in Dagenham that had been given a large warehouse space with a peppercorn rent. Now they are more established they can pay higher rents but still struggle to meet commercial rates and are still using meanwhile spaces. This creates instability and added pressure on the business to frequently have to relocate and search for warehouse space that is rare and tenuous. The majority of their customers are in even more precarious situations. The BFS supplies small veg box schemes and sustainable food retail outlets around London. The only ones that survive in the long term are those that don't have to shoulder a rent, or find alternative space in community centres, churches or multi-use meanwhile spaces. Often not fit for purpose, it can limit their ability to grow and become commercially viable.

#### Case Study: community business premises

<u>The Plunkett Foundation</u> have worked with developer Thakeham to incorporate a community business into a new development in West Sussex. Woodgate Community Shop is open daily and stocks a huge range of products from everyday groceries to freshly baked goods and locally-sourced items. It operate as a 'community business', a not-for-profit that is owned and run by the local community. The local community can buy a 'share' in the business, become a member and have genuine say on how the business runs.

Day-to-day the store is run by an employed manager and volunteers, supported by a voluntary committee of local people. The community group is responsible for running the business in the long-term, making key governance decisions. Any profit will be invested back into the community to support good causes or community projects.

## Section 4: London's capacity for growth and design quality

### 4.5 Designing the homes we need

We agree with and support the intention to provide good quality homes that meet people's needs, provide a healthy place to live and respond to future challenges including those of climate change.

1. Suitable kitchen space at home: Smaller homes, built at higher densities have reduced kitchen,

food storage and dining space. Many homes are now built without enough space for a family to sit and eat together resulting in poor habits around mealtimes, snacks and the social aspect of eating together. It also creates reliance on pre-prepared food, often high in fat, sugar and salt, as a regular part of the diet, leads to poor health outcomes such as diabetes and heart disease. Lack of storage of food also has implications for resilience as highlighted in the recent Tim Lang report, as individual are advised to store food and water.

This issue is applicable to students, people in temporary accommodation and people in their place of work and to residential design. The ability to prepare a healthy day time snack and sit comfortably to eat it will encourage people to choose the healthy option and is one that can be addressed through planning policy; the right policies can create healthier homes and build in resilience thinking.

Policy Principles:

- All new residential developments built with enough space for food storage, food preparation, cooking and dining.
- Address the ability for building occupants to cook and eat on site at design stage.
- Consider if Nationally Described Space Standards are adequate. i.e. could there be a need to develop local space standards or adopt shared standards across the region justified by local social, cultural, demographic data.

#### 2. Food Production:

In the current London Plan it is stated in policy G8: Food Production:

In Development Plans, boroughs should: 1) protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites 2) identify potential sites that could be used for food production.

- In practice there are few examples of food growing amenity space being incorporated into new developments, as this guidance was voluntary. Where developers have created food growing spaces, it was not designed in consultation with the local community or experienced growers and has resulted in unsuitable spaces or lacked community buy-in to ensure uptake and long term maintenance of the space. This policy should be strengthened based on this learning.
- We support the "Space to Grow" amendment in the Planning & Infrastructure Bill and suggest The London Plan adopts this.

"(1A)A spatial development strategy must include a statement of the strategic planning authority's policy towards including the provision of allotment and community garden land." This amendment would require planning authorities to include their policies in relation to the provision of allotment and community garden land in their spatial development strategy, to meet current and future demand.

 We support the London Assembly <u>Environment Committee's April 2025 recommendation</u> to "Encourage London boroughs to work with communities to support a right to grow, such as Southwark's Allotment Expansion Guarantee, and make additional land available for community food growing where needed with secure leases."

Further policy principles:

- Publish amenity space standards to include space suitable for food growing, so that residents have access to communal and / or private space.
- Encourage innovative opportunities for food growing such as green roofs and balconies.
- Incorporate in any landscaping proposal for food growing spaces and edible planting, the necessary structures such as storage for tools and equipment, water supply, irrigation, water butts, as part of a cohesive design.
- We recommend developers compile management and maintenance plans, in consultation with local partners, such as <u>Seeds for Growth</u>, to ensure spaces are managed successfully once the development is handed over.
- We recognise that not all residents will want to create and manage a food growing space. We
  recommend developers create multi-use community infrastructure to support residents to
  use as they want, whether that's community gardening, sports, play, picnics, BBQs multiple
  multi-use spaces with a view to intergenerational, multicultural, accessible, gender inclusive
  design.

**Case Study: Right to Grow in action in London**In 2025 Southwark became the first London borough to pass the Right to Grow motion. This is a culmination of work by the council since 2020 to identify land and provide a clear and easy way for residents to access land to grow, alongside support to set up and maintain thriving community growing spaces. Central to this was the appointment of two community food growing officers who, since 2021 they have supported the creation of 19 new gardens with 239 plots for cultivation by local residents.

<u>Read more</u> about Southwark's Right to Grow initiative and what Southwark Council has achieved so far.

#### Case Study: Community food growing on housing estates

Westcott Park community garden, North Acton (Peabody Trust)

This thriving garden is located within the Westcott Park estate. It covers approximately 870m<sup>2</sup> and features food growing beds, a 34-fruit tree orchard, greenhouse, poly tunnel, rainwater recycling system, composting area, wildflower meadows, wildlife pond, solitary bee hotel, and chicken and duck facilities.

Since its launch in 2011, local residents have transformed a previously disused and overgrown area that was prone to antisocial behaviour and drug abuse. Today, they're proud to say that over 5,000 residents have been involved with the garden, helping it to become a vibrant community hub. The garden provides a space for residents to come together, share skills, and connect with nature. They offer opportunities for people to grow their own food, learn about sustainability, and develop new skills. The success of this strong community-led project was built upon clear and timely consultation with the community, asking the residents what they wanted as the first step. The group is constituted with a bank account and committee that ensures they are able to sustain themselves through grants, with clear and fair decision-making processes to ensure community buy-in.

**3. Community food amenities** that provide spaces to grow, cook and share food are becoming vital sites for community food resilience, in response to increasing food poverty brought on by the cost-of-living crisis and threats to food security. Recommendations for the next London Plan include a framework that:

- Support temporary use of land and buildings for pantries, community shops (or similar)
- Ensures community amenities in new developments include kitchens and dining spaces as key to wellbeing, resilience, community cohesion, which complement community food growing space by providing facilities to process and share food. Consultation with London food partnerships has shown that community food spaces and particularly community kitchens are a key ask from residents, particularly for those who do not have access to adequate kitchen facilities such as those in temporary accommodation, or other means to cook and share meals with other people.
- Food Surplus Redistribution Hubs are being developed in several local places to facilitate storage and redistribution of surplus food to communities, such as food banks, community pantries and cafes, as well as cooperatives and other models. Having food hubs to serve the borough is key for logistics and distribution of food and strengthening local supply chains against shocks.

#### **Case study: Food Surplus Redistribution**

Nourish hub Hammersmith and Fulham Council (H&F) part fund Nourish Hub, a community food hub operated by the charity UKHarvest, using largely surplus produce to deliver services including a low-cost community lunch and cooking classes for adults and children, children's holiday activities and, cooking classes for all ages, as well as linking with wraparound support services. The Council also commissions Nourish Hub to provide a Meals and a Chat service, producing healthy and sustainable meals which are delivered by cargo bike at just £2 per meal. Trained staff go beyond delivering meals by conducting regular wellbeing checks and offering meaningful, friendly conversations. This personal touch helps to support vulnerable residents at risk of social isolation, transforming the service into a comprehensive care experience that goes far beyond the traditional Meals on Wheels model. One resident mentioned that the chat they receive as part of the service is often the only time they speak to someone that day. H&F social workers are trained in awareness raising of Meals and a Chat service and continuous feedback from residents is used to alter and improve the service. The Disabled People's Commission report and its recommendations provided the starting point for this work alongside the council's strategic priority of 'doing things with residents not to them'. https://www.nourishhub.org.uk/

#### **Exemplary guidance:**

#### **Brighton & Hove PAN Food Growing and Development**

https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/downloads/ldf/PAN6-Food\_Growing\_and\_development-latest-Sept2011.pdf

## 4.10 Designing for everyone

We agree with your statement that "the infrastructure available to support participation in public life is key to an inclusive city. This includes requirements for public toilets and changing places, lifts and ramps, quiet spaces, resting places and seating."

We would add that food growing spaces, community kitchens and communal dining spaces are effective strategies to create community cohesion and resilience and provide a particular lifeline for people in temporary accommodation, refugees and asylum seekers.

#### **Exemplary guidance**

#### **Tower Hamlets Gender Inclusive Design report**

https://thcvs.org.uk/wp-content/uploads/2025/01/QMUL.pdf

## Section 5: London's infrastructure, climate change and resilience

The London Plan can provide strategic support for a more sustainable food system which increases access to locally sourced healthy food, encourages a circular food economy, manages land for public benefits of health, climate and nature.

Currently, there is nothing explicit in planning policy to explain how 'sustainable development' – ie the key aim of planning - relates to sustainable food production, even though the food system is the main reason for biodiversity decline globally and responsible for a third of greenhouse gases (GHGs). Not all food production methods contribute to sustainable development or local and national targets equally, so the London Plan should set out the kind of food system that should be supported, ie:

- Agroecological food systems, organic farming, growing more fruit and vegetables, pulses, and legumes to help accelerate our transition to nature and climate friendly diets
- A more transparent and diverse localised food system, with more SMEs and cooperatives to build community wealth and resilience
  - Transitioning from polluting intensive agriculture to more sustainable food production and higher animal welfare

#### Food system resilience

The London Plan has a vital part to play in enabling London to achieve greater food security and food system resilience. This would require the designation of infrastructure such as warehouses and food stores, community facilities such as refrigeration, community kitchens and canteens as well as protection of food growing and farming land in and around the urban fringes.

Tim Lang's recent report "Just in Case: 7 steps to narrow the UK civil food resilience gap", is a sobering read and emphasises that we are already in a food crisis, with nearly half a million Londoners still using food banks. In addition to the cost-of-living crisis, London's supermarket dominated supply chains should be diversified to increase resilience to shocks such as pandemics, climate change, conflict and cyber-attack. This 'just in time' model needs to be complimented

policies that support diversity in food supply and the London Plan could enable civil society to increase food resilience through provision of space and infrastructure for these supply chains and retail.

#### **Climate change and biodiversity**

The London Plan must ensure it supports a transition away from all fossil fuel intensive development, including:

- 1. Provide overall clarity around the need to prioritise climate change in all developments
- 2. Introduce enhanced requirements for developments that have significant environment and climate change impacts, including those related to food (see below).

Food and farming is responsible for 20-30% of greenhouse gas emissions globally. Urban food growing and peri-urban farming have the potential to prevent climate change by reducing emissions, by increasing the production and consumption of healthy, low-emissions foods, like vegetables, pulses and legumes. Additionally, they offer fresher food, low food miles and refrigeration needs, can sequester carbon in soil and boost biodiversity if measures are taken to support agroecological farming methods over industrial and conventional farming. Sustain alliance, along with CPRE London are calling for more Greenbelt sites to be earmarked for peri-urban agriculture, horticulture and orchards due to its benefits. For example, a life-cycle analysis of Sutton Community Farm in south London, found a GHG reduction of 34kg per hectare per year, compared to the same amount of food that would have been bought through mainstream retail channels.

#### Preventing further harm to the climate and our rivers from intensive livestock agriculture

Industrial farming is a primary contributor to global warming, environmental damage and land-use change. Intensive livestock agricultural units are increasing in both number and size in the UK – with the number of large units increasing by 20% since 2016. Livestock farming is the source of 70% nitrogen pollution in the UK, and a major source of pollution in the Thames catchment. The Thames is already <u>oversaturated with nitrates and phosphates</u>. To support the Mayor's ambitions to clean up the Thames, the London Plan should include a presumption against permitting new or expanded intensive livestock units, as per the recommendations of the <u>Environmental Audit Committee</u>:

"There should be a presumption against granting planning permission for new intensive livestock units in catchments where the proposed development would exceed the catchment's nutrient budget"

#### Supporting food growing and urban agriculture in all it's forms

Currently large number of Londoners are involved in food growing and the multiple benefits that they provide deserves increased recognition and protection; without these spaces London would be a much less green and biodiverse city, as data continues to show from the Capital Growth programme, supported by the Mayor of London.

Community-led urban agriculture takes many forms, from residents growing on small plots on housing estates, to allotments, to larger scale productive horticulture on the outer London fringes. All of these different levels of food production provide essential skills and education that empower people to grow and cook their own food, supports local enterprise and SME-focussed supply chains.

London has a flourishing network of sites that are protected for nature, such as SINCs, and they offer invaluable benefits to people and the environment. The London Plan must protect these sites from

development, even if national government <u>presses ahead with plans</u> to make it easier to approve developments that threaten protected sites.

### 5.4 Waste

Towards a London Plan requests more sustainable waste solutions that support London's growth and environmental goals.

Approximately 24% of London's food waste is managed through anaerobic digestion and composting, according to ReLondon. The remaining food waste that goes to landfill causes methane emissions, a powerful GHG. The London Assembly have estimated that composting this instead could save 275 thousand tonnes of CO<sub>2</sub> per year – the same as the total carbon footprint of 40,000 Londoners.

We recommend including food waste composting at a community level to compliment and relieve pressure on municipal food waste facilities. This can provide appropriately scaled food waste management that makes the waste product (compost and liquid fertiliser) accessible to local food growing operations.

#### Case study

R-Urban Poplar is an eco-civic hub located on the edge of the Teviot estate, in Poplar, London. The project aims to develop civic resilience in the face of climate change through a public programme of events, workshops and infrastructures. There are two main strands to work, the first works towards prototyping a just food system which places circularity at its heart, the second focuses on resource re-use and repair. <u>https://r-urban-poplar.net/</u>

Madleap is a closed loop recycling business based at R-Urban. They are finding sustainable solutions to food waste and engaging people in the process of creating the circular economy from the ground up. They are a designing small-scale anaerobic digestion systems that can be used where waste is generated. [more stats – how many households, volume of waste processed, GHGs saved etc] https://www.madleap.co.uk/

### 5.6 London's Open Spaces

Towards a London Plan states: "The current London Plan is generally silent on rural London. However, in the context of the government consultation on land use and the London-wide Green Belt Review, a specific approach should be considered. This could include policy on nature interventions such as rewilding and woodland, energy, and water infrastructure. Examples include solar farms, flood mitigation and reservoirs and industrial farming and other agriculture that needs planning permission."

**The issues:** The targets for new build housing and green Belt review will drive land speculation and landbanking, increasing the immense pressure from development, risking more viable farmland being left idle or lost permanently. As food security becomes an increasing priority, we must regard green belts around cities as "food resilience zones" and assess land for civil food growing capacity in planning decisions.

It is estimated that 19% of grade 1 land (the highest grade and relatively rare at just 2.7% of all farmland in England) is in urban fringe areas, with the London Green belt having significant amount of this prime land (Farming on the Edge, CPRE 2025).

#### **Policy Principles:**

- Identify and safeguard rural and peri-urban land for food growing and protect the best and most versatile (BMV) agricultural land.
- Avoid development which undermines the viability of an agricultural or horticultural land holding.
- Identify and safeguard land on the periphery of urban areas which is most suitable for market gardening.
- Designate space for environmentally beneficial fruit and nut tree planting, community food and small farm enterprises, and horticulture.
- Site designations and boundaries, such as Green Belt, should provide long term certainty to enable businesses to fund investment.
- Adopt the national policy target of 30% of land managed for nature by 2030 (NB this a land management target and is separate from BNG on development sites. Sites managed for nature should not be dependent on being part of development proposals.)
- Encourage developments for farms and food enterprises that demonstrably help transition to more healthy and sustainable diets and build a Market Garden City renaissance. For example poly tunnels and boreholes for market gardens, buildings for educational visits and volunteer programmes, and the infrastructure to support a regionalised food system e.g. storage and processing facilities
- Incorporate a multifunctional used, beyond a simplistic either or for schemes like rewilding, recognising the multiple benefits that can coexist on the same site for food production, nature net gain, and public engagement.

#### Case study: Community-based peri-urban market garden

<u>OrganicLea</u> is a workers' cooperative growing food on a former horticultural yard, with glasshouses and 12 acres, located on North-east edge of London. Waltham Forest Council supported OrganicLea with a 25-year lease and 5 years of minimal rent to cover council's insurance and admin costs. The lease was extended to 36 years, and reduced rent extended in recognition of the social, environmental and economic value of the project. After 15 years of development, Organiclea delivered the following in 2023- 2024

Economic and job creation	<ul> <li>Generated income over £1,380,873 with 50% generated through food and plant sales, training and consultancy work.</li> </ul>
	<ul> <li>Employed 19 FTE workers (plus seasonal / sessional workers) in food growing, retail, therapeutic horticulture and community outreach.</li> </ul>
Food security	<ul> <li>Delivered 35,207 fruit and veg bags to Waltham Forest residents</li> </ul>
	<ul> <li>Produced 12,662 kg of organic produce worth £83,259.</li> </ul>
	<ul> <li>Sourced an additional £170,668 worth of local organic produce from small-scale local growers &amp; wholesalers</li> </ul>
	<ul> <li>Produced 10,000 food plants that were sold to local growers</li> </ul>
Learning and	• 47 trainees and 293 volunteers introduced to horticultural volunteering
education	<ul> <li>200 accredited learners (including 99 people achieving City and Guilds accredited awards).</li> </ul>

	<ul> <li>7 schools engaged in education, outdoor activity days and regular Forest School sessions.</li> </ul>
Nature and climate	<ul> <li>Sequestered 25 tonnes of carbon dioxide through climate-friendly soil cultivation and agroecology approaches, and harvested 1 million litres of rainwater.</li> <li>Identified 67 species of plants, in addition to those planted for sale.</li> </ul>

#### **Exemplary guidance**

#### Stir to Action Community Models for Farm Ownership

This report investigates alternative models for the ownership of farmland. Co-produced by Stir to Action, Shared Assets, The Ecological Land Co-op, and the Community Supported Agriculture Network UK, they worked together to explore the strengths and weaknesses of available models and began mapping the alternatives. <u>https://www.stirtoaction.com/family-farm-succession</u>

**Sustain's Fringe Farming Report** provides extensive evidence of the viability peri-urban agriculture and how it can be protected in planning.

https://www.sustainweb.org/reports/feb22-fringe-farming/

Just in Case: 7 Steps to narrow the civil food resilience gap by Tim Lang

https://nationalpreparednesscommission.uk/publications/just-in-case-7-steps-to-narrow-the-ukcivil-food-resilience-gap/

## **5.19 Healthy Communities**

Towards a London Plan states; "In December 2024, national policy was introduced to restrict hot food takeaways near schools and other places where children gather, or where there is a risk of over concentration and impact on local health, pollution, or anti-social behaviour. The London Plan could remove its policy on hot food takeaways and rely on this new national policy."

- Sustain advise the London Plan retains its policy on hot food takeaways. The NPPF's policy
  objectives are commendable but lack the detailed guidance necessary for practical
  implementation. Without clear definitions of key terms such as 'fast food outlets,' planning
  professionals face considerable constraints in translating these aspirations into enforceable
  planning decisions.
- We also recommend including restrictions on dark kitchens as they are commonly linked to fast food delivery. This can be looked out through examples such as Camden council, which has brought in a <u>restriction on dark kitchens applications</u>.
- Exploration of differential designations that could make it easier to stem to flow of unhealthy food options, and create healthy neighbourhoods.

#### **Healthy Food Advertising**

Another key intervention that planning can influence is food advertising. Exposure to unhealthy food

advertising in the public realm can be reduced, significantly impacting on consumption choices and improving the health and well-being of residents, particularly children.

Advertisements are controlled with reference to their effect on amenity and public safety only, so the regime is lighter touch than the system for obtaining planning permission for development.

#### **Policy Principles**

- Avoid over-concentration of consents for development which carries advertisements. (For example, telephone kiosks and bus shelters require planning approval if they have advertising panels.) Consider if they have an operational need or are intended to be a carrier of advertising panels. Consider appropriateness of their proximity to facilities used by children and young people.
- Explore the definition of "amenity" in the context of the advertisement regulations.

**Contact: Rachel Dring, Capital Growth Coordinator, Sustain. Rachel.dring@sustainweb.org** 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. <u>www.sustainweb.org</u> This response has been compiled with Sustain staff and Capital Growth working party members including Sutton Community Farm, Tower Hamlets Food Partnership, WEN, Good Food Lewisham and Hammersmith Community Gardens Association