

London Food Link response to the London Borough of Tower Hamlets Core Strategy Consultation 26-10-2009

This response has been submitted by London Food Link, 94 White Lion Street, London N1 9QR in consultation with the following organisations

- Women's Environment Network
- Tower Hamlets Co-operative Development Agency
- Spitalfields City Farm
- Planning Aid London

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About London Food Link

London Food Link (LFL) (a project of Sustain; the alliance for better food and farming - www.sustainweb.org) 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.

Planning and food

Food, like water, shelter and air is essential for human existence. Even though food is a central part of our lives, it tends to be absent from many spatial plans although planning influences how much food is produced, where we can buy it and where our waste goes. It is internationally recognised that our built environment must be better designed to encourage healthy eating¹ and that more needs to be done to ensure that everyone is able to buy affordable healthy food easily and that food is produced in a less-damaging way to the environment.

Spatial planning should be used to address:

- Health inequalities and diet-related disease of which lack of sufficient and affordable fruit and vegetables retailers are a factor.
- The negative impacts of some supermarkets (both out-of-town and in town centres) around market concentration and pricing.
- Urban food growing e.g. allotments, community gardens and parks, on and around buildings
- Obesity, via restricting the concentration of fast-food outlets especially around schools.
- Food growing by protecting and promoting land for commercial food growing and supporting associated infrastructure e.g. wholesale markets, efficient distribution systems, abattoirs, and anaerobic digesters

Food in Tower Hamlets

Tower Hamlets is a highly dense and populated area and is one of the most deprived boroughs in the UK². A large amount of work has been on-going in Tower Hamlets with respect to research around food access, diet related ill health and initiatives that try to address some of these issues.

¹ WHO & The Commission on Social Determinants of Health http://www.who.int/social_determinants/en/ (2005)

² Local and national statistics and reports show that Tower Hamlets is ranked 3rd out of 354 local authorities in England in terms of deprivation. 72 of its wards are in the top 10% of most deprived. 70% of residents are Bangladeshi. Nationally 73% of Bangladeshi households live on less than 60% of the UK average income, a level widely recognised as the "poverty line" (Index of Deprivation, 2007) Low Income Diet and Nutrition Survey <http://www.food.gov.uk/multimedia/pdfs/lidnsvol03.pdf>

A recent study in Tower Hamlets found that 76 per cent of households are within a 10 minute walk of a supermarket, retail market or greengrocers, but 97 per cent are within a 10 minutes walk of a fast food outlet. The researchers also found that many of the borough's shops do not sell the range of fresh fruit and vegetables necessary for a healthy diet³.

The council and NHS Tower Hamlets are already undertaking a lot of initiatives via their healthy borough programme which focuses on increasing the amount of shops that sell affordable, good quality fresh fruit and vegetables and the other on encouraging healthier options provided by fast food outlets. We also welcome the points made in the core strategy that relate to food growing and healthy eating and feel that this is a very progressive and proactive way of addressing many issues people in the borough face with respect to food.

In order for the strategy to have the potential effect we believe it could have, we would like to see various elements strengthened in the following 5 areas:

1) HOUSING

Tower Hamlets has to meet housing targets of 43,000 new homes by 2025 and it is essential that as well as ensuring that these new populations have access to water, schools, healthcare, that they also need to have access to food. As mentioned above Tower Hamlets is already involved in many initiatives to improve people's access to a healthy diet and this needs to be supported in the core strategy by;

- **Ensuring that new build and redevelopment of housing and business include space for growing food.** Brighton and Hove Council have included this in their core strategy as a way of ensuring green spaces and food security. This can also count towards climate change adaptation, targets towards amenity space, adequate play space for children, and potentially impacting on the community safety and well-being of the individuals and the feel of the area.
- The importance of food growing is already recognised in the Tower Hamlets Open Space Strategy 2006-2016 but needs to be further integrated into the Core Strategy to support action. The London Plan that is currently under consultation⁴ also supports community food growing initiatives such as Capital Growth which encourages boroughs to create 80 new growing spaces by 2012. Tower Hamlets could pledge to sign up to this initiative and associated support with creating these spaces.
- **Ensuring there are fresh fruit and vegetable retail outlets within walking distance of peoples homes.** We feel that fruit and vegetable retail needs to be specified within the core strategy in order to ensure the spread of this provision across the borough is fair, even and accessible to help reduce health inequalities. LFL welcomes the point made in 4.10 referring to the importance of access to healthy food including food production, and we feel that text needs to be further clarified to refer specifically to ensure fresh fruit and vegetable retail outlets are within walking distance to people's homes. In addition, provision and preferential support for food retail can include street markets, covered markets and farmers' markets. This can encourage access to healthy, sustainable and affordable food and also offer opportunities for small and medium sized food enterprises to become established in communities, without the financial risks posed by taking on premises at an early stage of food business development.

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

⁴ The London Plan, October 2009 <http://www.london.gov.uk/shaping-london/london-plan/>

- We are aware that there nothing in planning policy to distinguish outlets that sell fresh fruit and vegetables from other types of “convenience shop”. This presents difficulties for local authorities as they are unable to tell whether there are enough shops that sell this fresh produce and also limits their powers if they wish to encourage more of these outlets.
- For some examples of London boroughs that have explored tackling access to food shops in their UDP please go to http://www.sustainweb.org/pdf/lfl_planning_guidance.pdf

2) OBESITY

We are very pleased to see the point mentioned in 4.9 around reducing the over-concentration of uses as well as providing more access to healthy food retail. In order for this clause to be held up to scrutiny we believe the text needs to be expanded and that there should be particular reference to fast-food outlets and/or hot food takeaways (class A5). We would like to see the following initiatives implemented in Tower Hamlets;

- Planning permission not to be granted to a hot food takeaway if it falls within a 400m boundary of a primary or secondary school
- No more than 5% of the units within the centre or frontage being hot food takeaways, or no more than two A5 units located adjacent to each other, no less than two non-A5 units between individual or groups of hot food takeaways
- Where hot food takeaways are deemed appropriate a fee will be introduced via a Section 106 agreement and this money will contribute to healthy eating initiatives such as food growing, cookery clubs etc.

These suggestions are based on an SPD proposed by LB Barking and Dagenham which is under consultation at the moment⁵. LB Waltham Forest has also explored similar initiatives.

3) ENVIRONMENT

As mentioned in the draft core strategy there is a commitment to increasing the amount of open spaces for many reasons including increased health and well-being, biodiversity and reducing the impact of flooding. Food growing can contribute to many of these targets and LFL is very keen to promote it as a way of achieving a greener and more socially cohesive borough. We encourage for food growing to be written down in the core strategy as an option for consideration alongside creating “open spaces”.

The food system in the UK contributes between 20-30% of Greenhouse gases⁶ and a third of our food is thrown away⁷. Reducing waste is an important element in tackling climate change and food composting can be used to reduce waste to landfill as well as contribute to growing initiatives within (and outside) the borough.

⁵ Draft SPD: Saturation Point – Addressing the health impacts of hot food takeaways (August 2009), London Borough of Barking and Dagenham <http://consult.lbbd.gov.uk/portal>

⁶ See Food Climate Research Network www.fcrrn.org.uk

⁷ Waste and Resources Action Programme www.wrap.org.uk

4) TEMPORARY PLANNING PERMISSION

LFL would also like there to be a strong reference to temporary use of land and buildings by looking to food growing and food retail such as food co-ops, temporary street markets. In the instance of buildings or areas remaining without use, we believe that some food initiatives can be encouraged and developed on a temporary nature and are low cost, and can contribute to economic vibrancy and social cohesion of an area.

5) HEALTH INEQUALITIES

“In the UK, people on lower incomes are more likely to suffer from diseases that are often associated with a poor diet, such as heart disease, cancers and stroke as well as being associated with poor oral health. Factors that can contribute to a poor diet amongst people on lower incomes include lack of money, inadequate shopping facilities, lack of knowledge and conflicting information about what constitutes a healthy diet”⁸

London Food Link believes that a planning system that encourages healthy and affordable fresh food and food growing can go a long way in tackling diet-related ill-health and health inequalities amongst a population. We welcome the initiatives that the council has already taken to address these problems and would like to see this further embedded in council planning and policy.

Supporting documents

- Interim report of Buywell Retail Project - part of the Healthy Borough programme (October 2009)
- Fast food outlets summary - joint Healthy borough programme
- How London’s planners can improve access to healthy and affordable food (2005) - Sustain and The Food Commission http://www.sustainweb.org/pdf/lfl_planning_guidance.pdf
- London Borough of Tower Hamlets Open Space Strategy

⁸ Good Food for Camden: A Healthy and Sustainable Food Strategy, 2009-2012, (2009), London Borough of Camden and NHS Camden <http://www.camden.nhs.uk/good-food-strategy.htm>