



Response to Planning Policy Statement consultation 4 : 'Planning For Prosperous Economies'

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This response can be made public.

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). 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/>¹ and represents the general, rather than detailed views of members of that network.

This response to the Planning Policy Statement (PPS) on Planning for Prosperous Economies, issued by the Department of Communities and Local Government will focus solely on food and farming. Food contributes significantly to the UK economy and planning affects the food system both in how land is used to produce food and also how food is distributed, purchased and disposed of. Sustain has published various reports on planning and food and our response to this PPS focuses on two key areas:

- food retailing and the importance of ensuring that a variety of healthy, sustainable and affordable fresh fruit and vegetable food outlets are accessible to everyone,
- how the agriculture and associated industries can be supported by planning to protect and stimulate a local and sustainable food economy.

Food and economic growth

The UK food sector was estimated to have a gross value added of £69.1 billion in 2005 and accounts for almost 20% of part-time employment and almost 9% of full-time employment in 2007.² Most food businesses are registered as micro businesses, but the market is heavily concentrated and larger companies tend to dominate the sector. Not only do food businesses create employment, but they can also contribute to wider economic regeneration and resilience of town centres and commercial and social vibrancy³. Whole districts have been regenerated through food e.g. Brick Lane and China Town in London, and can even become tourist attractions in their own right which, in turn, attracts more economic activity to an area.

In a wider economic context, diet-related illnesses cost the NHS £7.7 billion per year⁴ and The Health Select Committee estimate of lost earnings attributable to obesity was £2.3–3.6 billion per year,

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

² <https://statistics.defra.gov.uk/esg/publications/pocketstats/foodpocketstats/fsiyp.pdf>

³ The Real Choice, CPRE (2006) www.cpre.org.uk

⁴ Food Statistics Pocketbook 2008, Defra
<https://statistics.defra.gov.uk/esg/publications/pocketstats/foodpocketstats/foodpocketbook2008.pdf>

accounting for an annual total of 45,000 lost working years.⁵ Whilst we acknowledge there are a range of factors that contribute to this, the planning system can be used to help increase people's access to healthier food and therefore could go some way in tackling these problems and in addition to strengthening the economy.

Aspects of the draft PPS that Sustain welcomes include:

- the retention of the sequential approach of prioritising development in existing town centres, over edge-of-centre and lastly out-of-centre sites.
- an emphasis on protecting and stimulating town centre growth;
- policies that will support and protect markets, town centres and village shops;
- acknowledgement of the need to plan for low carbon economic activity.

Aspects of the draft PPS that Sustain has concerns with include:

- lack of recognition of the role of agriculture in rural economies. Planning needs to support this industry as well as those agricultural business that wish to diversify.
- concern over the merging of PPS7⁶ with PPS4⁷ and the deletion of the main objectives of PPS7. We believe this leaves unclear the status of policy on sustainable development and how that links to economic development in rural areas.
- lack of clarity around the concept of "town centre". This might exclude some areas e.g. housing estates and some rural areas that will need planning support to ensure food shops nearby.
- lack of clarity in the structure of the impact assessment appendices in the consultation document which makes it difficult to see how they will be applied in the future and therefore provide detailed comments in this response.

Fresh fruit and vegetable retail

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 sometimes few or no shops selling a good range of fresh and affordable fruit and vegetables – these are sometimes called food deserts. Large food retailers often prefer larger and more profitable sites, 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. Therefore we welcome the approach of PPS4 to attempt to reverse this trend and the recognition of the importance of local and village shops mentioned in part EC6. We also welcome the inclusion of the impact on health in the impact test in Annex B and, more specifically, the reference to ensuring choice and access to healthy food and the Cabinet Report; *Food Matters; Towards a strategy for the 21st Century*.

We do have some concerns over:

- lack of a clear **definition of town centre** and therefore which areas are included and excluded by the sequential approach. We recommend that some terms e.g. "town centre" "market" and "country" town be properly specified in the glossary of the PPS and consistently used throughout the document. A clear definition of these terms could improve the accessibility of fresh fruit and vegetable retailers in a local area. A proposed definition could be that fresh fruit and vegetable outlets (including markets) need to be accessible within acceptable walking distance (500m) of residential urban areas, and that isolated fresh fruit and vegetable retail outlets should be protected in rural areas.

⁵ Foresight. Tackling Obesities: Future Choices Project Report (2007) Department of Health
http://www.dh.gov.uk/en/PublicHealth/Healthimprovement/Obesity/DH_079713

⁶ Planning Policy Statement 7: Sustainable Development in Rural Areas (2004). Office of the Deputy Prime Minister <http://www.communities.gov.uk/publications/planningandbuilding/pps7>

⁷ Consultation paper on a new Planning Policy Statement 4: Planning for Prosperous Economies (2009), Department of Communities and Local Government
<http://www.communities.gov.uk/publications/planningandbuilding/consultationeconomicdevelopment>

- **stipulation of the term fresh fruit and vegetable retail outlet.** People need access to fruit and vegetables to have a healthy diet and in current planning guidance fresh fruit and vegetable retail is classified along with other types of food retailers such as “fast food shops” under the heading convenience shopping. This means that planners find it difficult to know what kind of food retailers there are in an area. The associated effects on a high street and the surrounding population will differ if the only accessible food retail is fast food. Sustain would like to see more fruit and vegetable retail outlets that sell healthier food (for example greengrocers, neighborhood shops and street markets), and classified as a separate retail category to ensure that a healthy choice of food is always available to consumers. These retail outlets should be promoted, supported and protected as a health priority, just as pharmacies are treated with special priority by local authority planning departments. Furthermore we believe a separate classification for “quick service” food outlets would enable local authorities, if desired, to limit the number of fast food restaurants near schools which has been shown to have significant impact on children’s diet and health⁸.

Food production

Agriculture and associated industries such as food processing are not mentioned in this PPS. However, not only do they currently contribute to the rural economy they also provide food which, in the context of climate change, fluctuating oil prices and population growth is important in providing the resilient and localised food systems that can go some way in helping us prepare for the future. We would therefore like to see recognition of the role of agriculture and sustainable agri-business mentioned in this plan (as it is one of the objectives of PPS7) and believe planning can support agriculture by:

- reserving the highest quality grade land for food growing (paragraphs 28 and 29 in PPS7);
- redressing the imbalance of the emphasis on farm diversification by adding a reference to planning to support food growing;
- considering planning to support infrastructure for local food production such as abattoirs and other food processing plants.

Food and planning

Cities and the countryside have been shaped by how we produce, distribute and store our food⁹. Planning is integral to ensuring a sustainable food system including by protecting land for food production, planning support for local infrastructure such as wholesale markets and abattoirs, and retaining food retail diversity that ensures everybody can obtain affordable and fresh fruit and vegetables. Currently there are serious problems in the food system illustrated by, for example, the major costs associated with diet-related ill-health and environmental damage caused by unsustainable production practices. This issue is also becoming increasingly recognised by international bodies such as the UN and by the UK government as illustrated by the publication on the Cabinet Office Report; *Food Matters: Towards a strategy for the 21st Century*¹⁰ and the establishment of the Council of Food Policy Advisors in 2008.

Planning policy often fails to recognise the importance of food and the role to be played by the planning system to ensure sustainable production and consumption of food. Therefore Sustain calls for:

- a) explicit and formal recognition of the need to incorporate food in policy guidance in the same way that other essential services such as water, waste, energy and housing are considered.
- b) a separate policy note from government on food and planning to provide guidance on how planning authorities should routinely include food in their remit.

⁸ *The School Fringe: what secondary school pupils buy from shops around their schools* (2008) Sarah Sinclair & Prof. J. Winkler http://www.londonmet.ac.uk/londonmet/library/z13371_3.pdf

⁹ *Hungry City: How food shapes our lives.* Carolyn Steel (2008) Random House Books
<http://www.hungrycitybook.co.uk/>

¹⁰ *Food Matters; Towards a Strategy for the 21st Century* (2008)
http://www.cabinetoffice.gov.uk/strategy/work_areas/food_policy.aspx

Consultation Questions

2. Does the draft Statement include all that you understand to be policy from draft PPS4, PPG5, PPS6 and PPS7? If not, please be specific about what paragraphs in any of these documents you feel should be included in this document? Please can you explain why this should be the case?

This PPS proposes to replace all of the objectives of PPS 7 and Sustain believes that these objectives need to be retained to ensure sustainable (not just economic) rural development. Specifically we would argue for the retention of objective 4 which relates to the promotion of sustainable agriculture and other objectives that relate to the prevention of urban sprawl, protection of green spaces and supporting rural enterprise. In addition, paragraphs 28-29 of PPS7 need to be retained because they refer to the preservation of the best and most valuable land for food production. Although they are not proposed to be deleted in PPS7, we argue they should be moved into PPS4 to ensure clarity of their status.

5. Do you think the restructuring of the impact test from the consultation draft of PPS6 achieves the right balance and is it robust enough to thoroughly test the positive and negative impacts of development outside town centres?

We are very pleased to see the draft PPS support and protect street markets and town/village centres; however this needs to be extended to recognise the importance of farm and corner shops and fresh fruit and vegetable retail outlets. Access to fresh fruit and vegetables should be considered an essential service and planning should reflect this. We welcome the inclusion of health in the impact assessment on the development of town centres (Annex B) and welcome the reference made in the document to ensuring choice and access to healthy food. We feel this could be achieved by incorporating that the term availability of “fresh fruit and vegetable retailers” as a criteria in the impact test.

We believe that the impact test is a more thorough way of considering planning applications; however we feel that, where there is a possibility a proposal could harm a town or village centre, a needs assessment should be included as part of the impact test.

6. Should more be done to give priority in forward planning and development management to strategically important sectors such as those that support a move to a low carbon economy, and if so, what should this be?

Between 20-30% of UK greenhouse gas emissions result from the food and agriculture system and this is mostly from the production stage. Food production is extremely important and increasingly vulnerable in the context of global warming, fluctuating oil prices and population growth. Thus more support needs to be given to sustainable production in the UK to produce resilient, and localised food systems. Planning can help by ensuring the most suitable and highest grade land is protected for farming, and considering planning applications for agriculture and for farming infrastructure as an important contribution to sustainable economic development.

9. Do you agree the policies do enough to protect small or rural shops and services, including public houses? If no, please explain what changes you would like to see.

Sustain is very pleased in general to see the policies in the draft PPS that relate to small or rural shops and services and feel that the following point needs to be incorporated that provision of fresh fruit and vegetables is a service and requires a separate classification and status in planning. Fresh fruit and vegetable outlets (including markets) should be accessible within acceptable walking distance in urban

areas (say 500m), and ensure protection of more isolated fresh fruit and vegetable retail outlets in rural areas.

With regard to pubs, we feel that the important role pubs play in the vitality of community life in rural, urban and suburban areas needs to be recognised and clearly stated in PPS4.

10. In response to Matthew Taylor, we have altered the approach to issues such as farm diversification. What do you consider are the pros and cons of this approach?

Whilst farm diversification can be a sustainable and profitable activity, Sustain feels that this policy needs to recognise the importance of farming as an economic activity which contributes significantly to many local economies and an increasingly important one in the context of climate change and food insecurity.

11. Do you think that the proposals in this draft PPS will have a differential impact, either positive or negative, on people, because of their gender, race or disability? If so how in your view should we respond? We particularly welcome the views of organisations and individuals with specific expertise in these areas.

Provision of neighbourhood fruit and vegetable shops benefits all groups, but especially those who do not have access to private or public transport. Those on low-incomes, have been linked with having increased diet-related diseases such as obesity and diabetes¹¹ and support for and protection of accessible and affordable fresh fruit and vegetable retail outlets will go some way in tackling this problem.

¹¹ “Diabetes in the UK 2009: Key statistics on diabetes” (July 2008), Diabetes UK. <http://www.diabetes.org.uk/>