

**LONDON FOOD LINK'S RESPONSE TO THE PLANNING AND HOUSING
COMMITTEE'S REVIEW OF THE ROLE OF THE PLANNING SYSTEM IN
SUPPORTING COMMERCIAL FOOD GROWING IN LONDON
(SEPTEMBER 2009)**

About London Food Link

London Food Link (LFL) runs a diverse network of organisations and individuals – such as farmers, food writers, caterers and community food projects - who want to make London's food system more sustainable. LFL aims to increase the availability of sustainable food in London, tackle the barriers preventing access to healthy and sustainable food for Londoners and protect and celebrate London's diverse food culture. LFL is part of Sustain: the alliance for better food and farming. This response is submitted following a consultation with colleagues and members of LFL but represents the general, rather than detailed views of members of that network. LFL has already submitted an initial response to the London Plan which can be found at

http://www.sustainweb.org/pdf2/LFL_response_to_London_Plan_review_June2009.pdf

How effective do you think the planning system is in a) in protecting existing farm land and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

The planning system is complex which makes this question challenging to answer. The planning system can be used to protect land for food production, but also needs to work with other policies and various levels of governance (councils/regional and national bodies). Some national planning policies have protected agricultural land such as PPS2 on Green Belts, and PPS7 on sustainable development in rural areas which designates higher grade land for agricultural use. Conversely, and disappointingly, the role of agriculture was not mentioned in PPS4, the planning statement for prosperous economies, which could have added some more weight to the importance of agriculture to sustainable urban and rural economic development. Thus we believe the planning system can, and sometimes does protect current and potential agricultural land, but more needs to be done.

In London, for example, around half of London's agricultural land has been lost since 1965 and there is a shortage of available allotments spaces in central London¹. How London feeds itself has not yet been recognised by the planning system as economically important, let alone the role of food and farming in contributing to climate change adaptation, and the health and well-being of London's population.

London's outer boroughs could play an important role in protecting agricultural land, not only through their decisions about land use, but also because they own agricultural land which they let to tenants via the county farm system. Unfortunately, increasingly cash-strapped councils are under pressure to sell county farm land which, being close to London, is of high value. It would be helpful if the London Plan could emphasise to local authorities that county farm land should continue to be used for agricultural purposes. We agree with the

¹ <http://www.london.gov.uk/assembly/reports/environment/allotments.pdf>

recommendations of the 2008 Don Curry report ² that local authorities should carry out strategic reviews of their county farms, and that regional strategies should also recognize the importance of the county farm structure as a “crucial entry point for new entrants to agriculture”. County farms could also be used not only to produce food, but also for other sustainable development activities such as providing renewable energy, and educational opportunities.

Some members of the Sustain network have reported difficulties with the planning system which has inhibited development associated with agriculture, such as erecting farm buildings. Whilst we have concerns about supporting farm diversification if it is away from agriculture, we would like to see the planning system support and encourage diversification that makes agriculture more viable, such as by allowing farm shops, and residences for farm workers.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

In the existing London Plan (revised 2008)³ policy 3D.18 mentions encouraging and supporting the agricultural sector in London and the Green Belt, including appropriate diversification. We would like to see this kept in the revised plan and strengthened to reflect the potential commercial viability of farming in the Green Belt. We would also like this to be linked with the London Food Strategy, which has a strong focus on localizing the food supply in ways that are environmentally and economically sustainable.

In addition, it would be helpful to include activities related to agriculture, such as anaerobic digestion, which could contribute to keeping London’s waste in London and would provide compost for agricultural use. This compost could be used and sold as an alternative to non-sustainable sources of compost, such as peat, thereby providing another source of income for farmers. There is also a role for the retention and expansion of allotments and community gardens all across London which not only contribute to food security, but also to the health and well-being of Londoners⁴. Although the Metropolitan Green Belt will not be able to produce enough food to feed London’s population, it can go some way towards reducing food miles, increasing transparency in the food supply chain, encouraging business and enterprise, connecting Londoners with the production of food and the countryside. It can also contribute to other aims such as green landscape protection and biodiversity.

The changes to the London Plan do mention the importance of street markets and farmers markets and greening areas around London, but these needs to be linked with explicit support for food production. Non commercial urban agriculture is also important for people, especially those on low incomes, to have access to allotments, gardens and other sites for growing.

² <http://www.defra.gov.uk/FARM/policy/sustain/pdf/county-council-farms.pdf> The Importance of the County Farms Service to the Rural Economy

³ <http://www.london.gov.uk/thelondonplan/docs/londonplan08.pdf>

⁴ <http://www.london.gov.uk/assembly/reports/environment/allotments.pdf>

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

As well as finding space of growing food, it is also necessary to build and plan for associated infrastructure, such as abattoirs (there are now no abattoirs in Greater London)⁵ and food distribution in the capital. It has been argued that the congestion charge has caused problems for sustainable food distributors, which could perhaps be tackled by councils subsidising vans running on recycled cooking oil or another sustainable fuel source. Crime is also a problem, especially on land left derelict (which has often been bought for speculative reasons and not for immediate use). Allowing communities to produce food on this land, albeit temporarily, would be a useful approach. In some instances large infrastructure projects, such as cross rail and the expansion of Heathrow, will eat into the land available for production. We consider that it is vital to take into account the impact on food security when making planning decisions over farmland. If the decision is taken to build on agricultural land, it should at least be replaced elsewhere in a suitable location.

Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities? Should it also encourage these activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies, i.e. transport, rail, waterway and housing bodies?

We would welcome specific support from the London Plan to promote a range of commercial food growing activities. The London Plan should also encourage assessing land grade and its potential for food growing and maintain the best quality land for food growing. It also makes sense to encourage commercial food production in a wide range of locations such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies. However, it should be ensured that the production of food on these sites is done for commercial purposes rather than individual use.

What policies outside the planning system would support the maintenance or expansion of commercial food growing in the Green Belt? Do you think that green belt land is being utilised in the most productive way?

Research for CPRE by Oxford Brookes University in February concluded that:

Diversification away from agriculture is not the solution to the farming crisis. Potential commercial rental income is likely to attract farmers away from land-based diversification, inflate the cost of farm buildings beyond the reach of agricultural users, and encourage short-term asset stripping. Instead PPS 7 [Government planning policy on rural areas) should express a preference for land-based forms of diversification such as local food enterprises, forestry, the green economy and sustainable tourism.

The recommendation on national planning policy could equally apply in London and the surrounding counties and districts covered by the Metropolitan Green Belt. At present the Metropolitan Green Belt exists as a disconnected series of individual areas split between multiple planning authorities whose main concern is with PPG2 requirements. It also sprawls

⁵ http://www.lda.gov.uk/upload/pdf/Capital_Eats.pdf

across three government regions, with only around ten per cent in Greater London. The Green Arc Initiative, which takes a broader view, has been hampered by being split into four quadrant areas. Given the cross-regional significance of the Metropolitan Green Belt, not least for the future of London, we would recommend an integrated Metropolitan Green Belt Strategy which would include agricultural production, together with the re-use of suitably treated food and human waste, ecosystem services, biodiversity and recreation.

Do you have any other comments that may be useful to the investigation?

Planning for a supply of food to the capital is not yet mentioned in the London Plan. There are increasing challenges to the food system all over the world such as fluctuating oil prices which affect the cost of production and distribution, and climate change and unpredictable harvests which threaten the food security of a large urban population. Given these and other challenges, we believe it is essential to incorporate food production into the London Plan.

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