

Examination in Public of the draft London Plan:

Written Statement from London Food Link, Sustain to the EIP Panel

January 2019

Ref ID 821

Matter 65: GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT – GREEN BELT AND METROPOLITAN OPEN LAND (POLICIES G2 AND G3)

1. **We welcome Policy G2 and particularly the proposal in Policy G2 B that ‘de-designation’ of Green Belt will not be supported.** This policy is essential to create a strategic London-wide approach for this important land which has value for all Londoners, not just those living in the local area. This will create certainty for local planning and serve to protect valuable and agricultural land to be used for food production, in line with national government desire to increase farming productivity.

This land also contributes to delivering on Good Growth 3 - creating a healthy city and various national policies and initiatives to increase access to nature and improve health and diet. For example recent publications by NHS England¹ and previous the TCPA guide which states the role of the food environment and food growing is key to this.

2. **We would like GG2 and GG3 to go further to show how Green Belt can be protected and enhanced and deliver on GG3 and national policy; and we believe ‘a productive Green Belt would be a protected Green Belt’.**

The policies and details provided are needed but should go further to avoid deterioration of the quality of the land and help to increase access and multifunctional uses of the Green Belt. There is strong evidence that agro-ecological and community based farming can deliver multi-functional uses in the Green Belt, with some growth in this area and potential for much more:

- In London we have strong examples of the role that peri-urban farming can play in creating a healthy and inclusive city and new green enterprises, with a number of new farms on Green Belt land. (See Sutton Community Farm and Growing Communities – case studies). A clear London policy context will create the right setting for local policies that help to others to access land and leases, as well as funding and investment.
- A recent Report by London Assembly Environment Committee², includes the following recommendation: *“In the London Plan, the Green Belt and Food Growing policies should include a requirement for boroughs to give added weight in local development plans to food growing as one of the most productive activities in the Green Belt.”*

¹ <https://www.england.nhs.uk/publication/putting-health-into-place/>

² <https://www.london.gov.uk/sites/default/files/farminginlondongreenbelt.pdf>

- The same report recommends, *“In his food policy, London Plan and other work, the Mayor should look for opportunities, such as those outlined in this report, to support and promote farming methods that maximise environmental and social benefits and support his other policy goals”*.
- Nationally this relates to changes in relation to redefining agricultural support in the UK; peri-urban farming was recently supported in a speech by Defra Minister George Eustace, and basic calculations by Sustain have shown that if even small fraction of what is currently import into the UK could be grown in our peri-urban areas, that we could have the market for dozens of farms on the peri-urban fringe creating jobs and resilience for our food systems. Growing food closer to markets is also beneficial due to transport, workforce and the multifunctional benefits they can provide for education and health.³
- As such the London Plan could reference the important national context for food production and green business opportunities. Currently this policy falls short of addressing the demand that will be placed on the Green Belt, along with challenges faced in terms of diet and food production. The policy should give planning authorities the power to protect productive green use on finite peri-urban lands and actively support land uses that deliver public and environmental value.
- The policy should also provide the community, cultural and social context of farming and what these community and social farms bring to London, to help these farms to gather the support, land and leases they require – see case studies.

Suggested wording

Policy G2 London’s Green Belt

B) The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported.

C) Support will be given for schemes that utilise and protect the Green Belt for food production, where this enhances the environment and amenity of the land.

3. In relation to point b) in the matters, we do not support the principle of land swapping, as we recognise that uncertainty around future policy and designation is a risk to the Green Belt.

There are significant tracts of Green Belt land in agricultural use, and this land still has an intrinsic value and huge potential in terms of food production and ‘cultural services’ (such as the sense of wellbeing produced by seeing an agricultural landscape). We do not feel that these can be swapped and this could be a loophole leading to exploitation and could undermine the permanent value. Uncertainty can lead to ‘hope value’ where land is banked on the hope it can be sold in the future. This further exacerbates the problem for new entrants’ access to land and security of tenure.⁴ It may also lead to land neglect and degradation.

³ [Land Workers Alliance data showed that if just 1% of the £7.8billion worth of fruit and veg currently imported was produced in the UK, this would bring £78 million into local economies, enabling the establishment of 780 new market gardens with an annual turnover of £100,000. This represents 11.3 new market gardens around each of Britain’s 69 cities.]

⁴ This is discussed here <http://ecologicaland.coop/community-supported-agriculture-and-community-land-trusts>

Currently national policy is assessing how it can value the public goods that farming provides (such as soil, air and water quality, flood prevention, nature and wildlife protection) so we can protect and enhance these values and therefore losing farm land would be counter-productive to national policy.

CASE STUDIES

<p>Sutton Community Farm – run by and for community members</p> <p>Running since: 2010 Size (acres) 7.1 acres Turnover; £475,000 18/19 projected No employed 8 (7 FTE) Food production; tonnage and variety 17 tonnes in 2018 season. Over 250 seed varieties, including 100 salad varieties Lease length: 15 years (although includes break clauses)</p>
<p>Growing Communities Dagenham Farm – social enterprise</p> <p>Running since: May 2012 Size (acres): 1.74 acres (of which under 1 acre in cultivation in a mixture of poly tunnels, greenhouses and outside areas. Turnover; last year (to April 2018) £27,500 No employed: equivalent 1 grower (5 days a week). Food production; tonnage and variety: 4.5 tonnes per annum. Greenhouse crops tomatoes/cucumbers etc, mixed salad leaves and greens. Lease length: 20 years (but may be extended). Benefits: community events, training, work with schools, employment</p>
<p>Benefits: community events, training, work with schools, employment Long term leases very important for farms to allow: investment in infrastructure e.g buildings, bore holes (10 year payback), solar, biodiversity - hedges takes 4-5 years to start making difference; investment in soil health - to protect and improve this as an asset; Securing funding (funders/investors won't consider funding without longer term security) Challenges include: Competition with purely commercial interests, lease negotiation - big overhead for small organisations to have to engage with lease negotiation and development of social and educational facilities in the context of what is considered a green belt exempt development.</p>

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