

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 66: GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT – BIODIVERSITY, TREES, FOOD GROWING AND GEODIVERSITY (POLICIES G6 TO G9)

1. Sustain welcomes the inclusion of a policy on food growing (G8): as food is a strategic health issue and food growing is a planning issue.

Food growing and productive green space has a positive impact on physical and mental health with multi-functional benefits including

- Healthy, sustainably grown or reared food produced close to populations, with lower greenhouse gas emissions
- Opportunities for connection with nature and activity promoting mental health
- Increased resilience through development of localised food systems
- Recreational and skills development
- Contribution to biodiversity

The current large number of Londoners involved and the multiple benefits that food growing projects have provided for the city deserves increased recognition and protection; without these spaces London would be a much less healthy, green and biodiverse city. This is supported by evidence and data from our Capital Growth programme, London Food Strategy and the previous London Plan.

Furthermore NHS England have now established Healthy New Towns¹, a three year programme, to look at how health and wellbeing can be planned and designed into new places. This is particularly relevant to London where much of the new development is larger scale. Its Ten Principles have been published and include access to healthier food which food growing spaces provide.

2. A London-wide policy is needed and useful. Sustain have evidence of the beneficial strategic context this creates for the development of local plans and how it delivers London's strategic goals.

The last London Plan and SPG (Sustainable Design and Construction – Supplementary Planning Guidance 2014 applies to London Plan Policies 2.18, 3.2, 5.3, 5.10, 5.11, 5.21, 7.18 & 7.22. The SPG recognises that

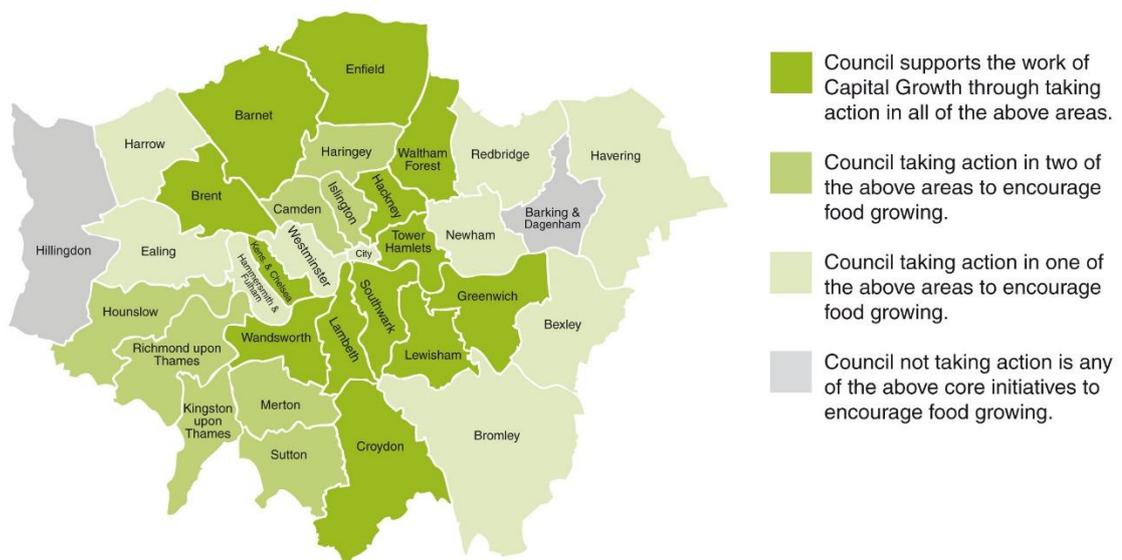
¹ <https://www.england.nhs.uk/publication/putting-health-into-place/>

- growing food locally involves a range of activities that have health and community benefits.
- developers should investigate the demand and opportunities for providing food growing space on their site. Food growing space should be secured when opportunities arise. This could be temporary or permanent.
- Low maintenance herbs and other edible plants can be incorporated into roof gardens or landscaping schemes; non-active parts of large construction sites have been used for food growing.

This has been guidance to developers since 2014.

Since 2011 Sustain/London Food Link has reported positive action across London in its Good Food for London council comparisons², which encourage boroughs to take actions that are under their control to contribute to better food across London. The food-related policies in the London Plan, which are spatial in nature, provide the context for their planning policies so council can clearly see how their local planning policies are part of a much wider context

Through our campaign to encourage more local authorities to incorporate food growing into local plans we have continuously referenced the London Plan SPG and as a result 32 of the 33 London Boroughs now have supportive policies, with local groups able to reference these to support new activities or protect existing food growing.



Title: Community Food Growing Map (included in recent publication).

The review of the London Plan is the time to incorporate guidance into policy, rather than reduce it.

3. A clear food growing policy is consistent with national frameworks;

whilst the London Plan is being assessed against the 2012 NPPF, local plans will be drawn up under the 2018 NPPF. The current national policy states:

8. Promoting healthy and safe communities

91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and

² <https://www.sustainweb.org/gffi/?m=2&b=0&y=2018&v=2>

accessible green infrastructure, sports facilities, a diversity of local shops selling fresh, health food, access to healthier food, allotments and layouts that encourage walking and cycling.

4. **The policy needs more detail to be able to significantly encourage and assist in creating a healthy city (GG3).** In particular our suggested wording (below) would address the following areas that are lacking:

- To make the policy consistent with other policies in the Green Infrastructure chapter, we feel that there should be a strong overview statement, including responsibilities for the Mayor to actively promote food growing in London. This would support implementation of the Mayor of London's new Food Strategy.
- While the draft policy recognises the need for new spaces it also does not acknowledge the need to protect and enhance existing spaces – we are suggesting amends on this bases.
- There should be explicit reference for encouragement of use of Green Belt for farming, horticulture and orchards (see note on Matter 65) and means to connect food production with markets via community of private sale. We believe a productive Green Belt would be protected Green Belt, rather than land being left due to its 'hope value' and targeted for future development. It is also important that the type of farming is referenced, as not all farming and agricultural uses will contribute equally to health. See also London Assembly Environment Committee Report on Farming in the Green Belt.³
- The amends to GG3 mean it now reads “assess the potential impacts of development proposals **and development plans** on the **mental and physical** health and wellbeing of communities, in order to mitigate any potential negative impacts, **maximise potential positive impacts**, and help reduce health inequalities, for example through the use of Health Impact Assessments.” We would suggest that a clearer G8 would significantly help to maximise the positive impact of food growing as has been achieved over the last 10 years.

Suggested wording

In Development Plans, boroughs should

- a) 'protect existing **urban farms**, allotments and **other community food growing spaces, particularly those within dense urban areas or producing food for sale** and encourage provision of space for community gardening, **including for food growing and orchards**, within **all types of** new developments or as a meanwhile use on vacant and underutilised sites.'
- b) **Should protect the best farmland** and identify potential sites that could be used for commercial food production prioritising **that which farms to protect and enhance soil, provide sustainable drainage and improve biodiversity (i.e. organic, low input, agro-ecological) and provide long leases for these uses**
- c) **Ensure that all new housing developments incorporate an area that can be used for communal growing of food**

This wording is supported in recommendations made by the TCPA (Practical Guide 8, P15) where they state under **Food environment – Development Guidelines**⁴

Food Growing

- Development that maintains or enhances opportunities for growing food including the provision of community orchards and prevents the loss of food-growing spaces.

³ <https://www.london.gov.uk/sites/default/files/farminginlondongreenbelt.pdf>

⁴ <https://www.tcpa.org.uk/tcpa-practical-guides-guide-8-health>

- Opportunities for households to own or have access to space to grow food, for example in roof or communal gardens and allotments.
- Protection of the best and most versatile agricultural land on the urban fringe and encouragement for its use for food production.

5. **Sustain support the policy to increase commercial food production but with amends so this can contribute to a healthy and equitable city.** The

policy needs to be explicit to the types of farming that it would encourage and our suggestions are based on the following rationale.

- London's resources of land and soil for agriculture, horticulture, orchards and private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure.
- The Mayor and Boroughs should also safeguard existing good quality farmland that is or has potential to produce food at scale, particularly on the urban fringe.
- Farming can have significant positive impacts if delivered with community or social purpose and/or environmental care e.g. care farms, community farms such as Sutton Community Farm or organically-certified farms such as Forty Hall and Dagenham Farm, which also provide social and individual health benefits through training and activities.
- Higher intensity large scale food production does not always provide the multi positive benefits of agro-ecological farming and/or the social and employment benefits of community farming. Sustain advocates the application of agro-ecological principles - as the FAO has noted building in agro-ecological objectives into farm policy can support food production and food security and nutrition while restoring the ecosystem services and biodiversity that are essential for sustainable agriculture. Agroecology can play an important role in building resilience and adapting to climate change."
- London has signed up to the **Milan Urban Food Policy Pact** in 2015 which stated that: *'current food systems are being challenged to provide permanent and reliable access to adequate, safe, local, diversified, fair, healthy and nutrient rich food for all'. It suggests action to: 'Protect and enable secure access and tenure to land for sustainable food production in urban and peri-urban areas, including land for community gardeners and smallholder producers.*
- Short leases give farmers and growers little longevity, rights or leverage to secure land, funding, resources and policy support; so our experience suggests that stronger language that supports them would be useful. Also while we welcome meanwhile use as an additional feature – this does not replace the need for long term leases.

6. **We welcome the encouragement for food growing in new developments but this should be a requirement in new or regenerated housing developments.** This requirement would have more impact if the onus was placed to explain why such gardens are not included, as is the case in Brighton & Hove with their Food Growing and Development Planning Advice Note⁵. In major developments, the Mayor should require space for the cultivation of food in order to create a greener and more resilient city.

Capital Growth, has many examples of the multiple benefits from an area of land for communal food growing in and around, for example, housing developments, community venues, public institutions, workspaces and schools and universities. These include benefits for health, education, community cohesion, biodiversity, enterprise and local jobs and skills.

We have worked with numerous Registered Social Landlords and are aware of many developments adding such spaces, but equally others that have not considered this until after physical works have been completed, retro fitting growing areas into new estates and apply for funding to do so.

Case Study: **Walthamstow Stadium**, a very popular greyhound racing stadium, closed in 2008. Now the site has been redeveloped with just the historic art deco frontage remaining. On the site behind, there are 292 new homes developed by L&Q Housing Association with landscaping including allotments. These are in fact long raised beds.⁶

This is reinforced by a TCPA's Practical Guide 8: Creating health promoting environments⁷ - which sets out the scope of opportunities for ambitious councils who want to create high-quality, large-scale new developments. It advocates those undertaking new developments should consider the food environment (food retail and food growing) as one element of good place-making. This Practical Guide also suggests tools and mechanisms for delivery and implementation which can be adopted by local authorities and delivery partners. The principle for the food environment is encapsulated as:

"Providing the local community with access to a diversity of food outlets selling healthy food options, and the opportunity to grow their own food in designated public and private spaces accessible from the home, school, or workplace."

7. **Sustain would encourage that the use of the word 'allotment' be clarified:** as we are aware there is both a statutory definition and protection of allotments, but that this term is also used as a 'catch-all' for food growing spaces and others using this only in relation to the traditional allotment sites. This is raised in our online tool kit⁸

Prepared by Sarah Williams
Programme Director, Sustain

sarah@sustainweb.org
www.sustainweb.org

⁵ https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/PAN6-Food_Growing_and_development-latest-Sept2011.pdf

⁶ <http://conranandpartners.com/project/lq-former-walthamstow-stadium/>

⁷ <https://www.tcpa.org.uk/tcpa-practical-guides-guide-8-health>

⁸ https://www.sustainweb.org/planning/gathering_evidence/