

Sustain Draft Response NPPF 2018 consultation

Consultation on revised planning policy framework for England

Sustain is an alliance for better food and farming. We advocate food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. <https://www.sustainweb.org/>

Good Food

Our working definition for good food is that it should be produced, processed, distributed and disposed of in ways that:

- Contribute to thriving local economies and sustainable livelihoods - both in the UK and, in the case of imported products, in producer countries;
- Protect the diversity of both plants and animals and the welfare of farmed and wild species,
- Avoid damaging or wasting natural resources or contributing to climate change;
- Provide social benefits, such as good quality food, safe and healthy products, and educational opportunities.

Role of Planning

Planning has a role in delivering a sustainable food system and we would like to see leadership through the National Planning Policy Framework for a shift towards a more sustainable food system delivering food security and nutrition for all in such a way that provides economic, social and environmental benefits. Planning for food has a vital role to play in reducing and avoiding obesity and diet-related conditions; improving mental health; reducing food poverty and inequalities; increasing biodiversity and accessible green space; ensuring a productive landscape with thriving agriculture on healthy soils; promoting good food jobs, training and enterprises; and improving the country's reputation as a good food destination for tourists.

The draft NPPF and guidance partly addresses the role of food in promoting healthy communities but fails to address the food system holistically.

Sustain's Comments

Section 6. Building a strong, competitive economy

The Economy section fails to commit to healthy and sustainable development.

Recommended change

Sustain would welcome policies that will enable the promotion of healthy and sustainable economic development. The NPPF and its guidance should encourage:

- the provision of business space to support enterprises engaging in food growing, preparation, storage, selling, cooking and food surplus management,
- measures to improve retail provision in under-provided areas such as markets,
- restriction on fast food outlets, which has recently been highlighted as a priority in Public Health England guidance to achieve healthier high streets,
- a stronger approach to increasing access to healthy food, via policies that encourage neighbourhood shops, with a particular emphasis on those that sell fresh fruit and vegetables and other healthy items in deprived areas, at affordable prices.

Supporting a prosperous rural economy

Paragraph 84 states planning policies and decisions should enable the development and diversification of agricultural businesses.

Recommended change

Sustain considers that this positive statement is undermined by policies which encourage built development on agricultural land. Food growers need certainty that land will be protected from encroaching development. High land values and hope value results in short term tenancies. Food growers need sufficient length of tenure to allow investment especially close to urban areas where they are close to their markets and can engage with their customers. There should be certainty that productive land will be protected from short term uses which lead to its classification as brownfield.

Section 8. Promoting healthy and safe communities

Paragraph 92 proposes that planning policies and decisions should “enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Sustain welcomes in principle, this paragraph which is explained further in the Guidance as revised in 2014 & 2017.

Recommended change

Paragraph 92 (c) *Insert “and communal gardens” after allotments.*

We are concerned that “allotments” has a specific and restricted statutory definition which is off-putting to developers who are increasingly willing to include flexible space for community gardens within development and often call plots “allotments” for marketing purposes. Community food growing spaces tend to be integrated into new development as part of the overall landscape design, thus benefitting the mental and physical health of those residents and raising their awareness of food.

Paragraph 93 covers the social, recreational and cultural facilities and services the community needs.

Recommended change

We believe that food should be more fully considered within the planning of social infrastructure, in the following ways:

- Community food growing spaces should be considered as both part of green and social infrastructure, for their contribution to community and recreation. There is significant evidence of the social benefits of communal food growing. This includes overcoming isolation and building connections, friendships and important local networks with neighbours.
- Healthy food retail and catering should be considered as social infrastructure. Whilst this is clearer when the provision is led by the community, these initiatives are often more sustainable when run as social enterprises or smaller businesses with community benefit as a primary aim.
- In all healthcare settings, including hospitals, GP practices, and care homes – adequate provision of kitchen, and dining, alongside easy access to tap water, are essential to ensure a high standard of health. Consideration should be given for food growing and fresh food retail facilities to benefit patients, staff and visitors.

- Education and childcare facilities - adequate provision of kitchen, dining, and food growing space, alongside easy access to tap water, are essential to ensure a high standard of health and education of children, staff and families. Many schools and academies lack dining space which can mean children leave schools at lunchtime, leading to a proliferation of outlets selling junk food near schools. This needs to be addressed in new school or academies as well as existing schools and academies, to address the challenge of childhood obesity.

Section 11. Making effective use of land

Paragraph 117 proposes that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Recommended change

Sustain welcomes the national objective that in scaling up the quantity of house building recognition that the future generations living in those homes should have healthy living conditions.

The NPPF should set a strategic vision for homes which will meet the needs of residents over the lifetime of the building. There is insufficient leadership on minimum internal and external space standards on new housing. Occupants who do not have space to cook or eat together will not create a healthy community.

Paragraph 118 recognises the role of undeveloped land in food production.

Recommended change

Paragraph 118 is phrased negatively. All the uses in 118 b) including food production are positive uses for land.

Section 12. Achieving well-designed places

126. Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and effective landscaping;
- c) respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Recommended change

We would like to see the inclusion of:

- a recognition within design of the importance of communal gardening and food growing, due to the role these play in ensuring that active healthy lifestyles and community-building activities are made easier and more accessible as advocated by BRE Home Quality Mark <https://www.homequalitymark.com/>
- designing space with flexible use that can be easily adapted to growing food, so avoiding the retro-fitting of housing developments, once demand is established for food growing amenities.
- provision of adequate kitchen and dining facilities.
- New residential developments - adequate provision of kitchen and dining space and facilities should be ensured in planning, alongside easy access to tap water, as these are essential to ensure a high standard of health. Consideration should also be given for access to food growing and fresh food retail facilities.

Section 15 Conserving and enhancing the natural environment

Paragraph 168 states planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of geological value and soils (in a manner commensurate with their statutory status or identified quality);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

169. Plans should: allocate land with the least environmental or amenity value, where consistent with other policies in this Framework (Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality);.

Recommended change

NPPF should be proactive in guiding the use of rural land that is fit for the new future for food and farming, in delivering public health benefits.

“I believe the money we spend, as a country, supporting healthy food production is an investment not an expenditure, a way of reducing significant future costs not an enduring burden on the exchequer. Wholesome food production is an invaluable investment in the health of our nation, from which we all reap the benefits...”

Michael Gove MP, Defra Secretary of State, in A Brighter Future for Farming speech delivered at the [NFU conference](#), January 2018

The relevance to planning includes:

- **contributing to healthy diets** by reducing the health and economic burden of diet-related disease and making sustainably produced, fresh food available, affordable and accessible to all, by for instance:
 - **more and diverse horticultural production** based on sustainable methods and decent working conditions,
 - **specific support for diversification** away from producing products we should be reducing in our diets, such as sugar,

- **better household food security**, better physical and mental health for workers and the ability of people on a low income to buy good food - through wages based on decent contracts and a living wage that reflects the actual cost of living, as well as better working conditions in the food and farming sector as a whole (notorious for low pay and precarious jobs)
- **tackling air pollution** from farming such as ammonia;
- **active promotion of access to countryside**, with educational farm visits raising awareness of food production;
- active promotion and **growth in acreage of beneficial farm systems** that can deliver some – or all – of these outcomes such as organic, agro-ecological and agro-forestry.

Sustain's draft response to the consultation on changes to NPPF guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf

Plan review guidance

What is the role of the Authority Monitoring Report?

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Local planning authorities must publish information at least annually that shows progress with local plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the local plan is progressing and are encouraged to report as frequently as possible on planning matters to communities. This is important to enable communities and interested parties to be aware of progress. Local planning authorities can also use the Authority Monitoring Report to provide up-to-date information on the implementation of any neighbourhood plans that have been brought into force, and to determine whether there is a need to undertake a partial or full revision of the local plan, when carrying out a review at least every five years from the adoption date.

This information should be made available publicly. Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out what information the reports must contain, although there is other useful information that can be set out. In particular, the reports can highlight the contributions made by development, including section 106 planning obligations, Community Infrastructure Levy and New Homes Bonus payments, and how these have been used.

Sustain Response

As a campaigning organisation, effective monitoring is so important. We find that local plan policies respond to local evidence and include criteria for new development but then there is no monitoring of the implementation of policy so it is not possible to see if the policy was ever intended to be implemented, and if it is implemented what was the impact on the development and on the intended outcomes.

Build to Rent

Should build to rent homes meet additional minimum standards?

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Build to rent homes are normally designed, constructed and managed to a high quality standard. Individual schemes should meet any relevant local and national planning policy requirements. Affordable private rent homes within any particular scheme should be

constructed and managed to the same high quality standards as the private rental homes. There are no extra national standards in addition to this.

There is no national requirement for authorities to apply national space standards in their area. Space standards are optional. Where authorities choose to apply them the national policy does not preclude authorities from dis-applying them for particular parts of the local plan area, or for particular development types, such as build to rent schemes.

<https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

Sustain Response

Families living in social housing are at most risk of being in food poverty and the potential of experiencing poor health. Food poverty, or household food insecurity, can be triggered by a crisis in finance or personal circumstances, but may also be a long-term experience of not being able to access a healthy diet or afford to eat well. Without access to cooking facilities, families will be reliant on fast food take-aways and pre-prepared processed food. It is essential that social housing has space for cooking and dining.

<https://www.sustainweb.org/foodpoverty/whatisfoodpoverty/>