

THE NATIONAL PLANNING POLICY FRAMEWORK CONSULTATION
A RESPONSE BY SUSTAIN: THE ALLIANCE FOR BETTER FOOD AND FARMING
OCTOBER 2011

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1. About Sustain

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 to the consultation on the National Planning Policy Framework (NPPF) has been prepared following consultation with colleagues from Sustain's alliance, and with attendees at a food and spatial planning conference we organised in July 2011¹. It represents the general, rather than detailed views of members of these networks, many of which will also be responding separately. This response will focus solely on the food and farming implications of the proposed national planning policy framework because this is our area of expertise.

We recently produced a *Good Planning for Good Food* report² which identifies which current national planning policies support sustainable food systems, and how local authorities have used these policies in their areas. Therefore we are very keen to ensure that the new planning framework both retains and strengthens support for sustainable food systems, especially in the key areas of protecting agricultural land, promoting retail diversity, ensuring easy access to healthy food and enabling non-commercial food growing.

We recognise and support the concerns of our member organisations. In particular, the Campaign to Protect Rural England, Friends of the Earth and The National Trust have very serious reservations, which we share, about the NPPF's proposed definition of sustainable development. Specifically, we believe the conflation of sustainable development with growth is fundamentally wrong.

¹ A summary of the presentations and discussions is available here http://www.sustainweb.org/localactiononfood/food_spatial_planning/

² Good Planning for Good Food (2011), Sustain http://www.sustainweb.org/localactiononfood/food_and_planning/

Professor Tim Jackson's report, *Prosperity Without Growth*³, is only the most recent of many scientific publications showing, with powerful clarity, that growth is simply incompatible with sustainability. To base the entire NPPF on this flawed premise threatens the viability of the entire framework. This is not to argue in favour of stasis. Indeed, society will need to be at its most creative and dynamic to solve the problems we face. However, creativity could make matters worse, instead of better, if it is focused on growth.

We are also concerned that, while the NPPF makes some good proposals on, e.g. town centres and sustainable communities, there are too many potential loopholes and we fear these may undermine sustainable development. These issues are addressed in the sections below.

2. Planning and food

The effects of planning on the food system affect what we eat, how we eat it and our long-term physical and mental well-being. However food has not been specifically included in most planning policy (unlike other essentials of human existence such as water, air, transport, and housing). In recent years this has begun to change with some local authorities recognising the importance of incorporating food systems into planning (e.g. in the London Plan). Internationally there is now the American Planning Institute's policy on food. Food was also the subject of the Royal Town Planning Institute's "world planning day" in 2010. How to make the food system more resilient and sustainable is being more widely recognised as an urgent and essential issue, given the backdrop of climate change and fluctuating food and oil prices.

We therefore believe that the National Planning Policy Framework should ensure local authorities incorporate sustainable food and farming issues into their policy and practice by adding "*sustainable food and farming*" to the list of strategic priorities in Policy 23.

3. Planning for prosperity

Sustain is very pleased to see support for town centres at the heart of the objectives for economic development. However, we believe that there needs to be more emphasis on retail diversity in neighbourhood centres and recognition of the importance of the contribution of genuine retail diversity – not just different formats of the same retailers - to economic, social and environmental goals.

- Retail diversity

Retail diversity is an essential element of a sustainable food system (which includes, but is not the same as, a sustainable economy). It creates a range of employment opportunities requiring different skills, contributes to the vitality and distinctiveness of towns, and supports a variety of food supply chains – including those linked to social enterprises - which makes the whole food system more resilient. A range of food retailers – small, medium and large - are likely to use a wider range of suppliers, including local businesses and micro-enterprises, which contributes to sustainable development.

The current text in Policy 76 is

"Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period"

³ Jackson, T (2009) *Prosperity without Growth. Economics for a Finite Planet*. Routledge

We are concerned that the notion of competition in the NPPF is vague and so will not lead to sustainable and thriving town centres with a diverse range of food retailers. Town centre competitiveness could mean competitiveness with out-of-town centres, competition between different town centres, or indeed in the shops within that town centre, and may focus solely on low prices, to the detriment of quality, standards and long-term sustainable development. We would like to see this emphasis on competitiveness changed to focus instead on retail diversity.

Retail diversity is mentioned in PPS4 Planning for Sustainable Economic Growth⁴, and the Association of Convenience Stores⁵ defines retail diversity in the following way:

“Diversity could be considered in terms of location, ownership type, store size, fascia and format as supply side dimensions, whilst on the demand side, consumers require different types and ranges of products, variations in quality/position, price differences and service offers. Key amongst these would be the ability of different retailers to be available to consumers and to bring a sense of differentiation (possibly uniqueness) to the range of provision. In most cases this may be best achieved by actively supporting independent retailers and their supply systems.”

We would like to see the current wording in Policy 76 deleted and changed to: *“Planning policies should promote attractive town centre environments which support retail diversity”*. The Association of Convenience Stores’ definition of retail diversity should be incorporated into the Glossary of the NPPF.

- Neighbourhood shopping

Food retail is not just about town centres, but also about ensuring that shops are in locations that are accessible and meet the local community’s needs. Convenience outlets in neighbourhood shopping centres are important for many people who live in both urban and rural areas especially the elderly, socially isolated, and people who find it difficult to use transport to go out of their area for shopping. Neighbourhood convenience shops can offer price competition, opportunities for smaller producers and a greater variety of foods for people from different cultures. We are therefore very pleased to see the policy 126 in the “Sustainable Communities chapter” *“...safeguard against the unnecessary loss of valued facilities and services particularly where this would reduce the community’s ability to meet its day-to-day need”*

Some local authorities⁶ specifically mention convenience shopping, greengrocers, bakers and post offices in their Core Strategies. The London Plan, in Policy 4.8, wants Local Development Frameworks to “support convenience retail particularly in District, Neighbourhood and Local Centres, to secure a sustainable pattern of provision and strong lifetime neighbourhoods”⁷. We are keen to see that the national planning policy framework supports these initiatives taken by local authorities and are concerned that the detail and support that is in PPS6 (see wording below) will be lost.

⁴ Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009)

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement4.pdf>

⁵ http://www.acs.org.uk/en/info/document_summary.cfm/docid/CF8EC60D-73EC-4C48-BFD2656F3C74218D

⁶ Good Planning for Good Food (2011), Sustain

http://www.sustainweb.org/localactiononfood/food_and_planning/

⁷ London Plan, Spatial Development Strategy for Greater London (2011), Mayor of London

<http://www.london.gov.uk/sites/default/files/The%20London%20Plan%202011.pdf>

PPS6⁸ 2:56

“Deprived areas often have poor access to local shops and services. To tackle this problem, local authorities should work with the local community and retailers to identify opportunities to remedy any deficiencies in local provision. This is likely to be best achieved through strengthening existing centres or, where appropriate, proposing new local centres.” (rural and urban areas)”

Therefore we propose a change to Policy 126 to acknowledge the importance of convenience retail in deprived areas and insert the following point: *“ensure that the convenience retail needs of the community are met through strengthening existing centres, or sole shops, or proposing new local centres in rural or urban areas”*.

4. Sustainable communities

Sustain is very pleased to see *“promot(ing) the health and well-being of the community”* as a key objective in the NPPF, but would like to see more detail to ensure that local needs are met. We will focus on two areas: food shopping and food growing.

- Food shopping that meets day-to-day need

It is acknowledged that some people in England are not able to buy healthy and affordable food⁹ and, while this is a complex issue, planning plays a role in ensuring that affordable, healthy, fresh and culturally appropriate food is accessible to the whole population. We are very keen to ensure that neighbourhood shops are protected if they provide for “day-to-day need” but currently planning policy does not enable planners to distinguish between types of retail. We have made the case elsewhere that a change to Use Classes will help planners to distinguish between convenience and comparison retail.¹⁰ The Planning and Housing Committee in the London Assembly, in a report prepared for the consultation on the London Plan, has also suggested that the Use Class Orders be amended to help improve community access to food shops.

- Growing your own food

There is an increasing body of evidence to confirm that growing your own food helps to promote well-being, not just in terms of physical and mental health, but also by stimulating local economic activity and, thereby, some skilled employment. Sustain therefore recommends growing food is incorporated into the designation of local green space.

The demand for food growing space is increasing¹¹ and, according to a National Trust survey, 70% of those interviewed felt that all new housing developments should include some space for

⁸ Planning Policy Statement 6: Planning for Town Centres (2005)

⁹ The London Health Inequalities Strategy; Draft for Public Consultation (August 2009), Greater London Authority <http://www.london.gov.uk/mayor/priorities/health/docs/health-inequalities-strategy-draft-consult.pdf>

¹⁰ Use Classes Order Review (2011) Sustain
http://www.sustainweb.org/localactiononfood/food_and_planning/

¹¹ For example allotment waiting lists - <http://www.telegraph.co.uk/foodanddrink/5422485/Allotment-waiting-lists-reach-up-to-40-years.html>

food growing¹². Some local authorities are trying to explore how to dedicate land for food growing, for example policy 7.22 in the London Plan¹³ states: “*Providing land for food growing will have many benefits, it will help promote more active lifestyles, better diets and food security, social benefits and support for local food growers*”

Sustain also recommended, in the recent consultation on Change of Use Classes¹⁴, a separate Use Class classification for non-commercial food growing.

However, some local authorities have found it difficult to allocate land specifically for food growing in their local plans, often due to commercial pressures to build on allotment sites and/or other actual or potential food growing sites. Given the upsurge of local interest in growing food, the NPPF should enable local authorities to designate such land. It is also important to note that growing food is both an urban and a rural issue, and while green space may be trickier to locate in urban areas, there may not necessarily be land available for people living in rural or suburban areas to grow food.

We would like to see food growing as a designation, added to the second bullet point in Policy 131 (Local Green Space designation) “where the green area is demonstrably special to a local community and holds a particular local significance because of its beauty, historic importance, recreational value, tranquillity, richness of its wildlife *or its importance for community food growing*”.

5. Protection of best and most versatile agricultural land

Sustain is extremely concerned that policies to protect the best and most versatile agricultural land are weakened in the NPPF, meaning that this land will come under increasing pressure for building development. Currently high grade agricultural land is protected, to some degree, in PPS7¹⁵. However, Policy 167 significantly undermines this.

High-grade agricultural land (whether it is in use or not) once it is built on, it is lost. The Foresight report¹⁶ mentions the increasing importance of not only protecting high grade agricultural land, but encouraging its use for agricultural purposes in order to adapt to climate change. Sustain is concerned that the current NPPF text:

- a) Emphasises the economic value of agricultural land over “other benefits”. We believe that protecting agricultural land is essential for current and future generation’s food production, as well as protecting biodiversity and enhancing our landscape in the long term. It should not, therefore, be assessed according to temporary economic value.
- b) Allows development if it is “necessary” as opposed to “unavoidable” (current text in PPS7). This appears to presume that development is automatically more important than the agricultural use. We maintain that there are few things more necessary than food.

¹² Planning Reform (September 2011) YouGov Plc for The National Trust.

¹³ London Plan, Spatial Development Strategy for Greater London (2011), Mayor of London
<http://www.london.gov.uk/sites/default/files/The%20London%20Plan%202011.pdf>

¹⁴ Use Classes Order Review (2011) Sustain
http://www.sustainweb.org/localactiononfood/food_and_planning/

¹⁵ Planning Policy Statement 7: Sustainable Development in rural areas
<http://www.communities.gov.uk/publications/planningandbuilding/pps7>

¹⁶ Land Use Futures: Making the most of land in the 21st century – Executive Summary (2010), Foresight Land Use Futures Project, The Government Office for Science, London
http://www.bis.gov.uk/assets/bispartners/foresight/docs/land-use/luf_report/8614-bis-land_use_futures_exec_summ-web.pdf

- c) Abandons the provision in PPS7 that, if land does need to be developed, that adverse effects to the environment be minimised.

Sustain agrees with others who have commented on the text on agricultural land in Policy 167, and proposes that *“Best and most versatile agricultural land should be developed only in exceptional circumstances, and should otherwise be designated and protected for agricultural, wildlife conservation, or landscape purposes”*.

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