

London Food Link response to the draft New London Plan February 2018

Sustain is the alliance for better food and farming. Two senior members of Sustain staff serve on the [London Food Board](#), helping to oversee implementation of the Mayor of London's London Food Strategy, and many of our projects and campaigns support implementation of the Mayor of London's London Food Strategy. Sustain also runs the [London Food Link](#) network, working for a healthy, sustainable and ethical food system for the capital.

Through our projects and campaigns we strive for a food system that benefits all Londoners. Our projects and campaigns with a strong London presence include:

- [Capital Growth](#), working with over 2,700 community food growing spaces across London, providing opportunities for 150,000 Londoners to get involved in food growing, bee-keeping, biodiversity conservation and food enterprise.
- [London Food Poverty Campaign](#), which publishes an annual food poverty profile, Beyond the Food Bank, charting progress by London Boroughs on action to reduce long-term food poverty. We also support practical initiatives providing solutions.
- [Good Food for London](#), our annual London borough league table and series of good food maps, comparing London Borough leadership on food policy and practice.
- [Sugar Smart](#), working with the Jamie Oliver Food Foundation and local food partnerships to reduce sugar consumption, with 15 London Boroughs involved.
- [Urban Food Fortnight](#), showcasing the capital's vibrant food scene.
- [The Jellied Eel](#), London's ethical food magazine, distributed free to over 100 ethical eateries around the capital, with an estimated 50,000 readers, telling the stories of growers, makers, cooks, sellers, savers and enjoyers of good food across London.

We have also run numerous projects – many with the support of the Mayor of London, London Food Board and others implementing the Mayor of London's London Food Strategy, for example to reduce the capital's food waste; improve the health and sustainability of food in London's schools and other public sector institutions; improve the availability and affordability of fresh fruit and vegetables in deprived areas; and secure a healthy and sustainable food policy for the London 2012 Olympic and Paralympic Games – a world first.

The London Plan has a vital role to play in reducing obesity and diet-related conditions; improving mental health; reducing food poverty and inequalities; increasing biodiverse and accessible green space; promoting good food jobs, training and enterprises; and improving London's reputation as a good food destination for tourists.

The following pages provide a summary of Sustain and London Food Link's response to the draft New London Plan, highlighting opportunities to improve the health and sustainability of London's food system. These have also been entered online although in some cases without the full detail of justification.

Summary

Sustain and the London Food Link network are members of the London Food Board overseeing implementation of the London Food Strategy. Overall, we welcome some of the bold commitments made within this draft new London Plan, in particularly around committing to a healthy city and taking practical steps to achieve this, such as restriction on fast food outlets, which has recently been highlighted as a priority in Public Health England guidance to achieve healthier high streets.

Despite these areas of progress there are lots of areas where the chapter policies could go further to reflect the key policies, as well as build on progress and create a plan fit for the next decade. As the document states, obesity and health inequalities are a key challenge for London – as are other diet-related diseases such as heart disease and diabetes that are also disproportionately prevalent in low-income communities – and there are many elements where the new London Plan can create a framework for local authorities to tackle these issues head on, through development, planning applications and local strategies.

Additionally, while we welcome the focus on the environment, circular economy and green infrastructure we would like to see more inclusion of the food sector and in particular the huge role that food growing and urban farming currently plays and could play in creating a healthier, greener London. This comment is relevant not just for Chapter on Green Infrastructure, but throughout the plan.

Our response contains general comments and is supported by specific recommendations and suggestions for how the draft new London Plan could be edited to ensure that the commitment to these key policies are upheld throughout the plan and its implementation. These have been added online but are repeated here with the justification and evidence to support our suggestions, which we hope you will find useful.

Please do get in touch if you require further evidence on any of the comments in our document.

Key Policies Comment

GG1: Building strong and inclusive communities	Building 'healthy' communities should be included within this vision.
GG2: Making the best use of land:	This should include a reference to food growing due to the multiple benefits, the high level of community involvement and London's international status as a leader in urban agriculture.
GG3: Creating a healthy city	We strongly support the proposals on banning junk food outlets on this, but would also like to see under point G, reference to supporting community food enterprises and community food growing, to embed this within the culture of London's neighbourhoods.
GG4: Delivering homes:	Add an additional point that reinforces the importance of green spaces within housing development.
GG5: Growing a good economy	This should reference waste and carbon.
GG6: Increasing efficiency and resilience	London needs a contingency plan for feeding itself ¹ , as most of our supply chains are built on a 'just in time' model, meaning any disruption could lead to major problems. This policy should also make a reference to soil as a critically important nature resource, which through current unsustainable production methods will be infertile within one generation ² .

¹ <http://neweconomics.org/2008/11/nine-meals-anarchy/>

² <https://sustainablesoils.org/vision/>

London Plan – Chapter 3: Design

This chapter includes some good policies on minimum internal and external space standards, and temporary use of development sites, but 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
- **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.

We strongly support the inclusion into policy of access to free drinking water, recognising its' environmental and health benefits.

Overall it appears that the role of food growing in terms of the health benefits, wider social and environmental benefits is not fully integrated into the draft New London Plan despite the strong evidence on this topic.

	Amends	Justification
Policy D1 A 7)	Insert "food growing" into 'should provide open space for social interaction, play, relaxation and activity.'	NPPF Guidance says: "Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport." In major development residents should have access to communal gardens, to connect with nature, enjoy plants and have the opportunity to engage in growing. ³
D1 B 3)	Needs an explanation of sustainability.	Clarity – emphasis on the creation of new healthy and sustainable communities in relation to design. ⁴
D1 B 5) Page 99	Lack of recognition of the role of local food growing spaces in sustainable drainage.	The draft New London Plan does not seem to recognise the benefit of food growing spaces

³ Reference:

Schmutz U., et al (2014). *The benefits of gardening and food growing for health and wellbeing*. Garden Organic and Sustain. [online] www.growinghealth.info

Sustain (2014) *Planning sustainable cities for community food growing* www.sustainweb.org/publications/?id=295

Mayor of London (2014) *Sustainable design and construction SPG Local Food Growing* www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/sustainable-design-and

NPPF Guidance www.gov.uk/guidance/health-and-wellbeing

How can planning help create a healthier food environment? Paragraph: 006 Reference ID: 53-006-20170728

What is a healthy community? Paragraph: 005 Reference ID: 53-005-20140306

www.kingsfund.org.uk/sites/default/files/field/field_publication_file/Gardens_and_health.pdf

⁴ Reference:

www.gov.uk/guidance/health-and-wellbeing *What is a healthy community?* Paragraph: 005 Reference ID: 53-005-20140306

<https://www.tcpa.org.uk/healthy-environments>

<https://www.tcpa.org.uk/developers-wellbeing>

		and edible planting into the landscape beyond food production. ⁵
Para 3.1.4 Page 100	Expand this section on the benefits of urban greening, to reference the health and social benefits of urban greening and food growing.	The draft New London Plan has not recognised the various roles that integrating food growing spaces and edible planting into the landscape can play.
Policy D2 A 6) Page 102	We welcome the evaluation of current green infrastructure in preparing development plans, but also feel that the needs of the future communities and current deficiencies must be addressed.	Currently some communities have limited access to green infrastructure and future communities may require an increase.
D4 D Page 109	We support having a minimum internal space standard and a minimum outside space standard, but are seriously concerned this may be interpreted as a standard (rather than minimum) for provision in high density development when it is interpreted alongside Policy D6.	People need space to cook and space to sit and share meal times; this is as crucial part of designing for healthy Londoners, as suitable sleeping space. Without guidance and recognition of this, new residential developments may not provide enough space for cooking and dining, and existing housing may be renovated to reduce this, particularly for rented property. Absence of this can lead to a reliance on pre-made and processed food, which is predominantly less healthy.
Policy D4	Insert new clause on 'Communal open space'.	Currently we do not see the aspiration for inclusive neighbourhoods (including community food growing spaces) being implemented in the design policies for open space. This is set out in the glossary definition of Inclusive neighbourhoods within the Plan ⁶ .
Para 3.4.6 Para 3.4.7 Page 113	Para 3.4.6 also mentions shared amenity space although it is titled private open space. Para 3.4.7 specifically covers communal play space.	In major development we want residents to have access to communal gardens where it will be possible to experience the seasons, enjoy plants and have the opportunity to engage in growing themselves. ⁷

⁵ Reference:

Sustain (2014) Planning sustainable cities for community food growing www.sustainweb.org/publications/?id=295
National Planning Policy Framework (2012) Department for Communities and Local Government. ((para 17)).

⁶ "An inclusive neighbourhood is one in which people can live and work in a safe, healthy, supportive and inclusive neighbourhood. An inclusive neighbourhood will ensure that people are able to enjoy the options of easy access by public transport and active travel modes (walking and cycling), to services and facilities that are relevant to them. It will also allow people to safely and easily move around their neighbourhood through high quality people focused spaces, while enjoying barrier free access to surrounding areas and the wider city. They should have safe and easy access to a network of open spaces which meet their recreational needs to enhance health and wellbeing, as well as welcoming easily accessible communal spaces which provide opportunities for social interaction."

⁷ References

Schmutz U., et al (2014). The benefits of gardening and food growing for health and wellbeing. Garden Organic and Sustain. www.growinghealth.info

Sustain (2014) Planning sustainable cities for community food growing www.sustainweb.org/publications/?id=295

Mayor of London (2014) Sustainable design and construction SPG Local Food Growing www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/sustainable-design-and

NPPF Guidance <https://www.gov.uk/guidance/health-and-wellbeing>

How can planning help create a healthier food environment? Paragraph: 006 Reference ID: 53-006-20170728

What is a healthy community? Paragraph: 005 Reference ID: 53-005-20140306

www.kingsfund.org.uk/sites/default/files/field/field_publication_file/Gardens_and_health.pdf

Sustain (2014) Planning sustainable cities for community food growing www.sustainweb.org/publications/?id=295

	Insert new paragraph on 'Communal open space: In major development residents should have access to communal gardens where it will be possible to experience the seasons, enjoy plants and have the opportunity to engage in food growing themselves.'	
Para 3.4.11 6 th bullet point Page 114	Include "Food Growing Space"	Landscape designs should provide flexible open space which may be used for food growing by residents should there be demand from the local community. ⁸
Policy D7 A Page 122	This should be more visionary, for example including edible landscaping in the public realm (for people as well as wildlife).	
Policy D7 M Para 3.7.11	We support the policy to provide and manage free drinking water.	This addresses growing public concern over consumption of high sugar drinks (obesity, diabetes, dental health) and the environmental impact of single-use plastic bottles (litter, carbon intensity, marine pollution). ⁹
Policy D7 K & Para 3.7.12	Support temporary use of development sites. Although this should not be instead of permanent gardens.	Developers are increasingly including moveable community gardens to encourage community cohesion. See case studies in publication to be launched end Feb ¹⁰

⁸ Mayor of London (2014) Sustainable design and construction SPG Local Food Growing <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/sustainable-design-and-nppf-guidance> www.gov.uk/guidance/health-and-wellbeing

How can planning help create a healthier food environment? Paragraph: 006 Reference ID: 53-006-20170728

What is a healthy community? Paragraph: 005 Reference ID: 53-005-20140306

⁹ www.sustainweb.org/news/oct17_ymca_waterfountains/
www.sustainweb.org/news/jun17_bristol_water_joins_sugar_smart/
<http://sustainablefoodcities.org/newsevents/news/articleid/811/animation-reveals-impact-of-sugary-drinks-on-young-people>

¹⁰ www.tcpa.org.uk/developers-wellbeing

Chapter 5 - Social infrastructure

We support many of the proposals within this section and are pleased to see that **health provision** is recognised as a vital part of London’s social infrastructure.

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, which is why it needs to be considered in both areas. 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. Encouragement of these initiatives throughout the settings in this chapter would help deliver on the key policies in this plan and other Mayoral priorities, notably those in the Mayor’s Health Inequalities strategy.

In addition, for effective provision around dietary health there needs to be adequate planning considerations on the areas below concerning food:

- **In new or refurbished hospitals** - provision of adequate kitchen facilities, including kitchens on every ward allows for fresh food preparation for patients and staff, including communal space for patients to eat together. They should also have access to drinking water.
- **In all healthcare settings, including hospitals, GP practices, and care homes** – consideration should be given for food growing and fresh food retail facilities to benefit patients, staff and visitors¹¹.
- **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 schools or academies as well as existing schools and academies, to address the challenge of childhood obesity.
- **Suitable space also needs to be available for breastfeeding**, taking into account need for privacy, safety and access to water, hand-washing and nappy-changing facilities.

These areas are woven into the specific policy proposals below.

	Amendments	Justification
S1G and 5.1.4	We agree with the recommendation that redundant social infrastructure be considered firstly for other social infrastructure before redevelopment – and would like community food growing to be considered as a prime example of this. For example Edible Landscapes in Finsbury Park has received designation as an Asset of Community Value.	Many of the 2,700+ community food growing spaces in London’s Capital Growth network, supported by the Mayor of London, are founded on repurposed, and often previously unloved communal ground, including derelict sports grounds, redundant corners of recreational space, land surrounding health institutions. These are often small plots of land that can

¹¹ There are numerous examples within London and outside of London e.g. University Hospitals Birmingham, where they have leading the way with food growing on hospital grounds with raised beds, poly tunnels and a 140-tree orchard, which contribute produce to fruit and veg stalls, open six days a week, and farmers’ market initiatives (in fifth year of trading) at the hospital to improve staff, patient and visitor access to fresh fruit and veg.

		be brought back into life and provide a hub for different communities.
Section 5.1.3	We support the proposal for Supplementary Planning Guidance to be developed in this area, and we would suggest that community food growing, which has been supported through some examples of spend on the Community Infrastructure Levy be included in the Guidance.	Supplementary Planning Guidance was developed in Brighton & Hove around community food growing, and we believe that this could provide a valuable resource, along with the general comments above, on how and where this could be incorporated. We recommend the Brighton & Hove guidance as a model for local authority planners seeking to improve green space.
5.1.7	We appreciate the need to build affordable housing, but we would urge that any new developments incorporate adequate provision of communal space e.g. for food growing, and also provision of adequate cooking and dining space within these facilities, in order to create healthy communities in these residential developments, rather than increase the long-term burden on health services.	
5.1.9	We agree with the principle of unused/underused facilities being used by community groups. We would encourage any guidance that sits alongside this recommendation to include consideration of fruit and vegetable retail, and/or catering, and/or training and/or incubation space for small food enterprises.	There have been many examples of community run or social enterprises performing valuable social infrastructure with convenient access to affordable healthy food, notably though not exclusively through retail and/or incubation of small food enterprises. These have been commonplace in East London boroughs, particularly in deprived neighbourhoods – including food cooperatives run in Newham, Hackney, Tower Hamlets and Greenwich.
S2B	<p>We agree with the principle of high quality new and enhanced healthcare facilities being supported. We would encourage any guidance that sits alongside this recommendation to include consideration of adequate kitchen and dining facilities, as well as widespread access to free drinking water.</p> <p>Our justifications in this section give examples of institutions whose physical infrastructure – supported in part by good decisions in planning and construction – provides the opportunities for healthier food for vulnerable people; healthy workplaces; income generation; and social cohesion - among many other important co-benefits.</p>	<p>This hospital also encourages patients to eat together. This supports patients to get back to normality and become more mobile during their hospital stay, and increases social interaction which reduces social isolation, combats loneliness and promotes greater wellbeing.</p> <p>Easy access to healthy food should be available for NHS staff 24 hours a day (supporting the Mayor of London’s 24-Hour City vision), at vending machines and canteens with provision for staff to store their own food and break-out spaces to heat and prepare food and take a break to eat it.</p>

		<p>Calderdale Hospital¹² achieves this with easy-to-access infrastructure that allows staff to order food at mealtimes and have it delivered to them. This initiative delivers food direct to staff that otherwise don't have time or can't leave the wards to eat.</p> <p>There should be water fountains on every ward and free tap water readily available at canteen and food points.</p>
5.2.9	.	<p>Children being treated in St Mary's Hospital paediatric ward in north-west London are now benefiting from meals freshly prepared onsite using fresh, unprocessed ingredients, in a brand new kitchen. This example shows that if hospitals don't have full catering facilities, individual wards and departments can still make local changes to enable better food provision, if that infrastructure is available. Child patients now benefit from a freshly cooked menu of nutritious food, available at flexible times throughout the day so that children having treatment don't miss out on a meal. Visiting parents are also provided with kitchen facilities.</p> <p>Guy's and St Thomas' NHS Foundation Trust received the Soil Association's Food For Life Bronze Catering Mark award in 2016. The hospital cooks meals from scratch using onsite production kitchens, have since started a partnership with SERCO to supply 1,200 meals a day to neighbouring Barts Health NHS Trust enabling Barts to serve freshly cooked meals.¹³ Again, having the infrastructure in place has enabled healthy food provision.</p>
S 3 B 8	We suggest amended text to ensure that facilities incorporate suitable, accessible outdoor space, including for food growing.	The justifications in this section are the same as for health settings, above, but instead with children, education staff and families/carers as the key beneficiaries.
S3B 11	Additional point suggested 'ensure adequate provision of kitchen, dining,	The justifications in this section are the same as for health settings, above, but

¹² <https://www.soilassociation.org/certification/catering/sectors/hospitals/case-studies-hospitals/iss-healthcare-at-calderdale-royal-hospital/>

¹³ https://www.sustainweb.org/publications/taking_the_pulse/

	and food growing space, alongside widespread access to tap water in all new and existing educational facilities.'	instead with children, education staff and families/carers as the key beneficiaries.
5.3.10	We are pleased to see recognition of space for food growing within the design of education and childcare facilities. This section needs to be amended with inclusion of the following additional sentence: 'design of education and childcare facilities also needs to ensure adequate provision of kitchen and dining space, alongside widespread access to tap water to support positive nutrition and hydration initiatives to improve children's health and attainment.'	The justifications in this section are the same as for health settings, above, but instead with children, education staff and families/carers as the key beneficiaries.

London Plan - Chapter 6: Economy

The Economy chapter relates to the wide scope of food, particularly access to healthy food. The draft New London Plan states that: ‘Obesity is one of the greatest health challenges facing the capital’, and as such measures to tackle this at a systemic level needs to be developed.

We therefore welcome the proposed restrictions on fast food outlets, including the requirement for food outlets to comply with Healthier Catering Commitment standards; the measures to improve retail provision in under-provided areas; and the reference to farmers’ markets. Sustain supports these policies, but would like to see them taken further to ensure that healthier food provision can help reduce obesity and other diet-related conditions.

In some respects, the Economy chapter lags a little behind some of the other chapters in its commitment to health and sustainable development. There might be a danger in this, if decision-makers find themselves able to choose either ‘healthy and sustainable’ or (unhealthy, non-sustainable), purely ‘economic’ options. We hope that our comments will enable the promotion of healthy and sustainable economic development. We further note that this would also help to meet the Mayor of London’s fairness, social inclusion and employment objectives, as the food sector is a major employer – production, manufacturing, foodservice and retail – present in every neighbourhood.

In summary, we are recommending amendments to encourage:

- Initiatives to support enterprises engaging in food growing, preparation, storage, selling, cooking and food surplus management – for example provision of low-cost business space.
- Provision of free-to-use and easily accessible drinking water fountains in the design of business, transport, public space and shopping areas, particularly those frequented by children.
- Provision of easily accessible water supplies and tool storage facilities for community food growing spaces.
- 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.
- Community gardens on vacant land in business and shopping areas, using planning agreements to secure these.
- Kitchen gardens in office and industrial areas.
- London’s parks and gardens as educational and tourist destinations, and their productive use for gardening and locally grown fresh food in associated catering establishments. The Royal Parks and several boroughs have championed this approach, for example The Regent’s Park Allotment, which provides training and educational opportunities.
- Skills development in gardening, marketing, cooking and serving of healthy food, as a vital component of the Mayor’s drive for skills and opportunities for all.

Page no and policy no for reference	Amends	Justification
Policy E1 – Offices. Section G, need a new sub-para 4	The policy should require design of offices which enables kitchen garden produce to be grown and served in company restaurants or restaurants serving the office area.	Greening the city, healthier environment for workers and others, facilitating skill development to grow food, a healthier diet and understanding of links between food growing and food on the table. Good

	It should also look at ways to consider dining space for staff for larger employers.	examples in Open House visits in the City – and across the world
Policy E2 - Low Cost Business Space	The policy should encourage unused class B space to be used for Good Development initiatives by community business, including food initiatives e.g. growing/storing/preparing/cooking food products. If the site is under pressure for development when there are local initiatives available, planning agreements should be sought to utilise part of the development site, or for off-site provision.	This will promote healthy food, good local development and jobs, and a low carbon economy. Also to combat food poverty. This should be part of the Mayoral commitment to tackling obesity, implemented through all of the plan.
Supporting Text Policy E3 6.4.3: Affordable workspace	This is a useful policy – but the promotion of healthy food growing, processing and distribution should be included in para 6.4.3 or as a new paragraph.	As above.
Policy E4 – Land for industry	Similar to above addition to E1, design of industrial areas should include the potential for garden produce to be grown and served to workers and visitors in restaurants serving the company or the estate. Also the provision of wholesale markets could be broadened to include other food growing and distribution functions, e.g. for community kitchens or to sort and distribute food that would otherwise be wasted.	
Policy E7 Intensification of land for industry	Design principles for greening, gardens and food provision should be incorporated into this policy. Also, drinking fountains etc. for workers.	
Policy E8 and para 6.8.3 p252	London’s food and restaurant sector should be included as one of Mayor’s sectors to promote enterprise, particularly those that promote healthy food and are led by local organisations.	Through the London Food Strategy, London aspires to be a culinary destination and good food capital. Encouraging food clusters and promoting SME food and catering innovation, especially healthy and sustainable food would reinforce the commitment to enable good jobs, reduce food waste, tackle obesity and ensure consistency across policies.
Policy E9 B6	We welcome the reference to improving retail but this needs to incorporate Public Health England recommendations to influence the retail offer on the high street, protecting locally-owned retail stores and tackling over-concentration of certain shops , to conserve retail	https://www.gov.uk/government/publications/healthy-high-streets-good-place-making-in-an-urban-setting Sustain’s extensive work on health inequalities over the past two decades, and the work of the London Food Board, indicates that those living in poverty have less access to affordable,

	establishments that stock healthier, locally sourced products’.	quality and healthy food. A recent analysis by Greenwich CDA showed that a basket of healthy food was more expensive than less healthy food in a more deprived area.
Policy E9 B7	We support encouragement and provision of incentives for farmers’ markets, local food markets, artisanal markets promoting healthy and sustainable food, but feel this should be reflected more consistently within the chapter (see above).	Markets provide an important low-cost route to market for new enterprises, direct sales of farm produce as well as the multiplier effect they have on the local economy. This can also support policies on tackling obesity and other diet-related health conditions and improving food access for people on a low income. This is supported by new Public Health England guidance.
Policy E9 Retail markets and hot food takeaways.	Add B10 – <i>‘facilitate the use of appropriate vacant land in shopping centres for community gardens, including temporary use if the land is envisaged to be used for development in the medium to long term.’</i>	Make the shopping centre more attractive, foster gardening skills and grow food that can be used in catering for shoppers, exemplary community engagement in the town centre. Examples including the Skip garden at King’s Cross and Lambeth’s Edible Bus Stop.
Policy E9 C	<p>We welcome the ban on new fast food takeaway outlets within 400m of school. We would like to see this extended to include a ban on outdoor advertising of unhealthy food and sugary drinks (legal High Fat Sugar and Salt (HFSS) definition used by Ofcom), especially on public transport routes used by school children; or a levy on such advertising hypothecated to pay for children’s health promotion.</p> <p>London councils leading the way include Waltham Forest, Lambeth and Tower Hamlets.</p>	<p>London has highest growth of hot food takeaways of any UK region, from 1831 in 2009 to 3571 in 2017.¹⁴</p> <p>We also have has a serious challenge in addressing obesity and other diet-related conditions such as diabetes. Schools represent symbolic areas and should be healthy food zones.</p> <p>Proliferation of fast food outlets and highly processed food undermines good work being done by London schools to improve the food environment for children. There is a duty of care to take action on their everyday food environment.</p> <p>This has been supported in planning decisions in other areas. For example in Wallsend, North Tyneside, where at least 25% of year-six pupils are considered ‘very overweight’ an inspector has ruled that controlling the proliferation of fast-food outlets ‘has a role to play’ in addressing childhood</p>

¹⁴ (The Times/AllMapData from CEI, 29/1/18).

		<p>obesity. Details below and further evidence available on request ¹⁵</p> <p>A recent Parents' Jury survey (Dec 2017) indicated concern that healthy messages in school are being undermined, especially if schools don't have stay on site policies.</p>
Policy E9 D	We support the proposal for takeaway outlet planning permission to be linked to Healthy Catering Commitment or other robust standards that support access to Healthier Food.	Encourage healthier eating outlets to tackle obesity.
Policy E10 Visitor Infrastructure	London's parks and gardens within the wider metropolitan open land and green belt are a great focus for tourism. We would like to see productive use of these spaces for food growing and gardening encouraged, and with associated facilities for visitors and the people involved in gardening.	It's important to celebrate and showcase our progress and status in terms of food growing and urban agriculture to visitors. It shows our commitment as a leader to be a more green, healthy, sustainable and community centred city. Examples are kitchen gardens at National Trust properties – e.g. Osterley Park; Capital Growth allotment at Regent's Park.
Policy E11 Skills and opportunities for all	This is a reasonable and worthwhile policy, but it would be helpful to list skills that would contribute to a low carbon and sustainable economy, and that would be available to deprived areas and vulnerable people. Such a list should include gardening, marketing, cooking and serving healthy food.	

¹⁵ The appellants argued that local plan policy is “too blunt a tool” to address health and well-being. However, the inspector defended the policy, pointing out that it was in accordance with the National Planning Policy Framework (NPPF), which seeks to promote healthy communities.
<https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=23443921>

Green Infrastructure

As Sustain has highlighted in previous consultations, there needs to be more recognition and link of the role that food growing and productive green space can have on physical and mental health. In particular G8 needs to be reworded; whilst food growing is mentioned in a few places, it does not receive the coverage it deserves in regards to its current and potential role in delivering multiple benefits including:

- Healthy food, 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 green and biodiverse city, as data continues to show from the Capital Growth programme, supported by the Mayor of London, London Food Strategy and previous London Plan.

We would like to see more links made between the Greenbelt and potential for peri-urban agriculture, horticulture and orchards. We believe that a productive Greenbelt would be protected, rather than being left and therefore targeted for future development. Moreover, the application of organic and permaculture techniques for food growing could contribute significantly to biodiversity, soil retention, carbon sequestration and water management.

	Amends	Justification
	Supporting Text	
Policy G1 8.1.1	Network of green spaces, street trees, green roofs – add food growing and gardening and ‘hedgerows’ and edible spaces.	Arguable these could be as important as green infrastructure and we should be encouraging these from the outset within the policy.
Policy G2 C	Add: ‘Support will be given for schemes that utilise and protect the Greenbelt for food production, where this enhances the environment and amenity of the land. ‘	We welcome the protection of the Greenbelt and feel this should be reflected in the policy. This should reference climate friendly food, increase food security and green business opportunities. Currently this policy falls short of addressing the demand that will be placed on the Greenbelt, 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.
G3	New sub-paragraph after D2 – ‘It includes significant agricultural or horticultural activity’	The criteria for designation of Metropolitan Open Land should include land that has high public value in terms of food production, the level of use, recreation, social enterprise and educational opportunities it provides for Londoners.
para 8.3.1	Add ‘food growing’ after ‘leisure uses’.	Land for food growing provides multi-functional purposes for common good including provision of healthy food,

		contributing to resilience of the food system and provision of recreation. There are current areas of land which are providing significant benefit in this way or have potential to.
G4	Supporting text	
8.4.1	Local spaces, including those used for communal activities, such as food growing at a neighbourhood level, should be mapped and protected spaces.	Collectively these spaces could form a larger area than MOL, and are arguably more accessible, better utilised, community-led and hence resilient Capital Growth 2,800 growing spaces have signed up since 2008 but these are not currently designated or recognised within the spatial planning system.
Para 8.4.2	Add 'allotments' after 'trees'.	
8.4.4	Add 'food growing'	Growing food enhances green and open spaces and engages community
Table 8.1 Page 308	Reference food growing. Land for growing food can form part of the range of activities in all categories of open space, from regional parks with city farms to Small Open Spaces including areas for community food growing. Small Open Spaces, Pocket Parks – following on from 8.4.1 need a consistent definition, mapping and mechanism to protect	No mention of food-growing, although many include food-growing. E.g. College Green and Slip Pocket Park
Policy G5 A	After '(including trees)' add 'private and community gardens'.	
para 8.5.2	After 'enhanced biodiversity' add 'fresh healthy food'.	
Policy G6 F	Add <i>'The value of gardens, allotments and pasture in providing biodiversity and access to nature should be recognised in all proposals and local decisions'</i>	We have evidence that gardens and food growing provides wildlife habitats, promotes healthy lifestyles, clean air. Due to the number, scale and biodiversity value these deserve a mention. For example Capital Growth Gardens have provided over 150 000 people access to nature and created over 70 ha of biodiverse green space.
Table 8.2, Semi-natural vegetation	After 'grassland', add 'vegetable, fruit and flower gardens and pasture, edible annual and perennial planting'.	The Urban Green factor needs to mention food growing as an example of semi-natural vegetation. ¹⁶ These important types of green spaces could be overlooked if not referenced.
8.6.2	Add <i>'Including orchards, community gardens'</i>	

¹⁶ <https://www.agroforestry.co.uk/about-agroforestry/forest-gardening/>

G7	G7A – after ‘urban forest’ add ‘and orchards’ G7B -2 – at end, add ‘including fruit trees’ G7C – add at end, and community orchards on open space, and individual trees that produce nuts and fruit as part of forest gardens.	
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Proposed changes to Policy G8 Food Growing, and supporting text

This draft policy on food growing does not go far enough to recognise the role and demand for community food growing outside of traditional allotments, which are already protected.

We believe there is sufficient evidence of the many benefits of growing food, and evidence of the demand in London, which is one of the world’s leading cities on urban agriculture, to justify greater commitment to protect and expand land for food growing.

As a result we are suggesting a rework of this policy as follows:

Policy G8	Amends	Justification
New Point	Add ‘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. In major developments, the Mayor will require space for the cultivation of food in order to create a greener and more resilient city.’	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 London Food Strategy. London has also 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.’
A	In Development Plans, boroughs should:	
1)	Amend to say ‘protect urban farms, existing allotments and other community food growing spaces, particularly those with significant involvement or food production and encourage provision of space for community gardening, including for food growing and orchards, within new developments.’	Community growing spaces typically have leases that give 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. The Mayor and Boroughs should safeguard existing food growing spaces

		with high amenity value, producing food at scale, or on high grade agricultural land, particularly on the urban fringe.
2)	Identify potential sites that could be used to increase local food production for London, with long-term agreements.	There is a need for an increase in land for growing food, particularly with long leases to create a more resilient food system, ensure access to nature and provide the opportunity for sustainable livelihoods.
3)	Ensure that land for community gardening and commercial food growing is developed in a manner that protects and enhances the soil, provides sustainable drainage and improves biodiversity.	Higher intensity large scale food production does not always provide the multi positive benefits of environmentally-friendly food growing and farming.
4)	Ensure that all developments incorporate an area that can be used for communal growing of food.	Capital Growth, supported by the Mayor of London, 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.
	Supporting text	
8.8.1	In addition. Land for food growing also contributes significantly to access to nature and wildlife diversity.	
8.8.2	Currently this statement suggests that there is no way to ensure that small scale food growing is given prominence and protection. We would like this statement to include a bolder vision to protect these assets: <i>That as pressure to build on open space increases, smaller growing spaces should be recognised and protected for the amenity they provide particularly in dense areas. There is also opportunity to include such spaces in new developments, particularly those that replace existing gardens, as well as gardens connected to social infrastructure. In addition there should be consideration of other areas, such as green roofs and walls, re-utilising existing under-used spaces and incorporating spaces for food growing in existing and new schools.</i>	Over 2,800 growing spaces have registered with capital growth since 2008 many of which have transformed neglected spaces, engaged communities and created green infrastructure from scratch. These spaces deserve recognition, protection and support.

8.8.3	We welcome this statement and the recognition that the type of growing system impacts on the environmental benefit, but recommend that the climate emissions are also linked to the type of growing system used.	
8.8.4	This statement should say that the food system can have a positive impact on the environment.	
8.8.5	It would be useful to recognise that to date Capital Growth has supported over 2800 different food growing spaces covering over 70 ha of land and involving over 150 000 Londoners.	

London Plan Chapter 9: Sustainable Infrastructure

The topics covered in this chapter are not as directly relevant to food and farming, yet we know that a sustainable food and farming system does require infrastructure.

We would welcome:

- An acknowledgement of the significant GHG emissions related to food delivery and food waste and a strategy to tackle the pollution associated with the large volume of food and food waste that is transported across London every day.
- A pioneering approach to promoting sustainable diets and creating the infrastructure needed to ensure this happens through provision of land for growing food, premises for local food enterprises, and for efficient distribution within the capital, given the significant level of emissions associated with what Londoners eat.
- A commitment to create infrastructure for low GHG emissions food delivery in the development of new large communities.
- Leadership from London on how cities protect vital natural resources for food production, including soil, pollinators and water in and around the capital, including a commitment to protect all high quality Grade 1 farm land for food growing and consider hinterland for new market gardens instead of housing or other developments, to increase urban and peri-urban food production and distribution.

Page no and policy no for reference	Amendments	Justification
Policy S12	Add a new paragraph after B: <i>'The Mayor and Boroughs should ensure that sites are available for developments that serve local needs, and therefore reduce the need to travel, including local food growing and agro-ecological food production; also recognise the importance of associated tree planting in carbon reduction.'</i>	Food is a major contributor to Greenhouse gas emissions and therefore a reference to the elements that related to spatial issues should be made. The way food is grown is a major contributor, along with the type of food eaten, and types of transport e.g. refrigerated transport.
Policy S12	Add a reference that acknowledges that, where possible land be made available that helps to reduce the greenhouse gas emissions of our food system, e.g. land for growing food, or infrastructure that could help get more plant-based food into London, e.g. food distribution hubs.	Peas Please is a new campaign to encourage plant based diets – which are healthier with lower carbon emissions. The coordinators of this work serve on the London Food Board, overseeing implementation of the London Food Strategy.
Policy S17/18	Make reference to provision of space and infrastructure for community composting to reduce waste and create a circular economy. This is especially the case in boroughs where food collection is not provided.	Composting has a spatial requirement, and can also be linked to city farms and community gardens.
S17/18 and a new policy on soil.	Reference to the importance of compost and manure in soil quality and encouraging biodiversity, including diversity of food, plants, insects, mammals and birds.	There is also a broader need for a policy to identify soil quality, protect areas of good soil quality and improve areas with poor quality.

London Plan: Transport

Policy no for reference	Amendments	Justification
Policy T1	Add the need for access to diverse retail within walking distance to reduce car use and consider the impact of a rise in home delivery of groceries and prepared/cooked foods.	The exponential growth in this area has significant impact on transport.
Policy T2	We support the healthy streets approach but would like to see a reference to nature and biodiversity in the breakdown of what a healthy street is.	Strong evidence that access to nature is key for health and wellbeing and healthy streets should reinforce the idea of green infrastructure and nature corridors.

Contact details

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