

London Food Link's response to the Mayors Environment Strategy Consultation



London Food Link and Capital Growth

This response is from London Food Link, part of the charity Sustain. London Food Link is *the voice for good food in London* and has worked in the capital for over 12 years on strengthening the understanding of the role that good food can play in strengthening communities and economy as well as ensuring people understand the impact of the food system on the environment.

During this time London Food Link has run a number of projects including Capital Growth, London's food growing network of over 2500 community gardens and farms, Ethical Eats, Food Save and Good Food for London which have all contributed positively to London's environment.

Our response

London has a great track record of leadership and innovation on good food initiatives and in particular on the community food growing agenda, that has spanned the last two administrations and resulted in a silver award from the national Sustainable Food Cities initiative. We would like to see the Mayor continue to build on the city's assets and reputation to ensure that London continues to be leading city by integration of food policies across its remit and deliver on the Milan Urban Food Pact.



Overall while the strategy takes some great new approaches and has set out some clear visions in particular areas, such as air quality and waste, we think that there are some missed opportunities as follows:

- The role of the Mayor in leading and convening change beyond statutory responsibilities is not fully recognised.

- The **link between environment and health** is not strong enough in areas other than air quality.
- There could be **further integration with other strategies** – particular health inequalities and food.
- We would like to see an additional objective/policy/proposal under ‘Green Infrastructure’ Section 5.1 that **recognises the role of urban agriculture and productive landscapes** in providing quality green spaces that provide wildlife and health benefits, produce food, training and employment opportunities and engage the community.
- The strategy does not cover the **impacts of use of pesticides & herbicides**, the marine (or estuarine) environment or protection of high grade soil.
- The strategy does little to recognise the potential we have as a major consumer of food. We need to **support and protect farm diversity** (the mix of farm sizes) around the capital but also across the UK where London derives its food and recognise our role on wider environment and future food security. Supporting a diversity of farms underpins rural economies, provides opportunities for new entrants and innovation, but also gives specific outcomes for nature; such as wildlife corridors, habitats and important landscapes.
- Considering the Waste Hierarchy and the prioritisation of reduction over other interventions, we would like to see **more of a focus on reduction policy**.

Below we have set out our feedback on each section with both general points and specific recommendations set out in the tables. We have designed this layout to be as easy as possible for you to review our recommendations and would welcome further conversations with the GLA on these suggestions.

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Environmental Challenges

While health is not a direct environmental challenge the environment does play a huge role in the health of London, as recognised in the wider determinants of health model. We feel that an integrated approach would recognise this link within the challenges section and describe how the environment strategy also has a huge role in delivering health outcomes for Londoners.

New approaches

Healthy Streets Indicators

- There should be inclusion in here about the reduction of street litter – of which take away food plays a big part.
- There is no coverage of environmentally friendly shopping/premises – the current definition suggests that streets stop at the pavement. Arguably what is sold, how it is sold and the planning decisions made around the creation of retail space along streets have as profound an impact on the environment.

Air Quality

- The air pollution associated with food transport within London should also be a key target within the strategy as it makes up a significant part of transport within the capital.
- We would recommend inclusion of sector specific initiatives to reduce emissions from transport, for example transport related to food supply or food shopping (particularly in points 4.2.1d).

Green Infrastructure

- There needs to be more integration in this section with health and the role of social prescribing to nature and community gardens.
- The opportunity to also provide healthy food through productive green spaces should be referenced as a key point of integration with other strategies.
- We would like to see an ambition or high profile initiative that links environment with health, for example food growing in every park, or a dementia garden in every borough.
- There seems to be a low priority of food growing i.e. allotments, community food gardens and farms, particularly in comparison to other forms of habitat. This is a missed opportunity because of:
 - The strong track record in the capital of delivering and engaging people through food growing;
 - The health, biodiversity and social benefits that food growing provides.
- Would like to see a reference to productive landscapes, in particular how a productive Green Belt could help with its protection i.e. a productive Green Belt is a protected one (as seen in other cities e.g. Tokyo).
- Include recognition of food growing gardens as Assets of Community Value and from this more protection through planning of high quality peri-urban farm land and other food growing gardens that are creating multiple outcomes e.g. lower carbon food system, sustainable urban drainage and a thriving social enterprise network.
- As part of this we would like to see an aspiration to protect community food growing gardens, allotments, and farmland on London's urban fringe. With pressure from development we know this is a real and current issue.
- We feel that offsetting of biodiversity is not ideal and the focus should be on protecting not replacing green spaces

- We are not clear on how the Urban Greening Factor will create space for larger, successful projects with long-term leases that are able to also contribute to food security through urban agriculture and help the city to be a green *and* growing city.
- Within the ambitions for new habitats, we would like to see the creation of new food gardens and urban farms included.
- The document is not clear on the quality of a green space – what makes something quality? We would say this would be a mix of its contribution to biodiversity, health, food security and amenity value.
- We think that there should also be reduction targets for pesticide use in parks, schools and open spaces. Alternative weed controls are increasingly available and affordable so the Mayor needs to be leading way and supporting trials and set targets for reduced pesticide use.
- While agriculture should be supported any schemes endorsed should reinforce objectives to increase wildlife, i.e. agriculture that does not enhance wildlife and dependant on high fertiliser and pesticide use, should not be given priority.
- We would like to see more reference to the importance of skills and engagement and the opportunity for increasing social enterprise and job creation particularly in food and farming sector.

Below we include references to specific text changes or additions:

Objective 5.1

P134 – We would like to see a specific paragraph on food growing spaces

Add: *Community food gardens, allotments and urban farms*

Over the last 10 years the number of growing spaces, the amount of land they cover and the numbers engaged in these gardens and farms has grown significantly. At least 2500 new gardens have been set up in London and are part of the Capital Growth network, with over 200 000 people involved to date. These gardens (excluding allotments) cover at least 79 ha of land and are vital part of the green network in London, and as a result we have one of the most thriving food growing networks in the world. These green spaces can be found in schools, housing estates, parks as well as on the peri-urban fringe and support people to get outdoors and garden public and other open spaces, add essential biodiversity to land that otherwise might be neglected or brownfield sites and produce locally grown food. Many of them have potential to be assets of community value as well as SINC.

Policy 5.1.1

We believe that a **protected Green Belt** needs to be a productive one, in order to resist the threat of development. Good ecological farming can provide a productive Green Belt, delivering climate friendly food (i.e. low input fruit and veg), employment and training and enhanced biodiversity. This is demonstrated by Growing Communities Dagenham Farm which has created jobs, improved health, and grown tonnes of organic food as well as turning a green desert into an oasis of biodiversity.

Add: *The Mayor will actively support agro-ecological farming in the Green Belt in order to create protected and enhanced landscapes that provide climate friendly food for Londoners at a time when food security is a growing challenge.*

We would also like to see a reference to the London Plan ensuring that new developments are required to include space for food growing, due to the environmental, amenity, social and health benefits of growing food and in response to the allotment waiting lists.

Add:

The London Plan will safeguard existing food growing areas and urban farms, and high quality agricultural land particularly on the urban fringe and ensure that soil is also

protected. Meanwhile brownfield sites will be identified and prioritised for use as food growing sites.

Proposal 5.1.1.b

A reference to community food gardens should be added in the second paragraph

5.1.1c Box 9:

A reference should be included to promoting productive spaces that not only provide access to nature but also provide food

Proposal 5.1.1e:

We would like to see a reference to the added value of urban orchards

Proposal 5.1.1f:

We would welcome the mention of Capital Growth (alongside other partners already mentioned) who have provided data for the strategy but also made a significant contribution to the greening of London during the last 10 years, helped to involve over 200 000 Londoners and can continue to help deliver on engaging groups in the management of green spaces.

Currently we have supported growing across 79 ha of land and encouraged local authorities to include growing in their planning documents and plans using the existing London Plan as a powerful tool to achieve this.

Objective 5.2

5.2.1 Asset of Community Value

In this section there seems to be an absence of the mention of community gardens and urban farms and the value they add to biodiversity and green corridors. The inclusion of food growing in the London Plan has been a critical tool at a local level so continuing to reinforce this is essential.

We suggest that in **5.2.1.c** that community food gardens and urban farms are mentioned and also encouraged to register as Assets of Community Value.

Wording: Due to the community and environmental value of community food gardens and urban farms and the scale of their coverage in London, the Mayor will support and encourage groups to register their spaces as Assets of Community Value in order that they can receive adequate protection as green spaces and corridors for wildlife.

Note: Capital Growth are keen to help achieve this ambition.

Table 1: Add community food gardens and include a target for expanding the land covered by these spaces.

P165. We believe there should be mention of community food gardens which arguably are one of the largest groups of habitats in London and therefore as significant as the others referenced.

P167. It is unclear why these habitats are London priorities as they are not all relevant.

5.2.1.d We would like to suggest the inclusion of Capital Growth in this section as its database provides a key opportunity to monitor data from food growing spaces.

Objective 5.3

5.3.1.e Growing Enterprise

We feel that the opportunity provided by urban farming and food growing projects to create social enterprises that add to the local economy and provide jobs and training, is clearly absent.

We suggest that this deserves its own objective due to the amazing achievements of many of the Civil Society Organisations in London including Forty Hall Farm, Organiclea, Growing Communities Dagenham Farm, Sutton Community Farm, London Grown, Cultivate London and Keats Organics.

Wording:

The Mayor of London will seek to invest in green infrastructure for the emerging urban farming sector to help London become a leader in urban agriculture and green/ good food jobs. This will build on the work of established social enterprises such as Growing Communities, Organiclea, Sutton Community Farm and Cultivate London who are creating jobs and training opportunities through urban farming.

Climate Change Mitigation and Energy

- Shockingly there is no recognition of the fact that by 2050 food will account for 75% of global greenhouse gas emissions, mainly connected to the type of food eaten and the way it is farmed. Leading from this there is no attempt to curb this major contributor within the strategy's actions.
- Little attention has been paid to the report commissioned by the GLA 10 years ago - www.brooklyndhurst.co.uk/londons-food-sector-greenhouse-gas-emissions%7D-118 - let alone any progress towards addressing this contribution. We would argue that this warrants a section within 6.1 to recommend a series of actions the Mayor should take.
- A cross reference should be made in this section between the reduction of food waste (the following section) and climate change mitigation. Any reduction in food waste should reduce the need to produce more food, and with it reduce food production's large contribution towards climate change.

Waste

- We applaud the attention given to reducing food waste – both organic and packaging.
- Considering the Waste Hierarchy, we would like to see more policy emphasis on reduction, rather than the current focus recycling and waste management. The Mayor of London should ensure businesses over a certain size (medium and large businesses) have waste reduction policies in place and demonstrate how they will contribute to London's overall target of reducing food waste by 20% by 2025 and drive municipal recycling rates to 65% by 2030.
- We believe there is merit in hugely increasing access to tap water, and to making the link with the health inequalities strategy about the benefits of (tap) water over unhealthy drinks. In order to target another Mayoral priority - childhood obesity – we believe a new generation of water fountains and water refill points in public spaces, e.g. tube stations, parks, sports facilities, schools, should be prioritised, funded by private/community partnerships or through a levy on plastic bottles, and with the cooperation of Thames Water, Transport for London, parks departments, community groups and others.

Proposal 7.1.1b

Ideas for inclusion in this this proposal:

- The Mayor should urge businesses to set out concrete policies on single use packaging reduction. This should include monetary incentives for customers to use their own packaging, including coffee cups. This should also include a ban on plastic straw use.
- Any new businesses must have policies in place demonstrating how their operations will not contribute to more packaging waste.
- Businesses over a certain size (medium and large businesses) should be required to have policies in place to demonstrate how their operations will not contribute to packaging waste. This can include a total ban on single use plastic packaging, coffee cup lids, cutlery and straws.
- We would like to see the Mayor take leadership on a total ban on polystyrene, following the lead of many other cities across the globe.
- The Mayor should propose a surcharge for takeaway coffee cups that can go toward local authority funds for community waste reduction projects, which can include litter-picking days, food waste reduction workshops and other projects that have limited current access to funding.
- The Mayor should work with the GLA Group on a total ban on single use plastic packaging across their sites. This should include a ban on plastic cups, plastic packaging for catering events, and free access to tap water at all venues and sites.
- The GLA procurement team should work with suppliers to offer products that do not use packaging, including bakery items and sandwiches.

Proposal 7.1.1d

- The Mayor will set out guidelines for the GLA Group's procurement activities to cut waste and ensure reuse.
- The Mayor require food suppliers and caterers to demonstrate how they will minimise food waste, particularly post-consumer food waste, and single use packaging.
- The GLA Group should set out clear guidelines into their tendering process which requires suppliers bidding for contracts to avoid using single use plastic packaging unless there is a clear case for the use being unavoidable.

Circular/Low Carbon Economy

- More recognition of food's role in circular economy work is needed and the fact that by 2050 food will account for 75% of global greenhouse gas emissions, mainly connected to the type of food eaten and the way it is farmed.
- We would like to see encouragement and advocating of a locally-based, vegetable-based food system to make huge strides towards a lower carbon economy, with a leadership role from internal GLA operations, procurement and work with other sectors.
- There is an opportunity for more support creating jobs and enterprise in the sustainable/low carbon food and farming sector, and to be a leader in green food jobs, skills and food education – adopting healthy eating guidelines will have the added benefit of climate change reduction.

10.1.1b)

Include access to tap water and water foundations. Also we would like to see food as one of the focus sectors to be considered for the UK Industrial Strategy's Sector Deal

Programme. Food is already an issue where there is collaboration within the C40, with London being recognised for its leadership

(10.1.1c).

The work piloted with support of the GLA through Trifocal and Foodsave (as recognised in the waste section) as well as Urban Food Routes in the last 5 years, has helped to support pioneering food businesses that are contributing to a circular economy. But London can go further, by giving this sector the support it needs, and the attention that is needed to reshape the food sector - one of the biggest contributors to climate change, waste and other Mayoral priorities. This could include:

- Include the opportunity to be a leader in green food jobs, skills and food education – adopting healthy eating guidelines will have added benefit of climate change reduction.
- Encourage a locally based, vegetable based food system will make a huge statement about the future of food and low carbon economy – internal GLA operations, procurement (relevant to section 10.1.1d) and work with other sectors and as a focus for students (section 10.1.2b).

Section 10.1.2b

The points above are also relevant to section 10.1.2b where we see a role in encouraging student food enterprises contributing to the circular economy. This could build on our work with the NUS – Student Eats – which also supported many such enterprises across the UK since 2016.

Adaptation to Climate Change

P297

There is recognition in Figure 43 on page 297 that two of the six biggest consequences of climate change relate to the impact to food production and food supply. And yet there is no mention in the actions about how to deal with this, whether in terms of short term contingencies over crises/disruptions in the supply chain, or longer term changes to what is available both from the UK and abroad.

With a supply chain that is predicated on 'just in time' delivery – we have a fragile food system. This strategy should highlight the importance of researching what sort of dietary changes we may need to make in order to have a more resilient food system, ahead of then advocating what actions communities, businesses and public bodies may need to take to adapt to this.

Section 8.2

This rightly recognises the issue of water quality and drainage, and yet doesn't mention the contribution of agriculture in outer London and the surrounding catchment. This is an oversight, both for the reasons of a) reducing storage of water and slowing water flow and b) reducing run off (including agricultural and nitrate pollution) and the consequent costs to ameliorate this.

We recommend that attention should be given to working with these farmers and land managers, the Government bodies that can, through farm payments, encourage reduction of this problem, alongside citizens and businesses (particularly those under public contract) to encourage purchase of food produced through systems that minimise this. This point around cost saving on water treatment is also relevant to the aims of 8.3, but is not covered there either.

GLA Group Operations

- We are pleased there is recognition of the role that caterers can play in providing tap water to reduce plastic bottle waste – and would encourage the strategy to commit to phasing out selling bottled water across all GLA and TfL properties and catering within 1 year. We would like this section on catering to go much further as the food should be as sustainable as possible to reflect the points noted above which contribute to the Mayors Environmental Strategy aims – whether this is supporting farming systems that help improve the impact on water systems or in the mitigation or adaptation to climate change, as well as piloting any schemes to combat food waste.
- The Mayor should commit to enabling smaller farms to bid for contracts in food procurement, provide grants or low/no interest loans - easily available and well-advertised - to smaller farm business sizes around London to invest in sustainable production, processing and marketing, and promote the produce of all farm types in the capital.
- We believe that Transport for London’s advertising policies should be scrutinised over whether those companies they give space to meet the aims of the Mayor’s strategies. On food, this relates to the environment, health inequalities and food strategies. In order to meet the targets outlined above, the Mayor could extend nutrient profile modelling as already used in the advertising sector, to include food and drink that negatively impact on the environmental (and health) targets he is trying to reach. Whilst other would argue for a ban, we believe the Mayor should consider implementing a levy to discourage these adverts, and to help fund those initiatives that help promote alternatives.

*Coordinated by Sarah Williams | Programme Director
Sustain: the alliance for Better Food & Farming*