

Shared Assets comments

Page: [Chapter 3 Design](#)

Section: [N/A](#)

We support London Food Links response:

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 appreciated or integrated into the draft New London Plan despite the strong evidence on this topic and the Mayor of London's commitment to a refreshed London Food Board and London Food Strategy.

Page: [Policy D1 London's form and characteristics](#)

Section: [3.1.4](#)

We support London Food Link's response:

Expand this section on the benefits of urban greening, to reference the health and social benefits of urban greening and food growing.

Justification: The draft New London Plan does not recognise the role that integrating food growing spaces and edible planting into the landscape can provide, beyond commercial food production.

Page: [Policy D1 London's form and characteristics](#)

Section: [D1](#)

We support London Food Links response:

Amendment to Policy D1 A7) Page 98

Insert '*food growing*' into 'should provide open space for social interaction, play, relaxation and activity.'

Justification

In major development residents should have access to communal gardens, to connect with nature, enjoy plants and have the opportunity to engage in growing.

Page: [Policy D4 Housing quality and standards](#)

Section: [D4](#)

We support London Food Link's response:

Suggested amendment

Insert new clause on Communal open space.

Justification: Currently we do not see the aspiration for inclusive neighbourhoods (including community food growing spaces) being implemented in the design policies for open space, as set out in the glossary definition of Inclusive neighbourhoods

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.6](#)

We support London Food Link's response:

Amendment:

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.'

Justification:

Currently we do not see the aspiration for inclusive neighbourhoods (including community food growing spaces) being implemented in the design policies for open space, as set out in the glossary definition of Inclusive neighbourhoods. ?

Page: [Policy D7 Public realm](#)

Section: [N/A](#)

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

Page: [Policy D7 Public realm](#)

Section: [D7](#)

We support London Food Link's response:

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).

Page: [Chapter 6 Economy](#)

Section: [N/A](#)

We support London Food Link's response:

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.

However, 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 event space and shopping areas.
- 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: [Policy E2 Low-cost business space](#)

Section: [E2](#)

We support London Food Link's response:

The policy should encourage unused class B space to be used for Good Development initiatives by community business, including food initiatives.

Justification

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 throughout the Plan.

Page: [Policy E3 Affordable workspace](#)

Section: [E3](#)

We support London Food Link's response:

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

Justification:

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 throughout the Plan.

Page: [Policy E8 Sector growth opportunities and clusters](#)

Section: [6.8.3](#)

We support London Food Link's response:

London's food and restaurant sector should be included as one of Mayor's growth sectors particularly those that promote healthy food and are led by local organisations.

Justification

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.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [E9](#)

We support London Food Link's response to B6:

We welcome the plan to improve 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 establishments that stock healthier, locally sourced products'.

Justification:

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, 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.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [E9](#)

We support London Food Link's response to 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 previous comment on this section for B6).

Justification

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.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [E9](#)

We support London Food Link's response:

Suggested amendment:

Add B10 – *‘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.’*

Justification:

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.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [E9](#)

We support London Food Link's response to section C:

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.

Justification

London 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. 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.

Page: [Chapter 8 Green Infrastructure and Natural Environment](#)

Section: [N/A](#)

We support London Food Link's response:

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.

Page: [Policy G2 London's Green Belt](#)

Section: [G2](#)

We support London Food Link's response:

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.”

Justification

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 create green business opportunities.

Page: [Policy G3 Metropolitan Open Land](#)

Section: [G3](#)

We support London Food Link's response:

Suggested amends:

New sub-paragraph after D2 – ‘It includes significant agricultural or horticultural activity’.

Justification

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.

Page: [Policy G4 Local green and open space](#)

Section: [Table 8.1](#)

We support London food link's response:

Suggested amends:

Reference food growing. Land for growing food can form part of the range of activities in all categories of open space.

Justification:

There is currently no mention of food growing, although many include food growing. e.g. College Green and Slip Pocket Park.

Page: [Policy G5 Urban greening](#)

Section: [Table 8.2](#)

We support London Food Link's response:

Suggested Amendment:

After 'grassland', add 'vegetable, fruit and flower gardens and pasture, edible annual and perennial planting'.

Justification

The Urban Green factor needs to mention food growing as an example of semi-natural vegetation.

These important types of green spaces could be overlooked if not explicitly referenced.

Page: [Policy G6 Biodiversity and access to nature](#)

Section: [G6](#)

We support London Food Link's response:

Amendment:

Add point F: *'The value of gardens, allotments and pasture in providing biodiversity and access to nature should be recognised in all proposals and local decisions'*

Justification:

There is good evidence that food growing provides wildlife habitats, promotes healthy lifestyles and better mental health, as well as clean air. For example Capital Growth gardens, supported by the Mayor of London and the previous London Plan, have provided over 150,000 people access to nature and created over 70 hectares of biodiverse green space.

Page: [Policy G8 Food growing](#)

Section: [N/A](#)

We support London Food Link's response:

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 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.

We support London food link's response: Suggested amendment:

Add 'London's resources of land for agriculture, horticulture, orchards and private and community gardens should be protected, planned, designed and managed as integrated features of green infrastructure. In major development, the Mayor will require space for the cultivation of food.'

Justification

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.

Further amends

Section A In Development plans, boroughs should:

1) Amend to say 'protect urban farms, existing allotments and other community food growing spaces, and encourage provision of space for community gardening, including for food growing and orchards within new developments.'

Justification

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.

2) Identify potential sites that could be used to increase local food production for London.

Justification

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.

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.

Justification

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.

Justification

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.

Page: [Policy G8 Food growing](#)

Section: [G8](#)

We support london food link's response:

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.

Page: [Policy G8 Food growing](#)

Section: [G8](#)

We support london food link's response:

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.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [SI2](#)

We support London Food Link's response

Suggested amends:

Add a new paragraph after B: *'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; also recognise the importance of associated tree planting in carbon reduction.'*

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.

Justification

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.

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

We support London Food Link's response:

Suggested amends

Make reference to composting as reducing waste and creating a circular economy.

Justification

Composting has a spatial requirement, which can be linked to community gardens.

Suggested amends for 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.

Justification

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.

Page: [Policy T1 Strategic approach to transport](#)

Section: [T1](#)

We support London Food Link's response:

suggested amends

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.

justification

The exponential growth in this area has significant impact on transport

Page: [Policy T2 Healthy streets](#)

Section: [T2](#)

We support London Food Link's response:

Suggested amends

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.

Justification

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.