

London Assembly Planning and Housing Committee
'Cultivating the Capital' Investigation
Combined Evidence Received

Investigation: Cultivating the Capital –Food Growing and the Planning System in London

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UA001 Daltons Farm Ltd

To: Alexandra Beer

Subject: planning

Re planners supporting farmers

I have had only a little brush with the planners and generally found them to be rather ignorant to the needs of farmers as we are a minority in Hillingdon . They seem to think that if you own your farm and farm house that we are stinking rich so dont need to submit any planning application to diversify and that we should keep farming as we are .

Regards

UA002 Deen City Farm Ltd

To: Alexandra Beer

Subject: Planning & Housing Committee; The role of the planning system in supporting food growing in London

Dear Alexandra

I received a letter from you recently re the above subject. It sounds like an interesting piece of work but sadly it is not one upon which I can give huge comment.

We are a city farm in SW London, one the larger ones in London and our work is extremely varied. We are open to the public, have large numbers of visiting school groups, embrace both agricultural and horticultural learning, cultivate crops, graze animals, teach horse-riding and, perhaps most importantly, host vast numbers of volunteers (over 200 a year) many of whom are disadvantaged or in need of support. That's just the tip of the iceberg! Summing up: we aim to show and involve people in learning where their food comes from.

We are on land leased to us by the local authority who, in turn, lease it from the National Trust who own Morden Hall Park. The Trust effectively lease us the far north tip of the Park. Our 4-5 acre site includes grazing, growing and yard areas as well as modest buildings. Our Garden Project has won many awards but is still funded on a year to year basis through charitable trusts or Children in Need or similar. Our biggest difficulty is long-term fundraising rather than planning issues.

Planning has only come to our attention because of a need to get permission for a wind turbine. Of course, there is a danger that someone could make a planning application to use our site for some other purpose, but our lease agreement should protect us from this (assuming we can successfully renegotiate our lease!)

In terms of wanting additional land: we expect to be able to take on an additional area of Morden Hall Park for grazing but the challenge will be the additional rent and the cost of maintaining the land. With a remit that prioritises education

As a registered charity, we concentrate on education rather than commerce but are mindful of social enterprise. If the demand for additional grazing wasn't so high, then we could use the land for pick-your-own fruit & veg and try to bring in revenue. Security is also an issue in London – might be a common theme amongst other respondents. I know this won't be of much help to you. I'd happily have you visit our project if you haven't done so already and talk to you about urban growing and the role of city farms & community gardens (all of which do wonderful work yet have to constantly battle for funding). You may want to get in touch with the FCFGC

(<http://www.farmgarden.org.uk/>) for a centralised view too.

The long and short of it is yes, we'd like more land, but only if we had the resources to afford the rent and to maintain it and to keep it secure. Yes, I believe that Londoners would prefer food grown in London (we can't even begin to meet the demand for fresh eggs and veg).

Do get in touch if I've misunderstood or if you feel I can offer any further help.

Kind regards

UA003 Theresa Villiers MP (MP Chipping Barnet)

Dear Ms Jones,

Many thanks for your letter drawing my attention to the London Assembly Planning & Housing Committee's investigation in to the role of the planning system in supporting agriculture in London.

I am anxious to ensure that the London Green Belt Council has the opportunity to participate fully in your review. I am therefore passing your letter on to the Chairman, Cedric Hoptroff, and asking him to respond to you direct.

Thank you again for drawing this important review to the attention of the London Green Belt Council.

Kind regards

UA004 LB Tower Hamlets

The Role of Planning system in supporting commercial food growing in London

Q Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for food growing?

The Core Strategy (Submission Document) has the following policy in place (Policy SP03):

Support opportunities for healthy and active lifestyles through:
Promoting and supporting local food-growing and urban agriculture.

Q Does the borough have a food strategy and if yes, how does it support local food growing or sourcing from the London area?

No food strategy as yet. The Council's Sustainable Development team has responsibility for promoting local food growing as a key element of sustainable development. The Council's Sustainability Officer was a founder member of the Tower Hamlets Food Link – a council/ third sector partnership whose aims are to provide publicity, information exchange and training for anyone interested in local food growing in the Borough. The Partnership is currently finalising a bid to the Lottery Local Food Programme for a 5 year £250K local food growing project (submission expected October 2009).

The key outcomes of the project, if the bid is successful will be:

- a) Establish a local food resource centre
- b) Research food growing in Tower Hamlets and create a website based map of local food initiatives and projects
- c) Present the benefits of local food growing to 33 schools and 6 growing groups
- d) Research social landlords' policies on use of green space and actively support this sector to adopt community food growing on their estates
- e) Host an annual 'Local Food Growth Day' to celebrate and promote the Tower Hamlets Food network
- f) Evaluate the success of food growing in Tower Hamlets and produce a Manifesto for our development and expansion

The Sustainable Development team is taking the lead on ensuring that local food growing guidance is integrated into Council policies over time.

Q. Does the borough have any planning, economic development or health related policies that support the distribution or sale of locally grown food in the borough?

No specific policies in place yet. A number of initiatives such as participation in the Buywell Retail Project which is working with 17 convenience stores across London to increase the availability and affordability of fruit and vegetables in low-income areas.

Q. Should the London Plan (or local plans) seek to encourage food growing in public open spaces such as parks?

This may have a negative impact on Public Open Space (POS) provision. Here in Tower Hamlets due to severe POS deficiency food growing is not being supported in the borough's parks and open spaces. Housing amenity land is seen as having the best potential for food growing in borough.

Q. Should the London Plan identify areas that have the greatest potential for large scale agricultural/horticultural food growing activity, such as the Lower Lea Valley, and other potential areas such as Thames Gateway or the Green Grid? Can you identify other potential areas?

Don't know

Q. Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities? Should it also encourage these activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies, i.e. transport, rail, waterways and housing bodies?

The emerging Tower Hamlets Core Strategy (Submission version) supports local food growing and urban agriculture within the borough

UA005 Waitrose Ltd

Dear MS Beer

Further to Jenny Jones' letter of 10 July, in respect of the Planning and Housing Committee and its role in the planning system in supporting commercial food growing in London, my views are outlined below.

As you know, Waitrose has a long established relationship with a number of local producers throughout the country, and indeed in and around the London area, and fully supports the investigation in the hope that the outcome will be to encourage all the local producers and other food retailers who are willing to engage with local producers in supplying and producing commercially grown food.

In response to your individual questions I would reply as follows:

We do have an established policy of sourcing local food not only in London but from all areas of the UK as stated earlier. It is difficult to judge whether producing more local food would meet the demand of customers, meaning customers are now becoming more educated in the benefits of buying locally produced product and there is an undoubted constraint in place as a consequence of suppliers ceasing production and retailers sourcing product from other parts of the UK and wider continent.

Waitrose's current position is that we are able to source enough local food to meet the existing demand but the challenge will be if the demand increases, which we are sure it will, will the supply still be there to ensure that we can meet that demand?

Customers need further knowledge and education on the benefits of purchasing local food that will in turn change the behaviour of major retailers in the sourcing and supply of food for sale within its retail outlets. In short it has to be driven by customer behaviour. Consumers need to demand more access to local produce and retailers need to respond accordingly. Government needs to help promote this by freeing land for agriculture and providing business with opportunities to grow and retail their produce in the available space.

As mentioned earlier, Waitrose has and continues to be a supporter of local produce all around the UK including London. The array of product in our stores reflects the locality and the local needs of the population and we do all we can to foster relationships with new suppliers and encourage their business growth. There are a number of suppliers who are now nationally based who began their burgeoning businesses with the help of Waitrose.

I hope this sufficiently answers the questions and please do not hesitate to contact me if I can be of further help.

UA006 London Green Belt Council

Ms Jenny Jones
Chair, Planning and Housing Committee,
London Assembly

Dear Ms Jones,

Planning and Housing Committee: The role of the planning system in supporting commercial food growing in London.

Thank you for your letter of 9 July to our President, Theresa Villiers MP.

The Green Belt is designated primarily to prevent towns sprawling and coalescing into one another and to encourage urban regeneration. Although it is not there primarily to protect farmland, it should be contributing to that objective. The Government's advice on Green Belts is set out in Planning Policy Guidance Note No.2 (PPG2) and para 1.6 lists a number of objectives to which Green Belt, once designated, can contribute. These are:

- ***to provide opportunities for access to the open countryside for the urban population;***
- ***to provide opportunities for outdoor sport and outdoor recreation near urban areas;***
- ***to retain attractive landscapes, and enhance landscapes, near to where people live;***
- ***to improve damaged and derelict land around towns;***
- ***to secure nature conservation interest; and***
- ***to retain land in agricultural, forestry and related uses.***

In our experience, the last of these objectives is not often seriously taken into account - not with the same sort of weight as other objectives like access to the countryside and nature conservation.

As an example, we were recently represented at a public inquiry into Harrow planning application F 12203106, which was called in by the Secretary of State. The application related to Wood Farm in Stanmore. The proposal was to build 10 new large houses in place of the existing farm house and buildings in order to finance the conversion of the remainder of the land into a country park. The houses were acknowledged by the applicants to be inappropriate development in the Green Belt. However they alleged that the public benefit of the country park constituted very special circumstances justifying a departure from normal Green Belt policy. Understandably, the applicants did not stress that the proposal went totally against the objective of retaining land in agricultural use, but in our view their evidence that farming is no longer a viable use of the land was superficial and did not take into account the work being done by Sustain and the London Food Link.

We consider that there is a case for the London Plan to require planning authorities to give added weight to the final item in the list in PPG2, para 1.8 - to the extent that this can be done while maintaining consistency with PPG2.

UA007 Alara Wholefoods

To: Alexandra Beer

Subject: RE: Planning & Housing Committee: The role of the planning system in supporting food growing in London

Hi Alex,

In reply to the questions

Do you have any policy that relates to sourcing food locally/from within/close to London? If so, are you able to source enough local food to meet demand?

We do have a policy to source as local as possible. All our organic grains (Aprox 3,000 tons) are grown close to London and then flaked for us at a mill in Bedford. We also make lunch for all the team here (40 people per day) and some of this food comes from the gardens we have planted around the factory at Kings Cross.

What measures do you think could be taken to improve availability of local food?

There is a huge amount of land in London that could be used for growing food with all the benefits that brings. It takes imagination and work to make it a reality and as a cultural acceptance is required involving the arts in this would be usefull.

What role does or could your business you play in supporting growers and in fostering new areas of growing?

We have a permaculture forest garden here with 100 fruit trees, a vineyard with 30 vines and a growing area for three community groups. There is also two additional areas we are bringing into food growing use. We are also involved in developing the first inner city community scale anerobic digester in Europe. This has the potential to generate about 1500 Kg of digestate per day. There is also a lot of land around Camley St in Kings Cross that would be suitable for food growing. The combination of this digestate and the land would make a step change in the area.

Do you have any evidence to show that Londoners would prefer to buy food grown in / near to London?

We have open days when we do planting and celebrations such as Apple wassailing. Over these days we have had hundreds of people attend and take part all of whome are enthousiastic about local food

Do you have any other comments that may be useful to the investigation?

Local food is much more that a reduction in food miles. In my view food is central in shaping society. Reconnecting with what food is, how it grows in the soil, what a miricle it is and how it cannot be taken for granted is in my view the most likely key to moving on to a sustainable society.

UA008 London Parks and Green Spaces Forum

Dear Alexandra

Planning & Housing Committee: The role of the planning system in supporting commercial food growing in London

Thank you for inviting the London Parks & Green Spaces Forum to offer their comments on this important issue. We are based with the London Plan Team on the 4th floor of City Hall & I am aware that the issue of commercial food growing is being considered in the latest review of the London Plan. The Forum is not able to answer the specific questions in the letter from Jenny Jones but I do want to raise some issues that should be helpful to your investigations.

The Forum would approach the topic under the heading of 'land-based industries' as agriculture alone is too narrow. A broader definition that includes land-management and production (agriculture & horticulture), animal health and welfare and environmental industries would be more helpful. Using this definition would help to support sustainable & diverse land based activities in the Green Belt. The rest of this letter takes this broader definition to describe commercial growing in London.

Commercial growing takes place at two scales: intensive (market gardening, often involving the use of green houses & other forms of temporary protection) & extensive (large scale unprotected) and they involve different land takes. This has a profound impact on the appearance of the landscape. London once had a thriving market gardening industry, e.g., Upper Lee Valley that included nurseries and the production of flowers & pot plants. Many of these sites have been lost to development and production has moved out of London & even overseas, e.g., Holland. Market forces are a key determinate for such activities unless central & local government intervenes through the planning & economic means. The high cost of land (to buy or rent) makes it difficult for people to enter the land based sector and more people are leaving the industry as they reach retirement age. Therefore steps need to be taken to prevent a people & skills shortage, as it will have a knock on effect on the supply of land based goods & services in London. There is a need for supporting business start-ups in the land-based sector and for investment in land based training in London.

New growers will need to be housed on site & the presumption against development in the Green Belt currently prevents this. Appropriate development for housing for growers in green belt will need to be addressed in the review of the London Plan.

There is evidence that 'new growers' could be attracted from some of London's allotment fraternity but stepping-stones are needed to me to make this possible. Another possibility is to follow New York's Department for Agriculture that has been brokering a service to encourage immigrant farmers to take over farms from growers reaching retirement. This approach would fit well with London's multicultural population.

I hope that the comments contained in this response will be helpful to your investigation. Please contact me if you have any further questions.

UA009 Café Spice Namaste

Dear Ms Beer

Further to the letter from Ms Jenny Jones I have a few responses as best I can answer

FOOD SOURCING: Whilst we do not have a written policy we try our very best to source as locally as is possible. Unfortunately most of the meat fish and poultry though sourced from local suppliers may not necessarily be available in the immediate London area. Fruits, Vegetables etc. are sourced locally but could have travelled far due to the nature of the produce generally required from the Asian restaurant perspective. Some meat we use is produced and sourced locally though. However we are passionate about Being British and source whatever is possible to source British except where there is no choice.

AVAILABILITY AND MEASURES: Firstly in and around London alone much goes on which is not highlighted to our industry in greater detail as well as the fact that most of our suppliers for the industry remain ignorant of what is produced locally. i.e. London Orbital at least and a little further. The supply chain needs to know what is available and so does the chef / buyer etc. Cost is another issue and since our industry is riddled with high costs all round buyers do tend to save costs and when cost is the factor, local, sustainability etc all go out the window.

ROLES WE PLAY: As and when a local producer/ supplier is found we try to make contact and see if we can source locally. Recently I have managed to mention my local pork farmer a few times on my TV programmes and they have had fabulous responses from others and local people. As soon as and if we do come to know about more growers in our area it would be senseless if we did not make contact and at least tried to foster a relationship. This does not always come to fruition as farmers and growers have their own set of problems too with logistics, availability, manageability etc. and often cannot supply direct or they prefer not to.

EVIDENCE: I regret that I have no evidence but I have evidence only of the fact that every time we advertise on the menu that an item has been sourced specially or locally the demand for the product rises.

COMMENTS: Yes I do feel that as Londoners we need to be more aware of our local area and its productivity. People need to be encouraged to buy and support local. more media coverage is necessary to make Londoners aware of their neighbourhoods and so on. Local markets need to be enthused about sourcing and selling local. London has a host of small markets now and some are very successful but still many have products that travel from far and wide. if this becomes a trend people will automatically follow. Supermarkets also need to be signed up to this and they can have and make a huge impact on this kind of promotion. But they must be forewarned against making demands that can put a small producer out of his or her wits.

I hope these are adequate
am happy to answer more if you have any

Many regards

UA010 Federation of City Farms and Community Gardens

The value of London's urban community farm and garden projects is in their accessible locations and ability to demonstrate gardening skills and animal husbandry through formal and informal training to local communities, particularly those recognised as deprived. They have a strong ethos of open access and also work with children and young people, other community groups and particular groups, for example kids excluded from schools, and people suffering from mental health problems or disabilities.

It is not necessary to grow much produce to provide education in growing methods- therefore the actual quantity of produce grown is not the object. However small, adaptable operations are well placed to provide education about current priorities such as climate change and healthy eating.

Staff of London's community groups tend to have very strong gardening and animal care skills- some have become experts in their field.

Access requirements for non-professional volunteers, clients and learners, plus the very high land values in London, mean that growing areas tend to be small and reflect the fact that they are maintained by learners or children or eg. people with special needs, as well as being open to the public in most cases.

Contamination may deter cultivation of food plants.

Inner London land can be worth millions per acre whereas farmland outside is valued in the thousands per acre. Given the complex and demanding nature of inner London communities it can be economically, socially and environmentally sustainable to use land for social purposes and community benefit where it would not be commercially viable to turn that same land over purely to food production, and of reduced social benefit if access to the public were also restricted as is generally the case for commercial food production.

Producing goods for sale on a commercial scale cannot be a primary aim of an organisation with charitable objectives. Some projects do have produce for sale, which tends to be small scale and varying in availability.

While many projects have a hands-on food growing element to them, sharing space with other features such as wildlife gardens, it is up to the independent autonomous groups who run them to decide democratically how the land is to be used and it may be that they prefer other leisure or recreational uses.

In planning terms, community-run open spaces are subject to the same designations as other open spaces. It would be very helpful if there could be some additional level of protection, which would recognise the contributions these projects make in the fields of health and education to their local areas, to counterbalance the enormous pressure on urban space for built uses.

Meanwhile Gardens, so called because it started off with a temporary year-long licence, recently celebrated its 30th anniversary as a community garden. Perhaps some additional planning status could reward say "20 years as a reasonably well managed community project" in an area where there is an uncontested shortfall in public open space.

UA011 National Farmers' Union (NFU)

Comments from National Farmers' Union, South East Region

Introduction

The Environment Agency's "London State of the Environment" report has identified 2,381 hectares of Grade 1 agricultural land (excellent quality) across London. There are also 1,444 hectares of Grade 2 land (very good quality) and 17,977 hectares of Grade 3 (good quality). Land of Grades 1, 2 and 3a is considered "Best and Most Versatile" in planning terms and PPS7 guidance is that it should be preserved for agricultural use and only developed if the project is essential and there is no suitable alternative site.

An increased awareness in recent months of world food security sheds new light on the importance of preserving the stock of irreplaceable productive land, itself under threat from climate change (drought, flood and sea-level rise) as well as from development. The world's population is expected to increase by up to 3 billion by 2050, with increased affluence producing a demand for more protein in many regional diets. To meet these demands, current global food production must be increased by an estimated 80-100% over the same period (Wilton Park Conference 927, 2008). Despite climate change, the UK is likely to retain temperate, productive conditions for the foreseeable future and will be in a good position to contribute to the world food market for some time to come.

The Environment Agency report states that, in 2002, there were 472 registered agricultural holdings in London, farming 12,064 hectares. There has been a significant increase in unspecified holding types, with a notable reduction in horticultural, dairy, and pig and poultry units.

The Government's Strategy for Sustainable Farming and Food, delivered in the South East by GOSE and SEEDA, encourages local food production and encourages farmers and growers to supply the London market. Clearly the farms in the Greater London area have a key part to play in this, and the NFU supports all its members in achieving the objective. New Covent Garden Market, in conjunction with the South East Food Group Partnership, is working to increase the volume of south east produce that it handles.

Answers to specific questions

What issues are growers facing relating to land use pressures and retaining farmland?

While we have not had dealings with all the farm holdings in London, our experience suggests that mainstream farming has gradually given way to an increasing level of non-agricultural diversification such as commercial letting, light industrial, office and storage/distribution uses. Reported reasons for the change have been vandalism on farms, attacks on livestock and the encroachment of residential development around farms leading to complaints of statutory nuisance (mainly noise and odour) from normal agricultural activity. The latter is particularly the case with livestock and dairy units. The low profitability of farming over the past 10 years or so will undoubtedly have influenced diversification decisions, but the outlook for the industry is optimistic.

Another factor is that agricultural land in London has a potential development value far in excess of the likely income from farming, leading to the loss of some land to development where change of use is granted.

There is therefore a marked difference between diversification in rural areas, where its purpose is generally to supplement an ongoing core agricultural activity, and in the rural-urban fringe (not only London) where it is often a more practicable and profitable alternative to mainstream farming.

Agricultural land has been susceptible to compulsory purchase for major infrastructure projects such as the M25 and the Channel Tunnel Rail Link, and this is likely to remain a threat.

What issues currently prevent farmers from obtaining more land in or around London?

In the recent past, land prices have been driven up by demand from amenity buyers who have to some extent excluded commercial farmers from competing for available lots. Smaller farm businesses are less able to compete than large ones, but on the other hand larger businesses are less likely to be interested in small land parcels in more urban areas. Both economic circumstances and the food supply chain favour larger farms. At a time of slim profit margins, economy of scale can be crucial to survival. Supermarkets, which still account for the bulk of retail food sales, prefer to work with fewer, larger producers. This is why smaller farm businesses often succeed by identifying niche markets or producing for local demand through farmers' markets or farm shops, or directly to restaurants.

Would diversification support an increased/continued production or is it detrimental to yields in any way?

This would vary from case to case. Some non-agricultural diversification is accommodated in otherwise redundant buildings and so provides a useful supplementary income without affecting crop production. Other projects may be set up on productive land for a number of reasons – for example they might be more profitable than producing food or simply be more practicable in the particular circumstances (see comments on rural-urban fringe problems above). We would generally support diversification, preferably where it supports a core agricultural activity but not excluding cases where non-agricultural enterprise is the only realistic means of maintaining a livelihood. Perhaps the key here is to develop a profitable market for locally produced food that would become a more commercially attractive option than diversification, together with a planned environment that would make urban fringe farming both practicable and acceptable to the surrounding community.

Agricultural diversification is a different matter. Since the abolition of Common Agricultural Policy production-based subsidies in January 2005, the expected trend has been towards a market-led industry rather than the production of subsidised commodities. This is likely to lead farmers and growers to seek out new market opportunities and to move into the production of novel crops and value-added foods. New infrastructure will be required in the form of processing, packing and distribution facilities, and the planning system should be prepared for the innovative and imaginative decisions necessary to enable this to happen.

Do you have any evidence to show that Londoners would prefer to buy food grown in or near to London?

The popularity and success of Borough Market and various farmers' markets indicate that Londoners are no different from anyone else in finding locally produced food attractive. The problem is that many consumers, whatever they may say in market surveys, are ultimately price-led. In other words supermarkets, operating in a cut-throat sector and benefiting from economies of scale, continue to secure the bulk of the retail food market. Locally produced foods tend to be more expensive, as do organic products, and the potential market for them is therefore limited to those who can afford to make that choice. One way to bring about change might be to encourage and support community growing schemes on a not-for-profit basis, but realistically this is unlikely to make significant inroads into the market share of the major retailers. The NFU continues to encourage the promotion in London of foods produced in the capital and in the south east region, as does regional sustainable farming and food policy. As mentioned earlier, New Covent Garden Market certainly believes that it is possible to expand this sector of its business, and is seeking new local suppliers as well as increasing the volume of sales for those suppliers already using its facilities.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

The NFU was instrumental in introducing countryside and agricultural policies (3D.13 and 3D.14) into the London Plan and gave evidence at the Examination in Public. The consultation draft had made no mention of either topic. While we are pleased to see these policies, they are broadly drafted and do not go far enough in relation to some of the problems faced by farmers. We have produced a list of topics of planning interest to farmers and growers, which may be of help in understanding their concerns. We attach the document with this response.

Is there sufficient help in providing urban agricultural advice to existing and potential growers in submitting planning applications that have implications for land use, or in involvement in consultation on open space strategies, local development and the London Plan?

We generally only become involved in planning matters when members have serious problems leading to appeals and, in some cases, public inquiries. It is quite possible that large numbers of planning applications are processed successfully without being brought to our attention. We have seen cases where there does appear to be a lack of understanding within the local planning authority of agricultural matters, and particularly of the many external pressures placed on farmers and growers by ever-increasing Government regulation and by the non-negotiable requirements of supermarkets and quality assurance protocols.

What policies outside the planning system would support the maintenance or expansion of commercial food growing in the Green Belt? Do you think that Green Belt land is being utilised in the most productive way? There is clearly a problem with applications for agricultural development in the Metropolitan Green Belt, despite the fact that the open nature of the MGB is to a large extent dependant on agriculture and on associated land management by farmers and growers. Farm businesses must be allowed to retain their competitive edge if they are to succeed and survive. This involves a degree of reasonable development to keep up with modern methods and to comply with changing and increasingly stringent regulation. The likely alternative is at best the appearance of unwelcome influences such as a proliferation of horse paddocks, and at worst neglect and even dereliction of the land.

The use that farmers and growers make of the land, including Green Belt, depends on market opportunity and commercial feasibility, so economic development policies (for example business rate relief) that encourage, support and grow a market for locally produced food are as important as purely planning policies.

In 2008, Farming and Countryside Education (FACE), commissioned research that looked into the views of primary and secondary aged pupils on food, farming and countryside issues. Urban and rural children had varied impressions of the countryside. Those from urban areas remain detached from the countryside regarding it as a place where wealthy retired people live. Children, particularly from ethnic minorities, often expressed concern that they do not fit there. There was also confusion about where the boundaries of the countryside start and end. The results of this research remind us of the task ahead if we wish to widen access to the countryside.

The positive management of the Green Belt by farmers as part of a green network is therefore an important gateway for engaging with urban children and family groups, but this must be as part of a profitable agricultural enterprise. Promoting visits to farms in the Green Belt encourages valuable opportunities for multi-functional experiences such as local food production, wildlife, recreation and cultural experiences. These visits can be formal, involving schools undertaking a wide range of hands-on activities that meet the curriculum needs subjects, or informal, involving clubs, interest groups and families, and encouraging healthy living and leisure opportunities.

There a number of current farm-link projects offering communities in deprived urban areas access to the countryside. Evidence from these programmes demonstrates that there are many benefits including the building of respect among children for farmers' land and livelihood, helping to reduce trespass and vandalism.

Planning matters of concern to farmers and growers

1. New infrastructure for agricultural diversification/expansion resulting from CAP reform towards market-led industry

Since the abolition of production-based subsidies in January 2005, the trend of CAP reform has been towards encouraging a market-led industry. Consequently we can expect planning applications for new infrastructure to support emerging and expanding enterprises as they move to meet demands from existing and new markets. Local planning policy must reflect this national driver of change.

2. Development to enable farms to comply with evolving environmental, hygiene and animal welfare standards

Legislation and assurance scheme protocols impose increasingly stringent standards on farm businesses in the areas of environmental management, employee working conditions, site and product hygiene and others. In many cases this requires the replacement or modification of existing, outdated facilities if the business is to comply and survive. Once more, planning policy must recognise this external influence on agricultural business development.

3. Support for new/replacement buildings, especially where old ones are unsuitable for modern agricultural needs

Where redundant farm buildings are unsuitable for non-agricultural diversification purposes and cannot be adapted for modern agricultural needs, demolition and replacement with up-to-date alternatives may be crucial to the development of successful farm businesses. We would like to see planning policy make provision for such new buildings.

4. Protection of best and most versatile agricultural land in light of food security requirements

Best and most versatile (BMV) agricultural land has always been protected in national planning guidance unless there is no suitable, sustainable alternative where development is needed for the wider public good. We take a pragmatic approach to this and accept that the loss of BMV land may sometimes be necessary.

5. Continuation of support for non-agricultural diversification to supplement core agricultural activity

The long-term prospects for agriculture are good, and the sector is one of the few to be unaffected so far by the world recession. Populations are increasing while climate change reduces the productive area worldwide. The UK is likely to remain productive for the foreseeable future and will remain a provider of food for its own and overseas needs. However, we are not yet out of the low profitability trend that has held back the industry over the past 12 years or so. The non-agricultural diversification that has been the saviour of many farm businesses remains important and should be retained in planning policy for the next plan period, in line with national planning guidance.

6. Continuation of support for conversion of redundant farm buildings

Redundant farm buildings are a valuable asset for conversion, whether for agricultural purposes in a developing business or for diversified, non-agricultural projects. There is also the possibility of conversion to rural affordable housing, as suggested in section 7.

7. Affordable housing in rural areas to complement rural employment opportunities

Developing and new farm businesses, together with non-agricultural rural businesses (often set up in diversified farm premises) will need a source of labour. We support planning policy that provides adequate stocks of affordable housing in areas where employment opportunities exist. Such a policy should include the conversion of redundant farm buildings into affordable housing, perhaps even where conversion for open-market residential conversion would not be considered appropriate.

8. Seasonal worker accommodation

Fruit, vegetable and salad crop producers are dependant on temporary harvest workers during the picking season. The preferred form of accommodation is mobile homes, often in large numbers on one site, with obvious planning implications. We would welcome a planning policy to deal with this so that well-balanced

proposals with adequate support facilities and site screening could be permitted. The benefits of this accommodation option include:

- o Operational flexibility of having workers on-site
- o Number of units adjustable to reflect fluctuating labour requirement
- o Reduced traffic volumes on local roads
- o Reduced demand on local rented housing sector
- o Improved employee welfare facility at central site

Alternatively, the conversion of existing buildings or erection of new ones, specifically designed for the purpose and either stand-alone or in combination with mobile homes, should be supported.

9. Sustainability policies

While we acknowledge the preference for development in areas served by public transport, we believe that a pragmatic view must be taken about the continued reliance on private cars in rural areas. A balance must be struck to avoid refusing otherwise very worthy applications purely on the grounds that they fail to meet unrealistic sustainable transport aspirations. This point was made by the Matthew Taylor Review in respect of housing (the sustainability trap).

10. Development near existing farms

We ask that due account be taken of existing farms before new residential development is permitted in their vicinity. Existing legislation gives the advantage to the complainant in statutory nuisance cases (mainly smell and noise), even where the farm existed long before the houses. The existence of residential development is always taken into account when agricultural or other commercial development is proposed. Due account should be given in planning conditions to alleviate potential conflict where permission for new residential development is given.

11. On-farm water storage

Agricultural abstraction is essential for irrigation, livestock, crop washing, food processing, crop protection and dairy hygiene purposes. In general, water abstraction has an increasingly damaging effect on rivers and groundwater as the demand for this scarce resource increases to meet all society's needs. The storage of winter abstractions and rainwater in reservoirs or tanks for use in the drier summer months provides a substantial, sustainable additional water resource and reduces damaging abstractions during summer low-flow conditions. Farm reservoirs are encouraged by the Environment Agency in Catchment Abstraction Management Plans and in River Basin Plans (Water Framework Directive delivery). Part-funding for them is available from SEEDA. We would welcome planning policy to reflect this high-level encouragement of on-farm water storage, which in effect provides a new, sustainable water resource.

12. Farm shops

Farm shops have become a common means of supplying locally produced foods directly to the consumer, meeting a number of objectives of the Strategy for Sustainable Farming and Food and providing a diversification lifeline to some farm businesses. To be viable they usually need to sell a proportion of externally-sourced lines. It would be useful to have a planning policy setting out reasonable and proportionate conditions on what constitutes 'local', and what ratio of home-produced/externally-sourced lines is acceptable. The importance of farm shops as a diversification enterprise and service provider (eg Post Office) should be weighed against any policy to restrict 'out of town' retail development. The NFU would welcome the opportunity to contribute information to assist in formulating such policy.

13. Renewable energy generating projects

We would welcome planning policy in support of renewable energy projects of any size. This would guarantee a market for energy crops and recycled biomass, opening up a new opportunity for farmers beyond the limited scope of what has happened so far. The policy must include anaerobic digestion (AD) as well as combined heat and power (CHP), 'heat only' projects, wind and solar power. AD has the potential to

bring climate change mitigation benefits by reducing the release to atmosphere of ammonia (a principal greenhouse gas) as well as providing power from waste.

14. Environmental management benefits most cost-effectively delivered through profitable farming
We would like environmental policies to reflect the fact that profitable farming is the most cost-effective means of delivering environmental and landscape management benefits as a by-product of their day-to-day business operations.

15. Non-statutory designations

We do not support the use of non-statutory landscape designations to restrict reasonable development in the countryside. PPS7 states that criteria-based policies are preferable to 'rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas.' The South East Plan reiterates the PPS7 preference by encouraging local authorities to develop criteria-based landscape policies (Policy C4, Ch.11 – Countryside and Landscape Management).

UA012 Kingcup Farm, Denham Commercial Food Growing in London

In response to the letter from Ms. Jenny Jones AM, dated 9/7/09:

In my view the main reason that agriculture is more in decline in the London area than elsewhere in the UK, is that production costs are higher, thus making farmers uncompetitive on price. On my own farm, I believe that my costs are 15%-20% above average for the country as a whole. There are many reasons for this, most of which do not relate directly to planning policy, including:

- The high opportunity cost of land, compared to rural areas.
- Increased security costs (eg. travellers, fly tipping, etc).
- Higher labour costs and lack of local skilled workers.
- Lack of support infrastructure eg. the nearest farm machinery dealer is 40 miles away.
- Road congestion makes it hard to move farm machinery about.
- Most London area farms are fairly small, with little potential to expand and exploit economies of scale.
- There is competition for water in the London area, which makes it hard to obtain abstraction licences for irrigation.
- Although there is some good quality land in the area, most is grade 3, which limits its agricultural potential.

Question 1: How effective do you think the planning system is in a) protecting existing farm land and commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples?

(a) It is often stated that 7% of the land in London is agricultural. Most of this is not currently used for food production, but provides horse grazing, or is derelict. I believe that little of this horse grazing complies with the classic definition of agriculture in the 1947 Agriculture Act and so, in theory, is contrary to planning guidelines. Despite this, we probably have to accept that equestrian sports are very popular and if Londoners are to take part in them, they need grazing for their mounts.

(b) Many residents claim that they wish to live near farmland, but when planning applications are made to modernise farms in semi-urban areas, they object. It is often felt that livestock units will be smelly and attract flies, whereas developments, like glasshouses, will be ugly. Local councillors, of course, seek to reflect the views of citizens and resist these plans.

Question 2: How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

When agricultural land is used for sand and gravel extraction, there should be a requirement to return it to farming when the work is finished.

Much of the agricultural land in the London area belongs to builders and speculators who are interested in capital gains, rather than farming. This land is often left unused and becomes derelict, which attracts antisocial use. Developers believe they will find it easier to obtain planning permission if the site is a mess. In order to counter this and try to ensure the fields continue to be farmed, perhaps there could be financial penalties for allowing land to fall into disuse. A derelict land tax is one possibility, but I am aware there are problems with this. Another alternative would be a surcharge on planning application fees for projects on derelict land.

When the GLC was wound up it had an extensive estate of let smallholdings and farms in the London area, which passed to the Local Authority where they were located. Perhaps the GLA could look at what has not been sold off and try to ensure they continue to be farmed. This would make a valuable contribution to retaining and perhaps expanding, commercial food production in London.

Question 3: What planning difficulties do growers experience, ie. When trying to extend existing farmland or find new land? What issues are growers facing relating to land use pressures/retaining farmland land?

Farm land will always be in short supply in London, as there is not much of it! Because of the many problems of farming in urban areas, landowners will always be tempted to sell up and move to areas with cheaper land. After all, almost any land use is more profitable than agriculture at present!

In my own area to the west of London, the main threat to farm land is from infrastructure projects, rather than residential, industrial or recreational developments. Cross Rail and the expansion of Heathrow alone will absorb a lot of agricultural land.

Question 4: What are the main factors that are necessary to ensure commercial viability and sustainability of farming and other food growing activities?

As stated in response to question (1), the planning system must allow urban farmers to modernise their holdings and develop added value projects, such as farm shops, to remain viable.

The current interest in buying local food is a great advantage for London farmers and should offset some of the disadvantages that they face.

For horticultural farmers, problems with licences to abstract water for irrigation are often a problem. It would be helpful if agriculture was given greater priority for scarce water resources.

Dealing with travellers is a major cost for London area farms. It also causes a lot of fear and stress. The legal and planning system could do a lot more to reduce this.

Question 5: What policies outside the planning system would support the maintenance or expansion of commercial food growing in the Green Belt? Do you think that green belt land is being utilised in the most productive way?

As already noted above, the retention and expansion of the County Council Smallholdings scheme would be of great value.

If the proposed bystander protection rules are brought in, many urban horticultural businesses will move away, as it will not be practical to advise large numbers of households about crop protection, chemical applications.

The new Nitrate Sensitive Zone regulations will hit some livestock farms in the Green Belt hard (eg. dairy, pig and poultry units).

The downward pressure on food prices being exerted by the supermarkets and others will affect Green Belt farms more, as they tend to be high cost producers because of the problems of farming on the urban fringe.

Question 6: Would diversification support an increased/continued production or is it detrimental to yields in any way?

Farmers must respond to changes in the marketplace. Often this means diversification, which need not be detrimental to overall yields of food.

Question 7: Do you have any other comments that may be useful to the investigation?

Agriculture in the London area is in a very fragile state. It would be a great shame if it was allowed to fade away. The London Assembly Planning and Housing Committee's interest in the topic, is therefore very welcome.

Please do not hesitate to contact me if anything in this note is not clear, or I can provide further information.

UA013 Dr Richard Wiltshire (King's College London)

Dear Alexandra,

Just a few brief comments if I may:

- (i) A lot of new growing spaces in inner London were likely to be temporary, so the planning system needs to be flexible enough to accommodate "meanwhile" uses.
- (ii) Farmers in outer London might be encouraged to diversify and help solve a burning issue across London at present by providing allotments on a commercial basis, and planners need to be aware of the implications of this, particularly for green belt areas.
- (iii) There are risks associated with food growing in parks (theft, risk of exposure to needles etc), yet most of the community benefits of growing flow as much from flowers (at much lower risk) as from vegetables, so I think it's important not to focus too narrowly on food growing, but broaden this out to encouraging "community gardening" in general - incorporating vegetables where locally appropriate.

Regards,

UA014Lea Valley Growers

Dear Alex

Re: The Role of the planning system in supporting Commercial food growing in London

Established in 1911, The Lea Valley Growers Association, currently represent in excess of one hundred Commercial Growing members within the Greater London area.

The membership consists of Protected Horticultural growers, producing salad crops and ornamentals within Glasshouses.

What issues are Growers facing relating to land use pressures/retaining farmland land?

Few growers have been able to obtain town planning consent to construct modern Horticultural facilities either adjacent to existing nurseries or for new developments with the Lea Valley due to Local Authority refusal.

What issues currently prevent farmers/growers from obtaining more land in or around London?

The Reading report (2002 for Epping Forest District Council) states uneconomical land prices caused by "Hope value" for housing development placed upon land by landowners as the biggest obstacle to obtaining suitable land for food production.

A typical Nursery for edibles production would cost around £500,000 per hectare to establish based upon the cost of land at between £5-35,000 per hectare.

The Local authority plan has identified two geographical areas for Horticultural expansion, however, these are within areas with uneconomical "Hope Values" attached.

Continued...

Would diversification support an increased/continued production or is it detrimental to yields in any way?

Diversification is not a viable option for producers of protected crops as the capital investment needed to support produce grown within glasshouse's requires every available piece of the land to be used for production.

Retailing from the nursery is not an economical option. Energy production from CHP (Combined Heat & Power Systems) is only viable for larger growers.

Do you have any evidence to show that Londoners would prefer to buy food grown in/near to London?

The LVGA is continuously approached by organisations looking to source local produce from the Greater London area i.e. Sustain, The catering Market, Hospitals and Schools.

The reduction in the carbon footprint from local deliveries is substantial as the alternative is to import.

The £ to Euro exchange rate and the small changes in climate have slightly lengthened the growing season, UK growers are competing better with foreign imports.

This would lead to greater investment in new and second hand glasshouse production, however, the lack of suitable land with planning permission remains the greatest issue.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London?

The plan focuses on agriculture and the provision of allotments etc, however, a high proportion of protected crops i.e. Cucumbers, Peppers, Aubergines, Lettuce etc are produced within glasshouses in the Lea Valley.

The plan does not appear to assist the particular issues with planning that Glasshouse nurserymen/growers face when attempting expansion.

Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

The LVGA believes that direct intervention by Government is needed with planning approvals for new Horticultural developments with the Lea Valley and Greater London.

Is there sufficient help in providing urban agricultural advice to existing and potential growers in submitting planning application for land, responding to planning applications that have implications for land-use for urban agriculture, involvement in consultation open space strategies, local development and London Plan?

The Lea Valley Growers Association and the National Farmers Union provide excellent advice to members with regards to planning applications, however, the economics of land purchase and the negative attitude of planning authorities remains the main barrier to expansion.

The Lea Valley Growers Association would like to take this opportunity to extend an open invitation to the Mayor and members of the London Assembly for a visit to the Glasshouse Nurseries of the Lea Valley.

Here you will see first hand the professionalism of the operations in place and the superior quality of the product produced in Greater London.

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UA015LDA Olympic Legacy Directorate

London Development Agency

Planning and Housing Committee Investigation:

The role of the planning system in supporting commercial food growing in London.

Q) What role if any is planned for food growing in the Master plan area?

A) The Legacy Master plan and the work of the Olympic Park Legacy Company (OPLC) provide a number of exciting opportunities for supporting the entire food chain, from growing, processing/manufacture through to retail/wholesale and consumption.

In terms of food growing potential, the reality is that the site is constrained in a number of ways. Firstly, a wide range of the total site area is already 'spoken for' in terms of the inherited parklands, semi natural habitat, venues and associated space. The development plots to be built out by the OPLC and partners need to meet a diverse array of needs, including housing, commercial space, community infrastructure, facilities and parkland/open space.

Secondly, the site has an extensive network of utilities infrastructure underground and although the soil on site has been de-contaminated, many areas would still be unsuitable for the growing of food.

However, given the above limitations, food growing still has an important role to play:

- Provision of 2.1 hectares of allotments and the potential for community gardens
- Potential for food growing on 'green roofs'
- Edible landscapes within the parklands and other green spaces
- Linking food growing with educational and pilot programmes (e.g. Natural Health Services, Green gyms, school growing, living sustainability etc)

Lastly, the development plots will be built out over an extensive period of time and opportunities for interim uses are being currently being explored, including food growing.

Given the real limitations on extensive food growing on the park, it is important to understand the potential of the park to act as a real focus for other aspects of the food chain in London. Food could still be a significant aspect of the park:

- Food culture on the park, perhaps focusing on the diverse cuisines of East London (the world in one hundred cuisines);
- Farmers markets with an accent on local produce and also diverse food stuffs;
- Provision of commercial and retail space for local food sale concessions and independent SME's focused on food manufacture/processing/sale/restaurants – both interim and permanent.

Q) How much land will be provided for food growing?

A) Currently, the only formal and quantified provision for food growing space is the provision of allotments, which comprises 2.1 hectares to be provided after the 2012 Games. However, as set out above OPLC will continue to explore the feasibility of other opportunities through its legacy planning.

Q) Has provision of space for commercial or social enterprise growing been considered? If not why?

A) There is provision for allotments in legacy, and we will be looking at detailed management and governance of these within the overall context of the Olympic Park. This could include the potential for a community garden / social enterprise model but it is not anticipated that significant additional areas will be able to be set aside for intensive food production due to the physical constraints of provision (including underground utilities and remediation levels) and the need to balance many other competing needs on the site.

Q) What consideration has been given to using space on a temporary basis for food growing?

A) The phasing of legacy development will take place over an extensive period of time and opportunities for precisely this kind of interim use within latter phase development plots are being currently being explored. This provides an opportunity to consider the feasibility for temporary food growing, although utilities and remediation levels may determine the scope of this and would suggest that this will rely on raised beds being imported by the end operator.

Where an interim use is successful the ambition is to explore the potential to integrate it, as far as practicable, into the permanent legacy development which may involve either activities, events or space.

Q) Any other comments

A) The OPLC is keen to discuss with the Assembly the opportunities for food production in legacy. In particular, and given the physical limitations of the site, the OPLC would like to explore the opportunities for supporting related activities and other aspects of the food chain in London.

UA016 Knight Frank LLP
Farming in London – Response from Knight Frank LLP

Head of rural property research.

As we discussed during our meeting the planning system is probably of limited importance to encouraging or discouraging food production in and around London. The commercial realities of agriculture are more important.

We also question the feasibility, or indeed the desirability, for London to become more self sufficient in food production. There is huge potential to encourage more production at the individual (allotments) or community level, but increasing commercial agricultural production will be more difficult given the constraints of land availability and economic viability

Is there any evidence of pressure on commercial food growing from proposals for development/change of use in London?

Most of the farmland around London would be considered greenbelt so under existing legislation it should be fairly secure

How effective do you think the planning system is in a) in protecting existing farm land and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples?

Greenbelt policy effective in protecting farmland surrounding London

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

From my limited knowledge, I would suggest much of London's policy towards food production looks at the environmental and health benefits of food production and the desire to be more self sufficient in locally produced food. There is limited reference to the commercial realities of agricultural production

What issues are growers facing relating to land use pressures / retaining farmland land?

Apart from the general economic pressures on farming, the "pressure" usually comes from the ability to sell farmland for development at values significantly higher than agricultural values. Something most farmers are entirely happy with.

What issues currently prevent farmers from obtaining more land in or around London?

The disinclination to expand their farming activities on the urban fringe with its associated problems of crime/vandalism etc. Within London's built-up areas there is not land of the required size to interest farmers.

Many landowners around London would rather wait for their land to be developed in the future than invest in increasing crop production.

Land with any future planning potential would probably be too expensive to justify the price for farming activities.

However, it should be emphasised that most of the fields around London are being utilised for agricultural production, in some cases for high-value horticultural production, so the potential to increase production is limited.

What are the main factors that are necessary to ensure commercial viability and sustainability of farming and other food growing activities?

- Access to a stable customer base willing to pay a reliable price (price volatility is one of the biggest issues for UK farmers).
- Access to sufficient land to allow the required economies of scale – for cereal crops this is generally considered to be 400ha
- The correct soil and climatic conditions
- Sufficient finance at a realistic rate
- Access to qualified workforce
- A legislative and government policy framework that encourages not hinders the production of food

What amount of land in London is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way?

According to our GIS department there is circa 23,000 ha of agricultural land within the Greater London area. How much of this is actually cropped is not known to us.

What issues may arise in regards to farming activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies, i.e. transport, rail, waterway and housing bodies?

The size of these spaces would, for most crops, be insufficient to generate sufficient economies of scale for anybody to justify a commercial venture. There is probably enormous potential for local co-operative type schemes to provide food for the community or possibly even to stock a stall with home-grown produce at a farmers market, but to increase the overall self-sufficiency of London in terms of food or generate profits for anybody, I see little potential. Neither, however, do I see any serious issues that would arise from the introduction of small-scale schemes if access to sufficient water can be provided. There could be the potential for contamination of food grown on former industrial sites.

UA017LB Hillingdon

Dear Jenny Jones,

Re: The role of the planning system in supporting commercial food growing in London

Thank you for your letter dated 9th July 2009, received 16th July 2009.

I have been liaising with other departments and external organisations with intent to provide a quantitative response as soon as possible. However, in the meantime, please find my initial response below.

1) What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way?

Hillingdon is one of the top five boroughs on London's urban fringe containing rural land and the Defra agricultural census figures (2003) estimated the 1226 hectares of farmland in Hillingdon constitute approximately 10% of the total farmland in Greater London.

There is no land specifically devoted to commercial food growing in Hillingdon but there is agricultural land including existing farms, small holdings, allotments and liveries that may be suitable for food growing.

Much of the agricultural land in Hillingdon was designated as Green Belt under the 1938 Green Belt Act and given to the London Borough of Hillingdon in the mid -1980's whereby its status remains under covenant. In 2002, agricultural land use in Hillingdon consisted of mostly of grassland and rough grazing. While the Council owns approximately 32% of the estimated 1226 ha of agricultural land in the borough, the borough still loses approximately 40ha of farmland to other uses every year (Defra, 2003).

Hillingdon has long been subject to development pressure as the city has expanded so it is inevitable that some agricultural land is eventually lost to urban development, for example, Grade 1 farmland has been lost by Heathrow Airport expansion. Fortunately, the use of the Green Belt designation has restricted urban expansion and enabled the borough to retain relatively large areas of agricultural land for a London borough.

There are currently nine farms covering 560 acres in Hillingdon, however, 250 acres are positioned on old landfill sites. As there are potential contamination issues with farming over old landfill sites, this land is being used for rough grazing. The farms are predominantly dairy, a few liveries and some crop growing for on-farm consumption.

It is unlikely that the amount of new land for commercial food growing will increase in Hillingdon due to increasing development pressures and other existing land use designations. However, there is potential to maximise existing agricultural land, allotments, small holdings, orchards and farms for food growing purposes.

2) How effective do you think the planning system is in a) in protecting existing farmland and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

PPG2 sets the context for Green Belt policy in Hillingdon's Unitary Development Plan (Saved policies 2007). Hillingdon ensures that the quality of the green belts is enhanced through adopting a more positive approach towards applications that can be shown to enhance the surrounding areas through, for example, the creation of low-grade agricultural land.

However, while Green Belt policies may restrict development of the built environment, other activities permitted in the Green Belt such as for recreation may reduce land for food growing.

Over the next decade it is possible that a substantial area of Britain's countryside will change from food production to some other use. The effect this will have on urban fringe agriculture in Hillingdon is still to be seen, although already "horsiculture" is becoming increasingly common. Many land owners and farmers are likely to consider some form of diversification away from agricultural production to new uses for which there is a demand, such as recreation, wildlife reserves, improved access, and maybe even new woodlands. However, it is the Council's intention to protect the best and most versatile agricultural land (Grades 1, 2 and 3A) from irreversible development, and to protect the countryside for its own sake rather than primarily its productive value, in accordance with the provisions of PPG7 and Strategic Planning Guidance (SPG, para. 67).

As with all proposals, farm diversification schemes must preserve the openness of the Green Belt and not result in the excessive expansion and encroachment of building development into the countryside.

The General Powers Act 1967 states that 'It is expedient that as in this Act, the Council should be empowered to use, manage and maintain certain lands and buildings in the London Borough of Hillingdon known as Park Lodge Farm for the purposes of agriculture, education, recreation and leisure and to permit the public to use those lands and buildings for those purposes'.

3) Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing? How is this applied when assessing planning applications?

Hillingdon has local planning policy (UDP Saved Policies 2007) that relates to the protection of agricultural land (Grade 1, 2 and 3A), land suitable for food growing.

In determining the appropriateness of any proposals the Local Planning Authority will have particular regard to the effect of any proposed use or building works on its surrounding environment and ensure compliance with local planning policy.

4) How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

The London Plan currently has only one provision directly related to agriculture. This directs encouragement and support for "a thriving agriculture sector in London" and advocates the protection of the "best and most versatile agriculture land" in local plans. Designation of Grade 1, 2 and 3A farmland should be identified in borough LDF's to protect the best agricultural land and only allow for diversification in exceptional circumstances. Diversification involves farms earning income from sources other than agriculture ranging from food processing and farm shops to providing accommodation or leisure activities and grazing horses.

The London Plan should provide specific provision for land suitable for food growing in London now and in the future by increasing protection for green space and growing space in the London Plan. It would also be useful if technical guidance was produced on planning policy in relation to food growing and agriculture in Greater London.

London boroughs could specify the value of urban food growing as part of their sustainable development policies in their Unitary Development Plans or Local Development Frameworks or similar.

5) What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

The main barriers to providing greater space for food growing in Hillingdon would be environmental suitability (i.e. soil, contaminated land), environmental impacts (i.e. nitrate vulnerable zone), costs of increasing fuel, security and fly-tipping. Boroughs need to continue to use the planning system to protect and enhance open spaces, in particular prevent inappropriate development of open spaces, Green Belt, domestic gardens and playing fields so land remains available for food growing now and to meets any future needs.

If you wish to discuss this matter further, please contact me on 01895 277078 or email cmckinlay@hillington.gov.uk.

I look forward to hearing from you soon.

Kind regards,

UA018 Marks & Spencer Ltd

We are delighted to be able to contribute our views. In response to your questions regarding local food, Marks & Spencer is broadly supportive of your view of the need to increase the amount of food sourced locally.

We believe that genuinely local food (ie sourced within 30 miles) can deliver important social benefits that can arise from connecting people with the food they consume and those who produce it. We also recognise that research, including that done by Defra, suggests there is much less evidence of environmental benefit.

We think that a retailer could potentially support the growth of local (30 mile) food in a number of ways:-

1. Stocking local (30 mile) food
2. Providing land for local (30 mile) food to be grown on
3. Providing expertise in food production, storage and retailing

These options are discussed below:-

1. Stocking local (30 mile) food in major food stores

From a retailer perspective, we do not believe local sourcing can provide adequate supplies to stock a major food store. We could sell a few local products in some of our stores, but in practice it would be a tiny fraction of a store's turnover and could lead to accusations of 'tokenism' or 'greenwash'.

We believe that major retailers can make more of a practical difference through a commitment to maximise the amount of food that they source from the UK as a whole, from regional supply chains across the UK and from celebrating small scale artisan producers wherever they are sold.

Through market research, we have established that buying British food is a priority for our customers, as they want to support British farmers, especially in these tough times. They also want to know where their food has come from. We support a regional Food Strategy to ensure we grow the best crops in the most suitable locations and then label openly, so customers are aware of what they are buying and where it is produced, enabling them to make an informed choice.

2. Providing land

In London and particularly town centres, the availability of land is at a premium, and this is where a large number of our stores and customers are located. Being a high street retailer in these locations means we do not have much land to work with.

However, we are always looking at how we can maximise the land we have and what alternative uses it may have in the future. We have also asked our suppliers if they have spare land that they could provide for local food producers. In addition, profit from our 5p carrier bag charge, which we introduced in 2008, has been used by our charity partner, Groundwork, to fund 3 allotment projects in East Durham, Glasgow and Northamptonshire.

3. Providing expertise

As a predominantly own brand food retailer we have a large amount of in-house and supply chain expertise in the production, transport and retail of foods. We can look at how this expertise could be shared with local producers, if this is the type of support they want.

I hope the above will prove useful to your review. If you wish to discuss this further, please do not hesitate to contact me.

Head of Technology - Food Division

UA019RB Kingston

Dear Ms Beer,

The role of the Planning system in supporting commercial food growing in London.

I refer to your letter...dated 9th July 2009 which has been passed on to me as the person best placed to provide you with a response.

I write to inform you that I have had the opportunity to study the questions you raise in connection with the above and I would now wish to respond as follows:

What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way? There is approximately 400 hectares (very rough estimate from GIS, there is approximately 640 ha of green belt, so there could be more) currently dedicated to agricultural activity, the majority of this is dedicated to grazing, and part is dedicated to cropping of cereal crops (mainly barley).

How effective do you think the planning system is in:

a) Protecting existing farmland and other commercial growing spaces

London Plan policy 3D.18 and saved UDP policy OL3 are the policies currently protecting agricultural land in the borough. Given that the agricultural land within the borough is also designated as Green Belt, it is therefore hard to say how effective the agriculture policies are in isolation.

b) In allowing activities associated in the support or expansion of agricultural activity?

The borough policy does not really address the expansion of agricultural activity otherwise than by reference to appropriate uses in the Green Belt in saved UDP Policies OL1 & 2. However, Policy OL3 does recognise quality, location, efficiency and upkeep as issues to consider.

Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

No

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing? How is this applied when assessing planning applications?

See Paragraphs A and B above: Saved UDP policy OL3 protects agricultural land in the borough, however, there are no specific policies in place to protect, maintain or provide space specifically for commercial food growing.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

I don't believe that they currently do. It identifies agricultural land, which includes a number of other activities which may not involve food production.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

Land ownership is the biggest barrier that RBK has. The logistics of encouraging food growing currently are difficult. Agricultural land within the borough is privately owned. For the Council to facilitate commercial food growing or market gardens, the Council would need to compulsorily acquire the land to lease back to market gardeners.

Do you have any other comments that may be useful to the investigation?

The study should also consider the contribution made by allotments. These can make a significant contribution especially where there is active management and assistance is available to enable the sale or exchange of produce.

I trust that this response to the consultation is clear however, if there is anything that you feel requires further explanation please do not hesitate to contact me.

,
Interim Strategic Planning and Sustainability Manager

UA020 City of London

Commercial Food Growing in London

1. Consultation Document:

Planning and Housing Committee: The role of the planning system in supporting commercial food growing in London

2. Issued by:

London Assembly – Planning and Housing Committee

3. Date Issued:

09/07/09

4. Consultation response date:

21/08/09

5. Summary of document:

Letter sent to various City Corporation senior officers from Jenny Jones Chair of the London Assembly Planning and Housing Committee, regarding how the Planning system could foster agriculture and encourage more food to be commercially grown in the capital.

6. Response to consultation questions

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for growing food? Is there currently any mechanism for identifying new areas that may be suitable for food growing?

Given the restricted geographic area and pressures on land within the City, current policy does not include guidance on the protection, maintenance or provision of space for growing food. The City's emerging LDF policy includes a requirement for protection and enhancement of urban green spaces, green roofs and vertical habitats which does not preclude their use for informal food growing.

Does the borough have a food strategy and if yes, how does it support local food growing or sourcing from the London area?

Although we do not have a food strategy the City Corporation's food sourcing policy for its functions includes a sustainability requirement promoting the use of organic, seasonal and locally sourced food. The City has also adopted a local procurement policy and published a Local Purchasing Toolkit for City based firms which advocates local procurement of goods and services wherever possible.

The City has carried out research into the issue of food deserts in the Portsoken ward in the east of the City which concluded that access to fresh, appropriately priced food was poor in particular estates.

Does the borough have any planning, economic development or health related policies that support the distribution or sale of locally grown food in the borough?

The City Corporation sponsors the Sustainable City Awards which include a Sustainable Food category (co-sponsored by Sustain – the Alliance for Better Food and Farming) which recognises and rewards the provision and promotion of sustainable meals. Organisations entering this category should show their commitment to local, seasonal, food, produced to high environmental and animal welfare standards. The City and Hackney PCT Healthy Weight Strategy includes an action "to develop opportunities for Hackney and City residents to participate in locally appropriate growing projects" which will contribute to the objective that "Everyone will find it easier to buy, prepare and eat affordable healthy food"

Should the London Plan (or local plans) seek to encourage food growing in public open spaces such as parks?

There are many pressures on public open spaces ranging from use for sport and recreation; arts and culture; health and well being. These range from formal facilities such as sports pitches; athletics tracks and tennis

courts to informal open spaces for picnics; kicking a ball about; kite flying etc. It would therefore not be appropriate for public open spaces to be used for any form of large scale food growing e.g. allotments.

However, parks can and should provide opportunities to encourage food growing by education and promotion. There are already some examples of demonstration allotments, herb gardens and raised beds for disabled use; unfortunately, these examples do not appear in many public open spaces. Any opportunity that the London plan can be used to encourage large open spaces to promote and encourage food growing would be welcome.

Should the London Plan identify areas that have the greatest potential for large scale agricultural/horticultural food growing activity, such as the Lower Lea Valley and other potential areas such as the Thames Gateway or the Green Grid? Can you identify other potential areas?

There needs to be a careful balance struck between maintaining the amount of green open space that we currently have so that it can continue to be used for leisure and recreation, and creating new growing space.

While there might be advantages in turning redundant land into growing spaces (but one has to consider why it became redundant in the first place) we should not be advocating turning large areas of (to take an extreme example) Epping Forest into market gardens covered in poly-tunnels.

Looking at it another way, I believe that Enfield Council owns something in the region of 10,000 acres of potential agricultural land that might be exploited more commercially but the Inner London Boroughs are unlikely to have any significant amount of land suitable for either agriculture or horticulture.

Areas such as the Lower Lea Valley which are already designated for various forms of regeneration are likely to be the most suitable for the encouragement of commercial agriculture/horticulture, or indeed allotments, but one has to be realistic and accept that any increase is unlikely to make a great dent in the food demands of the capital, with its 8 million population. Nevertheless, anything that can be done to help reconnect the urban population with the source of its food - and an understanding about its production and the value of fresh food - can only be a positive change which would support the aims of the London Food Strategy. Many of those under 20 years old are sadly ignorant of where their food comes from or how it is grown / produced.

Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities? Should it also encourage these activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus and unused land owned by public and private bodies i.e. transport, rail, waterway and housing bodies?

This is really two questions: (a) Should the London Plan promote specific commercial food growing activities; and
(b) Should it encourage these on specific types of area?

6(a). It would be useful to focus on those activities best suited to the urban and peri-urban area. Clearly large scale wheat or barley growing would not be appropriate but more intensive horticulture or vegetable growing could maximise the yield per hectare (though it might fall foul of the vociferous Organics lobby), or the creation of allotments if there is a local demand for them..

6(b). A balance needs to be struck here too, to avoid the risk of reducing the social and recreational value of existing Open Spaces. It could be useful to have small scale 'farming' activities in some Open Spaces for educational purposes (as suggested above) but not to the extent that it diminishes the principal purpose of those spaces.

The "Capital Growth" project (www.capitalgrowth.org), supported very publicly by Boris Johnson and Rosie Boycott (the Chair of The London Food Board) with funding from the LDA, which aims to have 2,012 new growing spaces across the capital before the Olympic Games, is a useful way of re-engaging communities with the pleasure of 'growing your own' and can serve as useful education for children - but it will not have any significant impact on the food supply chain. There are, however, plenty of areas, especially in the outer Boroughs, where there is redundant land, much of it apparently owned by public authorities, which have the potential to be used for allotments or small scale high intensity growing (but might need decontamination before being suitable for growing food crops).

Do you have any other comments that may be useful to the investigation?

A distinction needs to be made between commercial food growing areas and non commercial food growing in allotments, gardens and window boxes. Any areas designated for commercial food growing would need to be carefully selected, to ensure that commercial cultivation is economically viable; otherwise this could restrict opportunities for the land to be used as allotments, orchards or leisure gardens.

Although not under the direction of the London Plan, there must also be an opportunity to make greater use of urban fringe land in the Home County areas adjoining London. For example, Surrey County Council owns a significant amount of smallholding land some within outer London Boroughs, but most just outside, which have in the past been used for food growing but are increasingly being turned over to other uses as economic pressures have made small scale farming uneconomic. This sort of land would potentially provide a much greater resource for local food growing in close proximity to London than using land within London which is currently used for sport and recreation. The promotion of locally sourced food could help to make food growing in these areas economically viable again.

UA021 Colne Valley Development Forum
Reference Colne Valley Development Forum

Dear Alex

Thank you for giving us the opportunity to comment on the role of the planning system in supporting commercial food growing in London.

I am writing on behalf of the Colne Valley Rural Development Forum, our area includes Hillingdon's green belt. Our vision is "To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside".

It is our opinion that the main barriers to commercial viability and sustainability of farming & food growing in the rural urban fringe to the west of London appear to be:

- 1) High land values. When land comes onto the open market it is very unlikely to be purchased by farmers. A solution to this could be policies and associated encouragements for local authorities (or other suitable organisations) to maintain (or even expand?) their agricultural estates so that when a lease expires land is not lost to agriculture.
- 2) Additional costs in the rural urban fringe. Local farmers estimate their costs to be 10-15% higher than an equivalent business in a more rural area. This is due to issues such as unauthorised access, flytipping, theft, vandalism... etc.
- 3) The green belt policy has been very successful in maintaining open land. However, green belt policy has not been so successful at preserving agriculture and growing in itself - Green belt policies say no to development but don't help with finding positive use for land. There are large areas of damaged, derelict or disused land to the west of London, much of which is held by individuals or organisations in the hope of future development opportunities. However, despite this there are still many farms operating on the western edge of London. We are optimistic about the long term viability of farming in the area (given food security issues and 'peak oil' etc), it is the short term viability that we feel is under threat, we need to act now to ensure that farmland is maintained to meet the future needs of London.

An example to illustrate points 2 and 3 comes from a landowner from Harmondsworth who said "We were generating a small amount of income from growing but following a spate of vandalism and arson in the mid 1980's, we gave up and the land has been derelict ever since"

If planning policies were to change to support agriculture a robust definition of agricultural activity is needed to ensure that the green belt as a whole is maintained. It may be appropriate that in order to be allowed to develop their farm business planning policy would have to be relaxed to allow a range of diversified activity particularly within existing farmsteads. Certainly agricultural activity has been stifled on many units by overzealous interpretation of the planning rules. In return for permitted developments however the farmer should be prepared to fulfil his-her role as guardian of the green belt and producer of local food by entering into contractual agreements with the planning authorities to perpetuate farming in London

Clearly the main factors affecting the viability of food production in the London are the same as those experienced by agriculture as a whole. It is well documented that the price of food achieved by farmers, as primary producers, has left them vulnerable to the vagaries of the market and profiteering from those who

add value further down the supply chain. The Colne Valley Rural Development Forum seeks to bring together farmers and others to facilitate the benefits of working together and by helping to tap into any sources of finance that may help to sustain their future. The Green Belt and green farmland has a fundamental role to play in all this. It is both an asset, proving a unique designation in the protection of landscape and local character as well as a hindrance with its dogmatic planning rules and interpretations.

An enlightened approach to planning will be needed to thwart the immediate threat.

Chairman

Executive Committee Colne Valley Development Forum

UA022LB Bromley

Dear Alex,

As discussed over the phone on Friday, I'm replying to the letter from Jenny Jones AM dated 9th July concerning the above.

There are numerous reasons why this is going to prove problematic in the London context, despite the Governments recent statement about 'food self sufficiency' and I have addressed these in my responses to the specific questions detailed in the letter, however there is on issue which I think should also be raised in any discussion and that is the sale and subdivision of farmland.

Over recent years, several farms in our Green Belt (adding up to nearly 280 ha) have been sold and subdivided (not physically in terms of fences etc) and sold off to people who think they can build on them, either now or in the future. Many of the enquiries I have had are from the far-east, India and the middle-east, they don't understand the British planning system and because of the way the plots are marketed, names (in the case of Layhams Farm in Bromley – "Canary City"!) and illustrations showing what appears to be an existing road system servicing the plots, which does not exist. This has been happening all over the country over the last few years, the farmers make more than they would otherwise and the likelihood of the land being brought back into productive agricultural use is minimal as people will hang onto it (hope value) and want to at least recoup their original investment (over the agricultural value of the land).

On the specific questions asked in Jenny Jones's letter, my responses are as follows:

1. What amount of land in the borough is currently devoted to commercial food growing?

Unfortunately as land use surveys are no longer undertaken, we have no data what so ever for this, all I have been able to find, as no doubt you have, are the results of the sample surveys on the DEFRA web site (link to the June survey on their web site) and do not give figures for individual farms.

2. How has this changed in the last few years?

No data for same reason as 1 above

3. What is the potential for increasing the amount of land used?

The majority of agricultural land in Bromley is Grade 3, detailed (and costly) analysis may show that it is towards the higher end of the scale but past experience has indicated that for the most part it is likely to be mid to low classification. Not the most productive agricultural land.

In my opinion, in order to increase the amount of land used for agriculture, it is going to require some sort of Government incentive, at present they encourage 'diversification', which in most instances, for smaller farms, is going to be much more profitable than food production.

The other problem which is often put to us is vandalism, crop damage and potential danger to livestock due to the proximity to the built up area.

Until these problems are overcome it is likely to be difficult to change from various diversified uses, horse grazing for example in Bromley, to productive agricultural use.

In fact paragraph 8.10 of the Bromley UDP stresses these points.

4. How effective do you think the planning system is in:

a) protecting existing farmland?

We can protect the land from development quite successfully using the Green Belt policies, although with the decline in farming many agricultural buildings are being converted to other uses which is in essence allowed by PPG2 and is difficult to resist. The only weapon in our armoury as far as the land itself is concerned, is the protection of the 'best and most versatile' agricultural land offered by Policy G9, but even here this is often challenged because this is defined as Grades 1, 2 and 3a (paragraph 28 of PPS7).

b) allowing activities associated in the support or expansion of agricultural activity?

agricultural PD helps but there is clearly an incentive to diversify (paragraph 30 of PPS7), not necessarily related to food production.

c) Do you have any specific examples?

No.

d) Does anything else need to be done through the planning system, related regulation or incentives?

Other than addressing the plot sales issue already outlined, nothing which I can put my finger on.

5. Does the borough have any local planning policy or guidance that specifically relates to food growing?

No.

6. If so how is this applied when assessing planning applications?

Not applicable.

7. How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London Borough of Bromley Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

If we are still talking about 'commercial food growing in London', the London Plan Policy (3D.18) is of little use, for one thing it promotes diversification (in line with government guidance, granted), but more often than not this does not involve the production of food. We can stop nefarious uses through the planning system, but without some sort of financial incentive (from the government or GLA), I don't think planning policies as such can do anything to really encourage farmers into food production. On a much smaller scale, Councils can promote allotments and their creation within larger development schemes when they come forward.

8. What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

There probably are some, but none which come to mind right now.

9. Any other comments?

No

I hope these comments are of some use.

Regards,

UA023 Arup Ltd

Dear Alex,

I am writing in response to your letter to my colleague Eike Sindlinger seeking our views on the role of the planning system in supporting commercial food growing in London. We were grateful for the chance to respond as this is an area in which Arup is taking an increasing interest and role. Arup is a leading consultancy in the area of sustainable design and planning and it is surely self-evident that a vibrant and successful local food supply is an essential element of any city which seeks to achieve a significant degree of sustainability and resilience in the 21st century. By extension, the planning system, as the main vehicle for expressing a vision and making decisions on the form of development and use of land within cities, must incorporate awareness and support for food growing at a range of scales within urban and peri-urban areas.

Our work touches on food and agriculture in a variety of ways – such as on masterplans for new communities, when developing sustainability plans for existing cities and regions, and as part of strategies for increasing resilience to climate change. We have drawn upon this experience along with our extensive knowledge of the planning system to provide our responses.

We hope you find our comments useful and would welcome any further consultation on this issue.

Associate Director (Planning)
Arup

UA024LB Lewisham

Planning and Housing Committee: The role of the planning system in supporting commercial food growing in London

1. Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for food growing? Is there currently any mechanism for identifying new areas that may be suitable for food growing?

The London Borough of Lewisham Unitary Development Plan (July 2004) includes Policies OS1 Metropolitan Open Land and OS7 Other Open Space that can be related to the protection, maintenance or provision of space for food growing.

The Council will accept agriculture, allotments and nursery gardens within Metropolitan Open Land (MOL) provided that access and environmental quality of the site would be enhanced. This would also be the case for non MOL.

The emerging Local Development Framework will continue to support the above principles, however, there is no specific mechanism or adopted policy that will identify new areas for food growing.

2. Does the borough have a food strategy and if yes, how does it support local food growing or sourcing from the London area?

The Borough has adopted the Lewisham Food Strategy (July 2006) and the following sections are the relevant aims sought:

On page 25, which states,

“The food access section of the strategy will seek to do the following:

1. Increase capacity of local people to access a healthy diet through raised awareness and opportunities for education and skills development.
2. Increase physical access to healthy food for socially excluded and vulnerable groups.
3. Raise awareness of food access issues in town planning and regeneration initiatives.
4. Promote local food businesses to create opportunities for the local population
5. Promote and support urban growing in Lewisham.”

And

On page 50, which states,

“The food sustainability section of the strategy will seek to do the following:

1. Reducing energy consumption and water use and increase renewable energy use in Lewisham’s food sector and amongst Lewisham residents.
2. Reduce waste production and pollution created by the food chain in Lewisham.
3. Reduce the negative environment impact of food transportation into Lewisham by promoting the growth of a local food economy and culture and shortening supply chains.
4. Promote the purchase and availability of ethnically traded (Fair trade) food in Lewisham.
5. Promote the public procurement of sustainable good in Lewisham.”

3. Does the borough have any planning, economic development or health related policies that support the distribution or sale of locally grown food in the borough?

No.

4. Should the London plan (or local plans) seek to encourage food growing in public open spaces such as parks?

We support the principles and objectives in encouraging food growing in public open space. Particular attention should be given to maintaining a balance between food growing and the quality of public open space.

Based on the recent draft Lewisham PPG 17: Open Space, Sport and Recreation Study (2009), the quality of the urban parks in Lewisham varies in different wards. It is important to ensure that the introduction of food growing would not bring any adverse impacts to existing open space in terms of accessibility, quality and management. Additional funding may also be required to provide sufficient lighting, water supply facilities, toilet facilities, storage and parking to the potential food growers. Facilities for disabled users need to be further developed.

Lewisham Council manages 36 sites (898 plots) of allotments across the borough. There is a waiting list of 1,270 of people for an allotment. This demonstrates that there is a strong demand in growing vegetables and fruit locally.

5. Should the London Plan identify areas that have the greatest potential for large scale agricultural/horticultural food growing activity, such as the Lower Lea Valley, and other potential areas such as the Thames Gateway or the Green Grid? Can you identify other potential areas?

We support the identification of these areas within the London Plan for large scale agricultural/horticultural food growing activity.

6. Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities? Should it also encourage these activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies, i.e. transport, rail, waterway and housing bodies?

We would have no objections to these proposals provided that they are arable, safe and accessible with minimal environmental impacts. Land owners would need to agree to such new uses.

7. Do you have any other comments that may be useful to the investigation? Site ownership? Is it done by allotments?

We look forward to receiving further details regarding implementation and the delivery of funding mechanisms.

UA025 Planning Aid for London

Planning Aid for London's response to the consultation on the role of the planning system in supporting commercial food growing in London

Planning Aid for London

Planning Aid for London provides free or affordable independent and professional advice on planning matters to individuals and community groups in London. PAL for the last twelve months have been working with Sustain and have been consulting with a wide variety of partners on food growing issues. The advice provided by PAL clearly reflects the current UK planning system, but it is not part of central or local government, nor developer influenced - and is therefore impartial. Through our staff and a network of over 100 volunteers across London we help and support people to:

- Understand and interact with the planning system;
- Take part in preparing strategic policy and plans;
- Put together plans for their own communities;
- Make comments on planning applications;
- Apply for planning permission;
- Appeal against refusal of planning permission; and,
- Appear with confidence at Planning Committees and Public Inquiries.

PAL provides experienced Community Planning services - a central feature of which is to help target disadvantaged and other groups get involved in making places for healthy lives.

Background

The way in which food is grown, supplied, consumed and then disposed of can have significant impact on the sustainability of our cities. The benefits of local food are many, encouraging and improving healthier lifestyles, local environments and adapting/mitigating to climate change, regeneration and community empowerment and cohesion. PAL aims to support, through the provision of advice and training, individuals and communities who are seeking to grow or access local food in London.

PAL believes that this review should not focus solely on commercial agriculture in London as there is also significant scope to improve the planning system for non-commercial food growing. Furthermore, the distinction between the commercial and non-commercial food growing is often not clear cut. While in law "allotment garden" means an allotment wholly or mainly cultivated... for the production of vegetable or fruit crops for consumption by himself or his family (Allotment Act, 1922, Section 22.1.) allotments sometimes sell produce that is excess to their needs, and community gardens, such as Growing Communities, have minor commercial operations. Consideration of both commercial and non-commercial agriculture should be combined to make a strategic consideration of all forms of agriculture in London.

1. How effectively the planning system supports and encourages agriculture in London

PAL recognises and supports the proposal by the London Borough of Hounslow to use S106 monies to employ an allotment officer for the borough. There is potential for S106 monies to be used more strategically in this manner. For example the establishing of local markets for the sale of local produce will enable social enterprises to develop while allowing for a more diverse employment base.

2. How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London?

PAL supports the proposed revisions to the London Plan which seek to improve the green spaces in London, especially those which:

- strengthen the promotion of urban greening and urban agriculture;
- highlight the importance of Borough Open Space Strategies as part of the evidence base for borough LDDs; and
- encourage new development to provide for children's and young people's play and informal recreation.

However, PAL believes that there is the potential to further strengthen these policies.

- PAL would like to see the London Plan recommend that Local Planning Authorities develop specific allotment and community garden strategies. These should: identify land available for food growing opportunities; identify and regularly update levels of demand for local food growing; develop management policies for food growing sites; promote wider community involvement in food growing sites; and promote biodiversity on these sites.
- PAL would like to see new and existing developments, especially those including both private and social housing, to also provide space for food growing. There is potential for green spaces on housing estates, which are currently under-utilised, to be used for individual and/or community food growing projects. The provision of guidance on design and community involvement in these spaces would be a useful resource for Housing Associations and Local Authorities in creating these resources.
- Further to the above point there is potential for the London Housing Strategy to strengthen its position on green spaces with regards to food growing.

3. Do you believe there are any gaps in planning policy and control as it relates to agriculture in Greater London?

PAL is aware that there is some confusion and/or ambiguity as to the different conditions of planning in relation to allotments and community gardens. PAL suggests that this ambiguity be removed by giving equal conditions and protection to community gardens and allotments. PAL would also like to propose an emphasis on allotments being in social control to aid the development of more social enterprises.

4. Should the London Plan encourage these activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies?

Yes, where the land is suitable. Although it is recognised that there are innovative ways of overcoming problems with contaminated land, such as container gardening in skips etc.

Given the current economic climate, PAL would also like to see the London Plan, and London Boroughs support food growing as an interim use such as that employed in Leipzig, Germany

Response to the committee's questions:

How effective do you think the planning system is in a) in protecting existing farm land and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

a & b) Not very effective.

There has been a significant reduction in the area of productive agricultural land within Greater London over the past fifty years. Planning policy on its own is not responsible for this, but it has does not have the policies in place to prevent development on land that is suitable for food growing.

Two actions are required if commercial growing spaces are to be encouraged. One action is to amend planning policy to become more explicit in its support for commercial food growing as part of a coherent urban design policy. This is essential.

The second action is a much wider recognition of the context within which food growing takes place and the barriers that will exist if issues of food security, equitable and environmentally sustainable agricultural and economics are to be pursued within planning policy. One can expect strong lobbying against such a localized food system from "agribusiness" and food distributors and suppliers profiting from imported cheap food. Strong rational arguments exist for a viable local food system, but the lobbying power of agribusiness can easily swamp these arguments. Civil servants and politicians involved with amendments to planning policy, and subsequently planning committees, will need to be particularly aware of this context, within which agribusiness promotes its causes, often presented as pseudo objective reports, a good example being the "Agriculture" supplement included in The Guardian of the 25/08/09. This supplement produced by "Lyonsdown Media Group", appears to present an overview of agricultural options for Africa, but on closer reading it is an advertisement for a high tech multi-national agro-business approach, nowhere does it present the case for intensive localized organic agriculture.

Similarly it must be recognised that we need to re-learn how to introduce viable, local sustainable food systems maximizing production and dealing with food distribution. To address this current issue, planning policy and incentives supporting prototype, experimental and demonstration urban agriculture projects would be especially.

Planning policy could be strengthened to protect fertile land and sites with good access to sun and water. Land suitable for market gardening (high yield) should in particular be protected. I understand that in Sussex (and perhaps London) it is near impossible to gain planning permission for new market gardens with glass houses, due to the earlier misuse of planning permissions granted for the erecting of greenhouses and a dwelling, whereby permission for market gardens was used as a front for erecting country houses. Rather than prosecuting offenders, permission is no longer granted for glass houses. It would be interesting to know if similar contradictions exist in London.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

These comments relate to the GLA document “A New Plan for London” Initial Proposals for the Mayor’s London Plan, consultation event 18 June 2009. (Accessed August 2009)

This document provides a strong foundation for the integration of commercial food growing in to London. Within the “Quality of life” section it undertakes to promote urban greening and urban agriculture.

Gaps:

To realize this desire commercially viable Urban and Peri-urban agriculture must be recognised as a legitimate land uses within The London Plan.

The London Plan requires a more sophisticated definition of urban agriculture. At the moment allotments appear to be the main (only?) type of UA which the city wishes to promote.

The London Plan needs to be explicit about different types of urban agriculture and planning officers and planning committees need to be familiar with their different impacts:

- 1) a commercial urban agriculture – i.e ,market gardening which is likely to have the largest direct environmental benefits, esp. if organic (GHG emission reductions, cradle to cradle food production and potential integration with waste management – composting)
- 2) educational urban agriculture – behaviour change potential.
- 3) social & public health focussed urban agriculture – eg allotments, community building, exercise, healthy eating.

Commercial organic food growing if supported is likely to have the largest direct benefits and this has infrastructural & urban design implications that the London Plan needs to acknowledge.

The “New Plan for London” document introduces important concepts that, if developed with respect to the role of commercial food growing, provide powerful support for the integration of commercial urban agriculture, for example:

Continue to maximise output, but “optimise” not “maximise” density. This is a very important concept which supports integrated urban development that can minimize ecological footprint. The provision of space for local food growing is such an “optimization strategy”

Climate Change, the intention to “*Reflect(s) spatial implications of emerging environmental strategies*”.

Another important concept that allows for the recognition of urban design strategies such as the Continuous Productive Urban Landscape (CPUL) design concept which proposes the coherent introduction of space for urban agriculture into a wider urban design strategy.

To “*Create positive environmental impacts from waste processing.*”

Allows for the integration of composting into food production systems.

The framework of intentions exists, within proposals for the New London Plan, but the connection between these intentions and urban agriculture needs to be made explicit.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

There are knowledge gaps and if these are addressed, a much stronger case can be made. The following would help to provide a solid basis for developing urban agriculture policy:

Undertaking land mapping and design studies assessing options and consequences of introducing commercial food growing into the city. Initial small scale academic studies indicate that more open space is available than local authority records suggest.

Undertaking a food growing study for London, one for green belt, one for areas within the green belt. This should be undertaken within a coherent urban design strategy that articulates the benefits that urban and peri-urban agriculture can bring to surrounding areas and how it can integrate with other elements of sustainable infrastructure (green corridors, cycle ways etc.) Designing urban agriculture as an essential element of sustainable infrastructure.

The number of market gardeners in London is very low, reflecting the difficulty of sustaining commercially viable urban food growing, due in part to the cost of land, and labour. If local food is to be promoted both these issues need to be addressed. Capacity needs building.

Some objections, on the grounds of visual amenity, can be expected to the increased use of unheated glass houses and poly tunnels, these should be addressed directly by engaging in public debate, and working to communicate rational and qualitative arguments in favour of these spaces and structures. A coherent design strategy for their introduction to London would help.

Planning officials and elected representatives workshops or CPD events may be required to familiarise people with these issues.

What measures do you think could be taken to improve availability of local food?

Capacity Building – with respect to physical, human and financial infrastructures and developing design & conceptual frameworks – showing how urban agriculture “could work”.

What policies outside the planning system would support the maintenance or expansion of commercial food growing in the Green Belt? Do you think that green belt land is being utilised in the most productive way?

Setting a target for the supply of food for London, grown within the M25.

Currently the Green Belt appears to be predominantly viewed as “leisure space” – golf & pony clubs predominating. It is easy to imagine how productive agricultural uses could be reintroduced alongside publically accessible leisure space.

Do you have any other comments that may be useful to the investigation?

Organisations with a strategic role in planning London’s future, like the London Assembly have a significant role in articulating the arguments in favour of local food and presenting them nationally and internationally. Working with farmer’s organisations and learning from the logistics applied by current food systems would help to frame and define the arguments in favour of local food.

In parallel to developing planning policy it would be helpful to generate discussion and illustrate viable alternative models to current food systems. Such illustrations could demonstrate a variety of benefits in the following areas: environmental- including spatial & design, behaviour change potential, health, quality of life, food security, food miles and integrated no waste systems (eg integrated composting).

The lobbying power of international agro business and food marketing multinationals is significant and well resourced; this makes it easy for local food arguments to be overwhelmed. The local food / urban agriculture argument is complex, and has to take account of many factors which cumulatively make a strong case. This makes it relatively easy to find one aspect of any argument which can be used to “disprove” the arguments for urban agriculture in particular situations. This can then be spun into a spurious case for dismissing the entire argument. A good example is the way in which the food industry has distorted the argument against food miles. A couple of years ago the press were presenting a balanced argument for the negative greenhouse gas emissions impact of food miles. Then suddenly the singular example of heated greenhouses was used to imply that food miles was not a good measure of environmental impact, and it appears that the media bought this as an argument against food miles in general, and the topic went off the agenda. (Note: Crops grown in the UK in heated greenhouses can have a higher green house gas impact, than crops grown in the open and imported from overseas. This fact is well known as is the ability of unheated green houses to extend the growing season in the UK. The correct argument is that local food has to deal with seasonality and energy efficient storage / preservation of crops. At certain time of the year it imported crops may have a lower environmental impact.)

The capacity to respond to such arguments is a necessary part of articulating the case for local food systems.

End.

UA027 Tesco

Dear Ms Jones

Thank you for your letter about commercial food growing in London.

Locally sourced products at Tesco

Sales of local products are growing at Tesco and have remained strong during the economic downturn with customers keen to support their local economies. We currently stock around 4000 local lines and in 2008 local products accounted for £624 million of sales, representing a 30% increase on the previous year. We hope to develop our local range further in 2009, and aim to increase sales to £800 million in the coming year. To this end we have invested in a network of regional buying offices with dedicated buying, marketing and technical teams.

In England, we class a product as local if it is produced in that county or a neighbouring one. We source Scottish, Welsh and Northern Irish local products from within those areas. We are constantly looking for new suppliers and products to respond to customer demand, as well as trying to identify opportunities to highlight the local provenance of existing lines. After highlighting the Hampshire provenance of our watercress, sales in the county were 93% higher than elsewhere this summer.

Locally sourced products in London

Our research shows that what customers classify as being local varies by region. In particular local has a wider meaning to Londoners than to customers from other regions, with them attaching greater importance to a product's provenance than whether it was produced nearby.

The research found that customers in London were more likely than those from other parts of the country to identify a product from the UK as being local and least likely to define local as being products produced within 30 miles of where they live. Londoners were also more than twice as likely to define local food as food produced in adjoining counties.

These findings no doubt reflect recognition by customers of the particular challenges that urban locations and London in particular - with its limited land availability and other geographical and infrastructure constraints - present in terms of food production.

We currently source from several London breweries, including Meantime Brewery and Fullers, but have found there to be far fewer suitable local suppliers in the London area than elsewhere.

However, we are particularly keen to improve the range of local products we stock in our Express stores and have a number of Express stores in London.

We would therefore be happy to work with you to explore some of the challenges and identify potential suppliers in the London region, including for example through local food networks. We already work with food networks across the country, including the South East Food Group Partnership (SEFGP) which is also looking into improving the availability of local food in London.

UA028LB Camden

Response to London Assembly planning and Housing Committee investigation into the role of the planning system in supporting commercial food growing in London.

London Borough of Camden Aug.2009

1 Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for food growing? Is there currently any mechanism for identifying new areas that may be suitable for food growing?

There is no specific reference to protecting or providing space for food growing however there are policies for protecting existing open space which for example allotments would be included. There are also policies for protecting garden space.

Planning thresholds for the provision of open space include provision of allotment space if the development involves 200 or more dwellings. There are currently no mechanisms for identifying new areas for food growing.

There are policies and guidance to promote the creation of green roofs and roof gardens but currently no guidance on what is appropriate where ie when is a roof garden more preferable over a green roof. When should roof gardens be designed for food growing rather than other outdoor amenities.

We are currently considering providing some guidance on urban food growing in Camden's Supplementary Planning Guidance however we have yet to work out what form that might take

2 Does the borough have a food strategy and if yes, how does it support local growing or sourcing from the London Area ?

The Council has a Food Strategy: "Good Food for Camden: a healthy and sustainable food strategy "(2008)

Supporting local Food Growing

- protect and support allotments in Adelaide Community Garden & Allotments; Antrim Grove; Augusts & Redhill; Branch Hill; Fitzroy Park; Kentish Town City Farm; Regent's Park Rowing Club; South End Green; and Mansfield Allotments Association – in line with the Camden Allotments' Strategy, 2007-2012
- investigate setting up a food bartering mechanism i.e. distribution of excess allotment produce
- identify and enable new sites for allotments and other community food growing spaces, with the support of the new Capital Growth campaign for 2,012 new food growing spaces for London by 2012. The campaign has the support of London's Mayor, the mayoral food advisor, the GLA climate change team and the London Food Board
- investigate food growing opportunities on housing estates as part of the review of the Grounds Maintenance contract as included in Camden's Environmental Sustainability Delivery Plan 2008-2012, as part of wider work to improve biodiversity, storm water attenuation and food-growing²⁴
- establish one or two new food growing sites in the pilot phase of Capital Growth (November 2008 to April 2009), which is seeking an initial 50 sites across London
- commit to at least 80 new community food growing spaces by 2012, as the London Borough of Camden's contribution to the Capital Growth campaign for 2,012 new food growing spaces for London (i.e. 2,012

divided by 33 London boroughs = 80 spaces each), and the practical support necessary to make these a reality, such as matchmaking communities with appropriate land, provision of funding, equipment, training, security measures, planning support, publicity, etc. (many such support measures can attract funding and service provision from other organisations, via the Capital Growth campaign coordinators and the LandFit25 service)

- support development of the ambitious Global Generation²⁶ programme (the subject of Big Green Challenge and Lottery funding bids) to involve young people in Camden in developing food growing projects, including several roof gardens in the borough
- run a 'Food Up Front'²⁷ pilot project with the support of this established urban food growing network, to support householders in turning over their front gardens to food production and engaging in community activities and mutual support
- identify food-growing projects, individuals and communities who are already running successful food projects and enable them to overcome practical and policy barriers, do more and support others to do the same. For example:
 - o the successful and popular Calthorpe project²⁸ indicates that it needs help with lease arrangements on Council land, to secure their future
 - o Alara Wholefoods , Booker (the cash and carry wholesalers) and the sustainable food restaurant Konstam³⁰ have identified Network Rail and Council land around Camley Street on which they would like to grow fruit trees and other foods
 - o spaces identified by the environmental regeneration charity Groundwork, which aims to work with disadvantaged communities on food growing in Camden³¹
 - o public spaces in which highly visible demonstration food growing projects with good interpretation could be run, with the support of local businesses, Capital Growth and Food Up Front, such as parks, estates and planters throughout the borough.
- show leadership and ambition: challenge other boroughs to follow suit
- maintain and promote the website advice already given by Camden Council to encourage food and growing – link this to emerging opportunities for training, free equipment, grant support, advisory services, etc., as signalled on the Capital Growth website³²
- working with Groundwork and the What If? project, contribute to the plans to set up 20 new 'Vacant Lot'³³ sites on estates in Camden, Islington and Hackney as semi-transient food growing sites to match the changing needs of housing estate residents

Sourcing from the London Area

- promotion of London Food Link's 'Local Food Finder' scheme
 - exploring the feasibility of working in partnership with London Food Link to help Booker and other food distribution companies in Camden to make their operations and their supply chains more sustainable;

- encourage Camden’s public sector institutions to play an active role in the LDA’s new ‘Local to London’ food infrastructure project¹⁶ working with wholesale markets, with Camden’s institutions providing demand for local and sustainably produced food

- facilitate relationships between public sector institutions and local and sustainable food suppliers by providing a supplier directory (already commissioned as part of the initial phase of food programme development). Beyond the duration of the food programme development, Camden buyers will continue to have access to up-to-date sustainable supplier information through the London Food Link website

3 Does the borough have any planning, economic development or health related policies that support the distribution or sale of locally grown food in the borough?

The Local Plan policies seek to promote and protect local markets otherwise nothing specific

4 Should the London Plan (or local plans) seek to encourage food growing in public open spaces such as parks?

Yes

5 Should the London Plan identify areas that have the greatest potential for large scale agricultural/horticultural growing activity, such as the Lower lea Valley and other potential areas such as the Thames gateway or the Green Grid. Can you identify other potential area?

Yes

6 Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities ?

Yes it would be useful to promote specific activities according to appropriateness of a site or local area. Should a proportion of the roof space of an area be dedicated to food growing activities?.

Should it also encourage these activities on new and unconventional growing such as brownfield sites, roof gardens, surplus and unused land owned by public and private bodies ie transport, railway waterway and housing bodies.

Yes for example in a densely developed borough such as Camden land adjacent to railways provides a great deal of scope for allotments, forest gardens and bee hives etc.

7 Other Comments

Maybe I’ve missed something however it seems what is lacking, what needs to be developed are some sort of targets around how much food could / should be produced within greater London only then can meaningful policies be developed around the allocation of space for different urban food growing activities. I guess ultimately some form of Transition Plan for food

supply needs to be developed similar to that developed for Totnes. A huge task but necessary.

For densely developed areas often the only viable space is roof space (see comment above for 6). Should it be a planning requirement that whilst roof space might not immediately be used for food growing it should be capable of being used for doing so in the future by being built to accommodate the appropriate loadings.?

UA029 CPRE London

London Assembly - Review of the role of the planning system in supporting commercial food growing in London

Comments from CPRE London

CPRE London exists to advocate, campaign for and influence the stewardship and sustainable use of land and other natural resources, in order to protect and enhance the environment and quality of life in London - and the wider English countryside - for the benefit of all. Information about our past and present projects can be found on our website at www.cprelondon.org.uk.

We are necessarily concerned with the supply, production and consumption of food, and the resulting waste in London, as they each affect the city's population and its landscape. We warmly welcome the present review and are grateful for the opportunity to offer comments in relation to the questions raised.

How effective do you think the planning system is in a) in protecting existing farm land and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

Our view is that the planning system has generally been effective in protecting existing farm land around London in the recent past through the application of Green Belt policy as set out in Government planning policy (PPG2, available at www.communities.gov.uk/documents/planningandbuilding/pdf/155499.pdf). However, former market garden areas and orchards within London have largely disappeared and an area equivalent to c. half of London's remaining farmland has been lost since 1965. Land has been removed from agricultural use and assigned to other purposes, usually but not always in accordance with Green Belt provisions. Elsewhere, allotment sites have been reduced or completely lost.

The Metropolitan Green Belt covers the vast majority of the agricultural land within the GLA area as well as in the surrounding shire counties. Statistics produced by Communities and Local Government (CLG) show that only 2% of new dwellings built in 2007 were in the designated Green Belt, and only 22% of these (or 0.4% of the total) were built on previously undeveloped land in the Green Belt, which in planning terms means land in agricultural or forestry use. By comparison, 14% of new dwellings were built on agricultural land across England. In London, 96% of new dwellings were built on previously developed land. This is consistent with trends in previous years and reflects the higher targets for the re-use of previously developed land in London. The projected growth of London's population in relation to the supply and the efficiency of the use of suitable brownfield sites necessarily give rise to concerns in the longer term in the absence of a regional strategy for the Metropolitan Green Belt and agriculture.

The outer London Boroughs play an important role in the protection of agricultural land. Firstly, local planning authorities decide proposals that may directly or indirectly affect agricultural land and its use. Secondly, some are owners of extensive areas of agricultural land that is let to tenants.

It is however necessary to point out the differences between (a) land in active production or temporarily set-aside, (b) land that is not currently in production but which could easily be returned to productive use, (c) land which, physically, could be returned to productive use but which it would be difficult to restore for other reasons: farmland converted to golf courses; farms sold off in multiple small plots; inaccessible isolated areas etc; (d) former agricultural land now in other permanent use: residential; industrial etc.

The planning system is based on the allocation of land for different uses with designation has been either single-purpose/exclusive or heavily weighted towards a single purpose role rather than, although it does not formally recognise the multifunctional nature of land. Neither formal allocation nor statutory protection for an identified use guarantees such use or its protection, however. The key point is that the planning system can allocate and help to protect land for particular purposes, such as food production, but does little to encourage active production or associated stewardship of land.

Relative economic costs and benefits to the land-owner and tenant are dependent on ever changing markets and on local conditions. In some instances the requirements on local authorities to gain the best return from their assets and to meet expenditure requirements can encourage Boroughs to sell Green Belt land for development

Apart from the relaxation of planning controls in relation to buildings for agricultural use (occasionally abused by those seeking to develop on Green Belt land) we are not aware of measures to directly promote food production within the planning system. Permission for farmers markets and for on-farm sale of produce (of local origin) has helped to support food production and sale. Permission to use buildings in support of such activities and, in particular for activities that add value e.g. production of artisan cheeses, yoghurt, organic herbs would be of assistance. Composting of green and food waste in appropriate locations within the Green Belt could provide a viable commercial operation that would help support food production (commercial and domestic).

PPG2 aims to support farming in Green Belt areas by advising that Green Belt boundaries should be defensible and can endure. Professor Martin Elson points out that PPG2 was originally based on a concern to ensure that farm holdings in urban fringe Green Belt areas did not become too isolated and thus prone to vandalism or abandonment. This aspect of the advice dates back to the formulation of Green Belt policy in the 1950s and refers to the findings of studies which showed that farmers needed a clear boundary to avoid becoming too isolated. Also, the idea that 'permanence' of Green Belt should be something longer than the next plan review refers partly to the former Ministry of Agriculture, Fisheries and Food's stipulation that it would not invest in agricultural land that had no guarantee of protection for more than 10 years. Such long-term certainty would also be needed for a wardening service along the lines proposed by the Countryside Commission (now part of Natural England), (Martin Elson, Green Belts: Conflict Mediation on the Urban Fringe [Heinemann 1986]).

In CPRE's view, the long-term nature of schemes to improve the management of agricultural land in the Green Belt, such as the Environmental Stewardship schemes run by Natural England and Country and Regional Parks, emphasises the continuing validity of Elson's analysis.

However, London's Green Belt remains very much at the front line of pressures for new development. Research carried out for the GLA in 2008 found that Green Belt boundaries around London were being reviewed in no less than 18 separate locations with a view to accommodating major new development, mostly housing (Robin Thompson Associates and Urban Studio, Approaches to Growth: Study of Sub-regions, Growth Proposals and Co-ordination in and around London, Final Report March 2008 - Accessed from www.london.gov.uk on 18 April 2008). If the Green Belt is to realise its full potential as a source of food for London, such constant nibbling at the boundaries must be resisted as much as possible. Negating the 'hope value' of small plots of land in the Green Belt would be a valuable first step that the boroughs could address individually or in concert.

Taking one borough as an example. Bromley contains a significant proportion of London's Green Belt and agricultural land. The local authority is the owner of a significant area of farmland, much of it inherited in large part from Kent County Council as part of the boundary changes associated with the establishment of Greater London. What remains as farmland is administered by the council's Valuation and Estates department and is let to tenants. Other areas are managed by the Parks department and have been transferred to other uses e.g. public golf courses. As a result of the development of an area of Green Belt land that included a public park for a new school, Scrubs Farm was transferred back to the council and transformed into the new Richmal Crompton park, with the outcome that the net area of agricultural land was reduced as a result of development. A nearby allotment site within the Green Belt is also subject to a residential development proposal supported by the local authority. Other farm land has been converted to informal recreational use, some fields now maintained for 'horsie-iculture'. In 2006, one of the few dairy farms surviving in London - included within the boundaries of the proposed Darwin's Living Laboratory World Heritage Site - was sold off in small plots. Some of these are presently advertised as having development potential in a pleasant Green Belt setting. None now seem to be farmed. Past history would suggest much of it is likely to become horse pastures with land associated with stables in more urban areas likely to be subject to development proposals unless there is a shift in values which results in policy change. At least one Borough's UDP documentation refers to an oversupply of agricultural land in Europe, despite the fact that the world's human population is consuming more than it produces each year and is, literally, eating into stored reserves. The Mayor and London's Councils have the opportunity to give greater thought to food security and local food production in their preparation of the revised London Plan and new Local Development Frameworks. Proposals in relation to the former provide encouragement.

Given the strategic importance of London and of the Greater South-East as a whole for the UK and Europe, consideration should be given to how national agencies and the government might be encouraged to incentivise local food production (and consumption).

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

The London Plan presently provides no strategic policy framework to support food production in London. This is unfortunate because issues of climate change, air and water quality, soil conservation, health, employment, biodiversity, recreation are vital to London's economic sustainability and our quality of life as well as to agricultural production. Strangely, Policy 3D.14 makes no reference to the Mayor's Food Strategy but we would expect that the new plan will remedy such failings.

The current plan goes only so far as to say that the Mayor will and the boroughs should seek to encourage agriculture. There is no reference to food security or the role which local food production could play in feeding London, in helping to improve food poverty, enhance the environment or provide employment. This can be regarded as a hangover from the past when little value was placed on urban food production or the realities of climate change and a swelling population were taken on board.

Policy 3D.14 makes reference to bio-fuels. Whereas, short rotation coppice and food waste might provide useful local CHP supplies, we would very strongly advocate the retention of green areas for food production and wildlife and use London's roofs for solar thermal/pv, whilst underlining the need for adequate insulation of older properties. Producing biodiesel in the Green Belt to enable folk to commute into the city rather than producing food would be indefensible.

Again inner London boroughs also have a role in relation to providing sites for community gardens/allotments – which might include suitable, accessible sites in outer London boroughs - were simply emphasises the need for local authorities to

Although the entire Metropolitan Green Belt area is already insufficient to feed London's existing population, London's farmland could e.g. provide fruit and vegetables that would supply meals in London's schools. Consideration should be given to how initiatives that might provide new markets, incentives or subsidies for growers might be implemented where other benefits e.g. health, education, biodiversity, landscape might benefit as part of wider aims.

The impacts of a changing climate, with consequences for the suitability of different crop types, pests, seasons and the role of a productive Green Belt in mitigating climate change (as well as benefitting from the Urban Heat Island effect).

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

The most significant barriers are economic, practical and attitudinal. Central London boroughs have generally shown little interest in food production, an issue that would generally be regarded as beyond their remit. They could do more to provide points of sale. Past planning decisions have resulted in the decline of small local shops and supermarkets in favour of out of town or mega-markets. The withdrawal of EC size/shape produce regulations should make smaller growers more viable. How can more produce from the London area and elsewhere in the Metropolitan Green Belt end up in our shopping baskets and on our plates? Without investment, incentives and political support it is unlikely that the status quo will change. That would be a considerable disappointment.

Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities? Should it also encourage these activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies, i.e. transport, rail, waterway and housing bodies? For commercial growing, scale, accessibility, security, water supply etc will be vital in determining the viability of a particular site. The relative value of a crop will also play a part. A restaurant that sources its herbs locally or can boast that it grows its own in a rooftop garden may be able to make good use of a small

area. However, what may be perceived as unused or 'waste' land by one group may actually be a valuable wildlife haven or informal play area in an area of otherwise poor provision. Commercial production which detracts from the aesthetics of an area (e.g. poly-tunnels) or acts as an obstacle to access should be discouraged whilst production that directly improves the landscape, encourages wildlife, enhances ecosystem services and increases public amenity in a more-multifunctional way should be strongly supported. Within the Metropolitan Green Belt there must be many examples of successes and best practice which could be used to raise awareness and encourage others.

Where large buildings e.g. warehouses are to be constructed the provision of roof top gardens and/or glazed growing areas (which can benefit from buildings' 'waste' heat) should be a requirement wherever wildlife roofs are not appropriate.

We would encourage food production in general in a wide range of situations and strongly support regional and local schemes to encourage Londoners to 'grow their own' in appropriate locations. This should be regarded as increasing the customer base for commercial growers. Those who grow their own out of necessity or as a lifestyle choice are more likely to buy from a market offering novel varieties or items that can't be grown at home.

What policies outside the planning system would support the maintenance or expansion of commercial food growing in the Green Belt? Do you think that green belt land is being utilised in the most productive way? CPRE has noted that a recurring issue raised by land owners and land managers is the scale of obstacles to diversification caused by the planning system. However, although we recognise the importance of sustainable and discerning diversification to farm businesses, nationally, research has consistently shown that the planning system is no barrier to diversification schemes, including those which may be justifiably be refused as being detrimental to yields (See CPRE, *Squandering our Assets*, 2004, full copy included with this evidence). Furthermore, a report prepared for the London Development Agency in 2005, to cite just one example, found that in the Metropolitan Green Belt, a higher proportion of farmers' income came from diversification than anywhere else in the country

www.greenarc.org/downloads2007/Farming%20Londons%20greenbelt.pdf.

Research for CPRE by Oxford Brookes University in February 2004 (a full copy is included with this evidence) concluded that:

Diversification away from agriculture is not the solution to the farming crisis. Potential commercial rental income is likely to attract farmers away from land-based diversification, inflate the cost of farm buildings beyond the reach of agricultural users, and encourage short-term asset stripping. Instead PPS 7 [Government planning policy on rural areas] should express a preference for land-based forms of diversification such as local food enterprises, forestry, the green economy and sustainable tourism.

The recommendation on Government planning policy could equally apply in the strategic planning context of London and the surrounding counties and districts covered by the Metropolitan Green Belt.

At present the Metropolitan Green Belt exists as an entirely disconnected series of individual areas split between multiple planning authorities whose main concern is with PPG2 requirements, rather than as a unified area. It also sprawls across three government regions, with only ~ ten per cent within Greater London. The Green Arc Initiative which takes a broader more strategic view has been hampered by being split into four quadrant areas. Given the cross-regional significance of the Metropolitan Green Belt, not least for the future of London we, and the other CPRE branches surrounding Greater London, strongly advocate a whole Metropolitan Green Belt Strategy in which agricultural production, together with the re-use of suitably treated food and human waste, climate conditioning, ecosystem services, biodiversity and recreation were all supported in an integrated manner. There is considerable scope for improvement.

The veg/fruit box delivery system could be encouraged by the reduction of rates on growers' premises e.g. farm shops.

Do you have any other comments that may be useful to the investigation?

Encouragement of food growing in schools (under RHS schemes, the initiatives of individual teachers etc.) is to be commended. It would be a good thing to see this expanded into London farms producing foods

(where conditions and circumstances permit) for London schools, with children gaining more of an idea of the importance of food and what affects its supply.

Markets can add to local character and the vibrancy of town centres as well as providing points of sale for local produce.

A Green Belt Plus brand for London would provide a means of identifying locally-produced food. This could be of benefit e.g. in establishing grazing projects that would help to maintain areas of conservation grassland in the London area, provide markets for livestock from city farms or fish from the Thames. The creation of such a brand might have sufficient weight for supermarket chains and could also be used for milk from West Wycombe or honey from Islington.

During summer 2009 CPRE has carried out a detailed survey of people's attitudes on the future use of the Metropolitan Green Belt as part of a wider investigation as to how Green Belt land is used and how its environmental and agricultural value might be improved. This survey received 464 responses from a range of members of the public and land managers with twenty per cent coming from residents in the ninety per cent of the Metropolitan Green Belt beyond London's borders and the rest split evenly split between residents of Green Belt boroughs and of more urban areas. CPRE's National Office is working closely with Natural England, who are carrying out their own research on the environmental condition of Green Belt land. The results in January 2010 and the Committee will kept informed of these findings and other Green Belt work with which CPRE London is involved.

Overall, we would conclude that initiatives which invigorate agriculture in London will have various benefits, not least in promoting the stewardship of London's countryside, in addition to encouraging local food production and should be viewed as a vital, integral part of efforts to create a more sustainable London for the benefit of all.

UA030What If: Projects Ltd

RE: Planning and Housing Committee: The role of the planning system in supporting commercial food growing in London

Comments:

What if: projects Ltd are currently working in partnership with Groundwork London to establish 20 new allotment gardens on social housing estates in Hackney, Islington and Camden. We successfully attracted Big Lottery funding (with match funding from housing associations) to deliver these allotments over the next three years. Inspired by the success of the VACANT LOT allotment garden that What if: projects set up in 2007 on a piece of vacant and neglected land on the Royal Oak and Charles Square estate in Hoxton the team is now extending this approach to other underused spaces on inner city housing developments in London.

We are proposing that there is an abundance of land for growing food within the inner city of London. Many inner city housing estates suffer from deprivation and are surrounded by fenced off, neglected spaces that could be adjusted through simple means to accommodate food growing in the form of allotments, orchards, small scale vegetable farms, bee keeping etc. All of these growing projects allow local residents to become active within their immediate environment and encourage stewardship of the land.

What if: projects produced a mapping of vacant spaces for growing covering the housing estates in the Hoxton area. This map reveals a network of mostly unused grass areas and concreted pieces of land that are not suitable for additional housing developments but could become an asset as well as a resource to the neighbourhood. We propose to expand this map to cover the inner city area of London.

Please let us know if you have any questions or if you would like more information.

UA031 Mayor's Office, GLA

Dear Jenny

Planning and Housing Committee: The role of the planning system in supporting commercial food growing in London

Thank you for your letter of 9 July asking for information to help inform the Planning and Housing Committee's investigation of the role of the planning system in supporting agriculture in London. As you will see, I am afraid we do not have much information that will help your inquiry. I suspect this is partly because agriculture and horticulture operate to some extent outside the planning system, and because many of the planning issues that do face them apply essentially at local level, and will be things that individual boroughs will have more knowledge and experience of.

Is there any evidence of pressure on commercial food growing from proposals for development/change of use in London?

There is no evidence that we are aware of that commercial food growing in London is under particular or general pressure from development. It is not an issue that has been raised during consultation on either "Planning for a Better London" last summer or in response to the initial proposals for revision of the London Plan (although we are still going through the responses received to this document).

Information from the Department of the Environment, Food and Rural Affairs' Agricultural and Horticultural Survey suggests that over the last four years, the number of agricultural holdings in London has increased, while the amount of land used has shrunk somewhat. Unfortunately, the Greater London Authority's own London Development Database does not distinguish between agricultural land in active use for farm growing and that used for other purposes (such as grazing horses).

The position is particularly unclear as many agricultural activities do not require planning permission (under section 55 (2) of the Town and Country Planning Act 1990, use of land for agriculture (including horticulture) or forestry is not classified as "development" - and so does not require planning permission).

How effective do you think the planning system is a) in protecting existing farm land and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples?

Given the lack of evidence available, it is difficult to give a comprehensive answer to this question. Much of London's agricultural land will either be in the Green Belt or covered by designation as Metropolitan Open Land. Both are quite strongly protected in planning policy. The Government's Planning Policy Guidance 2 (Green Belts) identifies retention of land for agricultural and related uses as one of the objectives for the Green belt (paragraph 1.6), and identifies new buildings for agriculture and forestry as being among the very limited classes of development appropriate for Green Belt land (paragraph 3.4). In addition, Planning Policy Guidance 7 (on the rural economy) encourages the protection of the best agricultural land.

One issue that has been of concern outside London has been the location of farm shops. Local authorities have often refused planning permission for them on grounds of traffic generation or highway safety or because their location tends to be contrary to the "town centre first" approach in Government planning policy. We are not aware of this being a particular problem in London.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

The current London Plan (consolidated with alterations, February 2008) contains policy 3D.18 that supports and encourages agriculture. It does not, however, refer to allotments or community food growing. The forthcoming review of the London Plan represents an opportunity to provide more guidance and support for food growing, and it is likely that it will contain a draft policy supporting a thriving agricultural sector in London, particularly in the Green Belt and use of land for growing food nearer to urban communities via such mechanisms as 'Capital Growth'. It is also likely to encourage boroughs to protect existing allotments and identify other potential spaces that could be

used for growing food in the community.

What involvement has there been from other parts of the GM family in terms of the benefits of promoting commercial food growing in the London Plan and the economic development, health and sustainability benefits that might accrue?"

There are two elements to this issue: the potential to make the food that the GLA group buys more sustainable, and to increase the amount of food that it could grow on its own land.

The London Development Agency has funded the development and implementation of the London Food Strategy since 2004 and the existing programme is now transferring to the GLA to enable this work to continue at until 2011/12. Project Officers in the former LDA Food Team worked with the London Plan team on the previous revision of the Plan.

In terms of what food the CLA group buys, the LDA commissioned research in 2005 working with the Metropolitan Police Authority, the London Fire and Emergency Planning Authority, Transport for London and the CLA to highlight the special value of working with CLA group catering operations to increase their sustainable food procurement. The research showed that they can demonstrate good practice for London, and revealed the opportunities and barriers to the use of sustainable food supplies in catering paid for by the public purse.

The research found that to achieve a large impact there would be particular benefit in working with the MPA and with TfL, which then had 100 catering units and 29 restaurants respectively, in the case of the Police Authority serving 10 million meals per year.

The research meant that the benefits of public sector procurement were highlighted in the London Food Strategy. Following the publication of the research LDA officers worked with senior CLA group procurement officials to attempt to develop healthy, sustainable food procurement policies across the group and Rosie Boycott, Chair of London Food, is keen to resume this dialogue to ensure that the CLA group can lead the way in London demonstrating the economic, environmental and health benefits of sustainable food.

LDA funding for the public sector procurement strand of its Local Food Infrastructure project is enabling sector clusters (such as universities) and geographical clusters to be developed. I will make sure that this work includes an evaluation of the extent to which CLA group organisations could be engaged to promote sustainable food in the capital, and how their success in doing so could demonstrate viability of the practice.

In terms of growing food in London, I am keen to use the Mayor's Capital Growth initiative to investigate the potential for increasing the amounts of food grown on land owned by CLA group organisations. Aims for the next phase of that project include encouraging organisations to make available land, and materials for growing spaces; and enrolling 300 public sector organisations e.g. schools, prisons, local authorities, mental health trusts and universities in the project.

I am very keen to draw together all the work so far undertaken on these issues to revitalise the role that all or any part of the CLA group can achieve in making London's food system more sustainable. The London Plan has a vital role to play in providing the framework that can help make that aspiration a reality.

In closing, I would like to reserve any further comments at this stage, but I will be interested to see if the investigation can bring forth any new suggestions on the way that planning issues can be best used for sustainable development.

UA032 GOL

LONDON ASSEMBLY PLANNING AND HOUSING COMMITTEE

THE ROLE OF THE PLANNING SYSTEM IN SUPPORTING COMMERCIAL FOOD GROWING IN LONDON

CONTRIBUTION FROM THE GOVERNMENT OFFICE FOR LONDON

Your contribution is sought on the following questions:

How effective do you think the planning system is in a) in protecting existing farm land and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

National planning policy provides a positive framework for land use, within which the Mayor and local planning authorities have an important role in setting regional and local priorities.

National planning policy on agriculture, farm diversification, equine-related activities and forestry is set out in Planning Policy Statement 7: Sustainable Development in Rural Areas, paragraph 27 to 33. A consultation draft PPS Planning for Prosperous Economies, issued by CLG May 2009, may potentially replace paragraphs 30 (i-ii) and 32 of PPS7 (farm diversification and equine-related activities).

In addition, PPS7 is being considered for consolidation into a single PPS (with PPS 9, Biodiversity and Geological Conservation, and PPG 17, Planning for Open Space, Sport and Recreation), with public consultation in the autumn.

You may wish to feed in any findings from your scrutiny as consultation opportunities arise during review of national policy.

The most relevant parts of current national planning policy are described in this and following paragraphs. PPS7 recognises the important and varied roles of agriculture and identifies that planning policies within RSS and LDDs should recognise these roles and support development proposals that will allow farming and farmers develop to: become more competitive, sustainable and environmentally friendly; adapt to new and changing markets; comply with changing legislation and associated guidance; diversify into new agricultural opportunities; or broaden their operations to add value to their primary produce.

PPS7 makes clear the presence of best and most versatile agricultural land should be taken into account in relation to other sustainability considerations when determining planning applications. Local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5 of the Agricultural Land Classification) in preference to that of a higher quality (grades 1, 2 and 3a) where significant development of agricultural land is unavoidable. If any undeveloped agricultural land needs to be developed, any adverse effects on the environment should be minimised. Local planning authorities may wish to include policies in their LDDs to protect specific areas of best and most versatile land from speculative development and to decide whether such land can be developed.

PPS7 is clear that "diversification into non-agricultural activities is vital to the continuing viability of many farm enterprises". Local planning authorities should set out in their LDDs the criteria to be applied to planning applications for farm diversification projects. Local authorities should also be supportive of well-conceived farm diversification schemes that contribute to sustainable development objectives, sustain agricultural enterprise and are consistent in their scale with their rural location. This applies equally to

schemes around the fringe of urban areas. Potentially, paragraphs 30 (i – ii) of PPS7 on farm diversification may be replaced by Policy EC9.2, 3 of the consultation draft PPS Planning for Prosperous Economies.

In relation to farm diversification within the green belt, local authorities should give favourable consideration to proposals for farm diversification where the development preserves the openness of the green belt and does not conflict with the purposes of including land within it. Where developments would result in inappropriate development in terms of PPG2, any wider benefits of the diversification may contribute to the 'very special circumstances' required by PPG2, for a development to be granted planning permission.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

London has a dynamic relationship with its rural hinterland, which, of course, extends far beyond the Greater London boundary. This relationship is important for food as well as recreation and it's also where many people who work in London live. However, the remit of the London Plan is the Greater London area. Any wider consideration would need to be addressed in a co-ordinated way through the regional strategies of adjoining regions.

London Plan Policy 3D.18 Agriculture in London makes clear that DPDs should provide protection for the best and most versatile agricultural land, in accordance with national planning policy in PPS7. London Plan policy 3D.18 supports farm diversification and other measures to meet the needs of farming and rural business development in DPDs, also consistent with PPS7. All such policies should be consistent with the presumption against inappropriate development in the green belt. Reference is made to London's agricultural community playing an important part in contributing to a sustainable source of food and promoting sustainable urban development. The development of farmers' markets in London is cited as one good example of this.

The emphasis of London Plan policy therefore very much reflects national policy in PPS7. It is noted that 15% of London's area is farmed. However, the London Plan rightly has a strong urban focus, addressing the needs arising from population and economic growth over the long-term of a major metropolitan area.

In addition to the London Plan, the Mayor's Food Strategy, published in 2006, includes an action 'more of London's food will be local and diverse' and a sub action to 'increase food production within London, in response to demand' (page 73 of the strategy). Recent work by the London Food Board has focused on improving the supply of local food from the surrounding regions, using the wholesale markets as 'hubs'. London Plan policy 3B.4 contains reference to wholesale markets and paragraph 3.160 describes their changing roles.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

Land supply in London is limited, land values are high and agriculture may struggle to compete successfully with other, much higher value uses on commercial sites. Even on land with various forms of policy protection, such as green belt or metropolitan open land, agriculture faces competition from other uses, such as leisure, which may also have significant benefits for the urban population.

In addition, London is a city of 7.6 million people (GLA, April 2009) and provision for its food needs is complex and much more than a local or regional issue. For example, London is part of the global food network (13% of the UK's total food and drink imports come through the Port of London).

Some boroughs are already looking at utilising unconventional spaces to grow food, including railway banks, grass verges, school fields, and hospital gardens. However, any benefits may need to be set against the value of having relatively undisturbed habitats in an urban environment for biodiversity purposes.

Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities? Should it also encourage these activities on new and unconventional growing spaces such as brown field sites, roof gardens, surplus or unused land owned by public and private bodies, i.e. transport, rail, waterway and housing bodies?

Government wants the UK to increase food production as long as it is driven by an increased demand for UK food and is achieved as sustainably as possible.

The options listed above on locations for food growing are strategic choices for the Mayor of London as the regional planning authority, (though see our comments on barriers above). Developers may have concerns where these initiatives are considered to have cost implications for new development. Any such proposals will also need to be workable, for example, considering the structural impact on buildings of green roofs, and complement broader London Plan policies.

We note the Mayor proposes, in his review of the London Plan, to protect all open spaces from inappropriate development and promote this green infrastructure for growing food and urban agriculture, among many other uses.

In his response to 'Planning for a Better London', the Mayor indicated that he had asked his officers to examine further the idea put forward that the planning system should be used to protect land currently used for growing food, and to encourage more land for food in new developments. National planning policy is set out in PPS7, described above.

The London Food Board's Capital Growth project sets out that 2,012 community spaces will be created to grow food by 2012. This is equivalent to freeing up around 25 hectares of poor quality green space for growing food, and will include pocket parks in urban environments and green roofs. The project provides practical support to organisations or groups of enthusiastic gardeners who want to grow food for themselves and the local community. Land has already been opened up by a range of organisations, including borough councils, schools, hospitals, housing estates and transport networks.

London already has allotments throughout the urban area, which can provide locally grown food for individuals. Government recognises the role of allotments as places that provide opportunities for people to grow their own produce. Public interest in allotments has undergone a recent revival in line with current thinking on healthy eating, organic food and exercise. This has created a greater demand for allotments in some areas, which is critical to protecting them from a change of use in the future as a consequence of disuse or dereliction. The Government's aim is to ensure that allotments are well managed, are considered as part of the overall green infrastructure, and are only disposed of where there is no demand for them and established criteria have been met.

It is clear that what is described here will not feed London, but will provide significant additional benefits by reconnecting citizens to healthy, sustainable food production.

What policies outside the planning system would support the maintenance or expansion of commercial food growing in the Green Belt? Do you think that green belt land is being utilised in the most productive way?

Before considering other sources of policy, you should understand the planning grounds for creating green belts. National policy is set out in Planning Policy Guidance Note 2: Green Belts. This makes clear that the fundamental aim is to prevent urban sprawl by keeping land permanently open; the most important attribute of green belts is their openness. Land is included in green belt to restrict urban sprawl; to prevent

towns merging; to inhibit encroachment on the countryside; to help preserve historic towns; and to assist urban regeneration by placing the green belt out of reach of developers. Once designated, green belt land may offer access to open countryside for the urban population, provide opportunities for outdoor sport and recreation, and offer other incidental benefits by retaining attractive landscapes and conserving nature.

If a planning application (or prior approval notification) is received in respect of green belt land, it is for the local planning authority to assess the appropriateness or otherwise of the proposed development, and determine the issue in light of the stringent tests set out in PPG2 and any relevant policies in its local plan.

London's green belt extends well beyond the Greater London boundary (less than one tenth of the green belt lies within Greater London). Any policy consideration would need to be addressed in a co-ordinated way by regional authorities in London and in adjoining regions.

Government Office for London

UA033 Sustain (London Food Link)

LONDON FOOD LINK'S RESPONSE TO THE PLANNING AND HOUSING COMMITTEE'S REVIEW OF THE ROLE OF THE PLANNING SYSTEM IN SUPPORTING COMMERCIAL FOOD GROWING IN LONDON (SEPTEMBER 2009)

About London Food Link

London Food Link (LFL) runs a diverse network of organisations and individuals – such as farmers, food writers, caterers and community food projects – who want to make London's food system more sustainable. LFL aims to increase the availability of sustainable food in London, tackle the barriers preventing access to healthy and sustainable food for Londoners and protect and celebrate London's diverse food culture. LFL is part of Sustain: the alliance for better food and farming. This response is submitted following a consultation with colleagues and members of LFL but represents the general, rather than detailed views of members of that network. LFL has already submitted an initial response to the London Plan which can be found at http://www.sustainweb.org/pdf2/LFL_response_to_London_Plan_review_June2009.pdf

How effective do you think the planning system is in a) in protecting existing farm land and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

The planning system is complex which makes this question challenging to answer. The planning system can be used to protect land for food production, but also needs to work with other policies and various levels of governance (councils/regional and national bodies). Some national planning policies have protected agricultural land such as PPS2 on Green Belts, and PPS7 on sustainable development in rural areas which designates higher grade land for agricultural use. Conversely, and disappointingly, the role of agriculture was not mentioned in PPS4, the planning statement for prosperous economies, which could have added some more weight to the importance of agriculture to sustainable urban and rural economic development. Thus we believe the planning system can, and sometimes does protect current and potential agricultural land, but more needs to be done.

In London, for example, around half of London's agricultural land has been lost since 1965 and there is a shortage of available allotments spaces in central London. How London feeds itself has not yet been recognised by the planning system as economically important, let alone the role of food and farming in contributing to climate change adaptation, and the health and well-being of London's population.

London's outer boroughs could play an important role in protecting agricultural land, not only through their decisions about land use, but also because they own agricultural land which they let to tenants via the county farm system. Unfortunately, increasingly cash-strapped councils are under pressure to sell county farm land which, being close to London, is of high value. It would be helpful if the London Plan could emphasise to local authorities that county farm land should continue to be used for agricultural purposes. We agree with the recommendations of the 2008 Don Curry report that local authorities should carry out strategic reviews of their county farms, and that regional strategies should also recognize the importance of the county farm structure as a "crucial entry point for new entrants to agriculture". County farms could also be used not only to produce food, but also for other sustainable development activities such as providing renewable energy, and educational opportunities.

Some members of the Sustain network have reported difficulties with the planning system which has inhibited development associated with agriculture, such as erecting farm buildings. Whilst we have concerns about supporting farm diversification if it is away from agriculture, we would like to see the planning system

support and encourage diversification that makes agriculture more viable, such as by allowing farm shops, and residences for farm workers.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

In the existing London Plan (revised 2008) policy 3D.18 mentions encouraging and supporting the agricultural sector in London and the Green Belt, including appropriate diversification. We would like to see this kept in the revised plan and strengthened to reflect the potential commercial viability of farming in the Green Belt. We would also like this to be linked with the London Food Strategy, which has a strong focus on localizing the food supply in ways that are environmentally and economically sustainable.

In addition, it would be helpful to include activities related to agriculture, such as anaerobic digestion, which could contribute to keeping London's waste in London and would provide compost for agricultural use. This compost could be used and sold as an alternative to non-sustainable sources of compost, such as peat, thereby providing another source of income for farmers. There is also a role for the retention and expansion of allotments and community gardens all across London which not only contribute to food security, but also to the health and well-being of Londoners. Although the Metropolitan Green Belt will not be able to produce enough food to feed London's population, it can go some way towards reducing food miles, increasing transparency in the food supply chain, encouraging business and enterprise, connecting Londoners with the production of food and the countryside. It can also contribute to other aims such as green landscape protection and biodiversity.

The changes to the London Plan do mention the importance of street markets and farmers markets and greening areas around London, but these needs to be linked with explicit support for food production. Non commercial urban agriculture is also important for people, especially those on low incomes, to have access to allotments, gardens and other sites for growing.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

As well as finding space of growing food, it is also necessary to build and plan for associated infrastructure, such as abattoirs (there are now no abattoirs in Greater London) and food distribution in the capital. It has been argued that the congestion charge has caused problems for sustainable food distributors, which could perhaps be tackled by councils subsidising vans running on recycled cooking oil or another sustainable fuel source. Crime is also a problem, especially on land left derelict (which has often been bought for speculative reasons and not for immediate use). Allowing communities to produce food on this land, albeit temporarily, would be a useful approach. In some instances large infrastructure projects, such as cross rail and the expansion of Heathrow, will eat into the land available for production. We consider that it is vital to take into account the impact on food security when making planning decisions over farmland. If the decision is taken to build on agricultural land, it should at least be replaced elsewhere in a suitable location.

Should the London Plan promote commercial food growing activities by specifying market gardens, horticulture, urban farming and other related food growing activities? Should it also encourage these activities on new and unconventional growing spaces such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies, i.e. transport, rail, waterway and housing bodies?

We would welcome specific support from the London Plan to promote a range of commercial food growing activities. The London Plan should also encourage assessing land grade and its potential for food growing and maintain the best quality land for food growing. It also makes sense to encourage commercial food production in a wide range of locations such as brownfield sites, roof gardens, surplus or unused land owned by public and private bodies. However, it should be ensured that the production of food on these sites is done for commercial purposes rather than individual use.

What policies outside the planning system would support the maintenance or expansion of commercial food growing in the Green Belt? Do you think that green belt land is being utilised in the most productive way?

Research for CPRE by Oxford Brookes University in February concluded that: Diversification away from agriculture is not the solution to the farming crisis. Potential commercial rental income is likely to attract farmers away from land-based diversification, inflate the cost of farm buildings beyond the reach of agricultural users, and encourage short-term asset stripping. Instead PPS 7 [Government planning policy on rural areas) should express a preference for land-based forms of diversification such as local food enterprises, forestry, the green economy and sustainable tourism. The recommendation on national planning policy could equally apply in London and the surrounding counties and districts covered by the Metropolitan Green Belt. At present the Metropolitan Green Belt exists as a disconnected series of individual areas split between multiple planning authorities whose main concern is with PPG2 requirements. It also sprawls across three government regions, with only around ten per cent in Greater London. The Green Arc Initiative, which takes a broader view, has been hampered by being split into four quadrant areas. Given the cross-regional significance of the Metropolitan Green Belt, not least for the future of London, we would recommend an integrated Metropolitan Green Belt Strategy which would include agricultural production, together with the re-use of suitably treated food and human waste, ecosystem services, biodiversity and recreation.

Do you have any other comments that may be useful to the investigation?

Planning for a supply of food to the capital is not yet mentioned in the London Plan. There are increasing challenges to the food system all over the world such as fluctuating oil prices which affect the cost of production and distribution, and climate change and unpredictable harvests which threaten the food security of a large urban population. Given these and other challenges, we believe it is essential to incorporate food production into the London Plan.

UA034LB Greenwich

As far as I am aware, no land in Greenwich is used for commercial food growing and this has therefore not been a planning issue in this Borough. We do not have any local policy or guidance related to commercial food growing and have not received any recent planning applications for such use. On this basis, I do not feel we can usefully contribute to your investigation.

Directorate of Regeneration, Enterprise and Skills
London Borough of Greenwich

UA035 DEFRA

Alex

Thank you. I'm afraid I have no knowledge of the issues you raise in your consultation and so am unable to respond. Nor do I think anyone else in my organisation is likely to be in a better position

Director, Food & Farming Group

UA036LB Redbridge

Dear Madam,

Consultation on role of planning system and support for commercial food growing in London

Thank you for your letter dated 9 July 2009 in relation to the above matter and apologies for this late response. I wish to offer the following answers to the questions raised in your letter.

What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way?

There is in the region of 500 ha of commercial croplands in Redbridge, mostly located on the eastern part of Fairlop Plain and to the south of Hainault Forest Country Park. There has been little change in the area over the last few years, except for the excision of land at Hog Hill to make way for the Redbridge Cycling Centre to replace the Eastway Cycle Circuit at Stratford, which was closed to make way for the London Olympics.

Parts of the agricultural land are also subject to extractive (sand and gravel) quarrying operations. As areas are worked out, the land is rehabilitated to allow for its return to agricultural use.

There is very little potential to increase the amount of land used for commercial agriculture in Redbridge. Virtually all land not currently developed for urban purposes is protected as open space due to its important recreational value, or is otherwise protected for its nature conservation value.

How effective do you think the planning system is in a/ protecting existing farmland and other commercial growing spaces b/ in allowing activities associated with the support or expansion of agricultural activities? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

The main source of protection for agricultural uses in London, is the fact that most agricultural land in the capital (and all commercial agricultural land in Redbridge) is designated Green Belt. As such, there is a limited range of uses to which it can be put, other than agriculture.

Outdoor sport and recreational uses are generally acceptable alternative uses under national Green Belt policy. Given the critical need to improve recreational open space provision and that commercial farms are not normally accessible to the public, the Council would by way of supporting stronger explicit protection of agriculture, especially as there is some evidence to suggest that farm land in London is commercially marginal. A more productive approach may be to inquire into the commercial viability of current farming and what can be done to improve it.

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing? How is this applied when assessing planning applications?

No. The Redbridge Local Development Framework does provide explicit policy protection to allotments . Allotments are not typically used for commercial food growing, however they are an important source of natural produce for many Redbridge residents.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

London Plan Policy 3D.18 Agriculture in London is adequate. Given the many important competing uses for land in the capital, it is not considered that agriculture requires a higher profile.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

- 1/ Lack of commercial viability on marginal land close to built-up urban areas.
- 2/ Important alternative uses of open land including for outdoor sport and recreation, nature conservation and non-commercial growing of produce on allotments.
- 3/ Potential conflict between large scale mechanised agriculture and nearby residential uses (e.g. noise, dust and pesticide use).

Do you have any other comments which may be useful to the investigation?

Given the growth pressures faced by London and the important competing uses for open land, the case for expanding commercial agriculture is not particularly evident. Modern, broad-acre farming will always be heavily constrained close to urban areas due to the potential for land use conflict. There may be some scope for expanding niche agricultural industries that do not pose such challenges, especially if they were accessible for visits by members of the public.

There may also be a case for protecting the best quality agricultural land for continuing commercial farming. If this occurs it needs to be based on professional assessment and mapping of the best quality agricultural soils.

UA037LB Richmond Upon Thames

Dear Alexandra

My response to your questions is as follows:-

What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way? –

Not aware of any

How effective do you think the planning system is in a) in protecting existing farmland and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives? –

Effective in protecting open land through Green Belt or Metropolitan Open Land designations.

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing? How is this applied when assessing planning applications?

No, we only have one farm and this is used for grazing

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

Could perhaps encourage smaller scale food growing on “spare” open land, eg parts of school sites or even amenity areas around commercial premises. At the Council offices here we have an allotment for staff to grow fruit and veg, but this is not commercial.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

Do you have any other comments that may be useful to the investigation?

Role of allotments and private gardens is also important in food growing, even if not commercial. Hope that this is helpful

UA038 Fresh Farm Foods

What issues are growers facing relating to land use pressures / retaining farmland land?

Not enough land around London. At times the land that we farmers use is bought for building projects and you're forced to move further out of London. In our case we started in a field in Enfield and in a few years it was bought by Tottenham Hot Spurs and we were forced to move on.

What issues currently prevent farmers from obtaining more land in or around London? If

you are a farmer, do you want to obtain more land for growing?

Year after year we are looking for more land but it is always difficult to get it. There is a shortage of land for both farming and building but construction land is sold at a higher price so any land available is easily taken by those in construction who can pay more. That also mean any landlords would not want to sell land for agriculture as it pays very little.

Would diversification support an increased/continued production or is it detrimental to yields in any way?

Do you have any evidence to show that Londoners would prefer to buy food grown in / near to London? Not sure on this one.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London? Not sure either.

Is there sufficient help in providing urban agricultural advice to existing and potential growers in submitting planning application for land, responding to planning applications that have implications for land-use for urban agriculture, involvement in consultation open space strategies, local development and London plan?

I did not even know there was help from any organization to acquire land in then first place.

UA039 National Society of Allotment and Leisure Gardeners Ltd

To: Alexandra Beer

Subject: RE: London Assembly Consultation on Commercial food growing in London [Scanned]

Thank you for your email and would apologise for not responding, but we deal with allotment gardening which is all about people growing produce for themselves not growing commercially. I was not therefore sure whether comments from us would be fair or relevant.

However, I will try to comment generally.

One of the reason our members grow their own food is for access to fresh produce which has not travelled half way round the world (or in the case of UK produce from the growing site up to London wholesale markets and then transported back to it origin for sale). It is therefore important if we are to reduce food miles to grow and sell food as locally as possible.

With the current high demand for allotments access to land within London is the problem and this will apply equally to commercial food growing. Any agriculture is likely therefore to be small scale. Using green belt land for housing or other development will further reduce available agricultural land and must in the future be avoided. The recent report into the availability of land for providing world food in 2050 has to be taken into consideration if we are to be able to feed ourselves, and more emphasis has to be placed in retaining land for food growing.

It is reported that the UK produces just 10% of the fruit it consumes which has possibly resulted from EU standards which UK growers cannot reach due to our climate. This is a sad state of affairs which needs addressing.

In returning to allotment gardening, a standard plot is 250 sq metres (14-15 plots to the acre) our members grow a wide variety of produce including many varieties which are not viable for commercial growers for many reasons. A standard plot is sufficient for an average family to produce a large proportion of their annual fruit and vegetable needs, although they would require 4 times this to be fully self sufficient.

Again, our weather conditions affect cropping and there is an inevitable surplus/glut at certain times of the year. This surplus could be utilised by the local community through sales at farmers markets, box schemes etc. However such produce could supplement that produced by small scale farming.

Allotment gardening can work alongside commercial agriculture. Both play an important part in food production. Commercial units provide in bulk, whereas allotment gardens keep alive older varieties and

diversity. Currently there are some 90,000+ people employed in horticulture usually growing by monoculture or specialist work, but there are in excess of 300,000 allotment gardeners growing experienced in growing a wide variety of produce. Such skills cannot be lost or ignored. Although we do not have figures in support, we believe the actual produce yield from an allotment would be higher than commercial agriculture as our gardeners plant closer as they do not need to utilise machines to plant or harvest the crops.

UA040LB Barking & Dagenham

What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way?

We cannot give an accurate estimate of the amount of land used for commercial food growing in the London Borough of Barking and Dagenham. There are at least two farms in the north of the borough, their details and total areas are provided below (information provided by GIGL, 2008):

Furze House Farm	Grid Ref TQ483904	Area 51.57ha
White's Farm	Grid Ref: TQ485901	Area 2.58ha

How effective do you think the planning system is in a) in protecting existing farmland and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples?

Farmland within the London Borough of Barking and Dagenham is situated within the Green Belt and therefore protected by PPG2 and the councils Core Strategy Policy CM3. The current emphasis on using brown field sites for development has reduced pressure on the Green Belt.

Does anything else need to be done through the planning system, related regulation or incentives?

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing?

The borough does not have any specific planning policy or guidance that relates to commercial food growing.

How is this applied when assessing planning applications?

N/A

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

Gaps in planning policy:

1. Major and strategic residential / mixed-use developments could be required to make provision for food growing within the development site, or where this is not feasible (for example due to land contamination issues), off site. This should be in addition to external amenity space requirements.
2. All residential and mixed-use developments could be required to ensure that at least 80 per cent of external amenity space (both private and communal) is soft landscaped. This would ensure that land continues to be available for food growing if residents so wish.
3. Local authorities could be required to provide allotment space for any resident that requests one. At present local authorities are only required to look into providing allotments.
4. The protection given to allotments and gardens by the planning system is limited. Regulations that prevent allotments from being built on and reduce the amount of garden space that can be developed or hard landscaped would help keep land available for food growing.
5. Areas of amenity grass around residential developments could be used for growing fruit trees.
6. Schools could be required to have a food growing project in their school grounds.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

- Space for food growing has to compete with land required for housing development and for sport / leisure needs.
- Lack of funding is a major barrier to creating further allotments.
- Contaminated land may be a barrier to food growing in parts of the borough.

Do you have any other comments that may be useful to the investigation?

Small scale non commercial food growing (e.g. allotments and gardens) may be more sustainable, cost effective and productive than large-scale commercial food growing because:

- Food that is grown in gardens and allotments and consumed locally reduces the environmental impacts from transportation, packaging and storage.
- Non-commercial growers may use less inputs, such as herbicides and pesticides.
- Commercial growers dispose of produce that does not meet the requirements of supermarkets. People who grow their own food are less likely to throw it away because it is the wrong shape, has a blemish or isn't the right length.
- Commercial farms often have contracts with supermarkets and do not sell their produce locally.

To increase the sustainability of local food growing there should be an emphasis on and incentives for organic growing methods and improving biodiversity.

UA041 LB Merton

Dear Alex,

GLA Planning and Housing Committee: The role of the planning system in supporting commercial food growing in London

Thank you for the chance to comment on this consultation on commercial food growing in London, and for extending the deadline until 15th September.

What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way?

Aside from some small commercial gain from apiaries and produce grown by allotment holders, there is no land devoted to commercial food growing in the London Borough of Merton.

There is very little potential for increase due to competing pressures for development; we consider that the only realistic potential for increase could come from landowners of existing open space (such as the National Trust or the Council) pursuing the commercial growth of food on private open space or allotments. At this time the Council is not pursuing such a policy, in part due to the increased take-up of allotment plots.

How effective do you think the planning system is in a) in protecting existing farmland and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

There are no recent examples of applications for commercial food growing in Merton that would support an informed comment on this issue.

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing? How is this applied when assessing planning applications?

Merton's UDP supports the development of agricultural buildings on Metropolitan Open Land but, aside from this, does not have any local planning policy or guidance relating to the issues above.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

There are no relevant recent examples in Merton on which to base such an assessment.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

In Merton's experience, it is unlikely that land will come forward for commercial food growing that is not already in horticultural use (such as allotments) or privately owned open space. In 2006 Merton Council and the National Trust investigated a project which would have supported limited commercial horticultural activities on 1 hectare of disused allotments on National Trust land. However with the recent increase in allotment take-up, the amount of land available was reduced and the project became unworkable.

Please don't hesitate to contact us if you have any questions.

UA042 English Farming and Food Partnerships

Dear Alexandra

Please accept my apologies for the delayed response. I have looked at the letter and from what I understand, this is something that EFFF is probably not qualified to comment on. I should have responded earlier and I hope it hasn't caused too much inconvenience.

UA043LB Bexley

Dear Ms Beer

Planning and Housing Committee: the role of the planning system in supporting commercial food growing in London

Thank you for the kindly reminder and the extended deadline for responses to your consultation on commercial food growing in London. As you will be aware the London Borough of Bexley is an outer south east London borough which has areas of Green Belt land bordering Kent and the London Borough of Bromley. Parts of this land is used for agricultural purposes and a policy within the Council's Unitary Development Plan (saved policies 2007) currently seeks to protect agricultural land.

Policy ENV9 - The Council will oppose any form of development which will cause a loss of productive, or potentially productive, agricultural land classified as Grade 1 or 2 or 3a land, as defined by the Department of the Environment, Food and Rural Affairs (DEFRA), or which reduces the viability of farm holdings.

I hope the above information is useful. If you require clarification or explanation, please contact the above named officer.

Yours sincerely

UA044 Growing Communities

Growing Communities' Response to the London Assembly's Consultation on Commercial Food Growing. (September 2009).

Background: Growing Communities currently runs 3 organically certified food growing sites in Hackney, East London and a small micro-site, (with more to follow) to provide salad for our organic box scheme and farmers' market, (Stoke Newington Farmers' market).

What issues are growers facing relating to land use pressures / retaining farmland land?

For urban growers the main issue is finding suitable land for urban growing. Although small plots of land are sometimes available, they are often only available for a short time. Essentially in inner London most available land is ear-marked for development, (housing/recreation facilities) even if it has not yet been developed. Partly as a result all Growing Communities' growing sites are within parks or on private land and are very small. (0.5 hectares total). Our smallest site, measures only 10m by 10m and is the initial plot in our Patchwork Farm scheme. Occasionally small plots of land are available but they tend to have a short-life span which can mean it's not worth investing in the necessary infrastructure to get them up and running. There is also the problem of having a number of small sites dotted over a wide geographic area creating long- travel times between sites for growers/volunteers. Ideally we need larger patches of land with a secure 10 year, (minimum) tenancies or smaller plots within a restricted geographical area.

What issues currently prevent farmers from obtaining more land in or around London?

1. As urban growers the main issue preventing us from obtaining more land in London is a lack of suitable sites (see above). With a number of small sites, we need them to be within a certain geographical area. (to allow growers and apprentices to travel quickly between the sites.).
2. The issues for us if we wanted to obtain more land around London, (in the periurban area within the M25) are:
 - Lack of contacts & knowledge of what land might be available,
 - funding
 - availability of growers who want to travel further, (from inner London) to work on peri-urban land
 - need to create a new infrastructure to support this type of growing: eg. Sustainable transport infrastructure.

(nb: Growing Communities is currently developing and fundraising for a Periurban Starter Farm project which will attempt to pilot a larger periurban site worked by London based growers – supplying our inner city box scheme.)

If you are a farmer, do you want to obtain more land for growing?

As urban growers we are interested in obtaining more land for growing both close to our existing sites and in periurban area.

Would diversification support an increased/continued production or is it detrimental to yields in any way?

-

Do you have any evidence to show that Londoners would prefer to buy food grown in /near to London?

Our regular surveys of customers at our weekly farmers' market show that a large number of customers would prefer to buy food grown in/near to London. We also know that a large number of customers who join our box scheme, (now packing 900 bags a week) do so because they are attracted by the idea of getting organic salad, (as part of their weekly box) which is grown in Hackney.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London?

(see below)

Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

We believe that there is not so much a gap in planning policy – as a vacuum, an absence of policy as regards agriculture/growing in Greater London. It doesn't seem to come up as a consideration for planners in terms of possible and desirable land/space use. We note that there is almost no mention of agriculture/growing in the London Plan either as part of the Sustainable City section or in terms of its potential to kick-start sustainable economic development/new jobs. We would like to see a positive statement in favour of providing new growing community growing spaces and small grower spaces in planning guidance to Councils within Greater London (and other urban areas in the UK). In the areas surrounding inner London we would also like to see priority given to allowing small sustainable growing plots to be created within green belt land and in regional parks surrounding London – eg. Lea Valley. We also think that sales of Council-owned farms/land in the areas adjoining London, (Essex, Enfield, Brent, Middlesex, Surrey etc.) should be halted and potential planning applications relating to the non-agricultural use of this land should be opposed by the London Assembly/Mayor in terms of the impact the loss of this food-growing land on London's sustainable food production. These council owned farms are potentially an amazing resource on the outskirts of London and a perfect entry point for small farmers/growers looking to get into farming/growing as noted by the recent Curry Report on County Farms . Once this land is lost to farming it is very difficult to get it back.

Is there sufficient help in providing urban agricultural advice to existing and potential growers in submitting planning application for land, responding to planning applications.etc.

We have never submitted any change of use or planning applications relating to setting up urban growing sites – because of the location of our sites, (within parks/private land) so it's difficult to know if this would be useful.

Planning and infrastructure for Urban Food Growing

There is an immediate need for the planning system to do more to support the critical infrastructure that urban growers and producers need in order to support their growing operations, (eg. Composting facilities) and to distribute their produce: (eg. Planning guidance in favour of local food markets/farmers' markets/local food stalls/box scheme packing areas.)

UA045LB Hounslow

Subject: Response on commercial food growing in Hounslow

Dear Alexandra and Jenny,

Thank you for your letter dated 9th July regarding the GLA's Planning and Housing Committee's investigation into the role of the planning system in supporting agriculture and commercial food growing. Going through the questions in the letter, the first one asks whether we have a figure for the amount of land devoted to commercial food growing. We do not have a comprehensive figure, however the UDP (Policy ENV-N.1.14 Protection of Agricultural Land) identifies four main areas of farmland in the borough. These are Rectory Farm, Mayfield Farm, Osterley Park Farm and Hatton Farm (all except the latter being 'high quality' agricultural land). Together they make up approximately 140ha of land (based on land areas, and not taking account of the amount of land being actively farmed for commercial food production).

The second question asks about the effectiveness of the planning system in a) protecting existing farmland and other commercial growing spaces, and b) in allowing activities associated in the support or expansion of commercial food growing. Hounslow's main farms, and the vast majority of smaller areas of farmland, are protected by either Green Belt or Metropolitan Open Land (MOL) designation and associated policies (UDP Policy ENV-N.1.2 and ENV-N.1.5). This gives strong policy protection against development of inappropriate uses, and has been generally effective. Hounslow's Annual Monitoring Report (Chapter 13, available at www.hounslow.gov.uk) provides evidence of this. The answer to b) can be found in the same UDP policies, and particularly Policy ENV-N.1.2's identification of agriculture as an acceptable use in the Green Belt. The policy therefore allows construction of new buildings for agriculture within certain limits.

Hounslow also has a UDP policy (ENV-N.1.14) on protection of agricultural land. The policy encourages continuation of agricultural uses and opposes loss of high quality agricultural land. We are not aware of use of this or the Green Belt/ MOL policies in relation to commercial food growing in recent planning applications. However, they have been used previously eg at Mayfield Farm in 2003, where both the Green Belt and Agricultural Land (Policies ENV-N.1.2 and ENV-N.1.14) policies were used to support an application for an extension to an existing farm store. Policy ENV-N.1.14 also encourages farmers/ landowners to enhance natural (landscape/ wildlife value) of open land. This is something Hounslow has been recognised for (outside of planning) in a Natural England London wide farming award (http://www.naturalengland.org.uk/regions/london/press_releases/2008/110808.aspx) although this is not necessarily a scheme that encourages commercial food growing.

The question on whether the London Plan provides sufficient strategic planning guidance to support food growing is interesting. It seems that allotments are sufficiently covered, referred to as part of the assessment of open spaces in (borough level) open space studies and strategies. The London Plan policy on agriculture does not specify any detail about commercial food growing. It also sits outside London Plan (and DCLG) guidance on open space studies, probably rightly due to its distinct function. Due to this, commercial food growing is not something that we plan to cover in the study of Open Space and Sports Facilities (PPG17) currently being undertaken. The London Plan stresses the importance of public accessibility to open spaces (in its Open Space hierarchy), which may practically exclude many farms, and would therefore suggest that any further strategic guidance on commercial food growing should sit alongside Green Belt/ MOL policy.

Barriers or wider considerations needed to inform any future guidance on commercial food growing relate to the encouragement of biodiversity and improvements to access to nature /open space, as set out in the London Plan and other GLA and DCLG guidance.

UA046LB Lambeth

Dear Ms Beer,

Please see below response from LB Lambeth with respect to the questions outlined in your letter attached.

What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way?

There are limited areas within the borough devoted to commercial food growing. The potential for increasing the amount of land used for food growing is very restricted due to Lambeth being an inner London borough which is densely developed with little unused land.

How effective do you think the planning system is in a) in protecting existing farmland and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

Lambeth's Unitary Development Plan 2007 (UDP) does not contain any specific policies relating to the protection of farmland or commercial growing space. Policy 50 of the UDP protects open space within the borough including areas such as allotments.

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing? How is this applied when assessing planning applications?

No.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London?

No comment.

What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account?

The greatest constraint is that of land availability in inner urban areas such as Lambeth.

Do you have any other comments that may be useful to the investigation?

No comment.

UA047LB Southwark

What amount of land in the borough is currently devoted to commercial food growing, how has this changed in the last few years and what is the potential for increasing the amount of land used in this way?

There is currently no land used for commercial food growing in Southwark, however we do have approximately 17 ha of allotments for private food growing, all of which are protected open spaces. The contribution that allotments, as well as private gardens, estate gardens and roof gardens make to local food supply should not be underestimated, particularly in urban areas like Southwark where opportunities for commercial food growing are limited. Southwark has over 600 ha of greenspace, some of which could theoretically be used for commercial food growing. However the challenges are balancing this with the other uses of open space including for recreation and woodland and nature conservation.

How effective do you think the planning system is in a) in protecting existing farmland and other commercial growing spaces b) in allowing activities associated in the support or expansion of agricultural activity? Do you have any specific examples? Does anything else need to be done through the planning system, related regulation or incentives?

The planning system allows protection for both open space and industrial land, which can be used to protect farmland and commercial growing spaces. In very urban areas such as Southwark there are always pressures on land from competing land uses and the need for a mix of development to accommodate growth and meet the Mayor's housing and jobs targets. Current government policy (PPG17) is not clear on the need to consider commercial agricultural needs when identifying surplus supply of open space. Also, in urban areas the expansion of agricultural uses could lead to land use conflicts with neighbouring uses. Perhaps there is more potential for smaller local growing spaces which can slot into the very urban areas and provide communal food growing opportunities. In addition to allotments, there have been local estates in Southwark which have successfully applied for funding to create local growing spaces. The challenge is more about how decisions on the use and management of open spaces are made and the associated resources and financial costs associated with maintaining food growing spaces.

Does the borough have any local planning policy or guidance that specifically relates to the protection, maintenance or provision of space for commercial food growing? How is this applied when assessing planning applications?

We have policies to protect open spaces from inappropriate development, which could accommodate food growing if this could be balanced with the other uses of open spaces. We do not have any specific policies relating to commercial food growing as there are currently no such spaces in Southwark.

How well do the policies in the London Plan provide a sufficient strategic planning framework to support food growing in London? Do you believe that there are any gaps in planning policy and control as it relates to agriculture in Greater London? What other barriers are there to providing greater space for food growing and what other considerations will need to be taken into account? Do you have any other comments that may be useful to the investigation?

The challenges relate to balancing competing land uses in very urban areas. Any strategic framework for agriculture in London would need to look closely at the different types of opportunities available in inner London areas compared to outer London areas, and provide clearer guidance on balancing agricultural needs with other demands on open spaces, including for recreation and nature conservation. Commercial food growing use of open spaces would remove or reduce public access to open spaces, which is particularly critical in urban areas where the availability of open space can be limited. A food growing strategy would need to address local attitudes and concerns over how open spaces should be used and managed. There also needs to be consideration of the commercial viability of using inner London open spaces for food growing and whether there is any interest from commercial food growers.

