

**London Assembly Planning and Housing Committee**  
**Cultivating the Capital: Food Growing and the Planning System in London**  
**Combined Feedback to the Investigation**

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**UAFB001-Lea Valley Growers**

I refer to the above and to your letter dated the 12th April.

The Lea Valley Growers Association consider that this has been a comprehensive report with useful recommendations which hopefully will achieve better support for agriculture and Horticulture in Greater London from Local Authority Planners.

Recommendations 1, 7 & 8 are relevant to this organisation's membership.

Action is required for the compulsory purchase of suitable land e.g. (Forty acres for the erection of thirty five acres of glass) which can be shared on a cooperative basis by four to five growers, Much like Thanet Earth in Kent).

This will ensure the ongoing fresh fruit and vegetable needs of London are met for years to come and successfully monitored by planning application refusal statistics..

The alternative is increased imports, Higher carbon emissions and lower quality product from countries attempting unsustainable growth.

## **UAFB002-LB Hillingdon**

Dear Alexander Beer,

Cultivating the Capital – Food Growing and the planning system in London

Thank you for inviting comments on the London Assembly Planning and Housing Committee's report, 'Cultivating the Capital – Food Growing' report.

Hillingdon submitted comments on 'The role of the planning system in supporting commercial food growing in London' in June 2009. Any issues previously raised have been appropriately addressed through this report. In principle, the Council supports the recommendations outlined in the report.

We would agree that the London Plan should be amended to highlight the benefits of food growing and raise its use status in the Green Belt. However, this should not compromise the objectives of Green Belt land outlined in Planning Policy Guidance 2 (PPG2).

We would agree that borough planning policies should give weight to food growing when preparing Local Development Frameworks. Hillingdon's Core Strategy Consultation Draft (2010), which is currently out for public consultation, supports Policy 7.22 of the Consultation Draft Replacement London Plan (2009) such that a specific policy on food production will be addressed in Hillingdon's Development Management Development Plan Document emerging later this year.

We would agree that the proposed town centre supplementary planning guidance due by 2011 should include detailed guidance on farmers' markets and distribution networks for locally grown food.

We would welcome the amendment of the draft policy on contaminated land to include food growing in raised beds or skips as a temporary alternative to soil remediation.

We would agree that in order to educate and support planners and policy makers, the Mayor should produce supplementary planning guidance to assist urban farming and food production in Greater London.

We would agree that London boroughs should 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.

We would welcome a regional approach to food growing in Greater London.

We would agree that delivering the recommendations of the report will be achieved more effectively by relying on regional policies than through encouraging earlier action by individual local authorities.

Alongside specific amendments to the London Plan and borough planning policies recommendations in the report cover:

### Removing barriers to commercial viability

Commercial growers who contributed to the Committee's investigation spoke of the challenges they face to keep their operations viable, including pressure from housing development and 'land banking'. Some had found plans to modernise or diversify, like opening a farm shop on site, blocked by current Green Belt or planning policies.

However, 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.

PPG2 sets the context for Green Belt policy in Hillingdon's Unitary Development Plan (Saved policies 2007) that relates to the protection of agricultural land (Grade 1, 2 and 3A), land suitable for food growing. Hillingdon ensures that the quality of the Green Belt 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.

The Council's intention is 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).

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.

Encouraging more farmers markets and distribution channels

We would agree that there is a need for planning policies to encourage more distribution hubs to provide fresh meat, fish, fruit and vegetable supplies to London.

Tackling crime on farms

Crime adds up to 15 per cent to urban farmers' costs compared with rural counterparts. We would agree that the Metropolitan Police Service should properly record farm-related crime so the issue can be assessed and tackled by Local Authorities where relevant.

Assessment of further available sites for food growing

The report commends the Mayor's Capital Growth programme, which promotes the creation of local community growing spaces, and calls for an assessment of sites owned by the Greater London Authority to see if any are suitable for food growing. We would acknowledge that, in principle, boroughs could do the same for their existing and brownfield sites.

We would agree that the Consultation Draft Replacement London Plan (2009) 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.

We would agree that Policy 7.22 of the Consultation Draft Replacement London Plan (2009) needs to provide more relevance to Outer London boroughs, as outlined in recommendation 8 of this report.

In summary, we would consider regional guidance on the matter is essential. This will provide a greater mandate and justification for local authorities to promote more agriculture in Greater London and impose stricter requirements if it is required by the government. This will also help local authorities push food growing up the local political agenda. Although the need for food to be commercially grown in the capital is now widely accepted, there is still the need to raise its use status in the Green Belt. Introducing regional requirements will mean that all developments will have to comply with the regional and local policies, which will therefore level the playing field for local authorities.

We would consider the recommendations included in the report as useful and effective in achieving better support for agriculture in Greater London and considers that this report is an effective mechanism for achieving this aim.

## **UAFB003-LB Islington**

### **London borough of Islington response**

Islington has recognised the importance of food growing and its many benefits within our recently adopted Food Strategy, emerging planning policy within the Core Strategy and other LDF documents. Furthermore, we have embarked on a number of projects such as Edible Islington, the Council's own community food growing programme to increase food growing in the borough as well as linking with projects such as the Mayor of London's Capital Growth programme.

We have the following comments on the recommendations of the report:

- The proposed incorporation of urban agriculture in LDFs as a desirable activity through draft London Plan policy 7.22 (Recommendation 2) is supported. In addition to local policy this will lend extra weight to its consideration as part of the planning process. The importance of food growing is recognised within our Food Strategy, and our emerging Core Strategy policy (policy 15) supports local food production through the protection of existing food growing sites, as well as exploring opportunities for food growing spaces, including from new developments. Further policy is also being explored in our Development Management and Site Allocations documents.
- London Plan policy 4.8 which supports street and farmers markets and their contribution to the vitality of town centres – particularly farmers markets in the public realm and open spaces (Recommendation 4), with further guidance set out in the proposed Town Centre SPG is welcomed. Our Core Strategy recognises the important role that markets can play in our town centres.
- We would support further empowerment through the London Plan to encourage growing spaces on housing developments, rooftops and vacant land, including temporary use (Recommendations 5 and 6). However it would be useful to have further detail about how this could be delivered. Perhaps this could be set out in the proposed London wide SPG on food growing.
- The report recognises parks and open space, and other public and private land that can be used for food growing. Islington has been able to create a number of community gardens/allotments recently as part of our Edible Islington programme on underused land. Recommendation 7 is that boroughs should identify council owned and Brownfield land for urban commercial/community growing opportunities through the LDF process. Islington is currently in the process of exploring further sites for open space (which could include food growing) as part of the development of the Site Allocations document. However some sites may be too small, or may only be used on a temporary basis. Their allocation within the LDF will not always be the best approach. Further clarification on this would be welcomed.
- The recommendation for stronger links to the London Food Strategy in the London Plan is supported (Recommendation 10). However the current Food Strategy Implementation Plan (2007) is limited in its scope on food growing. Will there be a refresh of the food strategy and action plan? It is acknowledged that the London Food Board will continue to assist with the Delivery of the Food Strategy. It would be useful for them to have an input into any future London Wide SPG to consider how planning can deliver the objectives of the Food Strategy.

Other comments:

- There are opportunities to further explore opportunities for food growing and links with wider green infrastructure through the work that is taking place on

the development of the All London Green Grid and sub-regional area frameworks.

- Is there a body which can be set up to help with advice on funding issues for small scale horticultural/agricultural business? Could the London Food Board have some involvement here? As acknowledged in the report there is a belief that an investment strategy is needed to develop infrastructure projects, distributions hubs and assistance for enterprises.
- There is a focus on the green belt, however important functions such as composting can take place in inner London too. This can be at the individual, community or commercial level.
- Thinking about measures to promote economic viability at the strategic level would have benefits such as fostering relationships between where most food is grown (outer London), where there is a demand for it (inner London), and how this can be further enhanced. This could help growers to sell the food they produce, promote its benefits more widely and lead to an exchange in ideas and best practice. Inner London projects for example could benefit from visiting those in the green belt and vice versa.
- The report mentions that small-scale distribution and delivery services should be facilitated through planning – further guidance and advice on this would be welcomed.
- Urban agriculture also has the potential to provide beneficial habitat for a wide range of wildlife. As well as energy, water and waste policies these benefits should also link to the London Biodiversity Strategy and borough Biodiversity Action Plans.

**UAFB004-Mayor of London**

Dear Alexandra,

Thank you for your letter of 10 May enclosing a copy of the London Assembly Planning and Housing Committee's report ~ Cultivating the Capital'.

I believe that in overall terms the draft replacement London Plan is consistent with the aims of the proposed recommendations of this report. Some matters raised do not fall within the scope of the London Plan.

Regarding recommendation 3 on agricultural crime: the MPS do not currently compile data on agricultural crime. In light of your recommendation we will undertake research to see if evidence emerges of there being a significant problem. If that were to be the case then we would advise the MPS accordingly.

I also understand from Rosie Boycott that the report's contents have been broadly welcomed by the London Food Board, particularly its recognition of the efforts of the Board to promote the uptake of urban agriculture through the Capital Growth project. By working with landowners, boroughs and housing associations, Capital Growth is helping to identify land for Londoners to cultivate.

The programme to date has created close to 500 new growing spaces within the capital. From the GLA group Transport for London has already signed up to committing land and we are continuing to encourage the wider GLA family to engage with Capital Growth to free up land for cultivation where this is possible.

The GLA Food Team have worked closely with the London Plan team to make sure that the new Plan adequately reflects the objectives of the London Food Strategy, which has a key focus on making it easier for people to access healthy food.