

Sustain's response to the consultation on the Draft Further Alterations to the London Plan January 2014

About Sustain

Sustain: The alliance for better food and farming advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Amongst our projects and campaigns are:

- **Capital Bee**
Campaigning for bees, forage and a pesticide free city
- **Capital Growth**
Run in partnership with the Mayor of London, this is London's food growing network, including over 2,000 community food growing spaces, of which 82% of spaces are in the more deprived parts of London, and involving at least 100,000 Londoners. Capital Growth was developed to help meet the demand for land for food growing, helping Londoners find the land and develop the skills to increase the amount of food grown in the capital.
- **London Food Link**
Helping producers, consumers, retailers and caterers provide healthy and sustainable food.

Overall comments

Sustain acknowledges the need to provide more homes to meet London's growing population and calls for the Mayor of London to ensure that residential amenity and the quality of life and health of current and future residents is not compromised by overdevelopment, to the detriment of green space, including space for community food growing.

Sustain endorses the recently published Planning Practice Guidance to the National Planning Policy Framework (NPPF) advice that access to healthier food could be considered through the plan-making and decision-making processes.

A healthy community is defined in the NPPF guidance as

“a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:

- Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.”

Our response is relevant to the following paragraphs, maps and policies: Paras 1.44, 2.58 – 2.61, 2.63a, 3.10a, 3.16 – 3.27, 3.42 & 7.4a – 7.4, Maps 2.4 & 2.5 Policies 2.18, 3.7, 5.10, 7.1, 7.7 & 7.18.

Sustain calls for the London Plan to be strengthened to reflect the recently published NPPF guidance and the new communities to be developed in London should be designed as healthy communities.

a) Proposals for new high density development in London should demonstrate how opportunities for healthy lifestyles have been considered.

b) Sustain would welcome alterations to the London Plan that required any new areas of high density housing:

- to be specifically designed as healthy communities;
- to have access to purchase affordable healthier food, such as provision of street markets;
- to be provided with sufficient green space that promoted active lifestyles and opportunities for food growing;
- to include landscapes planted with productive trees and plants (such as fruit trees) that provide benefits for wildlife and people.
- to adequately provide kitchen and dining space within the dwellings

c) The Plan should be amended to ensure that policies apply both to inner and outer London now that major development areas are proposed throughout London. (in particular Policies 5.10 & 7.22c)

d) The most wildlife-rich brownfield sites should be protected from development; any development should be designed to minimise impact with adequate mitigation and compensation to include wildflower rich forage and sheltering sites for pollinators as called for in the Draft National Pollinator Strategy. (The Government is working with Natural England and a core group of natural and social scientists and will be launching the package of recommendations in summer 2014.)