

Urban greening

Would Policies G6-G9 assist in creating a healthy city in accordance with Policy GG3 and will they provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the individual policies and detailed criteria justified and necessary and would they provide an effective basis for development management?

Policy GG3 fails to emphasise the need to protect and conserve those natural elements and potentials that Policies G6 to G9 ostensibly relate to. Therefore, those 'Green Infrastructure and Natural Environment' policies are all the more necessary and important in setting a strategic context for plan-making and development management. Indeed. If it is reasoned that GG3 is not to be remedied in this respect then an overarching context setting policy with a holistic integrating approach to the environment, embracing green and blue components should have opened Chapters 8 and 9.

To avoid duplication, Just Space wishes to endorse most of the points raised by Respondents Scott-C 2191 (also known as Caroline Shah of Kingston) and the Friends of the Earth 755 who will be submitting Written Statements on M66, and whose drafts have been shared with Just Space.

In particular:

a) Will Policy G6 be likely to achieve net gains in biodiversity and consistent with national policy? Are specific provisions relating to European sites in BA necessary give other legislative requirements?

Whilst the Policy headlines SINCs, the ecological networks, quite correctly referenced, are deserving of comparable status given their importance to sustaining biodiversity. Not giving due attention to them would only enable, at best, net gains for nature (NPPF para 109) to be achieved in highly localised areas and not wider uplifts. Biodiversity to flourish needs 'corridors'. 'A Green Future: Our 25 Year Plan to Improve the Environment' (HM Govt 2018), albeit on a national scale, recognises that for natural world regain and retain good health, this requires networks/more closely connected (p58).

From UCL's 'Green Infrastructure for London: a Review of the Evidence'¹ urban biodiversity is typically restricted to highly fragmented, disturbed and degraded habitat patches leading to reduced native biodiversity (species richness and evenness). Strategies to conserve biodiversity must therefore focus on, among other things, improving the ability for species to move through the creation of green corridors. The Policy should, therefore, emphasise more the protection and conservation of ecological networks.

¹ pp25-26, 2018 <https://www.ucl.ac.uk/engineering-exchange/sites/engineering-exchange/files/ucl-green-infrastructure-for-london.pdf>

The Mayor's Biodiversity Strategy of 2005 is now out of date.

On the wording of Policy G6: A: SINCs should be both protected and conserved.
B1): ecological networks should be not only identified but protected and conserved.

b) Will Policy G7 be effective in protecting trees and woodland especially ancient woodland and veteran trees and in increasing the extent of London's urban forest?

If the Mayor wishes to increase in extent, and also in quality, London's 'urban forest' (8.7.2) then G87 B should promote locally significant sites as well. There is concern over the continuing loss of trees, particularly ancient and veteran trees and woodlands without wholly exceptional reasons and a suitable compensation strategy. Whilst this draft plan is being examined against the 2012 INPPF, the 2018 NPPF (para 175) is instructive on this issue. The loss or deterioration of irreplaceable habitats should be resisted.

c) Does Policy G8 provide sufficient encouragement to food growing and urban agriculture?

Just Space, as previously set out in its March 2018 response, has conveyed the importance of this issue.

Specifically on the wording of Policy G8 before us if it is to be retained as a policy within Chapter 8: food growing that is to be encouraged is not just community activity within new developments or as meanwhile uses, nor as commercial food production. The thrust and wording of the policy should be to promote food growing throughout the metropolis, including parks, open spaces, Green Belt and Metropolitan Open Land and by all; and long tenure-ships should be available to food growing, not just meanwhile spaces.

We have stated that with regard to Food Policies, that there is no explicit mention of them within the Good Growth policies as a specific strategic agenda to secure for London a clear and integrated statement on how London will ensure its Food Security.

It is felt that the provisions within GG3 on their own are unable to provide the kind of framework to allow for a full expression of G8 in terms of supporting an encouragement of food growing and urban agriculture and conversely that G8 as is currently stated does not provide an effective strategic context for the preparation of local and neighbourhood plans.

As such it does not provide an effective basis for development management with regard to food growing and urban agriculture. It cannot as a standalone policy and with insufficient security in terms of spatial and temporal attributes, form the basis of

what is needed for London to become a food secure city for all Londoners. An integrated high level policy is needed for a Food Secure London

We propose that G8 is contained in the following Good Growth Policy:

GG7 Policy proposals:

- 1. To substantially ensure that local and neighbourhood plans integrate the provisions in policies from 2-12 to support the management of a food secure city for each borough and London as a whole.**
- 2. To recognise and make provisions for Food Resilience and localised sovereignty with regard to food supply and good trading practices by ensuring that policies from 2-12 do not obstruct or interfere with the establishment of sufficient capacity at the level of each borough to provide for the growing, marketing, processing and distribution of food to meet the need for all Londoners with especial regard to healthy and culturally appropriate foods.**
- 3. To identify at the level of each borough, and within the articulation of local and neighbourhood plans, secure and sustainable green spaces to manage the production of locally grown food which is accessible to all Londoners. This will mean that all existing and new housing provisions incorporate within their designs, sufficient and appropriate allocation of space to enable Londoners to access sites for food growing at individual, community and commercial levels.**
- 4. Food Growing in London is an important way to ensure access to all Londoners to productive Green space, for the support of mental and physical health and well-being. Provisions for urban corridors within which productive urban orchards and forests can be established, will further supplement the current shortfall in local supply of fruit and vegetables in London and should be encouraged within local and regional development plans.**
- 5. To establish and develop Food Hubs in the Central Activity Zones, and Creative Enterprise Zones of Town centres and Opportunity Areas to provide for various light industrial developments around food processing, distribution, catering and intensive horticultural production. These are to be specifically encouraged by linking them to training provisions and local government procurement deals to ensure more secure food provision at the level of each borough and regionally as well as support for their establishment through grants and management support and facilities. Circular economies shall be prioritised and integrated so that food waste is minimised at source and at each level of the industry and provides a useful resource within the food production and supply industrial process.**

6. **To ensure coherent and secure food supplies in the city, considering the implications of a no-deal Brexit, a Mayor level audit flow is to be established (which can be replicated at borough level) to monitor the coherence between different production and consumption affecting strategies, such as are identified in but not limited to Policies within Social Infrastructure, Heritage and Culture, Economy, Housing Transport and Green infrastructure. The objectives of the audit will be to ensure the establishment of a Food Secure city.**

7. **That to strengthen social integration, inclusion and fairness, provisions to combat food poverty, social exclusion and homelessness shall be woven into borough level initiatives around food strategy at that level and shall be reinforced by the provision of this Good Growth Food policy which oversees the inter-sectoral management of food provision in the city.**

Narrative discussion:

7.1.1 A healthy city and citizen well-being is the product of interactions and balances between the built and natural environment, food supply (wholesale, retail and food production) at different scales both within and around the city and provisions for healthy social interactions which ensure social engagement in how the city unfolds.

Citizens are an active part of the city structure and the **availability, accessibility** and **affordability** of healthy food, such as the FSA and Defra indicate are important monitoring attributes, essential for achieving Sustainable Development at regional and city level.

7.1.2 The objectives of a strategic spatial plan for London is to achieve the sustainable development of the city and is enshrined within the NPPF, section 17/2012 version or section 8/2018 version, which provides the guidelines underpinning the London Plan. The UK is also signatory to the Milan Urban Food Policy Pact of 2015 which addresses the Strategic role that the city plays in developing sustainable food systems and promoting healthy diets. It is therefore essential to adopt an approach which is comprehensive, inter-sectoral and inter-institutional in its approach.

7.1.3 It is not enough to simply speak of ‘food growing’ without planning for how that food growing can be harmonised with other development management policies of the city and how it can be specifically supported by them by sufficient attention to:

- Secure and sustainable land provision (GG2) with sufficiently long leases to encourage the establishment of secure food production outlets at every scale of production, both community and commercial integrated into the management of green space in all city zones

- A citizen led approach which makes primary the provisions of GG1 and the need to work with London's diversity, many of who come from agro-ecologically sound food growing communities and so who can help to bring this knowledge to food growing hubs and allotments and private growing spaces - which they already do - which will have significant gains for community integration and cohesion. The RSA Commission recommends establishing inclusive growth as a regularised, official statistic which can be audited².
- Attention to official food procurement regulations, so that there is fundamental support to re-orientate institutions towards healthy eating.
- The need for younger members of society to be integrated into a green-living, healthy eating, exercise taking city to reduce statistics of childhood obesity and unhealthy pro-occupation with digital and virtual play to the detriment of exercise and healthy understanding of place based citizenship. Food growing in schools to play an active role in this which can also be linked to training provisions to provide subsequent generations of future Londoners who understand the green-linked economy.
- The concept of Urban Greening needs to integrate food growing as a part of its expression of green space provision. This allows for Social infrastructural and heritage policies to adequately, responsibly and pro-actively cater for all Londoners to have access to adequate social and community space to express culture and meet the infrastructural needs of a healthy city at all stages of its lifetime, i.e. from cradle to grave. Community spaces can also be green spaces used for leisure as well as for production.
- Markets, whether local and traditional or regional and wholesale function in a way which can encourage the local development of food cultures, minimise food poverty and food waste generation and increase their contribution to London's economy? We recommend that markets of all scales respond to the requirements of GG1 and GG3 as priority and are integrated into food hubs.
- Social Assessment tools are needed to monitor and design participant led enquiry into The Future of London Food as a matter of greatest priority.

See the following references:

https://www.birminghamfoodcouncil.org/wp-content/uploads/2018/07/BhamFoodCouncil_Response_draft_LondonFoodStrategy_July2018.pdf

[Household food insecurity measurement in the UK - Parliament UKresearchbriefings.files.parliament.uk/documents/CDP-2016.../CDP-2016-0238.pdf](https://www.parliament.uk/documents/CDP-2016.../CDP-2016-0238.pdf)

<https://www.food.gov.uk/sites/default/files/media/document/Food-Standards-Agency-Strategy%20FINAL.pdf>

² <https://www.thersa.org/discover/publications-and-articles/reports/final-report-of-the-inclusive-growth-commission>

<https://foodfoundation.org.uk/food-standards-agency-survey-confirms-enormity-of-those-struggling-to-afford-food-in-the-uk/>

<https://webarchive.nationalarchives.gov.uk/20180608095821/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<https://www.amps.org.uk/sites/default/files/uploads/11%20Appendix%204%20legislative%20and%20policy%20background.pdf>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/283072/household-food-security-uk-executive-summary-140219.pdf

<https://webarchive.nationalarchives.gov.uk/20130402191230/http://archive.defra.gov.uk/foodfarm/food/pdf/food-assess100105.pdf>