

Written evidence submitted by Sustain: the alliance for better food and farming (LRB56)

Levelling-up and Regeneration Bill

Written Evidence to The Public Bill Committee

We are 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.

Comments on the Levelling-up and Regeneration Bill

- 1 Our submission relates to Part 3, Chapter 2 which proposes National Development Management Policies be published by the Secretary of State in relation to the development or use of land in England.
- 2 Sustain supports the principle of national development management policies which are founded on core principles arising from national strategies. We believe this will free up local councils to prepare locally applicable detailed policies which will give clear guidance on what good development and land use will look like in their own place. This will put them at an advantage when development opportunities arise.
- 3 We see this as an opportunity to establish a consistent set of policies to achieve a sustainable food and farming system, that works for both people and planet. This could support agroecological farming, sustainable horticulture and organic and free-range animal agriculture.

Food is a national planning issue

Support for national development management policies

- 4 Currently, the National Planning Policy Framework, the Guidance to the National Planning Policy Framework and the National Design Code are supportive of a good food system. However, councils' awareness as to how they can harness the planning system to enable their residents to access good food largely relies on input by community organisations including the network of Sustainable Food Places¹. Whilst community led planning is a strength of the planning system, councils should not have to rely on local organisations to raise and provide evidence on nationally strategic issues.
- 5 National Planning Policy Framework sets principles into policy; Local Plans and design codes will allocate land and provide detailed advice. National development management policies would:
 - Show leadership on core principles of climate, public health and justice;
 - Raise awareness of the role of the planning system in delivering an effective, reliable, fair and sustainable food system;
 - provide clarity to plan makers and decision takers, and also to developers;
 - ensure consistency;
 - avoid duplication of each council interpreting and justifying national objectives arising from national strategies; and
 - free up food partnerships to work with local councils on local priorities.

¹ <https://www.sustainablefoodplaces.org/>

Planning Policy Framework for a sustainable food city region

- 6 The planning process can help to bring about sustainable local food systems.² Designing places which enable access to good food helps to create healthy and vibrant places and avoid the creation of even more obesogenic environments.³ Core principles of designing for sustainable food places are applicable throughout the whole of England in all communities. Therefore, the right to good food should not have to be justified by each local planning authority individually when national planning policy core principles apply across the country.
- 7 The multiple benefits of sustainable food systems include:
- improved health and wellbeing;⁴
 - inclusive and sociable communities;
 - environmental recovery⁵ and sustainability, including resilience to climate change;
 - opportunities for economic development, investment and skills development and rejuvenation of high streets⁶; and
 - improved amenity and good urban design.
 - Support for productive use of land in the city, urban fringe and countryside.
 - Contribution to biodiversity improvements in and around developments integrated as part of their design, securing measurable net gains for biodiversity.

Urban land

- 8 Many local plans support the provision of food growing spaces in new development, helping to achieve strategic objectives for green infrastructure, environmental quality and design, flood risk management, urban cooling and public health⁷. A national development management policy would establish the principle to be applied at the local level through design codes and masterplans.

Rural/peri-urban land

- 9 National development management policies could help balance the many pressures on land in the UK and our use of land overseas, including the impact of agriculture and the types of food consumed. Some more intensive forms of food production will be in conflict with local climate emergency, biodiversity, pollution or nature recovery policies. National development management policies could enable councils to use the planning system to support agroecological farming, sustainable horticulture and organic and free-range animal agriculture, while potentially limiting the introduction or expansion of intensive animal agriculture sites, which are so damaging.

² https://www.sustainweb.org/planning/for_planners/

³ https://www.sustainweb.org/news/oct19_edible_garden_cities/
<https://www.sustainweb.org/news/feb18/>

⁴ <https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/>

⁵ <https://www.sustainweb.org/publications/economic-recovery-briefing/?section=>

⁶ https://www.sustainweb.org/news/jul20_healthy_high_streets

⁷ https://www.sustainweb.org/publications/planning_sustainable_cities/

- 10 In the face of the climate and nature emergency, soil degradation and loss of natural ecosystems, land on the edge of cities could be safeguarded for agro-ecology, shortening supply chains, bringing food closer to consumers and building a better understanding of how our food is produced.⁸
- 11 Sustain's research has found farmers would like to change how they supply their produce, however planning systems can often be a barrier for small and medium sized food and farming enterprises. A national planning policy which could be tailored to local areas could help overcome that barrier.⁹
- 12 Another example of how national development management policies could help is with the classification of land use. For example, this could recognise that many agricultural holdings value the engagement of local communities and should be allowed buildings for educational visits and volunteer programmes without compromising their agricultural status

What would national planning policy look like?

- 13 A national development management policy to achieve a sustainable food system would cover the following topics:
- Food growing and production
 - Food Economy
 - Access to healthier food through retail
 - Access to healthier food in the home
 - Access to healthier food in the Public Realm
- 14 Local councils should not have to repeat nationally applicable policies in their local plans.
- 15 One example of where a core national policy is urgently needed is to control hot food takeaways to help to implement the Government's Obesity Strategy.¹⁰ The requirement for every local planning authority to justify a local policy based on detailed local evidence is proving frustrating and extremely expensive for planners and public health officials alike. Policies are consistently challenged by major companies who submit the same lengthy documentation. Some local planning authorities do not have the resources to see their policy through at examination stage.
- 16 Having a national development management for a healthy food environment would not preclude more detailed local policies appropriate to local areas.

Role of the planning system

- 17 Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, promote equity and enrich society and culture.
- 18 Our Vision for a better system of food, farming and fishing is for:
- Good food production

⁸ https://www.sustainweb.org/blogs/apr20_market_garden_cities/

⁹ <https://www.sustainweb.org/publications/beyond-the-farmgate/>.

¹⁰ <https://www.gov.uk/government/publications/tackling-obesity-government-strategy>

- Good food economy
- Good food for all
- Good food culture

We look to the planning system to help deliver this through the development and use of land.

September 2022