

# Food Partnership response to City Plan Part 2 – Sept 2016

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## Introduction

The city's commitment to taking a systematic approach to achieving a healthy, sustainable and fair food system is set out in its [Food Strategy Spade to Spoon: Digging Deeper](#) (2012) agreed by Brighton & Hove City Council and adopted by the Local Strategic Partnership. One aim of the plan is to ensure that food is at the heart of planning and policy work with an action to see that the City Plan supports a sustainable food systems planning approach, recognises the need of land for food growing (especially on the urban fringe), space for food infrastructure and the importance of urban design that encourages healthy behaviour.

We would like to see the City Plan Part 2 make reference to the key elements put forward in the Local Government Association's joint report (with Public Health England and Town & Country Planning Association), [Building Foundations – Tackling obesity through Planning and Development](#). The report sets out six elements to help achieve healthy weight environments through the planning process. The six elements are: **movement and access; open spaces, recreation and play; food environment; neighbourhood spaces; building design; and local economy**. We feel this is very strong and would like to see many of the recommended local actions considered within the City Plan Part 2.

We will also be putting in a separate proposal to develop a new Supplementary Planning Document (SPD) around three key areas: **food growing; access to healthy food; and preventing obesogenic environments**. We believe that this is an important next step in order to help both planners and developers embed a food systems approach. The Brighton & Hove Food Partnership is willing to identify and secure financial resources in order to produce this SPD.

In the [City Sustainability Action Plan](#) (Sept 2015) (Local & Sustainable Food section, p22), there are key actions and targets relating to food production.

Increase food growing projects in city:

- (1) at least 1 new food growing project on council housing land e.g. Bevendean
- (2) Plant 2 community orchards /yr (over 5 trees).
- (3) 1 new demo garden in central location.
- (4) Progress plans to reinstate food growing at Stanmer Walled Garden.
- (5) support community food projects to be resilient and sustainable

If the city is to meet these targets, there should be some reference to them within the City Plan.

## Food Partnership response to City Plan Part 2

### 2: Housing



In the development and adoption of the [Food Poverty Action Plan](#) (2015) a key theme that emerged as important in preventing food poverty (both crisis e.g. food bank use and ongoing e.g. people skipping meals / trading down to unhealthier choices) was the need for affordable, decent quality housing. We therefore support the needs to build good quality housing that is to a high energy efficiency standard as another key driver behind food poverty is the fuel vs food bill dilemma.

We welcome food playing a role within the City Plan but would like to see this strengthened to ensure food growing and access to healthy food is a key consideration in all future housing developments. We would like to develop a new Supplementary Planning Document (SPD) to support potential developers in achieving this vision.

### **QH2 - Urban Fringe Assessment**

We would like a specific requirement for food growing space within any new developments within Urban Fringe Areas and the retention of the food growing space requirement for Toads Hole Valley. If space cannot be accommodated on site we would ask that a contribution from developers be found to support other food growing spaces accessible from the sites of new development. We feel that this would be appropriate due to overlap of those sites deemed suitable for development (within 2014 Urban Fringe Assessment) and those sites deemed suitable for food growing (within Food Growing Mapping work carried out by Food Matters on behalf of the Council as part of the One Planet Living Sustainability Plan). This mapping work has already been shared with the Planning team but we can send it again if required. The city's [Sustainability Action Plan](#) Sept 2015 (p25) has a medium/long-term action to see that food production is delivered on the majority of land identified as suitable by the mapping work undertaken.

The Local Plan Policy [QD21 – Allotments](#), will be deleted by City Plan Part 2. Allotments are mentioned on p 30, 115, 201, 211 of the City Plan, but nothing states clearly, as per QD21, that 'Planning permission will not be granted for proposals that would result in the loss of allotments.'

We strongly oppose building on any current allotment site in the city and would ask that they receive some sort of protection under the new plan.

### **QH5 & 6 – Urban fringe site allocation / Good mix of housing**

The Food Poverty Action Plan (p3) identifies groups of people who are particularly at risk of food poverty and this includes families. Any steps that can be taken to specify affordable housing for groups at risk of food poverty including specific proportions of family housing should be taken.

Supporting Community Land Trust and other non-commercial house building through the planning process is one way that a good mix of housing could be built in the city. Also building on the city's eco-homes / sustainable building expertise and supporting the build of homes to ground breaking environmental standards

### **QH7 – Policy to ensure new development maximises site potential**



In order to manage the tension between the need for open space and the need for good quality housing, policies that maximise site potential would have value.

Clear guidance around the importance of good quality shared open space in these policies (including food growing, leisure and biodiversity-rich space) would need to be developed. The importance of open space for activity and play is also key in preventing and reducing obesity in adults and children as is the design of developments to prevent obesogenic environments. We would ask that any policy takes a strong lead on both of these areas.

We would like to now strengthen the information available for developers by developing a new Supplementary Planning Document (SDP) around food which could highlight case studies on multi-functional land use – further detail on this can be found in a proposal which will be submitted to BHCC separately.

### **Additional supporting info via Sustainable Food Cities Network**

#### **Planning policy and growing**

- Belfast City Council has led the development of a [Growing Communities Strategy 2012-2022](#) which aims to ensure that all parts of the community in Belfast have the opportunity to participate in and experience the benefits of growing. This includes as a key action the identification of new, sustainable sites for growing and the integration of green space provision in planning.
- The Royal Borough of Kensington and Chelsea has included food growing in the Climate Change section of their Core Strategy 2010 stating that: “The Council will: require development to incorporate measures that will contribute to on-site sustainable food production commensurate with the scale of development”.  
<http://sustainablefoodcities.org/Portals/4/Planning%20Sustainable%20Cities%20and%20Community%20Food%20Growing.pdf>
- [Croydon Council](#) applies a presumption in favour of development provided applications assist in the delivery of a [Green Grid](#) which includes:
  - Protecting and enhancing allotments, community gardens and woodland; and
  - Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites; and encouraging major residential developments to incorporate edible planting and growing spaces at multiple floor levels; and
  - Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.

The policy derives from the [London Plan](#) which includes several strategic policies promoting productive landscapes and encourages boroughs to identify other potential spaces that could be used for commercial food production or for community gardening, including allotments and orchards.

#### **QH10 - Self-build plots**



We support site allocations that make provision for self-build and custom build housing because of the potential for both of these options to introduce affordable / sustainable housing and the potential for the Food Partnership to collaborate with such buildings to introduce multi-functional land use / shared space that includes community food growing.

### **QH20 – Concentrations of HMOs**

A lack of shared housing options for younger working people (HMOs not used by students) is a challenge for people living and working in the city on a lower wage and anecdotally is resulting in people who would traditionally work in lower paid health and social care jobs leaving the city. If an increase in student housing can be achieved in order to meet the demand for student accommodation, a licencing scheme for non-student HMOs could be introduced. This would have the added benefit that whilst students are exempt from Council Tax, shared houses aren't.

### **QH21 – Other policy issues**

We would like to now strengthen the information available for developers by developing a new Supplementary Planning Document (SDP) around food which could highlight case studies on multi-functional land use – further detail on this can be found in a proposal which will be submitted to BHCC separately.

## **4: Retail and town centre uses**

### **QR6 – Restrict changes of use**

We support policies that prevent the 'knocking together' of smaller shops to make larger shops in designated areas of the city because it is this practice that can price out smaller / start-up businesses in favour of the large chains. If the distinctive nature of certain areas of the city including the independent food retail – shops and restaurants, is to be maintained it is important the high street is not homogenised.

### **QR9 – Changes of use in local centres and parades**

We would like to see access to healthy and sustainable food a consideration within planning around local parades of shops with restrictions on numbers of hot fast food outlets permitted so they do not dominate these important community parades.

Within the city's [Food Strategy](#) (Aim 3, p12), the following action is relevant to this question:

3.3 Safeguard the diversity of food retail including shops, markets and other outlets.

- Explore and learn from best practice in UK regarding use of planning and licensing around retail premises

- Explore potential for setting restrictions on any change of use to hot food takeaway (class A5).

Ensure that this issue is incorporated into the drafting and consultation for BHCCs City Plan Part 2.

The 2011 [impact study](#) on hot food takeaways near secondary schools (conducted by Brighton & Hove City Council) concluded that the focus of planning guidance should not be on hot food takeaways. However, given the success from several other parts of the country in introducing



policies to either restrict the number of hot food takeaways in proximity to schools, or by placing conditions relating to healthier catering in these establishments, we would therefore like to see this policy revisited.

### **Planning policy and access to healthy food – examples from across the Sustainable Food Cities Network**

- [London Borough of Waltham Forest](#) has adopted Supplementary Planning Guidance to deny planning permission to new fast food outlets within 400 metres of schools. See this [report](#) from the LGA for guidance on the successful use of SPDs.
- London Borough of Islington adopted a [Location and Concentration of Uses Supplementary Planning Document](#) (p36) that conditions planning applications for new hot food takeaways to “achieve and operate in compliance with the [Healthy Catering Commitment standard](#).”
- [Leicester City Council](#) introduced a Street Trading Policy to prevent burger vans trading outside schools.
- [Hillingdon Council](#) has passed a resolution under Section 37(2) [London Local Authorities Act 1990 \(as amended\)](#), prohibiting itinerant ice cream trading in certain areas in the vicinity of schools and in streets falling in listed major retail areas.
- Guilford Council requires in its [Street Trading Requirements and Application Form](#) (p7) that “at least one healthy meal choice should be provided”. The document gives examples of such menus however, these could be updated to reflect current nutritional guidelines.
- The [London Borough of Barking and Dagenham](#) introduced a Supplementary Planning Document (SPD) that calls on Section 106 to levy a £1,000 charge on hot-food takeaway businesses when they are granted planning permission and assigns the proceeds exclusively to the Borough’s fight against obesity. This adds to the SPDs further restrictions imposed in terms of the appropriate location (not in proximity of schools) and concentration of hot food takeaways.
- The London Borough of Lambeth has also introduced a policy – ED9 Hot Food Takeaways near Schools, which attempts to prevent the establishment of hot food takeaways if they are within 400 metres of a primary or secondary school. Lambeth Public Health (NHS Lambeth) developed [supporting evidence](#) to the policy.
- This [study](#) shows that 21 authorities have a policy to restrict the number of takeaways near to schools, 15 of which have developed an SPD which they have quoted when refusing planning applications for hot food takeaways.

### **QR12 – Important Parades**

Whilst we have not had time to do any research into this issue we feel that due to certain areas of the city having poor access to fresh food in walking distance, there may be value in designating some parades as ‘local parades’. If there is support for this idea we could work with you to identify which ones might meet this criteria due to access to fresh food.

Within the city’s [Food Strategy](#), there is an action (2.1, p11) to ensure that people throughout the city are within walking distance of outlets selling affordable fresh produce.

### **QR15 – Permanent markets**

We welcome the opportunity for additional permanent markets, particularly in sites where access to affordable, fresh, healthy produce is currently not available. Markets also provide a way for new



businesses to start, for example, the Street Diner market has enabled a number of new local enterprises to start and expand.

If there is to be a new site for a market there should be an evaluation of and learning from the redevelopment of the Open Market and in particular the challenges of combining the residential units and a working market (for example opening and delivery times)

Any new permanent market would be better if this is covered space

## 6: Transport and Travel

We strongly support the emphasis on active travel throughout the city including measures to improve the rights of way and access to the South Downs National Park. Active travel is a key means of preventing and reducing obesity.

Within the city's [Food Strategy](#), there is an action (2.6, p11) to create healthier environments that encourage walking & cycling to do food shopping

## 7: Biodiversity and Open Space

### QB9 – Local Green Space

We would like to see all allotments designated as Local Green Spaces due to their recognised value to wildlife and biodiversity and to the mental and physical health of residents. As much of the city's allotments are not statutory allotment land they do not have any protection and yet are a crucial part of the city's network of green spaces. With the deletion of QD21 we would like there to be more specific reference within City Plan Part 2 to the role of allotments and community food growing spaces.

We believe some of the city's community growing spaces, such as [Moulsecoomb Forest Garden](#), [Racehill Community Orchard](#) and the [Secret Garden](#), should also be designated as Local Green Spaces. We would be willing to work with the growing spaces and BHCC to demonstrate the range of benefits they bring both to people's health and to the local communities they are a part of.

## 9: Design & Amenity

### QD9 – Design of new development

We would like to see stronger planning policy that relates to the integration of food growing in new developments and to the inclusion of design principles that prevent an obesogenic environment. If this is not to be achieved via a specific SPD we would like to see this better referenced within City Plan Part 2.

Within the city's [Food Strategy](#), the following actions (Aim 2, p11) are relevant to this section:

- 2.1 Ensure that people throughout the city are within walking distance of outlets selling affordable fresh produce.
- 2.6 Create healthier environments that encourage walking & cycling to do food shopping



In the [City Sustainability Action Plan](#) (Sept 2015) (Local & Sustainable Food section, p22) there is also a specific action for there to be facilities for food waste collections available at all buildings in the city with catering outlets. We would therefore like this to be incorporated within the City Plan part 2.

## 11: Community Facilities

### CF7 – Community Facilities

Integrating kitchens that can be used to teach cookery and/ or to run shared meal projects (lunch clubs / cooking groups / pay as you feel cafes) will be an important tool in achieving the vision of ‘a city that cooks and eats together’ – a key aim within the city’s [Food Poverty Action Plan](#).

We recognise the value of community kitchens and venues that offer ‘shared meals’ in helping to address the impacts of food poverty by providing healthy food at an affordable cost with the benefits of reducing isolation and acting as a gateway to advice and further support. We would therefore like to see these important community facilities protected within the City Plan Part 2. We would be willing to work with BHCC to identify all the relevant sites.

