

Government [Consultation](#) on reforming the National Planning Policy Framework

The government has big plans to reform planning rules. They want to build 1.5 million homes and change green belt legislation to speed up development. We need your help to ensure these changes create healthy communities, protect rivers and support agroecology.

The deadline for responding is [24th September 2024](#).

We would be delighted if you can respond to the consultation, using the example answers drafted below. Responding involves filing in [an online form here](#) (more info [here](#)).

The consultation is *long*, but you can answer as many or as few questions as you choose. We have made a handy table to show the overall themes covered in each question, so you can choose those most relevant to you or your organisation.

Question number	Relevant to:
5	Public space, community access
6	Sustainable development
22	Horticulture, sustainable food production, food security
23	Grey & green belt land, peri-urban farms, community gardens and allotments
24	Grey & green belt land, peri-urban farms, community gardens and allotments
26	Grey & green belt land, peri-urban farms, community gardens and allotments
27	Food production, Local Nature Recovery Strategies, land loss

28	Food production, green belt land
29	Green belt land
30	Green belt land
34	Affordable housing provision, green belt land, nature and public access to green space
36	Nature and public access to green space, Green Belt
54	Rural affordable housing
59	Sustainable farming and the food system, wildlife & biodiversity
70	Health, food growing
71	Health
78	Climate, river pollution
79	Climate
81	Rivers, climate change, farming, local food
82	Farming
83	Sustainable food production, food security, health, farming, sustainable food places, local food infrastructure,

Glossary

NPPF - National Planning Policy Framework

PDL - Previously Developed Land

Sample answers

Question 5

Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Any increase of density should not be at the expense of providing sufficient public and private open space. Design codes should adhere to the principles that a variety of spaces should be accessible, including for the community to grow food close to their homes.

Question 6

Do you agree that the presumption in favour of sustainable development should be amended as proposed?

There is currently nothing explicit about development supporting sustainable food production; planning to enable sustainable food production is essential to achieving a sustainable food system and should be considered part of broader sustainable development. The spatial aspects of the food system are too important to be hidden within policies awaiting those with the patience to find them. Planners look to NPPF for clarity, for help in a local policy vacuum, for support in decision making.

Recommendation for NPPF paragraph 11:

Specific mention should be made to achieving a sustainable food system to help local planning authorities link through to NPPF when compiling their local policies. This will be especially helpful in designated “Sustainable Food Places” (see answer to Q83 for more information).

Question 22

Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

A commitment to bringing sustainable food production closer to urban communities has been inspired by many growers around London’s urban fringe, but it is time to transition from a fringe activity to a mainstream part of the food system. The current consumption of fruit and vegetables is already too low, and losing more productive land will impact the nation’s health and food security. Sustain’s briefing investigated existing farm productivity in London’s Green Belt, identifying data gaps, structural barriers, current opportunities, and necessary steps to advance this vision of integrating food production into the urban landscape.

Horticulture is a long-standing, accepted use of urban fringe and Green Belt areas, with glasshouses representing valuable horticultural infrastructure. The release of these horticultural sites would benefit landowners but could destroy the horticultural industry, undermine local decision-making, and disrupt expansion in the Green Belt. Careful consideration should be given before replacing these sites with housing for several reasons:

1. Irreplaceability of Land: Once developed, it is unlikely that land will ever return to horticultural use. Sites for glasshouses were traditionally chosen for their advantageous climate, light, and soil quality, characteristics that are still relevant despite changing economic circumstances for horticulture.
2. Resilience of Domestic Supply: Climate change and global politics threaten our reliance on imports from countries like Spain, Morocco, and Israel. Water scarcity and extreme weather could disrupt production elsewhere, highlighting the need for the UK to bolster its domestic supply. Glasshouses in the UK's temperate climate are essential for extending the growing season and enhancing food security.
3. Embodied Energy and Resource Stewardship: Glasshouses contain significant embodied energy in materials like glass and aluminium. While existing technologies may seem outdated, refurbishing and reusing these structures may be more cost-effective and environmentally responsible than building anew, especially as we face increasing resource scarcity.

A "hierarchy of need" should guide decisions about the future of glasshouse sites, factoring in their state of repair, soil quality, climate, light levels, and proximity to markets. The last fifty years of cheap energy have lessened the importance of these considerations due to easy transport, but rising energy costs and climate change will likely shift the economics back in favour of domestic production. Preserving and restoring glasshouse sites wherever possible is essential for a resilient and sustainable food system.

Question 23

Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

We are concerned about the impact of assigning this definition to land currently used for urban and peri-urban horticulture, which is of value both for social welfare, food production and social welfare. Such land is not considered to be open countryside, so there is a risk that it will be seen as "making no or very little contribution to preventing neighbouring towns from merging into one another" and therefore getting less protection. Peri-urban farms, community gardens and

allotments, some of which have been in use for decades, provide opportunities for people in built up areas to produce their own fresh fruit and vegetables, keep fit, connect with nature and be part of a community. These benefits have a financial value on top of the value of food that is produced. A study of allotments in Brighton and Hove demonstrated that soil on allotments stores 578 tonnes more carbon than grassland, supports 54 times more bees than other council land, reduces food packaging and waste and reduces health costs of the city council by preventing loneliness and improving mental health.

There is a continuum from subsistence to commercial production, with many commercial peri-urban farms offering a valued volunteering service that enables local people to engage with and learn about food production. The benefits provided by these farms are therefore very similar to those of allotments. We strongly advocate that there should be significantly more such peri-urban fruit and vegetable production. Therefore, the new definition for grey belt land should include wording to protect existing peri-urban farms, community gardens and allotments and provision should be made to ensure that more land is made available for urban and peri-urban food production within easy walking or cycling distance of built up areas.

Question 24

Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

We welcome the recognition of the need to protect the best and most versatile agricultural land and would support greater clarity in NPPF that land management which deliberately results in land being unproductive and left vacant will not be rewarded by being released for development as at present. Such mismanagement of land is preventing access for food growers who want to take the opportunity of growing good food close to the market, enabling a closer relationship between growers and consumers. Prospective agricultural tenancies are only available on short terms because of the hope that land will be released for housing or other development. Peri-urban farmers cannot raise finance with such short term tenancies. They are also unable to plant long term crops such as fruit trees.

An additional purpose of the Green Belt should be to protect agricultural land close to population centres (see answer to q23).

Question 26

Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

While we welcome the protections for the best and most versatile agricultural land, often such land is not affordable to small scale commercial horticultural growers and community gardens. Further to our response to question 23, additional measures are needed to ensure that significant areas of land are kept open and available for horticulture production within easy walking or cycling distance of population centres. A clause should be included in the NPPF stating that:

“Urban and peri-urban horticulture and agriculture bring significant health, dietary and environmental benefits to local communities, which have a financial value above and beyond the food they provide. Areas of land should be preserved for food production within eg 0.5 miles of any existing settlement or new build area, to ensure that local people have easy access to community food production.”

Question 27

Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

The current approach to building in the green belt risks a prioritisation of land protection, which would only include “land of environmental value” and “assets of particular importance”, along with “the best and most versatile agricultural land”. This risks the loss of land which has existing or future value for community and small scale commercial food production, which integrates biodiversity conservation and enhancement and public access with sustainable food production, through agroecology.

Agroecology is a global practice, a vision and a collective movement that aims to deliver nutritional security for everyone, alongside local economic resilience, and the restoration of ecological, living systems.

Alongside land in areas identified in draft or published Local Nature Recovery Strategies, **we advocate a designation for agroecological food production.** Such a designation would ensure that land close to population centres is kept open for the multifunctional integration of

food production, nature recovery and community access. This would contribute to social health and welfare, and improve public awareness of how food is produced. The reason such a designation is necessary is that it is not appropriate to use existing high nature value land for food production, while the best and most versatile agricultural land (i.e. Grades 1 and 2) are often not affordable or available to agroecological farmers, growers and community groups.

A solution would be create an additional 6th purpose for the Green Belt, in para 143 of the NPPF:

f) To preserve land for agroecological food production within easy access of population centres.

Question 28

Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

As outlined above, there is a risk with the thinking set out in the NPPF consultation document that only the best and most versatile agricultural land, and that with existing environmental designations will be safe from development. The definition of grey belt is sufficiently all encompassing as to allow for creeping encroachment of development on all other land. A much clearer, and stronger definition of grey belt is required as the current definition leaves too many grey areas. We welcome the statements in para 4 of the NPPF consultation document that, “any development on land released from the Green Belt must bring benefits, via not only mandatory Biodiversity Net Gain, but also through new rules that will secure improved access to good quality greenspace” and would welcome further engagement on what is meant by this, and whether it could lead to land being designated for agroecological food production.

Question 29

Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes.

Question 30

Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No. This is effectively removing protections on green belt land with few safeguards, which could ultimately lead to insidious erosion of the green belt, which will be permanent and irreversible.

Two changes are needed

1. Introduce Low Impact Development policies, allowing for reversible development that would not otherwise be permitted. Examples of this could include sustainable temporary dwellings for those working on the land as is allowed under Wales' One Planet Development Policy. These should be allowed for at least 10 years at first.
2. A substantial crackdown on multiple home ownership. This could be done for example through requiring change of use before a primary home can be turned into a second home or short term holiday let, as is being introduced in Gwynedd. At least research should be carried out to survey the impact of multiple home ownership on housing supply and affordability and an examination .

Question 34

Do you agree with our proposed approach to the affordable housing tenure mix? (ie 50% affordable, including an amount of social housing subject to local authority discretion)

We welcome the golden rules proposed in association with allowing housing development in the green belt, and that the increase is to 50% affordable. Nothing is said, however, about redefining what is meant by affordable, so it is assumed that affordable continues to mean 80% of the market value. This is not an appropriate definition of affordability since it bears no reference to incomes and can be affected by extreme income inequality and wealthy people from outside the area buying second homes.

For land workers and many other key workers this is still far from affordable. We propose that an additional "golden rule" would allow key workers, including landworkers, to buy land and build their own affordable, low-impact housing. Provision already exists in the original NPPF for "Rural Exception Sites", defined as "small sites used for affordable housing in perpetuity where sites would not normally be used for housing". Several counties and districts, including

Shropshire, South Staffordshire and South Cambridgeshire have already included policies to allow Rural Exception Sites within their local plans, allowing an avenue for people to self-build and contribute to affordable housing stock. The use of mechanisms such as Community Land Trusts ensures that the housing remains affordable in perpetuity.

However, we believe that a further “golden rule” should be added, connecting the affordable housing golden rule to the rule about securing benefits for nature and public access to green space. This rule should allow low impact housing for market garden workers in association with agroecological market gardens that are providing affordable local, fresh produce and public engagement (through farm visits, interpretation boards, courses or a volunteering programme). While it is important that such market gardens are able to be financially viable, through charging prices that cover their costs of production, including wages, there are mechanisms that enable wealthier customers to cross subsidise produce to make it affordable to low income customers. Furthermore, if it is possible for the land workers running such enterprises to live in affordable, low-impact housing at lower than market rent, the financial pressures on the business and the individual workers will be less than if they are struggling to earn enough to pay market rents.

One of the features of low impact housing is that it is designed to be not only affordable to build, but also to run, by virtue of being highly insulated and energy efficient. Furthermore, living on-site would create significant efficiencies in the running of the business, by enabling workers to integrate their domestic life with the long working day (which often stretches from 5am to 10pm during the summer) required by market gardening. A policy that positively encourages low impact housing for rural workers in association with market gardens would simultaneously address a proportion of the housing need while unleashing the economic, social and environmental potential of agroecological market gardening.

This golden rule could also be extended to enable housing for other types of land worker, such as coppice workers or small scale livestock farmers who may, for example, be offering a conservation grazing service to enable the management of biodiverse grassland within the greenbelts. All these land-managers, as well as traditional rural craft workers, struggle to find affordable housing, and yet are needed by society to fulfil the function of managing landscapes, and providing traditional and sustainable goods and services.

Question 36

Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes, we strongly support this approach and would extend it to cover access to land for agroecological food production. As we indicate above, and in other responses in this consultation, we believe that the Green Belt is a place where agroecological food production should be encouraged and supported through planning policy. For many urban areas, the Green Belt corresponds with peri urban areas and the rural hinterland described in [The Food Zones](#) model, which we advocate. As part of the Landworkers' Alliance's vision for a "market garden renaissance", to boost UK vegetable and fruit production, reconnect the public with how their food is produced and improve access to fresh produce, we are working towards every city and town in the UK being supplied by a blend of urban, peri-urban and rural hinterland market gardens. The customers for these market gardens and farms tend to have a stronger relationship with the farm than when they buy food in a supermarket, either through public access to the farm, a volunteering programme or through a regular newsletter. This relationship helps customers understand better the way food is produced and what is in season and to reduce packaging and waste. Evidence suggests that customers buying directly, or indirectly through "farmer focussed routes to market", tend to eat [more vegetables than the national average](#). Hence, a policy that supports the establishment of urban, peri-urban and rural hinterland agroecological horticulture in the green belt would have far reaching benefits on public health, the environment and social welfare, through people being able to access not only green space but community.

Question 54

What measures should we consider to better support and increase rural affordable housing?

Lack of affordable rural housing is one of the biggest barriers to the expansion of agroecology, a form of agriculture, horticulture and forestry, which would bring multiple benefits to the environment, health, local economic vitality and social well-being. The economics of the food system, in relation to housing costs, severely disadvantages food producers in two ways.

Firstly, the low prices paid for food, and other land based products, make it hard to run a land based business that will generate a sufficient income to pay current rents or mortgage repayments.

Secondly, the squeeze placed on the population who earn an average income by the high fixed costs of rent/mortgage repayments, energy and utility costs, means there is little or no flexibility in "disposable income" to cover increased costs of food. While "adding value" through direct

marketing or gaining a premium for organic production is an option in a society where people have the flexibility to “trade up” in their food choices, this is limited at a time when there is little flexibility in disposable income. For the expansion of sustainably produced food timber, fibre and other land based products necessary to address climate change and biodiversity loss, housing costs must be reduced to a level that enables everyone to be able to afford more sustainable options in food and other goods.

In answering this question we will address the specifics of housing for full time rural workers, and the wider needs of people who wish to live more sustainably and produce some of their own food, but who are not full time agricultural workers.

Rural workers dwellings

In theory, the needs of full-time rural workers are addressed in Policy 84, clause a, which allows for the development of isolated homes in the countryside if there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside”. In its previous iterations, in Annex A of PPS7 and before that Annex E of PPG7, a set of tests including financial viability and “functional need” were applied to determine whether an applicant qualified for an agricultural workers’ dwelling. Since 2012, the policy has been slimmed down to the above wording.

In practice, the combination of extreme caution by local planning authorities (LPAs), who are concerned to prevent any degree of precedent in allowing exceptions to the local plan; the lack of detail in Policy 84a; and insufficient understanding about the diversity of agricultural enterprises and their respective needs, has led to an austere and prohibitive application of this policy to agroecological enterprises. While there are many attributes that distinguish agroecological enterprises from more conventional farm or forest enterprises, of relevance here is that they are usually operating at a smaller scale, the principles of sustainable development are at their heart, with environmental objectives being given equal or greater weight than financial ones; and the domestic set up is deeply integrated with the business for efficiency and social wellbeing.

Due to the lack of detail in policy 84a, when making decisions LPAs and planning consultants often refer back to previous iterations of policy (PPG7 Annex E and PPS7 Annex A), interpreting financial viability to mean that the business generates at least one full-time livelihood equivalent to the National Living Wage (NLW). The NLW is calculated to cover the cost of housing, which represents a significant proportion of the income, and if housing is being provided through the rural workers dwelling, that is a cost that will not need to be covered. Furthermore, a very narrow definition of essential need is employed, relating to industrial scale production and the

types of overnight emergencies that might require attention. It is extremely common for rural workers' dwelling applications to be refused, especially for agroecological horticulture, but they are often allowed by planning inspectors when taken to appeal. This is because, when examined in detail, it is found that the combination of a range of tasks that must be undertaken from early in the morning until late at night, combined with potential emergencies such as flooding or vandalism, mean it is essential to the viability of the business that the worker lives on site. The traditional role of a farmhouse would have enabled all these functions to be carried out without question, yet in modern times very few people who are starting out in farming can afford a farm with a house. Indeed, many farms have been dismembered as houses have been sold off separately to farm buildings and land.

The "rural workers dwelling" policy therefore needs to be updated to reflect the situation in which many new entrant farmers, foresters and rural craft workers are creating new farms on bare land holdings, and that these new businesses are diverse and frequently do not conform to "traditional" types of farm business. The planning system needs to recognise the value of businesses that prioritise environmental sustainability over profitability, that create rural enterprise opportunities for people from non-agricultural backgrounds, and that seek to integrate education, social welfare and public access to the land with the production of agricultural and forestry goods. We would therefore welcome a change to wording that facilitates and encourages the establishment of a diversity of land based business types, while safeguarding areas of countryside from irreversible development of houses that will not lead to sustainable, rural enterprise.

Self build Low Impact or "One Planet" Development

There is an opportunity for a category of development that lies between rural workers' dwellings and conventional homes. While all new housing should be built to a high environmental specification, due to the urgency to address climate change through energy efficiency measures and the use of sustainable building materials, there is likely to be significant demand for a special category of planning that allows for self-built low impact or 'one planet' homes. There is already a strong precedent in Wales, with the 'One Planet Development (OPD)' Policy, which supports the establishment of sustainable and land-based communities in the Welsh context. See the 10 year review from the One Planet Council for learnings from the OPD Policy in Wales. Available here:

<https://www.oneplanetcouncil.org.uk/review-of-one-planet-development-in-wales-2010-2021/>

Low impact homes are commonly built by land-based workers engaged in sustainable farming and food production, but they are also attractive to those seeking more low impact and sustainable lifestyles.

Policy 84 should have an additional clause to its list of exceptions which allows the development of 'low impact' homes, defined as a development that "through its low negative environmental impact either enhances or does not significantly diminish environmental quality".¹

Simon Fairlie's "Fifteen Criteria for Developments Associated with Sustainable Land-based Rural Activities" could also be used as guidance to help local planning officers to distinguish between genuinely low impact development and people simply wishing to build a house on agricultural land.

Another approach is for local planning authorities to put a "Single Plot exception site" policy into their local plan, as has been adopted in Shropshire. These are sites which are granted planning permission as an exception to normal planning policies in order to meet a local need for affordable housing for people with a strong local connection, by allowing them to build their own affordable home.

Question 59

Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

A beautiful environment is important in the health and wellbeing of people, and for preserving the UK's heritage and landscape. Beauty should be a consideration in all developments. 'Beauty' should include the natural environment, wildlife and nature, and thus any application that threatens them should be considered a threat to beauty, for example pollution which affects wildlife, trees and other habitats.

Farming covers 70% of the UK, and sustainable farming and the food system are therefore integral to beauty and placemaking, and must be part of well-designed and beautiful developments. More diverse and nature-friendly farming systems improve the beauty and biodiversity of an area. People and communities see nature-friendly farmed landscapes as essential to the UK.

¹ Fairlie, S. (1996). Low Impact Development: Planning and people in a sustainable countryside. Jon Carpenter.

Furthermore, market gardens and small and medium-sized farms do a lot of public engagement. This includes local communities opportunities to volunteer, learn, and take part in food growing and land management.

SME food businesses are regularly involved in creating opportunities for the local community to get involved in food-related projects, like learning about food and cooking.

People who work in farming and food (e.g. bakeries, butchers, grocers, and other SME local retailers) are always thought of as integral to urban, peri-urban, and rural communities in terms of place

We support the amendment to paragraph 138 having contributed to its drafting to raise the importance of a healthy food environment.

Well designed buildings and places should include explicit reference to sustainability, including choice of natural and local building materials, energy performance, insulation, passive solar design, incorporation of renewable energy technology etc, which will inherently lead to beauty

Question 70

How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

National planning policy should prioritise ensuring peri-urban land for healthy sustainable food production and urban planning prioritising both community gardens and healthy food retail.

Clear national policy is vital in giving planning authorities comfort that policies will be supported at local plan examination. Currently, the references to a good food environment are scattered throughout national policy, so do not carry the weight of a single overarching statement.

Government funds campaigns, reports and toolkits for planners but the take up is ad hoc. For example, Healthier Place, Healthier Future 'Planning for Healthy Food Environments' toolkit, has been produced as part of the Government's childhood obesity trailblazer programme. The toolkit supports the creation of healthier communities through health-promoting planning policies. The advice should be incorporated into national policy and guidance. There is a lack of expertise within under-resourced planning policy services juggling too many priorities. Often the healthy food environment topic is seen as the remit of public health colleagues. However, our vision of a sustainable food system covers spatial planning beyond public health. Some IPAs do not have the resources to develop a new area of policy. Planners have told us that it helps them to have clear statements in the NPPF.

It is inefficient for each local authority to derive local evidence for a national objective. In the case of healthy communities, local areas must prove to planning inspectors that their area is already at a disadvantage; there is no recognition of prevention. We would argue that this is a failure of the system that requires evidence led policy. Councils must wait until the situation has already deteriorated and is unlikely to get much worse. At this point inspectors at examination are more convinced of the need for policy – BUT it is too late. Planners frequently report that they are frustrated at being knocked back at examination stage when they want to bring forward community supported policy to avoid poor outcomes.

Despite the current national policy context, development plans are not creating a healthy food environment. The 2022 report from the Commission on Creating Healthy Cities found:

“Access to Better Food

.... the Commission has noted the many ways in which local communities face obstacles to healthy eating. Problems range from lack of shops selling fresh fruit and vegetables, the loss of allotments, and difficulties facing those with the least resources in preparing and sharing home-cooked meals. The Commission welcomes Henry Dimbleby’s National Food Strategy Report, and we commend its analysis of food poverty. In addition to national regulation and taxation to discourage purchase of unhealthy meals and snacks, built environment policies can offer some positive solutions.”

The revised National Planning Policy Framework should clearly establish the principles of accessible neighbourhoods / compact cities / 15 minute neighbourhoods. This concept describes a place that is likely to be a healthy community. Assessment tools such as Scotland’s “Place Standard” would help planners and developers understand how a neighbourhood works. It identifies the assets of a place, as well as areas where a place could improve.

The Use Class Order was amended In 2020, introducing a new Class F - Local Community and Learning. National policy should draw attention to this opportunity to ensure convenience shops are provided within 1 kilometre of major new residential development and are protected through this classification (F2(a) Shops (mostly) selling essential goods, including food, where the shop’s premises do not exceed 280 square metres and there is no other such facility within 1000 metres). This would benefit both rural and suburban residents.

A core national policy to control hot food takeaways will help to implement the Government's Obesity Strategy. In dense urban areas local authorities may wish to draft more detailed local policies appropriate to their areas.

The recent changes to the Use Classes has resulted in a proliferation of hot food takeaways under the guise of "restaurants" which rarely have seated customers. The distinction between a restaurant and a hot food takeaway must be defined in planning terms.

Food deserts are found in areas of high deprivation where there is a risk of food poverty and of overweight and obesity. PHE advise "A good mix of food 'spaces' within a local community can offer opportunities for local populations to access healthy foods".

The ability to access healthier food is a social issue as well as a public health issue. One focus of concern to local authorities is the long-term health implications of eating habits started in childhood; another is the concentration of premises selling HFSS products (high in fat, sugar and salt) in socially disadvantaged areas. The 400m zone is based on the fact that most hot food takeaway food purchased by or for children is outside of school hours, on the route to or from school.

The facilities that could be included within the 400-metre exclusions zones are:

- Primary schools
- Secondary schools
- Sixth form colleges
- Community centres / youth clubs / Madrassas
- Parks / sports fields / playgrounds
- Leisure centres

Recommendations:

All urban communities should be able to access a shop or a market selling healthy food within a 10 minute walk from their home.

- a. Major residential development should be located where residents will have access to local services including a convenience store.
- b. Temporary use of land and buildings for pantries (or similar) will be supported in areas of deficiency;
- c. Isolated shops will be identified and protected from change of use. (Designated as Use Class F2 or removal of permitted development where necessary).
- d. Sections of high street will be protected and retained in retail use where their loss would result in areas of deficiency to local services.

Hot food takeaways should not be located within 400m of premises where children or young people meet, such as schools, leisure centres, playgrounds or youth centres. Good food hubs should be encouraged.

Access to healthier food in the home, at school and in the workplace

National policy recommendations:

- All new residential developments will be built with enough space for food storage, cooking and dining.
- The ability for building occupants to cook and eat on site should be addressed at design stage.

How residents can grow, cook and eat healthily - access to good food - is an issue for the development industry. High density developments at all social scales are putting people at risk of food poverty. Reliance on pre-prepared food, often high in fat, sugar and salt, as a regular part of the diet leads to poor health outcomes such as diabetes and heart disease. However, families cannot be blamed for taking these choices if they live in small homes, with limited cooking facilities.

National space standards must ensure new residential developments are built with enough space for food storage, cooking and dining. A decent home is one where there is access to healthier food and where routes to poverty are avoided through design. New residential developments should be built with enough space for cooking and dining to avoid dependency on takeaway food.

- Provision of functional kitchen and dining facilities
- Space to store food and to prepare & cook fresh food.
- Standards relevant to single person households and family homes

The role of kitchens is already recognised in Northern Ireland. Kitchens are seen as not only the main workplace in a home but they provide the focal point for much social activity. The design of the kitchen should, therefore, recognise its use as a family room.

The Commission on Creating Healthy Cities (CCHC) 2022 report found:

“The physical environment contributes in several ways to the problems caused by unhealthy diets and eating patterns. The small space standards not only of overcrowded existing properties, but of newly built houses and flats, mean many homes have no place for a family to eat together around a table. This discourages preparation of meals at home as well as diminishing the bonds of family life.”

This issue is equally applicable to students and people in their place of work. The ability to prepare a healthy day time snack and sit comfortably to eat it will encourage people to choose the healthy option.

Access to healthier food in the Public Realm

National policy recommendations:

- Advertisements will not be located in close proximity to facilities used by children and young people.
- Drinking water fountains will be included in the design of new public spaces.
- All major developments will include edible landscaping.

The definition of “Amenity” in the public realm should include consideration for mental health and for healthy eating. Street clutter and advertisements impact on the quality of the public realm. Telephone kiosks have been brought within the planning system due to the phenomena of kiosks masquerading as advertisement screens cluttering our streets in inverse proportions to the need to make calls. It was no coincidence that these kiosks proliferated in low income areas and advertised fast food. In the interest of amenity and design quality, we encourage planners to ensure kiosks are located where calls may need to be made.

The provision of drinking water fountains helps improve public health, reduces waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles.

Edible landscapes familiarise the public with food and where it comes from. Landscape policies can encourage the inclusion of edible plants such as fruit, nuts, herbs in the design and layout of buildings and landscaping of all major developments to benefit both healthy communities and biodiversity.

Question 71

Do you have any other suggestions relating to the proposals in this chapter?

Paragraph 96 c of the NPPF should be amended from:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green

infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

To:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:

c) Both promote good health and prevent ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities. This includes reducing key preventable health harms from conditions such as obesity.

- *Promotion of good health can be achieved via supporting access to healthier food (through local shops, markets, community food growing spaces, allotments and other services) and provision of services such as safe and accessible green spaces, active travel routes, sport and leisure facilities.*
- *Prevention of ill-health can be achieved via reducing the availability and visibility of health-harming products, particularly to children.*
 - *There is clear precedent and strong national evidence for local authorities across the country to take reasonable steps to limit the impact of health harming products to children, such as introducing 400 metre exclusion zones to prevent new hot food takeaways opening around schools. Local authorities should aspire to this as a baseline (with a presumption in favour of Article 4 to prevent new outlets opening near primary and secondary schools) and be empowered to extend the principle to other areas where children congregate (such as playgrounds, parks, post-16 education settings and nurseries), as appropriate for their local contexts.*

Question 72

Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Yes

Question 73

Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Yes

Question 74

Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes

Question 78

In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

It is encouraging to see climate change given prominence in this review. We must urgently transition to a low-GHG economy and planning policy is an important tool in doing so.

The NPPF must ensure it supports a transition away from fossil fuel intensive development across *all* planning decisions. The NPPF currently contains some contradiction on this aim around rural development, which is holding back the agricultural transition needed to tackle climate, nature, water and health crises. This review is an opportunity to do more, ensure consistency across government aims, and provide clarity to councils.

This should be done as follows:

1. Making climate change a material planning consideration, to provide necessary clarity around the need to prioritise the consideration of climate change in all developments. As part of this, establish a presumption against granting planning permission for high-GHG developments.
2. Clarify the definition of 'Sustainable Development' to ensure the definition can be understood by planners as it relates to food and agriculture (see q83)
3. Introduce enhanced requirements for developments that have significant environment and climate change impacts, including intensive livestock units (see Q79)
4. Introduce a presumption against granting planning permission for intensive livestock units in polluted catchments (see below)

Rationale

Food and farming is responsible for 20-30% of greenhouse gas emissions globally. As a major risk factor for future zoonotic diseases, as well as a leading driver of habitat loss and antibiotic resistance, diets and farming practices combined are a significant threat to the health of our planet. As noted by the Committee on Climate change, net zero requires a transformation in land use across the UK, including encouraging low-carbon farming practices and shifting to producing and eating less livestock. While emissions from other industries have reduced, those

from the food system have plateaued since 1990, with improvements in some on-farm practices cancelled out by the increase in intensive livestock production.

The UK Committee on climate change recommends reducing meat consumption by 20-50%, and switching to getting more protein from plant sources, and switching farming to more agroecological systems.

Nature-based farming has widespread acceptance among farming communities and governments as the solution to adapting from a fossil-fuel intensive farming to sustainable, low emissions methods which are more resilient to climate change, better for nature, create more jobs per hectare and per tonne of food produced and converting to nature-friendly methods has been proven to not reduce yield.

Clearer national planning policy is needed, setting out the types of food system and the types of production that will support a move to net zero, improve domestic self-sufficiency and produce more healthy affordable food, and thus will be supported by planning policy (more is outlined in our response to question 83).

Although three quarters of UK councils have declared a climate and nature emergency, few are taking action through local planning policy to address food-related emissions. This could be remedied through clarity in national planning policy.

Preventing further harm caused by intensive livestock units:

Industrial farming is a primary contributor to global warming, environmental damage and land-use change. Intensive livestock agricultural units are increasing in both number and size in the UK – with the number of large units increasing by 20% since 2016, meaning more and more planning departments are dealing with such applications.

The decline in the quality of the UK's protected habitats and rivers combined with the need to tackle climate change and the need to transition to lower density and higher welfare agroecological livestock farming means that stricter planning rules are needed to prevent the proliferation of industrial livestock units in the UK.

River pollution: Livestock farming is the source of 70% nitrogen pollution in the UK.

Nutrient neutrality rules are in place in 72 local planning authorities in England. In these areas, protected habitats are in 'unfavourable' condition meaning no development that would add further pollution is permitted to occur. Since any housing, commercial or industrial development has some nutrient impact, pollution is stalling housebuilding. These pollutants – chiefly nitrates and phosphates – are also potent GHGs.

The NPPF currently says (paragraph 88) that planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*

Under this guidance, the number of intensive livestock units has expanded rapidly, including the granting of planning permission in very polluted catchments such as the Wye Valley, Norfolk and Yorkshire. The NPPF should support sustainable rural development where it contributes to climate and nature objectives, but not where it risks worsening already polluted catchments.

Further, the NPPF should adopt the recommendations of the Environmental Audit Committee to address water pollution:

“There should be a presumption against granting planning permission for new intensive livestock units in catchments where the proposed development would exceed the catchment’s nutrient budget”

The presumption against granting planning permission should apply in all catchments where nitrogen budgets are exceeded, i.e. even where developers present mitigation or pollution reduction plans. The government has clear targets to reduce nutrient pollution. Such mitigation measures are insufficient to achieve these goals. Additionally, the resources required to monitor and enforce such measures and thus ensure they don’t lead to increased pollution over the lifetime of the project are unrealistic, given resource pressures on the Environment Agency and Local Authorities.

When considering whether such mitigation plans are sufficiently robust, the resources available to the Environment Agency and local authorities to ensure such mitigation measures are implemented throughout the lifetime of the project must be a crucial consideration. Where there is any doubt about this, the application should be refused.

Soy animal feed and deforestation: In recent decades soy has become the primary protein source in livestock feed - particularly for pigs and poultry in the UK context. Of the 2.7 million tonnes of soybean meal equivalents imported directly to the UK each year, an estimated 2.4 million tonnes (89%) is used for animal feed. This demand for soy is driving deforestation in highly biodiverse ecosystems such as the Amazon rainforest, causing irreversible changes to land-use and decimating precious carbon sinks. In order to address climate change on a broader scale, there is a need to reduce the number of intensive livestock units in the UK which rely on the unsustainable production of soy overseas.

Paragraph 88 should therefore be edited to say:

Planning policies and decisions should enable:

“The sustainable growth and expansion of enterprises in rural areas, where they contribute to sustainable development goals and align with the UK Government’s commitments around tackling global warming. Developments that support agroecology should be supported.”

Question 79

What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

GHG impact assessments should be required for all developments that have a significant environmental impact. At the moment, environmental impact assessments are required for some developments, but they don't consistently include detailed GHG emissions information to allow planning authorities or communities to assess the risk to local and national climate obligations for agriculture developments. Where this is being kept from the public, it is thwarting the informed, inclusive and democratic process that the public are entitled to. There are established methods for assessing the GHG impacts of agriculture – for example emissions are calculated and reported on by Defra.

To ensure consistency and certainty, impact assessment should:

- Include all GHGs, not just carbon. Methane, nitrous oxide, ammonia, and other GHGs are more potent than carbon, part of the government's climate obligations, and increasing more quickly than Carbon.
- Include direct and indirect emissions. This means including all GHG emissions that can be attributed to the development's construction and operation, including raw material inputs (such as animal feed in the case of agricultural applications). All emissions for which there is a strong degree of connection between the development and the impacts should be included, to align with Environmental Impact Assessment legislation. This is necessary to bring ensure national planning policy in line with the legal precedent established in the 2024 ruling of R v Surrey County Council
- Include all 'scopes', and a definition of 'scopes' to avoid inconsistencies. For food companies, scope 3 emissions are by far the largest contributor. In intensive animal production operations, feed can constitute 60-70% of the GHG footprint.

The technology and tools required to carry out GHG assessments for agricultural developments exists already. Clarification is needed on the most robust and scientifically sound methodology to use.

Question 81

Do you have any other comments on actions that can be taken through planning to address climate change?

1. Currently, only the very largest intensive livestock units require planning permission and an environmental permit, ie those that have capacity for over:
 - 40,000 poultry
 - 2,000 production pigs (over 30kg)

- 750 sows

This refers to the number of animals per 'installation', or single facility. These thresholds are incentivising developers to create more smaller operations, to fall outside the control of permitting and planning regulations. The threshold should be lowered for poultry and pig installations, and explicit thresholds set for cattle and other forms of livestock to bring these facilities within the planning and permitting system, as per the recommendations of the Link briefing on permitting here: https://wcl.org.uk/docs/Link_Briefing_Permitting_June_2024.pdf.

This would greatly improve the monitoring and control of developments that have significant pollution impacts. Failure to do so risks further pollution to air and water and the UK's ability to meet climate and nature recovery targets.

2. Clarification of the 'need' for development to ensure development need is understood in the context of the climate and nature emergency.

Currently, the National Planning Policy Framework requires planners to consider the 'need' for a development alongside other considerations like sustainable development. Further clarity around what constitutes food and farming 'needs' for the UK would help support applications that produce food in a way that aligns with health and climate goals. Such needs include:

- More healthy affordable food that improves nutritional security and domestic self-sufficiency, to be in line with a forthcoming land use strategy and increasing supply of the foods we don't eat enough of in the UK currently. This includes fruit and vegetables, pulses, legumes and beans, and less of the foods we must reduce for health and climate reasons including meat and sugar.
- Development that builds resilient local food supply chains, including worker housing, small-scale processing and packing facilities, polytunnels and small-scale horticulture, storage, space for markets and flourishing high streets.

Question 82

Do you agree with removal of this text from the footnote? (re removal of the Dec 23 addition "The availability of agricultural land used for food production should be considered, alongside other policies in this Framework, when deciding what sites are most appropriate for development.")

We support moving this statement from footnote into main policy, but we would not support simply removing the footnote without including it in main policy.

Policy should not be in a footnote. Policy should be deliverable. At the time Sustain, the alliance for better food and farming, questioned how food growing land could be distinguished through the planning system. However, we strongly endorse the principle and we do not think the best and most versatile agricultural land is successfully protected.

Sustain's briefing on land use, "*A Green and Pressured Land - making sense of the many competing demands for rural and peri-urban land*" makes recommendations on how to 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.

In the face of the climate and nature emergency, soil degradation and loss of natural ecosystems, land on the edge of cities should be safeguarded for agro-ecology, shortening supply chains, bringing food closer to consumers and building a better understanding of how our food is produced.

More fruit and vegetable production in the UK is needed given the vulnerability and sustainability of our current global supplies and because as a nation we are not eating enough for a healthy diet. Land on the periphery of urban areas which is most suitable for market gardening growing high value produce, close to consumers should be identified in local plans and safeguarded from damaging development. This includes allocating space for environmentally beneficial fruit and nut tree planting, community food and small farm enterprises, especially in horticulture. Site designations and boundaries, such as Green Belt, should provide long term certainty to enable businesses to fund investment.

Question 83

Are there other ways in which we can ensure that development supports and does not compromise food production?

Agricultural assets are key national infrastructure for food security, the self-sufficiency of our food supply, public health and tackling the cost of living crisis. The way food is produced, transported and sold are fundamental to Sustainable Development, (see the 17 UN Sustainable Development Goals, in particular goal 1-No Poverty, 1-Zero Hunger, 3-Health and Wellbeing,6-Clean water and sanitation, 10-Reduced inequalities, 12-Responsible Consumption and Production and 13 -Climate Action).

But not all food production methods contribute to the aims of sustainable development, planning policy— government policy or targets more widely, including recovering nature and tackling the climate emergency.

There's a need for the NPPF to more clearly define how planning can support sustainable food and farming. Currently, many activities that use land and that are vital for food security (for example forestry and many aspects of agriculture) aren't considered 'development' for planning purposes, even though the infrastructure necessary for them to happen *are* considered development (including for example storage facilities, polytunnels, markets, housing). As a result there is no guidance about how planning authorities can support sustainable food and farming through planning.

In December 2023 the Environmental Audit Committee recommended that planning policy needs to be aligned with a new land use framework, as a measure to ensure food security. They said: *The Government should publish guidance, under the National Planning Policy Framework, to encourage planning authorities to manage applications for land use changes which affect food security on an expedited basis.*

To deliver their recommendations, sustainable development must first be defined in the context of food and farming, including an outline of the kind of food system that planning should support. This will be especially helpful in areas designated, Sustainable Food Places (<https://www.sustainablefoodplaces.org/>)

To ensure the twin aims of domestic food self-sufficiency and climate and nature goals, planning should support:

- Agroecological food systems, organic farming, growing more fruit and vegetables, pulses, and legumes
- A more localised food system and SMEs / cooperatives
- Good jobs
- Transitioning from polluting intensive livestock agriculture to more sustainable food production

There should be a presumption against granting permission for intensive livestock developments in polluted catchments (see question 78)

In addition:

- Any land that is capable of producing food should be considered as 'sustainable agricultural use' in the planning process. Valuing such land is important for food security, climate and nature, jobs and livelihoods, and access to green space.
- All development proposals should be assessed for their impact on the food supply system.

Supporting a localised food system

Planning policy should protect and/or re-establish infrastructure such as agricultural land, local food processing and wholesale businesses, food markets, abattoirs, and small independent retailers, food hubs and distribution networks. The food supply chain in the UK has become highly centralised and opaque. This has adverse environmental, economic and social impacts. Support for investment into localised food systems and the infrastructure it needs should be signalled through national planning policy.

Sustain and RSPB in *The Case for Local Food* report recommended that in a review of NPPF: 'The most pertinent [recommendation] for encouraging shorter supply chains is to encourage a diversity of retail outlets including community shops, markets and town centre food hubs, and the development of infrastructure to support short supply chains, such as abattoirs and processing for smaller food businesses. The framework should also ensure that rural and peri-urban land is safeguarded for food growing, and that the best and most versatile agricultural land will be protected.'

The planning system can often be a barrier for small and medium sized food and farming enterprises whereas large agricultural businesses benefit from permitted development. Recent Sustain research found farmers would like to change how they supply their produce; it proposes that the Government works with local authorities to create local food and farming planning guidance which local authorities can tailor to their local area.

New food business models would include local food hubs that have capacity to carry out processing, storage, packing, distribution, and selling. Farmers and growers want to access markets themselves and grow connections with local citizens. Sustain has published a report on infrastructure needed to support a more sustainable local food system.

The UK Government should create a “**growth action plan**” to identify barriers and propose actions that will deliver innovative approaches to increase the market share of shorter supply chains to 10-25% by 2030. Local authorities could then work with local stakeholders to make these plans work at the local level. Local Enterprise Partnerships (LEPs) should be directed to support development of appropriate scale infrastructure and supply chain for local needs to boost capacity and markets for sustainably produced food.