



**RTPI**

mediation of space · making of place

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25<sup>th</sup> September 2009

Email response sent to: [susan.lenaghan@naturalengland.org.uk](mailto:susan.lenaghan@naturalengland.org.uk)

Dear Susan,

**RESPONSE TO CONSULTATION PAPER: Draft policy on food security and the environment.**

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 23,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This response was drafted by the RTPI Development Planning and Rural Planning Networks following an internal consultation. Thanks are due to members of the networks for their substantial contribution in reviewing the document.

This consultation integrates two critical issues – food security and the environment. The planning system has an important role to play in both issues and this response draws out the contribution that planning can make along with those aspects of the consultation which should become integrated within planning policy. General comments are set out below and more detailed responses to the consultation questions are attached.

Generally the planning profession is well versed in seeing the 'big picture' which can be usefully applied when considering food security against wider environmental concerns. In particular, planning could contribute to the debate by advocating a spatially based approach to evaluate the future needs of the agricultural and biodiversity sectors. This would include integrating the issue of food production with land use issues, of which some are highlighted below:

- to reduce the loss of agricultural and productive open land in urban areas and rural villages under pressure from urban expansion
- to ensure previously developed land is most effectively used for future development needs, and ensure non productive hard surfaces are kept to a minimum
- to increase biodiversity across urban and rural networks
- to increase the potential for food production and biodiversity of land not in agricultural use, including in urban areas.
- to ensure the longer term value of food productive and biodiversity land is recognised in evaluation and decision making.
- to ensure that these longer term values include a component representing food security.

There are a number of issues that the RTPI feels the consultation document does not fully consider, including:

- a rise in population along with rising aspirations of a growing population will be a major challenge for the 21<sup>st</sup> century and has major ramifications for food security, the environment and the planning system.

- the need to consider land use particularly the effects of those uses that directly or indirectly take land out of agricultural production and/or reduces biodiversity. The spatial pattern of development and movement is important to a more sustainable approach.
- the need to include a planned approach to the management of land in both rural and urban situations to ensure it is beneficially and productively used.

There is a need to re-set our priorities in relation to land and development so that land can be more efficiently used. A different set of priorities, not based solely on short term market conditions, will need to be applied to avoid decisions that could compromise our livelihood. A possible priority list could be:

- food production
- water supply and drainage
- biodiversity
- housing
- other productive uses, e.g. employment
- transport
- leisure activities

It is important for Natural England to consider that sustainability embodies multiple values such as social justice as well as ecological integrity, and that balancing these sometimes competing factors is often challenging.

Natural England might wish to consider providing a suitable, accompanying document supporting the final publication of this document which sets out an 'action plan for partners', within which they are able to identify the specific action required to implement the policies.

The RTPI would also support Natural England convening a working party on food security and the environment.

If you require any further assistance, please contact Rhian Brimble, RTPI Rural Planning Network Manager on 01443 229852 or email [rhian.brimble@rtpi.org.uk](mailto:rhian.brimble@rtpi.org.uk)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matt Thomson', with a long horizontal flourish extending to the right.

Matt Thomson  
Head of Policy and Practice

***POLICY 1: Food security and environmental security are both essential, they are often highly interdependent and should be addressed together, particularly given the challenge of climate change.***

The RTPI strongly supports this policy. It integrates well with a number of other areas in which planning has an influence.

A healthy environment is the key not only to allowing both land and sea to produce food, but in promoting the development of wider sustainable communities. This is the central theme of planning policy and highlighted in Planning Policy Statements (PPS) such as PPS1. Page 1, point 2 of the consultation document sets out the need to ensure that natural resources are used more sustainably and negative impacts on the natural environment are avoided, minimised or mitigated. This thinking is consistent with planning policies and provides an important linkage. Food is linked to a number of natural resources through planning policy and these links need to be made clear if planners are to play a key role in food and environmental security. For example biodiversity has a strong link to planning through PPS9 and it is important that both planning policy and Natural England policies highlight these important links. The environmental impacts of agriculture are set out at 4.8 of the consultation document and planning policy is linked to some of them through soils, bird species and landscape character assessments.

The unsustainable nature of current food production in England is usefully highlighted at 4.2, with heavy reliance on fossil fuels and phosphates. Consideration should be given to how planning policy on renewable energy can help to alleviate this problem.

***POLICY 2: Addressing the need for food security should be undertaken in a way which ensures natural resources are used more sustainably and negative impacts on the natural environment are avoided, minimised or mitigated, both here and abroad. Protection of the terrestrial and marine environments will underpin food security by maintaining the ecosystem services upon which we depend.***

The RTPI strongly supports this policy.

The RTPI has previously responded to a number of specific consultations on the natural environment/resources covering topics such as soil, landscape, flooding and water management. These responses can be found on the [policy pages](#) of our website. The RTPI Policy Team can be contacted via e-mail at [policy@rtpi.org.uk](mailto:policy@rtpi.org.uk) if you would like to discuss any of the comments raised in these responses.<sup>1</sup>

***POLICY 3: The current problem of food insecurity is, at the global level, primarily one of unequal distribution and access to food, and, in the UK, of household food insecurity and of poor nutrition. Sustainable food production can contribute to food security by providing food of good nutritional value.***

This policy goes beyond existing planning policy and encompasses both international aid and other professional areas concerned with nutrition. The policy also raises controversial issues over the costs of food, which is not primarily a planning issue, although planning could contribute here through encouraging allotments and 'growing plots' in all new housing developments, as well as preventing garden loss to hard surfaces and instead, encouraging its use for growing fruit and vegetables at low cost.

***POLICY 4: In the long term, it is highly likely that global food production will need to increase. We should seek to avoid and mitigate the projected increase in global demand for food as far as possible through more sustainable consumption and diets and less waste in supply chains.***

This policy sets out that global food production will need to increase, including within the UK. Planning does not have a direct role here but can help to ensure that agricultural land is protected against inappropriate forms of development that

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<sup>1</sup> [RTPI Response to draft Flood & Water Management Bill.](#)

[All Landscapes Matter draft Policy Consultation.](#)

[RTPI response to the Future Landscapes consultation.](#)

[Draft Soil Strategy for England](#)

will lead to its ultimate loss of productive capacity.

Changing our diets as set out at 7.11 through reducing our current consumption of meat and dairy products will have a significant impact on both landscape and biodiversity and will need to be supported by education around food and farming to promote behavioural change. Planning may well become involved through objections to biodiversity and landscape considerations, especially in the areas of protected status.

***POLICY 5: If, in future, food production in the UK and Europe needs to increase to provide people with a healthy diet, there will need to be simultaneous improvements in environmental performance. In Europe, the Common Agricultural Policy should aim to ensure both our food and environmental security.***

The requirement for not only more and different food production, but also improvements in environmental performance will require considerable determination and reconciliation. The planning system should have a key role to play here with its strengths in dialogue and mitigation role. Planning policies will not only need to be updated, but also be capable of helping resolve conflict between food production, biodiversity and landscape quality.

An important yet complex issue is the need for biodiversity to play a wider role in urban and rural development, including food production, rather than just increase food production by conventional means and genetically modified strains. Research needs to focus on this and it is possible that the UK planning schools could play a part in such research, possibly funded through Natural England.

***POLICY 6: Retaining the capacity to produce food in the UK and Europe is important for our food security, including through support for sustainable food production, appropriate research and development, protection of fertile land whilst allowing for other required land use changes, and suitable skills and knowledge.***

This policy has direct links with the planning system. The benefits are clearly set out for retaining and enhancing our capacity to produce more food in the UK and this needs to be re-emphasised in Planning Policy Statement 7 and 9.

Section 9.1.3 sets out an approach which the RTPI considers to be the role of the planning system, "*Protecting enough fertile land, which could be used for agriculture and food production if required, whilst valuing the current environmental services provided (e.g. flood management) and allowing for the creation of new habitats, coastal change, and the diversification of rural economies.*" Planning has a key role to play in taking a strategic view about land uses and to protecting agricultural land.

The RTPI supports the statement in section 9.7 "The Best and Most Versatile land classification enables choices to be made about future land use within the planning system".

***POLICY 7: Resilience in the food system will be stronger with a range of supply chains, including but not exclusively with healthy domestic agricultural and fisheries sectors, and we should encourage those with the lowest environmental impact. International trade policies relating to food and agricultural products should include the aim of the protection of the natural environment.***

The RTPI supports the growth of healthy domestic agricultural and fisheries to help reduce the environmental impact of transporting food globally.

***POLICY 8: There is an important role for local enterprises, citizens, and communities in ensuring food and environmental security, such as through involvement in allotments and community orchards, and these activities have multiple health benefits. Sufficient land needs to be made available to local communities to enable them to participate in sustainable food production.***

The RTPI strongly supports this policy and planning has a strong role to play in ensuring land is available for these uses. In order for sufficient land to be made available to local communities to enable them to participate in sustainable food production, planning can be instrumental in providing a more meaningful green space when considering planning applications and the provision of allotments and community orchards can be allocated in Local Development Frameworks. Consideration and allocation of green space is identified in many cases in order to improve biodiversity and provide spaces for communities to contribute to a healthy lifestyle. It now requires more attention to the opportunities for growing food, rather than providing amenity areas that produce little beyond visual amenity and remain a maintenance cost to local authorities. Urban/rural design must provide for practical green infrastructure that is suitable for food, biodiversity and landscape quality.

There is already anecdotal planning experience within some local authorities of low impact development that involves growing food on small areas of land. This knowledge could be drawn upon and shared together with other research and publications on the topic. The RTPI is currently advising the Foresight Land Use Futures Study which is due to report in January 2010. This project is focusing on the relationship between land use regulation and governance and all aspects of our finite land resources, including food, biodiversity, carbon management, urban and rural development.

Planning Aid and community planners also have a role to play here, helping communities reconnect with the land and benefit from the planning system. Planning Aid in particular plays an important role in engaging with hard to reach groups and often disadvantaged communities that can suffer and/or benefit greatly from decisions taken on issues such as these. It is important that hard to reach communities are effectively engaged in the process of identifying allotments and other areas for food production and Planning Aid can assist in this process.