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Nourish Scotland's response to the Scottish Government's consultation on the **Third National Planning Framework (NPF3) and a revised Scottish Planning Policy (SPP)**

Nourish Scotland welcomes this opportunity to comment on the emerging third National Planning Framework (NPF3) and a revised Scottish Planning Policy (SPP). Nourish represents the community and local food sector in Scotland.

Nourish notes the scant attention given to food system planning. We recommend that Scotland's future planning policies should include food system planning as a means for economic recovery, job creation, addressing regional disparities, reducing green house gas emissions and enhancing ecosystems and biodiversity. The food system is the chain of activities connecting food production, processing, distribution, consumption, and waste management, as well as all the associated regulatory institutions and activities.

Nourish recommends that Scotland's planning policies address 3 main points:

- Development plans prepared by planning authorities to include planning for food
- Put effective mechanisms in place to protect prime agricultural land from development
- Establish City foodsheds network as a national development in NPF3

Why do we need to think about the food system?

The Scottish food system - as part of the global food system – is unsustainable and contributes to some of Scotland's most pressing problems:

- diet related chronic disease like diabetes, heart disease, or cancer (due to highly processed food, lacking in nutrients but high in contents of sugar, salt and fat);
- inequalities (in access to land and access to healthy food);
- loss of employment, skills, food culture (due to centralization, efficiency, automation);
- environmental pollution, greenhouse gas emissions, loss of fertile soil (due to agrochemical dependent, industrial agriculture, global supply chains);

Our dependence on food imports and the lack of investment and planning for a sustainable food system jeopardizes the resilience of Scottish communities.

Food system planning

Historically, our towns and cities have been built around the supply and distribution of food. Through changes in the way in which food is produced, processed and retailed planning for food disappeared from the radar of the planning authorities. Today, the role of planning in creating healthy and sustainable environments, including the food system, is increasingly being recognised. For example, the American Planning Association has a policy which incorporates all parts of the food system from production to food waste, and planners are able to take courses on planning and food for their qualifications.

In the UK, organisations such as the Campaign to Protect Rural England (CPRE) have made recommendations on how the planning system can promote a sustainable food system. These principles also apply to Scotland.

- Government should develop national planning policy guidance to provide stronger support for a sustainable food system by showing how planning can promote and protect the infrastructure and assets needed to buy, grow, produce and distribute local food.
- Government should strengthen the ability of the planning system to ensure the vitality of town centres by enabling local authorities to set conditions on the location, scale and accessibility of retail as well as to restrict the dominance of particular operators in local market areas.
- Local authorities and other public bodies should form partnerships in their areas to develop food strategies and action plans.
- Local authorities updating their local plans should develop policies to support local food networks taking into account retail diversity and town individuality, support for markets and protection of fertile land.

A sustainable local food system can result in wide-ranging benefits for local economies, community regeneration, health and the environment and can thus assist with many of the issues the SPP and NPF3 aim to address.

Economic recovery

A localised food system will strengthen the Scottish economy. The New Economics Foundation (NEF) estimated that for every £1 spent on local food £2.50 is generated for the local economy. This is significantly more than the £1.40 generated when £1 is spent in a supermarket.

Job creation

A localised food system will create jobs in Scotland. In a study the Campaign to Protect Rural England found that local food outlets create three times the number of jobs than national grocery chains. Local food outlets support on average one job for every £46,000 of annual turnover; by comparison at three national chains one job is supported per £138,000 to £144,000 of annual turnover.

Reducing green house gas emissions

A localised food system, built on agroecology, will make a significant contribution to reducing green house gas emissions. Food accounts for 30% of our greenhouse gas emissions: from its transport, from the conversion of land for farming, the process of farming itself, the energy used in food processing and retail, and from food waste.

The agri-food system has an important role to play in the move towards a low-carbon economy and mitigating the effects of climate change. A sustainable, more localised food system will reduce greenhouse gas emissions through: shorter supply chains; ecological farming methods using less fuel and fossil fuel based inputs; reduced meat consumption, reduced wastage, increased seasonality and reduced refrigeration costs. For example, a UK Government study found organic farms use 50% less energy than non-organic farms to produce the same amount of food.

The preservation and restoration of fertile land, the application of ecological farming practices (high diversity, adapted to place, closed nutrient cycles, etc.) and decentralised food processing and retailing are important for mitigating the effects of climate change.

Nourish recommends that Scotland's planning policies incorporate the following 3 points:

- As suggested by the CPRE the Scottish Government's legislation, policy and advice framework on planning should ensure the inclusion of planning for food in the

development plans prepared by planning authorities. This will require planners to develop this area of expertise.

- All development plans should identify prime agricultural land and zone it for the use of food production. There must be effective mechanisms in place that protect prime agricultural land from development. The presumption should be against development on any land that is currently used for food growing. If agricultural land is developed then a suitable levy system should be put in place to compensate for loss production for example, a 'food production and ecosystem service foregone' charge for any roads, or buildings etc. (equivalent to say 50 years production).
- The NPF3 should include the city foodsheds network as proposed by Nourish in an earlier consultation as a national development. The city foodsheds network will create a network of periurban 'foodsheds' around Scotland's seven cities (sustainable food cities), investing through acquisition of or upgrading in hundreds of hectares of urban and periurban land for vegetable and fruit production. These holdings will co-operatively supply public procurement, social enterprises and community buying groups in the cities. The benefits include: opportunities for local job creation, skills development, regeneration, preservation and management of green space, potential for waste management, providing healthy locally produced food and so reducing food packaging and food miles and the potential for improving food security.
 - The development will create thousands of new jobs in small to medium scale local food businesses – retailing, processing, distribution, catering – and develop skills in horticulture, baking, cheese-making etc.
 - Sustainable food cities will depend on smart communications to minimise distribution routes and on creating a green infrastructure of urban and periurban horticulture with biodiversity built into production methods.
 - Organic production methods making use of the city's green waste compost and human sewage will recycle nutrients and sequester carbon.
 - The sustainable food cities network will make the urban landscape more diverse through urban growing spaces, more independent and community-owned retailers and food outlets. It will also transform the periurban landscape to create a 'foodshed' which supports better dialogue between cities and their rural hinterland.
 - The city foodsheds network will considerably contribute to food security. Nourish called for legally binding targets to be set through the Land Use Strategy. These should be set at:
 - a national food security target of 75% of the food eaten in Scotland coming from Scotland by 2020, and 90% by 2050. Accompanied by a national food production plan, with appropriate delivery mechanisms to achieve this.
 - a regional food security target of 50% of the food eaten within each region of Scotland coming from within that region by 2020, and 75% by 2050 with Regional food production plans with appropriate delivery mechanisms to achieve this.
 - Scotland's sustainable food cities network will be a key partner in the emerging European cities network

Resources

Carolyn Steel, Hungry City: How Food Shapes Our Lives

Campaign to Protect Rural England, From field to fork: The value of England's local food webs
<http://www.cpre.org.uk/resources/farming-and-food/local-foods/item/2897-from-field-to-fork>

Making Local Food Work, Local food and climate change. The role of community food enterprises
<http://www.makinglocalfoodwork.co.uk/reports.cfm>

Making Local Food Work, The value of the Community Food Sector. An economic baseline of Community Food Enterprises
<http://www.makinglocalfoodwork.co.uk/reports.cfm>

London Assembly (2010). Cultivating the Capital. Food growing and the planning system in London
<http://legacy.london.gov.uk/assembly/reports/plansd/growing-food.pdf>