
Bath & North East
Somerset Council

Allotment Management Plan 2015



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SECTION 1: INTRODUCTION

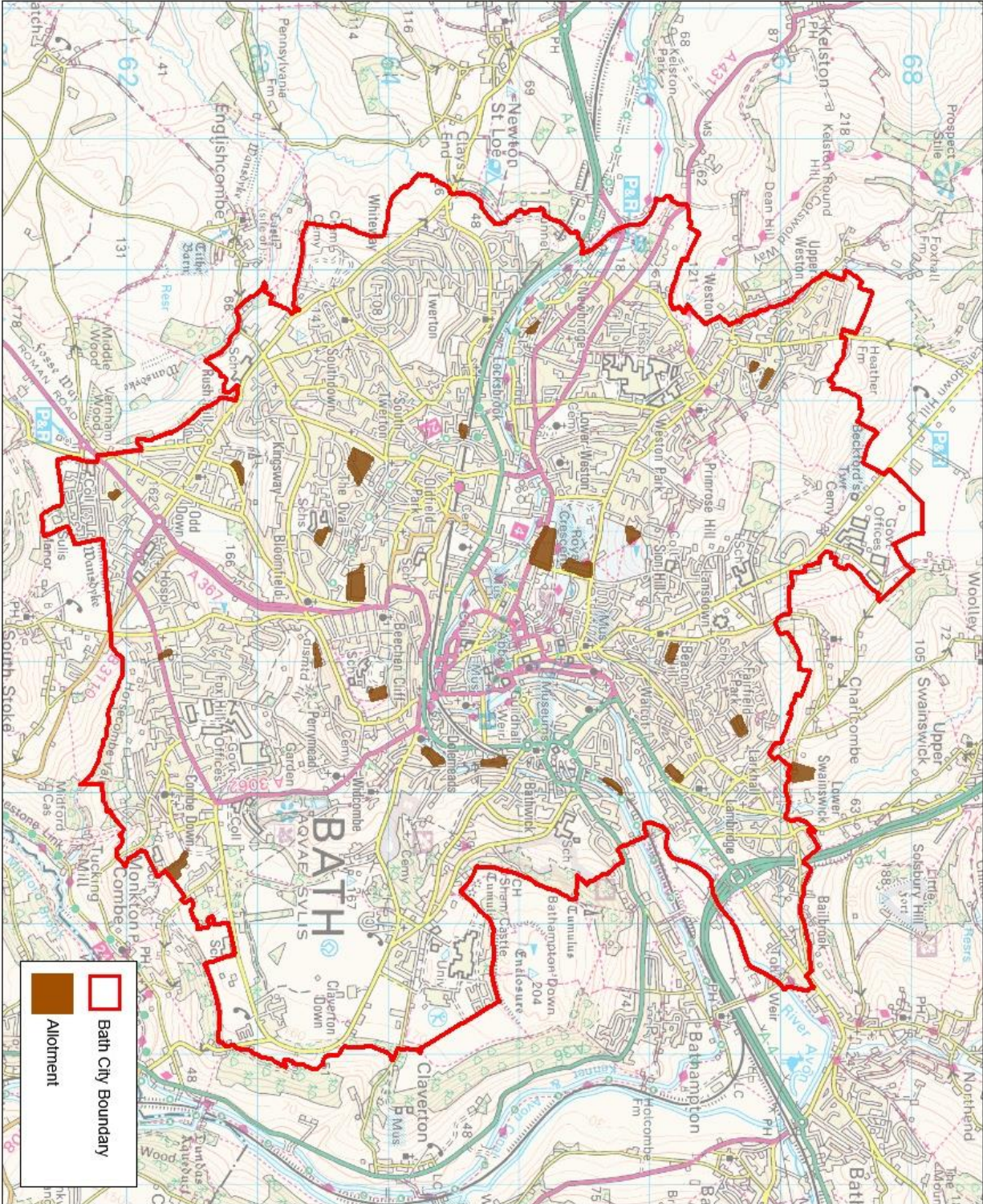
The Allotments service sits within the Parks service, which in turn sits within Neighbourhood Environmental Services. This plan has been developed as a way to improve management of the Allotments service, and has been developed in consultation with Bath & North East Somerset Allotment Association.

There are 42 allotment sites across Bath & North East Somerset, and the Council is responsible for 23 of those. All Council sites are all located within the City of Bath (as shown on the map overleaf), which amount to around 1130 plots in total. Allotments elsewhere in the area are managed by bodies such as Town & Parish Councils and social housing organisations. While this document has been developed for the Council's Bath City allotments, it is hoped that the quality standards set out here will impact upon allotment management throughout the district.

The plan's key aim is to maximise participation in allotment gardening. The Council recognises the importance of allotments as a leisure and recreational facility - they benefit the health and wellbeing of communities, green spaces and wildlife, and are a means of producing low cost locally produced food in a sustainable way.

This plan sets out to achieve a high quality service provision over the next 5 years, and beyond. It has been decided that it should initially be a 5 year Plan (with possible extension), as many of the targets set are dependent upon available finances. This is also to ensure that it remains current with regard to policy and recognised good practice.

It is intended that the Allotment Management Plan will link as a sub-strategy to the wider Parks and Green Spaces Strategy, Green Infrastructure Strategy, and the B&NES Local Food Strategy (a draft version of which is included in the Appendix).



SECTION 2: AIMS & OBJECTIVES

2.1 AIMS

Bath & North East Somerset Council's ***vision for allotment provision*** is:

to provide, facilitate, improve and maintain well-tenanted allotments, managed in an open and accountable manner.

The Council aims to maximise opportunities for its residents to enjoy the experience and benefits that allotment gardening can bring, and recognises that allotments have an important role to play in promoting local food production.

In the emerging Core Strategy, new allotment provision is proposed to be funded through developer contributions (Policy CP13), particularly within strategic site allocations (at Odd Down, Keynsham East and South West and Whitchurch). Policy CF.8, which protects allotments and land last used for allotments, is one of the policies saved from the Adopted Local Plan 2007, and is due to be superseded by 2016 by policies SCR 8 and 9.

This Management Plan is intended to set a standard for the supply of allotments, to improve the standard of service provision, and to consider the demand for allotments both now and in the future. It is important to maintain a strategic direction, a continuing and evolving sense of what is to be achieved and to be able to explain the agenda to others including raising awareness of the benefits of allotments for all.

2.2 OBJECTIVES

The following objectives form a 'good allotment charter' for allotment management in the City of Bath.

2.2.1 To provide enough allotments

The Council has a statutory duty under the Small Holdings and Allotments Act to provide allotments where there is a demand.

This plan aims to ensure adequate allotment provision in Bath. This will be achieved by creating new allotment sites; by retaining and protecting existing sites where possible, and expanding those where possible; by maximising tenancy levels on all sites; and by negotiating with developers in an attempt to ensure that any new developments result in provision of new allotment facilities.

Key action areas:

- Identify, select and secure new sites.
- Retain existing sites where possible, expand them where possible.
- Maximise tenancy levels on all sites.
- Aim to ensure that new developments in the area result in an appropriate net increase of allotment plots, encourage allotment sites within existing developments, protect boundaries on existing B&NES Council plots.

2.2.2 To provide high quality allotments

This plan aims to ensure that all new allotment sites are designed to a high standard - promoting environmental sustainability, biodiversity, accessibility, landscape character, community cohesion, safety and security.

A high standard will be achieved by applying design criteria to all new sites, and by developing site management plans for all sites (working closely with allotment holders and their representatives).

It is also intended that any shortfalls where existing sites are concerned should be addressed where possible, and that environmental sustainability should be promoted across the board.

Key action areas:

- Apply design standards to all new sites to promote environmental sustainability, biodiversity, accessibility, landscape character, community cohesion, safety and security.
- Develop site management plans, working with allotment holders and their representatives .
- Promote environmental sustainability on existing sites.

2.2.3 To ensure good management and administration

This plan aims to ensure that allotment management is effective, efficient and equitable.

Key action areas:

- Provide a fair and equitable lettings policy.
- Provide a high quality management and maintenance system.
- Promote self management.

2.2.4 To secure resources

The Council aims to maintain a forward programme of investment in new plots, improved infrastructure and maintenance, and sufficient staffing to optimise management and maintenance. These aims are subject to available resources, but both internal and external.

Key action areas:

- Draw up a detailed budget and financial plan.
- Maximise resources.
- Work in partnership with others where possible, to secure additional funding.

2.2.5 To increase access to other forms of food growing

The Council aims to increase local food growing spaces, in line with its Local Food Strategy planning policies (a draft version of which is included in the Appendix).

Key action areas:

- Enable controlled community food growing on Parks and Green Spaces land.
- Maximise opportunities to incorporate edible plants (i.e. fruit trees/bushes) into open and public green spaces.

SECTION 3: ACTION PLAN

3.1 To provide enough allotments						
Key action area	Ref.	Objective	Action	Resource	Responsibility	Timescale
Identify, select and secure new sites.	3.1.1	Monitor demand.	Continue to monitor the highest areas of demand within Bath, to inform the site selection process; and demand overall, to help guide the Council's attempts to meet demand in general.	Staff	Officer with allotments remit	Ongoing
	3.1.2	Select and secure new allotment sites.	Continue to identify potential allotment sites through an audit of land, and maintain existing register of sites with potential for use as allotment sites. All new sites must be deemed suitable in accordance with the site selection criteria (draft version of this included in the Appendix).	Staff	Officer with allotments remit, Property Services, Sustainability	Ongoing
	3.1.3	Develop new community allotment site at Fairfield Park.	Continue to work with local residents to move this forward.	Staff	Officer with allotments remit, Property Services	Ongoing
	3.1.4	Explore opportunities for allotments on private land.	Work with partner organisations and land-owners.	Staff	Officer with allotments remit	Ongoing
	3.1.5	Work with Parish Councils to promote and develop allotment sites.	Provide guidance as requested.	Staff	Green Infrastructure Team	As requested

Retain existing sites, expand them where possible.	3.1.6	Retain existing allotments.	Incorporation of CF.8 policy into the Placemaking Plan.	Staff	Planning	Year 1
	3.1.7	Identify opportunities for allotment expansion on existing sites.	Expand where possible.	Staff, Budget	Officer with allotments remit	Ongoing
Maximise tenancy levels on all sites.	3.1.8	Offer a range of plot sizes.	Aim to include starter “micro-plots” on new sites, to increase capacity and support new growers.	Staff	Planning	Ongoing
	3.1.9	Split large plots.	Split plots on existing sites when oversized plots become vacant (standard plot size is 125sqm, plots 200sqm or more considered to be oversized), and promote the splitting of plots when new growers take on plots.	Staff	Officer with allotments remit	Ongoing
	3.1.10	No longer allow more than one standard sized plot per tenant.	Any new requests for additional plots to be refused, unless it is deemed appropriate on the basis that the tenant is on a site with a significant number of vacant plots.	Staff	Officer with allotments remit	Ongoing
Aim to ensure that new developments in the area result in an appropriate net increase of allotment plots, encourage allotment sites	3.1.11	Maximise the investment potential from new developments.	Work with developers to encourage the provision of on-site allotments.	Staff	Planning Officer, Officer with allotments remit	Year 2

within existing developments, protect boundaries on existing B&NES Council plots.	3.1.12	Seek to ensure that all opportunities for collection of developer contributions, via planning approvals and S106 agreements etc, are exploited.	Seek to ensure that developers to carry out land purchase themselves if not making provisions on site, for all new major development sites.	Staff	Planning Officer, Officer with allotments remit	Year 2
	3.1.13	Encourage private landowners to establish non-statutory allotment sites.	Refer private landowners to the Allotments Regeneration Initiative for guidance on the design of allotment sites.	Staff	Officer with allotments remit	Ongoing
	3.1.14	Prevent encroachment onto allotment sites from neighbouring properties, and erosion of boundaries.	Coordination with Property Services, to stop encroachment by neighbouring properties or unauthorised access, keep boundaries clearly defined (as defined through Land Registry).	Staff	Officer with allotments remit	Ongoing

3.2 To provide high quality allotments

Key action area	Ref.	Objective	Action	Resource	Responsibility	Timescale
Apply design standards to all new sites to promote environmental sustainability, biodiversity, accessibility, landscape character, community cohesion, safety and security.	3.2.1	Establish design criteria for all new sites.	<p>Draft design principles below.</p> <p>All new allotments and community food growing spaces must demonstrate sustainable design by:</p> <ul style="list-style-type: none"> • Involving the local community and service users in proposals to accommodate local needs. • Being safely accessible to the local community via foot and cycle, including well overlooked access routes and lighting as appropriate. 	Staff	Officer with allotments remit, Property Services, Planning, Sustainability	Year 1

		<ul style="list-style-type: none">• Providing or being within close proximity to secure cycle parking.• Providing or be within close proximity to parking spaces.• Being well linked into the local green infrastructure network e.g. connecting trees, hedges and planted areas wherever possible.• Supporting biodiversity – e.g. incorporate organic plots/ wildflower borders/ ponds etc.• Promote resource efficiency- e.g. rainwater harvesting/ communal composting etc.• Creating opportunities for inclusive design e.g. raised beds, step-free and handrailed access, wherever possible.• Considerate of local character including landscape and visual impact and residential amenity.• Being secure• Providing communal space e.g. amenity space, picnic space, play space, orchards etc. wherever suitable.		
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Develop site management plans, working with allotment holders and their representatives .	3.2.2	Develop site management plans for every site.	Site management plans will be developed for each allotment site and published on the allotment web site. The plans will be reviewed annually and will include information about site facilities, details of neighbouring land ownership and boundary responsibilities, summer & winter maintenance details, issues requiring resolution and areas for improvement if funds become available.	Staff	Officer with allotments remit, Property Services	Year 1
Promote environmental sustainability on existing sites.	3.2.3	Promote organic gardening.	Encourage and support organic methods of growing. Consideration to be given to designation of more sites as 100% organic.	Staff	All	Ongoing
	3.2.4	Encourage on-site composting.	Promote availability of subsidised compost bins.	Staff	Officer with allotments remit	Ongoing
	3.2.5	Make leaf mould/ composted leaves and woodchip available on sites.	Distribution to be as equitable as possible between the sites as resources and access allow.	Staff	Parks Services Operations	Ongoing
	3.2.6	Encourage micro-generation experiments.	Opportunities for solar and wind power generation, if only to power tools or irrigation pumps, may be beneficial. Potential to be assessed, if and when sufficient budget becomes available.	Staff, Budget	Officer with allotments remit	If and when sufficient budget can be identified

3.3 To ensure good management and administration						
Key action area	Ref.	Objective	Action	Resource	Responsibility	Timescale
Provide a fair and equitable lettings policy.	3.3.1	Review rent, water charges, and discount eligibility criteria annually.	Aim to ensure that tenants on low incomes continue to receive a discount, and that rent and water charges (and service provision) continue to be fair and equitable.	Staff	Parks Services Team Manager	Ongoing
Provide a high quality management and maintenance system.	3.3.2	Increase capabilities of Colony database.	Android module to be implemented, which will improve inspections process. Web module to be implemented, which will allow self service for waiting list applications. Allotments layer on GIS (mapping) system to be updated and maintained in order to supply accurate and presentable maps to tenants etc, and Colony to possibly be linked with GIS system directly. Communities module to be considered, which could be used to facilitate self management.	Staff	Officer with allotments remit, IT	Year 1. Communities module TBC.
	3.3.3	Continue to improve the enforcement process.	Continue to streamline processes where possible, to reduce the number of uncultivated plots/ speed up eviction of tenants who aren't cultivating and thus reduce waiting lists.	Staff	Officer with allotments remit	Ongoing

	3.3.4	Improve communications with tenants.	Response times to be defined and monitored by new CRM system where enquiries come via Council Connect, staff to ensure they adhere to corporate response times regardless of method of contact.	Staff	Officers with allotments remit	Ongoing
	3.3.5	Maximise electronic communications with tenants.	Continue to capture email addresses where possible, and to seek any opportunity to communicate electronically rather than by post. Ensure website is up to date and information provided as robust as possible.	Staff	Officers with allotments remit	Ongoing
	3.3.6	Provide more educational information and support to tenants.	Production of an “Allotment Gardeners Beginner’s Guide”, potential provision of gardening courses/ workshops. Sustainability to assist by signposting etc.	Staff	Allotment Association	Year 2
	3.3.7	Develop strong partnerships with B&NES Allotment Association and site representatives.	Improve liaison and working through the Allotment Forum (see section 4).	Staff	Allotment Forum	Ongoing
Promote self management.	3.3.7	Enable sites to take steps towards self management.	Work with B&NES Allotment Association and site representatives to establish forms of self management where possible and appropriate.	Staff	Officer with allotments remit	Year 1

	3.3.8	Support any site associations wishing to become fully constituted.	Develop template constitution, clearly identifying the roles of the Council and site association in delivering self management.	Staff	Parks Services	Year 2 onwards
3.4 To secure resources						
Key action area	Ref.	Objective	Action	Resource	Responsibility	Timescale
Produce a detailed budget and financial plan.	3.4.1	Make accounts easy to understand.	Present to Forum.	Staff	Parks Services Team Manager	Ongoing
Maximise resources.	3.4.2	Budgeting and expenditure to be reviewed regularly.	Internal reviews, and consultation with the Forum.	Staff	Parks Services Team Manager	Ongoing
Work in partnership with others where possible, to secure additional funding.	3.4.3	Publicise funding opportunities to local community groups.	Groups signed up to Environmental Sustainability Network already receive this info, seek to include more groups and to publicise opportunities more fully.	Staff	Sustainability	Ongoing
	3.4.4	Explore opportunities for grant-funding outside the Council's reach.	Grant funding may be available for facilities/improvements.	Staff	Allotment Association	Year 2/3
3.5 To increase access to other forms of food growing						
Key action area	Ref.	Objective	Action	Resource	Responsibility	Timescale

Enable controlled community food growing on Parks and Green Spaces land.	3.5.1	Develop and publish guidance/ a clear process for the use of Parks and Green Spaces land for community food growing initiatives (not for profit). Respond to proposals and requests from community groups accordingly.	Develop appropriate rules/ guidance with Property Services. Parks Manager already providing guidance, but the idea is for this to become a formalised process.	Staff	Officer with allotments remit, Food Strategy worker, Allotment Association	Ongoing
Maximise opportunities to incorporate edible plants (i.e. fruit trees/bushes) into open and public green spaces.	3.5.2	Grow edible plants where feasible/appropriate.	Officers with allotments remit to ensure that all relevant staff are aware of agenda.	Staff	Parks Services	Ongoing

SECTION 4: MONITORING & REVIEW

4.1 ALLOTMENT FORUM

Effective communication and consultation is an essential component of good practice; the Allotments Forum will have responsibility for affecting this, both directly by its own actions and by monitoring the Council's performance.

The Council will consult on the Terms of Reference for the Allotments Forum, which will define responsibility for monitoring performance, strategic thinking and policy formulation.

Terms of Reference:

Allotments Forum to meet annually.

It will be chaired by the Cabinet member with responsibility for the Environment where possible, or failing that an appropriate member of Council staff.

Its members will include Councillors (numbers in proportion to elected Council), Council officers, allotment tenant representatives, and a representative from the allotment waiting list. Additional expertise may be co-opted onto the Forum.

The Forum will

- *monitor and advise on allotment provision*
- *monitor and advise on the allotment budget and expenditure, and on future requirements for capital investment*
- *receive and consider management reports (including site management plans)*
- *monitor the delivery of this Allotment Management Plan, and fulfilment of the Council's vision for allotments*
- *bring to the attention of the full Council issues of concern relating to allotment provision and management*
- *consider methods of monitoring customer satisfaction*
- *assist in the development of policies for Green Infrastructure, Waste Management, and Climate Change mitigation, in respect of allotments.*

In addition to the **annual public Forum meetings** (intended to take place around **mid-April**), it is intended for **three further Sub-Forum meetings to take place each year between the Allotment Association, Site Representatives and the Council** (intended to take place in **January, July and October** of each year). **Surgery sessions for allotment tenants are intended to take place within those same sessions, immediately following Sub-Forum meetings.** Regularity/nature of meetings to be reviewed annually.

4.2 SITE MANAGEMENT PLANS

Action plans will be prepared by the Council annually, in collaboration with site reps where there are site reps. This will be monitored and progress reviewed by the Allotments Forum.

4.3 MONITORING DEMAND

Between June and December 2014, the average estimated waiting time for prospective tenants dropped from roughly 3 years to 2 years. This was due to a combination of data cleansing (enabled by the new Colony database), and improved administration of the service. The Council hopes that by continuing to improve administration of waiting lists and the service in general, and by restricting tenants to a single plot on existing sites, that this average waiting time will continue to fall. The average waiting time figure will be monitored regularly, to help guide the Council's objective of meeting demand.

The number of plots on Council allotment sites will also be monitored. The splitting of large plots on existing sites, and the creation of starter plots on new sites, will increase the net number of available plots and therefore go some way towards meeting demand. The splitting of plots on existing sites will increase the number of available plots on Council sites, providing an estimated additional 10 plots per year.

4.4 PERFORMANCE MANAGEMENT

This Management Plan will be monitored annually and fully reviewed every five years.

SECTION 5: APPENDIX

5.1 Site Selection Criteria (draft)

Allotments/Community Food Growing Site Selection Criteria

The following criteria will guide the identification of new allotment sites in Bath & North East Somerset by the Council by the Neighbourhood Environment team (in consultation with the Environment Team).

These criteria will also be used by the Neighbourhood Environment Team to assess the suitability of new allotments proposed as part of development schemes through the Planning process (where this is triggered based on the requirements in the Green Space Strategy/Planning Obligations SPD).

A traffic light system is proposed where:

- Red identifies a major issue which is likely to make the site unsuitable/undeliverable
- Amber identifies an issue that is necessary/possible to mitigate or address through design
- Green identifies a positive enhancement opportunity that should be addressed through the design process

Where a constraint can be moved from “red” to “amber” this would represent the removal of a key barrier. All “amber” and “green” items should be taken forward for consideration in the site design and management process.

The criteria are split into four broad questions:

- Is the site deliverable?
- Is the site suitable for productive use?
- Is the site accessible to the area it is intended to serve?
- Is the site suitable for change of use, with appropriate design?

Is the site deliverable?

Category	Site selection options	Service area where relevant information can be obtained:
Ownership constraints	RED Not deliverable e.g. in private ownership where landowner is not amenable/B&NES Council ownership but earmarked for development/another use	
	AMBER Private/B&NES land with potential for allotments/community food growing use in short-medium term (including temporary use)	

	<p>GREEN B&NES/Private land with agreement in principle for allotment use in the short/medium/long term (this could also include land provided as part of a development scheme). Potential for land to be transferred into community/B&NES ownership.</p> <p><i>Evidence of the above should be summarised below:</i></p>	
Current land use	<p>RED Land in current use that should to be retained/protected with no scope to address through design</p> <p>AMBER Land is in current use that could accommodate allotments/community food growing if appropriately designed/or as part of the site</p> <p>GREEN Land has no current use that requires retention/protection and there are enhancement opportunities</p> <p><i>Evidence of the above should be summarised below:</i></p>	
Physical site access	<p>RED Access to the site cannot be secured (i.e. requires access via third party land that cannot be secured/landlocked)</p> <p>AMBER Access to the site is not ideal, but a solution could be possible through design (may include pedestrian/cycle</p>	

	<p>GREEN only access)</p> <p>There is existing suitable access to the site which can be utilised or an enhancement can be delivered.</p> <p><i>Evidence of the above should be summarised below:</i></p>	
<p>Likely timescale of availability</p>	<p>RED Land not likely to be available except in the long term</p> <p>AMBER Land likely to be available in the medium term (5-10 years) or available in the short term (but only as a temporary use)</p> <p>GREEN Land currently available or likely to be available in the short term (potential clashes with the growing.nesting seasons and legal issues need to be taken into account.</p> <p><i>Evidence of the above should be summarised below:</i></p>	
<p>Potential number of plots/level of space</p>	<p>RED Due to limited size of land available/cost of bringing land into use does not justify taking the site forward.</p> <p>AMBER Work to bring forward the land and cost justifies taking forward (even if limited number of plots/non-standard plots or community growing space the only option), further design work</p>	

	<p>needed</p> <p>GREEN</p> <p>Land can provide a number of plots with opportunities for complementary uses e.g. community growing, landscape areas, other green infrastructure benefits</p> <p><i>Evidence of the above should be summarised below:</i></p>	
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Is the site suitable for productive use?

Known previous land use	RED	Unsuitable previous use e.g. land known to be contaminated from previous use, substantial demolition of existing structures/features required, known landfill site
	AMBER	<p>Site has a suitable previous use (e.g. previously a green space), and could accommodate allotments community food growing where appropriately designed</p> <p>Site has recent history as an allotment/agricultural land</p>
	GREEN	<i>Evidence of the above should be summarised below:</i>
Known soil/surface water quality	RED	Unsuitable soil (inadequate/contaminated soil/water present) and no option to utilise alternative methods e.g. raised beds/temporary growing
	AMBER	No known problems with soil, however, land is currently woodland or scrub and poorer quality for growing

		<p>Site has recent history as an allotment/agricultural land</p> <p>GREEN</p> <p><i>Evidence of the above should be summarised below:</i></p>
Availability of utilities	<p>RED</p> <p>AMBER</p> <p>GREEN</p>	<p>No current provision and difficulties/high costs associated with installing new utilities (no other solution identified)</p> <p>Land has some form of water supply/catchment with options for improvement</p> <p>Land has current provision of mains water and other utilities with no need for additional improvements</p> <p><i>Evidence of the above should be summarised below:</i></p>
Water and flood Risk	<p>RED</p> <p>AMBER</p> <p>GREEN</p>	<p>Land is within a known flood risk (including surface water flooding) with no possible/expensive mitigation</p> <p>Any known risks can be mitigated in the short term with improvements (1-5 years) or risk areas can be avoided or dealt with through design</p> <p>Land is at little or no risk from issues arising from water with possible for enhancement opportunities e.g. drainage and run-off</p> <p><i>Evidence of the above should be summarised below:</i></p>
Topography constraints	<p>RED</p>	<p>Land has steep slopes and / or a significant number features (trees, buildings, banks etc.) which warrant the site unsuitable or too costly to bring into productive use (either for allotments or community growing space)</p>

	<p>There is a need for a manageable level of remediation needed on the site/part of the site to bring the land into productive use.</p> <p>AMBER</p> <p>There is limited/no remediation needed to bring into productive use and a good level of sunlight.</p> <p>GREEN</p> <p><i>Evidence of the above should be summarised below:</i></p>
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Is the site accessible to the area it is intended to serve?

Known and latent demand within the area	RED	No current local demand known/oversupply (with no interest from community groups/allotment association to undertake a local demand survey or to generate demand)
	AMBER	Some limited demand known (with interest expressed through a local demand survey/community group/allotment association to take forward/manage). Potential for existing demand to be displaced into the catchment area for this allotment.
	GREEN	Existing known demand/deficit in provision with strong interest from community groups allotment association to take forward.
		<i>Evidence of the above should be summarised below:</i>
Proximity to social housing/flatted development	RED	n/a
	AMBER	n/a

	<p>GREEN Is the site in close proximity to existing or planned social housing and could it provide some allotments/community growing space that could be managed by the RSLs/tenant groups. The site is in close proximity to flatted development where there is limited private garden space.</p> <p><i>Evidence of the above should be summarised below:</i></p>
Pedestrian access/walking distance	<p>RED The site does not have adequate/safe access for pedestrians and cannot be designed to provide this (and cannot provide for specific user groups e.g. specific disability groups). The site is physically detached from the area of need (>30 min walk).</p> <p>AMBER The site can be designed to have adequate/safe pedestrian access. The site is further away from the area on foot (>20 min walk).</p> <p>The site has accessible/safe access for pedestrians and is well located relative to the area of need (<10 min walk)</p> <p>GREEN <i>Evidence of the above should be summarised below:</i></p>
Cycle access/parking	<p>RED The site does not have adequate/safe access or parking for cyclists and cannot be designed to provide this (in addition the site fails to provide for pedestrians adequately).</p> <p>AMBER The site provides safe access for cyclists but does not have scope to provide cycle parking on-site (or nearby).</p> <p>The site provides safe access for cyclists and has scope to provide/support the provision of secure cycle parking nearby which can also be used by local residents/other community</p>

	GREEN	groups. <i>Evidence of the above should be summarised below:</i>
Vehicle access/parking	RED	There is no potential drop-off point on-site or nearby which can serve the site.
	AMBER	There is a potential drop-off point on-site or nearby which can serve the site but there is no publicly accessible parking on-site/within the vicinity of the site (within 200m of the entrance). There is pay and display parking within 200m only.
	GREEN	There is a potential drop-off point on-site or nearby which can serve the site but there is no publicly accessible parking on-site/within the vicinity of the site (within 100m of the entrance). <i>Evidence of the above should be summarised below:</i>

Is the site suitable for change of use, with appropriate design?

Ecological designations / protected species	RED	The site is located within an SNCI, there are known protected or at risk species present on the site and/or there are protected trees and there has been no discussion about the site with the Environment Team to ascertain whether there are mitigation opportunities. Further survey is required to establish whether the site/or part of the site is potentially suitable. Mitigation opportunities have been identified which would be required to be addressed before the site can be deemed suitable for change of use.
	AMBER	

	<p>There are enhancement opportunities identified to provide ecological and other enhancements.</p> <p><i>Evidence of the above should be summarised below:</i></p> <p>GREEN</p>
<p>Landscape/ Archaeological designations</p>	<p>RED The site is, or maybe, part of a valued area of landscape (defined in the landscape policy) and the effect of the proposals have not been assessed or discussed with the Council’s Landscape Architect (Planning/Environment Team).</p> <p>AMBER The assessments and / or discussion with the Planning/Environment Team have identified potential harm to landscape character, views or landscape features but it is considered they can be effectively mitigated</p> <p>GREEN The design of the proposals and the proposed mitigation measures effectively protect and enhance the character, views and landscape features of the site and its surroundings</p> <p><i>Evidence of the above should be summarised below:</i></p>
<p>Neighbour Amenity</p>	<p>RED There is a high risk of unacceptable impacts on neighbour amenity that cannot be addressed through design (e.g. right to light, access to private property is compromised).</p> <p>AMBER There are impact on neighbour amenity that should be addressed through design e.g. boundary treatment, management arrangement</p> <p>GREEN There are positive enhancement opportunities for neighbours e.g. visual improvements, active management of the land, opportunities to take part in community growing schemes or take on an allotment</p>

	<i>Evidence of the above should be summarised below:</i>	
Site security	RED	Is the site considered to be at high risk of vandalism or significant site security issues, with no potential to address through design/management.
	AMBER	Is the site considered to have some risk of vandalism/site security that can be addressed through design/management.
	GREEN	Opportunities exist to design out vandalism and security risks by increasing the use of the site and through design/management enhancements that will benefit the wider area. <i>Evidence of the above should be summarised below:</i>
Complementary use of adjacent space	RED	There is a high probability that there will be space left over which has no active use and is likely to be a cause of future problems, with no potential to address this through boundary treatment/design.
	AMBER	There is a need to design the space to make active use of adjacent space and clearly demarcate public and private spaces.
	GREEN	There are opportunities to co-locate complementary uses on adjacent space such as community food growing, play space or community space/PROW. Improvements etc Land contributes to green infrastructure and is multi-functional. <i>Evidence of the above should be summarised below:</i>

5.2 Local Food Strategy (draft)

B&NES Local Food Strategy 2014 - 2017

Councillor Foreword

“Food is not only essential to survival and health but it shapes our environment and landscapes, underpins our economy, helps build resilient communities and is at the heart of our culture and society.

In Bath and North East Somerset food and farming has always been an integral and important part of our area. We have a diverse food and farming sector, and vibrant community, voluntary and business sectors that have long been active on food issues.

However, nationally and locally, we face some important food-related challenges, such as rising obesity levels, health inequalities, food poverty, food security and the impact of food production and supply on the natural environment, including its contribution to climate change. There are also economic challenges facing some local food and farming businesses.

Bath and North East Somerset Council (B&NES) is committed to providing leadership through the B&NES Environmental Sustainability Partnership (ESP) to support local action on

these issues and to contribute to improving the health and wellbeing of our residents, to supporting a thriving local food economy, and to reducing our impact on the environment and climate. For these reasons, the B&NES ESP has overseen the development of the B&NES Local Food Strategy to help us to rise to these challenges.

The importance of healthy and sustainable food and the need for a food strategy is now greater than ever. We are confident that, by working in partnership, the delivery of the B&NES Local Food Strategy will help to drive significant change to improve the health of our communities, the environment, both here and more widely, and the local food economy.”

Councillor Paul Crossley: Leader of Bath and North East Somerset Council

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Section 1: Executive Summary

i) Vision

Bath and North East Somerset is a place where everyone can access good quality, safe, affordable food and enjoy a healthy diet, with more locally produced food that sustains the environment and supports the local economy.

In particular we want to reduce diet-related ill health and inequality, reduce the local environmental impacts of food production and supply including its contribution to climate change, increase food security and support a strong and prosperous food economy.

We want Bath and North East Somerset to be a place where good quality food is widely provided, celebrated and promoted and where everyone has the opportunities to develop food related skills and to reconnect with food and where it comes from.

ii) Purpose of the B&NES Local Food Strategy

The B&NES Local Food Strategy provides a framework for action that encompasses social, economic and environmental sustainability in a coherent and coordinated manner.

The strategy has been designed to bring together the full range of current food activities and to identify future opportunities within a single strategic framework, enabling greater co-ordination, cross-fertilisation and closer working between partners and stakeholders across the local authority.

It is the intention that this more integrated approach will increase the opportunities for our strategic ambitions to be realised, working in partnership with public sector organisations, food and farming businesses, the voluntary sector and local communities.

iii) Why do we need a local food strategy: The Evidence

The negative impacts of food and diet on health, the environment and the local economy are well evidenced in local and national data:

Health and wellbeing impacts:

The B&NES Joint Strategic Needs Assessment tells us that:

- 56% of adults are obese or overweight.
- 23% of reception aged children are obese or overweight - higher than the UK national average.
- In 2010 overweight and obesity in B&NES cost the NHS £45.8 million - a figure set to rise to £49 million by 2015.

- Poor diet and unhealthy weight disproportionately affects children living in more deprived areas or from a black or ethnic minority background.

Environmental sustainability and food security impacts

Local and national data tells us that:

- The global food sector accounts for between 14-30% of global greenhouse gas emissions (Vermeulen *et al.*, 2013).
- The UK imports approximately 47% of total food products potentially leaving us vulnerable to disruptions in global food supply and contributing to carbon emissions associated with food transportation, refrigeration and packaging (DEFRA, 2013a).
- 70% of B&NES land is in agricultural use providing significant opportunities to upscale local food supply and reduce reliance on imports.
- Food supply in B&NES depends heavily on transport fuels and petroleum-derived agrochemicals and is therefore vulnerable to peak oil, and contributes significantly to climate change (Local Climate Impact Assessment 2011).
- A third of all food produced in the UK is wasted (FAO, 2013).

Economic impacts

Local and national data tells us that:

- Full-time agricultural employment in B&NES has decreased by more than half between 2000 and 2010 (DEFRA, 2010).
- Domestic food expenditure in Bath and North East Somerset is around £382m/yr (DEFRA, 2013d). More of this could be retained in the local economy.
- Expenditure on local food generates an economic return of £3 for every £1 spent contributing to the local multiplier effect (Orme *et al.*, 2011).
- Public interest in healthy and local food is high with 81% of residents stating that they are willing to buy more locally-produced food to reduce carbon emissions (B&NES Council, 2009).

iv) Local Food Strategy Delivery Themes

The food strategy is structured around three delivery themes which have emerged from discussions across the key partnerships and with stakeholders across the community (See appendix 2).

The delivery themes are:

- Theme 1: Local food production
- Theme 2: Food provision and access
- Theme 3: Healthy and sustainable food culture

Theme 1 is about increasing opportunities for local and sustainable food production and supply to increase food

security, reduce carbon emissions and environmental degradation and to promote economic opportunities for local food and farming businesses.

Theme 2 is about increasing access to, and provision of, good food in B&NES including in public sector and private sector organisations, by improving the local food retail offer and by supporting low income residents to access good food. It aims to make the good food choice the easiest choice for citizens to make.

Theme 3 is about promoting and developing a healthy and sustainable food culture to increase the demand for healthy and sustainable food. It aims to raise the profile of good food, increase engagement in sustainable food behaviours and increase opportunities for people to cook from scratch, grow their own, celebrate food, and develop food related skills that enable them to make informed food decisions and to improve their diet.

v) Meeting local targets

The need for a B&NES Local Food Strategy arose from the synergy between the Environmental Sustainability Partnership objectives to reduce carbon emissions and environmental impacts from the food sector and the Health & Well-Being Board (HWB) objectives to reduce diet-related ill health and inequality. In addition, the importance of a thriving local food

economy to local economic well-being is included in the new Economic Strategy.

The B&NES Local Food Strategy will help to meet district wide targets set out in the Environmental Sustainability and Climate Change Strategy and the Joint Health and Wellbeing Strategy (See table 1):

- The Environmental Sustainability and Climate Change Strategy sets out a framework to reduce greenhouse gas emissions across the district by 45% by 2026. It includes nine work-streams to help achieve this – one of which focuses on up-scaling local and sustainable food production and supply.
- The Joint Health and Wellbeing Strategy sets out a framework to improve health and reduce inequalities including diet-related health and obesity. It includes eleven priorities including the “healthy and sustainable places” priority which includes objectives to increase the production and consumption of local food.

vi) **Table 1: Examples of how the local food strategy will contribute to priorities outlined in the Health and Wellbeing Strategy and the Environmental Sustainability and Climate Change Strategy**

<u>Health and Wellbeing Strategy Priorities</u>	<u>Environmental Sustainability and Climate Change Strategy Priorities</u>
<p>Improve health and wellbeing and reduce inequality</p> <ul style="list-style-type: none"> • Supporting more people to access, afford and choose good quality, healthy food can enhance the consumption of good food and improve dietary health. • Supporting more people to develop skills in food growing and cooking will equip them with the knowledge, skills and confidence to prepare healthy meals. 	<p>Reduce B&NES Contribution to GHG emissions</p> <ul style="list-style-type: none"> • An increase in local and sustainable food production can reduce GHG emissions associated with long-distance food transportation and energy-intensive food production. • Reducing and recycling food waste reduces GHG emissions caused by the break-down of waste food in land-fill.
<p>Improve jobs, skills and employment</p> <ul style="list-style-type: none"> • Up-scaling local food production and supply can provide a fairer economic return for local producers and stimulate new jobs in food processing, distribution and retail sectors, contributing to income growth and containment and job creation. • Supporting the establishment of direct-selling initiatives such as farmers markets, and seeking market opportunities for local food in a wider range of outlets provides economic opportunities to local food and farming businesses and contributes to the local multiplier effect. 	<p>Reduce the impacts of emergencies likely to arise from climate change and peak oil</p> <ul style="list-style-type: none"> • Climate change and peak oil are predicted to impact negatively on global food systems. Local and sustainable food production and supply improves long-term food security and can enhance our resilience to shocks and shortages in global food supply chains.
<p>Create healthy and sustainable places</p> <ul style="list-style-type: none"> • Local and sustainable food production, including community food growing can reduce B&NES's contribution 	<p>Maintain and enhance our natural environment and wildlife and realise the wide benefits of green infrastructure.</p> <ul style="list-style-type: none"> • The use of sustainable farming methods can reduce the

<p>to GHG emissions, decrease negative environmental impacts, increases food security and generates an increase in community food growing and associated health benefits.</p> <ul style="list-style-type: none"> • 	<p>negative environmental impacts of farming, helping to increase biodiversity and improve the quality of natural resources.</p> <ul style="list-style-type: none"> • Improving opportunities for community food growing can contribute to biodiversity, green infrastructure networks and enhance the natural environment.
<p>Increase the resilience of people and communities</p> <p>Engaging people in communal activities associated with food such as cooking and growing can contribute to community cohesion and social engagement. There is a portfolio of academic evidence that associates communal food-related activity with mental and physical health benefits, including social activity.</p>	

vii) Implementing the strategy

The B&NES Local Food Strategy sits beneath the high-level B&NES Environmental Sustainability and Climate Change Strategy 2012-2015 and is overseen by the B&NES Environmental Sustainability Partnership (ESP) Board. The strategy has been produced at a time of financial uncertainty for many of the agencies involved. Effective implementation will only be achieved if we are clear about our priorities and about the best ways to support and facilitate action within resource constraints. The following delivery approaches are designed to enable coordinated and effective action within this context and will be applied to each of the three delivery themes.

- **Partnership working: Bringing together the right people to make things happen.** The successful delivery of the strategy will be dependent on co-ordinated action and strong working relationships across sectors. We will work with and facilitate partnership working between: public sector organisations, parish and town councils, food, farming and retail businesses, landowners and advisory groups, the voluntary and community sector and individuals and organisations working in the food sector.
- **Community enablement: Enabling residents and community groups to achieve their health and**

sustainability aims. There are existing examples of community action to build upon, including community food groups, cookery clubs and community food-growing projects. We will continue to support local community groups and individuals working on food issues that contribute to delivery of the strategy. We will facilitate coordination and the sharing of experience and resources to increase community capacity.

- **Leading by example: Bold action from the Council and our B&NES ESP & HWB partners.** The Council and other public sector organisations will provide the leadership to effectively deliver the B&NES Local Food Strategy. These organisations will champion the B&NES Local Food Strategy at a strategic level and will drive positive change within their organisations providing exemplars of good practice.

viii) Action Planning

Action will be planned against the three delivery themes of the strategy. For each delivery theme, the action plan will include existing and potential future action points and will encompass the above delivery approaches. A proposed B&NES Local Food Partnership will further develop the action plan and provide the day to day monitoring of its implementation, overseen by the B&NES ESP Board.

ix) Glossary of Terms

“Good food” is the over-arching term used to describe the type of food that we are aiming to promote in Bath and North East Somerset. Our definition of good food is used widely across the UK and was coined by the Bristol Food Policy Council:

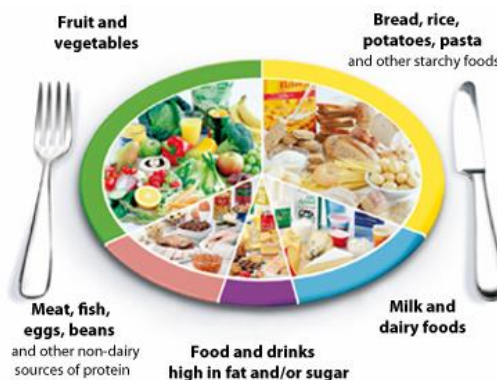
Good Food: “As well as being tasty, safe, healthy and affordable the food we eat should be good for nature, good for workers, good for local businesses and good for animal welfare.”

Community: The population of Bath and North East Somerset, including, but not limited to, distinct community groups and members of the population with a specific interest in food, farming and/or health.

Direct Selling Initiative: A form of direct food retail between food producers and consumers. Examples include farmers’ markets, box-schemes and farm-shops.

Farmers Market: A retail market at which farmers and food producers sell products directly to consumers.

Healthy Food: There is no legal definition of healthy food. When it comes to a healthy eating, balance is the key to getting it right. This means eating a wide variety of foods in the right proportions, and consuming the right amount of food and drink to achieve and maintain a healthy body weight. The NHS guidance for a healthy diet is based on the “eat-well plate” which demonstrates the ratios for different food groups and suggests that the majority of the diet should be made up of fruit and vegetables, bread, rice, pasta and other starchy foods. The health benefits of fruit, vegetables and fish are particularly well-evidenced and therefore ample quantities should be incorporated as part of a healthy diet. It is important to note that the evidence around healthy diet is constantly evolving and the official NHS dietary guidance could be subject to change.



Intensive farming: Energy intensive farming systems based on a high-input- high output model. Intensive farming is

characterized by a low fallow ratio and the heavy use of fertilizers and pesticides relative to land area.

Local Food: Food that is produced, processed, distributed, traded and sold within a 30 mile radius of Bath and North East Somerset.

Local Multiplier effect: The local multiplier effect refers to the greater local economic return generated by money spent at locally-owned businesses due to the retention and recirculation of money within local economies.

Organic Food: Food that is produced without the use of chemical fertilizers or pesticides.

Sustainable production: Agricultural and food production systems that enhance and sustain the agricultural resource base over the long term including air, water and soil quality, biodiversity, landscape character and climate. Examples of sustainable food production methods include low agro-chemical use, the provision of wildlife habitat space, improvements to energy efficiency, effective soil and water management and the practice of high animal welfare standards.

Section 2: The need for a local food strategy: The evidence base

This section outlines the evidence that underpins and informs the strategic approach (as outlined by the strategy delivery themes; Section 3).

An outline of the key food related issues and causes, potential solutions and the recommended B&NES response are provided in relation to

- Health, wellbeing and equality
- Environmental sustainability and food security
- Strong and prosperous local food economy

i) Health, well-being and equality

What are the issues?

After tobacco, diet and physical activity have the greatest impact on UK health (WHO, 2002). Unhealthy diets are characterised by high intakes of fat, sugar and salt, and low intakes of fruit, vegetables, fibre and oily fish. The consumption of unhealthy diets has contributed to a significant rise in obesity in B&NES and is a major risk factor for chronic

diseases including diabetes, stroke and some cancers (WHO 2002).

Diet related ill-health and inequalities in B&NES

In B&NES over half (55.7%) of adults are estimated to be obese or overweight, which is lower than the UK national average (B&NES Council, 2014). However B&NES has a higher than national average of reception-aged children who are obese or overweight (23%) and therefore addressing childhood obesity is a particular priority for our district (B&NES Council 2014). Elderly people are also vulnerable to diet-related ill-health and suffer disproportionately from malnutrition (B&NES Council 2012).

Diet-related health inequalities are apparent in B&NES with poor diet and unhealthy weight disproportionately affecting residents who live in areas of multiple deprivation and children who are from a black or ethnic minority background (See appendix 6). People living on low incomes in B&NES are also more likely to formula feed their babies and wean earlier than 6 months - a behaviour which is associated with elevated weight gain in infants.

What are the key causes of unhealthy diets? Analysis of the evidence

The reasons why people eat unhealthy diets are complex and are associated with issues relating to food *accessibility, affordability and culture*.

Affordability

In B&NES people living on a low income tend to have diets that are less healthy than people living on higher incomes (JSNA, 2014). This trend is related to “food poverty” which is the inability to access or afford foods that make up a healthy diet (See appendix 6). Rising food prices, inadequate provision of healthy and affordable food options, and a lack of access to finance, transport, cooking skills and facilities are all factors that contribute to food poverty and unhealthy diets (Maslen *et al.*, 2013).

Accessibility

The accessibility and provision of healthy and unhealthy food can also influence peoples’ dietary choices and their ability to easily access good food. Some rural and urban communities in B&NES have little or no food retail provision which could potentially affect residents’ ability to access good food, particularly if they have no means of private transport and infrequent bus links (See map: appendix 5).

Although research into the link between food availability and diet is relatively undeveloped some academic studies suggests that low healthy food retail provision and high unhealthy food provision (such as fast food takeaways) are associated with poor dietary behaviours (Caldwell *et al.*, 2009; Zenk *et al.*, 2009). In B&NES there are approximately 116 fast food takeaway outlets with an average of 52-63 outlets per

100,000 population (See map appendix 6). This is lower than the UK national average of 77 fast food takeaways per 100,000 population (See appendix 6).

Food Culture: Cooking, knowledge, skills

The causes of unhealthy diets and obesity are also linked to shifts in food culture. Over the last decade there has been an increasing trend towards the consumption of fast food, pre-prepared, convenience food products and a decline in cooking from scratch (Grinnel-Wright *et al.*, 2013; Ute, 2013).

Evidence from Change For Life suggests that 96% of households use pre-prepared foods (e.g. pizza, chicken nuggets) and only 16% cook from scratch every day (Ute, 2013).

This shift in consumer behaviour is not only associated with a rise in obesity, but it has contributed to a national decline in cooking ability, with 1 in 6 people lacking the skills, confidence and ability to cook and prepare meals from scratch affecting their ability to feed themselves healthily and affordably (Good Food 2011; Short, 2003). Evidence suggests that the reasons for these trends are associated with increased time constraints, shifting family priorities, the effect of food advertising, an increased availability of pre-prepared foods and decreased opportunities for cooking skill acquisition both within the home and public-sector educational organisations (Chenhall, 2010).

What are the potential solutions to improve diet-related health and equality? Analysis of the evidence

Adopting approaches that address the key causes of poor diets, i.e. food accessibility, affordability and culture will act to improve diet-related health and equality.

Improve the accessibility and affordability of good food:

Food accessibility and affordability can significantly influence food choice and dietary quality. For example, studies suggest that people living in areas with shops and markets selling a wide range of affordable, fresh produce eat more fruit and vegetables than those living in areas with a limited range or supply (Cadwell *et al.*, 2009). Ensuring that communities have access to healthy, fresh food within easy walking distance of where they live, and improving the retail offer of fresh, healthy and affordable food is important to improving food accessibility and to encourage people to eat healthier diets.

Enhancing the provision and availability of good food in a wider range of public organisations and businesses, such as schools, workplaces, catering and retail establishments can also help to improve the nutritional intake of their users and increase access to healthier food.

Encourage a healthy and sustainable food culture: Education, knowledge and skills

Evidence suggests that raising awareness of good food and a healthy diet and improving opportunities for people to develop skills in cooking and growing helps drive positive behavioural change and enables people to make informed and responsible food choices, equipping them with the skills needed to prepare healthy and affordable meals (Hartmann *et al.*, 2012).

Cooking from scratch and food growing is linked to higher fruit and vegetable consumption, skill development and cost savings and therefore further opportunities should be provided for food-related skill development to drive behavioural change and to address issues associated with food affordability (Grinnel-Wright *et al.*, 2013; Hartmann *et al.*, 2012; Reese, 2012). There is a clear need for education on healthy eating, food systems and cooking and growing skills to equip people with the skills and knowledge to make healthy and sustainable food choices.

The B&NES response to improving health and equality

The B&NES Local Food Strategy will create the framework for action to reduce diet-related ill-health and inequality in Bath and North East Somerset by addressing the key causes of poor diet i.e. accessibility, affordability and culture. In particular, the framework will include action to enhance the

provision of good food in a wider range of organisations and businesses to improve food accessibility and will inform action to address food poverty to enable low income groups to afford good food. The strategy framework will include action to improve food culture by increasing opportunities for local people to develop food related knowledge and skills, building on existing work with families and schools and by co-ordinating communal events that promote good food to the public and by providing more community food growing space and opportunities for people to reconnect with local producers.

ii) Environmental sustainability and food security

What are the issues?

People are aware that the food they eat affects their health, but what is less well known is the impact producing, processing and distribution has on the world's resources and environmental quality. The global food system has a huge environmental impact. It accounts for between 14-30% of global greenhouse gas emissions, generates an enormous amount of waste and pollution, and contributes to the degradation of natural resources such as air, water and soil quality, wildlife and biodiversity (Vermeulen *et al.*, 2012).

What are the key causes of environmental degradation and food insecurity?

The key causes of food-related environmental impacts and food insecurity are associated with intensive food production methods, food transportation and food waste:

Food Production

Although green-house gas emissions are generated from all stages of the food supply chain, the majority of emissions (80-86%) are associated with food production (Vermeulen *et al.*, 2012). Energy-intensive production methods including the use and manufacture of agro-chemicals, inefficient soil management that releases rather than absorbs greenhouse gas emissions, slurry storage and factory farming of animals are major causes of GHG emissions and contribute significantly to climate change, water pollution, soil erosion, biodiversity loss and poor animal welfare (Bellarby *et al.*, 2013; DEFRA, 2013b). Livestock's contribution to climate change is particularly significant accounting for up to 18% of food system GHG emissions (FAO, 2006).

As well as contributing to climate change, food production systems are, in turn, vulnerable to climate change impacts; The Intergovernmental Panel for Climate Change (2014) predicts negative impacts on food production as a result of the increase in extreme weather events such as flooding and heat waves, threatening global food security (IPCC, 2014).

Food Transportation

The impact of food transportation on the environment and climate change is also significant: The UK is heavily dependent on imported food, currently importing 47% of total food products, and 95% of fruit (DEFRA 2013a). The majority of this food is distributed via centralised supply networks and is processed, manufactured and retailed by large multi-national companies. Current food transportation contributes to air pollution, traffic congestion and GHG emissions with food transport in the UK, for example, accounting for 19 million tonnes of carbon equivalent emissions in 2002 (Vermeulen *et al.*, 2012). The UK's reliance on imported food threatens future food security as our ability to import sufficient quantities of food in the future is vulnerable to climate change, peak oil, rising world population, shifting dietary preference for meat and dairy and increased price volatility.

Food Waste

Other major environmental impacts of the food supply chain are associated with food waste and food packaging: In the UK approximately 30% of all food produced is wasted along various stages of the food supply chain (FAO, 2013). Not only is food waste a huge waste of money and resources, but food that is diverted into landfill produces methane - a powerful greenhouse gas that contributes to climate change (Bingemer and Crutzen, 1987; FAO, 2013).

What are the potential solutions to improve environmental sustainability and food security?

Adopting approaches that address unsustainable food production, supply, consumption and disposal will act to improve environmental sustainability and food security. The following recommendations will inform the B&NES strategic approach as outlined in the strategy delivery themes (See section 3).

Encourage sustainable food production

The use of sustainable production methods can significantly reduce environmental impacts associated with the local food sector (DEFRA 2013c). Approximately 70% of land in Bath and North East Somerset is in agricultural use and therefore environmental stewardship of land by farmers is incredibly important to provide environmental outcomes for the landscape such as climate regulation, flood mitigation, soil fertility and biodiversity provision. Sustainable food production methods, including low agro-chemical use, the provision of wildlife habitat space, improvements to energy efficiency, effective soil and water management and high animal welfare standards, will help to create farm systems that are healthy, robust and resilient to future changes in climate.

Encourage local food production and supply

Up-scaling local food production and supply can contribute to local food security and resilience whilst decreasing GHG emissions, pollution and congestion associated with long-distance transportation. Increasing provision of community

food growing space, protecting local food infrastructure and seeking market opportunities for local food are all examples of action to increase local food production and supply.

Reduce food waste and packaging

Supporting residents, businesses and organisations to reduce food waste and food packaging will reduce GHG emissions and environmental impacts associated with food waste.

Encourage a sustainable food culture

Evidence suggests that many people in the UK are disconnected from food production systems and supply chains and as a result know very little about where food comes from, how it is produced and its impact on human health and the environment (Clonan *et al.*, 2010; Duffy *et al.*, 2005). There is a clear need for education on food systems to increase demand for local and sustainable food.

The B&NES response to improving environmental sustainability and food security

The B&NES Local Food Strategy will create the framework for action to reduce the global and local environmental impacts of food production, supply and disposal and to increase food security within the context of climate change, through increasing local food production and supply, supporting sustainable food production in Bath and North East Somerset

and by continuing to support residents and organisations to reduce food-related waste including food packaging. Facilitating a joint approach to local food supply chain development, implementing environmental standards in public sector food contracts and increasing the provision of community food growing space are examples of action to improve environmental sustainability and local food security.

iii) Strong and Prosperous economy

What are the issues and key causes of economic decline?

The agri-food sector, including food production, processing, manufacture and retail, is an important component of the UK economy, employing approximately 12.5% of UK workers (Food Ethics Council, 2009). However, current food system trends including food importation, rising agricultural input prices and a consolidation in food retail has had detrimental impacts on many small and medium sized food businesses across the UK as they face increasing pressure and competition from large and/or international businesses (Lang, 2009). As a result, the UK has seen wide-scale agricultural decline and the disappearance of local abattoirs, processors and independent food retailers.

In B&NES there are approximately 399 farm businesses and an estimated agricultural labour force of 909 people (Note: this data does not include businesses that fall below the VAT

threshold) (DEFRA, 2010). The health of the agricultural sector in B&NES has worsened over the past 2 decades with full time agricultural employment declining by more than half between 2000 and 2010 (See appendix 4). Agriculture has had a fundamental influence on the rural economy and the character of rural landscapes and its current problems raise long term implications for the food and farming economy as well as rural poverty.

What are the potential solutions to improve economic and job opportunities in the food and farming sector?

Adopting approaches that support local businesses and enhance trade of local food will help to support a strong local food economy. The following recommendations will inform the strategic approach as outlined in the strategy delivery themes (See section 3.)

Increase trade of local food

Increased trade of local food could provide multiple economic benefits; It generates income growth for food and farming businesses, helps to create new jobs in local food processing and distribution and retail trades, and contributes to the local multiplier effect where money is retained and circulated in the local economy (Kneafsey *et al.*, 2013; Orme *et al.*, 2011).

An example of the economic benefits of local food is provided in the Food For Life 2011 report which found that increasing school meal spend on local, seasonal ingredients generated an economic return of £3 for every £1 spent, contributing to local income growth and containment and the creation and retention of jobs (Orme *et al.*, 2010). Furthermore there is strong community interest and engagement in local food with 81% of residents stating that they would be willing to buy more local food to help reduce carbon emissions (B&NES Council 2009).

Support local food and farming businesses

Championing and supporting local farming, distribution, processing, retail and catering businesses can contribute to income growth and enable them to prosper. Examples of successful initiatives to support local businesses include: championing local independent businesses, encouraging people and businesses to “buy local”, raising awareness of local food and influencing policy making to better support local business.

The B&NES response to providing a strong and prosperous economy:

The B&NES Local Food Strategy will create the framework for action to stimulate economic opportunities in the food and farming sector and to contribute to a prosperous food and farming economy in Bath & North East Somerset. In particular

the framework will include action to seek market opportunities for local food in a wider range of businesses and public sector organisations, facilitate local food supply chain development, raise the profile of local food and contribute to skills, jobs and development opportunities in food, catering and farming sectors.

Section 3: Strategy Delivery Themes

The B&NES Local Food Strategy is structured around three delivery themes. Each delivery theme identifies action needed to achieve our strategy vision. An action plan will be developed accordingly.



Delivery Theme 1: Local Food Production

Local Food Production

Encourage
sustainable
food
production

Support the
development of
the local food
supply chain

Improve
opportunities
for community
food growing

Introduction:

This theme sets out a framework for action to support and encourage more local and sustainable food production and supply in Bath and North East Somerset to increase food security, reduce the negative environmental impacts of the local food sector and to support local food and farming businesses.¹ An overview of the agricultural sector in B&NES is provided in appendix 4.

Objectives:

- To increase the amount of food that is produced, within B&NES.
- To increase the environmental and ethical standards of locally grown food, particularly to reduce green-house-gas emissions.
- To increase the amount of locally produced food that is distributed and sold locally.
- To increase the amount of community food growing space across the district such as allotments, community gardens and communal orchards.

Action:

(i) Encourage sustainable food production

Effective environmental stewardship of agricultural land is essential for good environmental outcomes for our landscape. In B&NES there are many examples of

¹ Note: The distance travelled by food, whilst significant, is not the only measure of foods' environmental impact and other factors' such as production methods and storage are important. This delivery theme addresses ways in which we can localise food production and supply, but only where it provides environmental, social and economic benefits and contributes to a sustainable food sector that provides wide diversity and choice.

good farming practice, however there are some pockets of land, including in the Bath World Heritage Site, that are in poor condition and therefore co-ordinated action is needed to further support sustainable food production.

Current examples of good practice:

- Approximately 62% of farmers in B&NES are enrolled in agri-environment schemes. These are funding schemes to support farmers to manage land to high environmental standards.
- There are a number of locally active advisory bodies, farming organisations, charities and government agencies that provide training, advice and support to farmers to adopt high environmental and animal welfare standards.

Potential future action:

- Develop a B&NES Local Food Partnership to strengthen relationships with the agricultural community and to facilitate support from expert advisory groups that encourage local farmers and food growers to adopt high environmental and animal welfare standards and to enhance the agricultural stewardship of B&NES landscape (including the Bath World Heritage Site).
- Encourage more farmers to enrol in training and support programmes for environmentally-responsible farming and effective land management such as land management schemes, Linking Environment and Farming schemes and RSPCA freedom food animal welfare schemes.
- Support farmers to reduce carbon emissions (and minimise waste) by investing in cost-effective renewable energies such as anaerobic digestion and wind energy.

(ii) Support the development of the local food supply chain

In 2007 B&NES council commissioned a report exploring the barriers to local food supply in Bath and North East Somerset. The key barriers reported include restrictive planning policies, inadequate food processing infrastructure, and a lack of time for food producers to identify retail markets (Belshaw, 2007).

Local food supply is reliant on local food infrastructure such as processing, storage, distribution and retail facilities as well as high-grade agricultural land. The protection of these facilities is needed, along with a co-ordinated approach to seek market opportunities for local food, to facilitate and enable local production and supply both now and in the future.

Current examples of good practice:

- There are a number of local food marketing initiatives in place including three farmers markets, a number of home delivery veg-box schemes and an online local food distribution service.

Potential future action:

- Develop a B&NES Local Food Partnership to facilitate joint action on local food supply chain development. Develop initiatives and projects to facilitate local food supply such as a local food directory and meet the buyer events.

Develop planning policies further to support the development and diversification of agricultural businesses and to protect high-grade agricultural land and supply chain infrastructure

- Facilitate an increase in the number, frequency and geographic spread of farmer's markets and direct food- selling initiatives throughout the district.
- Enhance market opportunities for local food in public and private businesses and organisations (see delivery theme 2).
- Continue to engage with West of England Partners to address gaps in local infrastructure and to co-ordinate opportunities for local food supply.

Case Study: Bath Farmers' Market

Bath's Farmers' market was the first in the country to be set up in 1997. It is held weekly every Saturday and provides an important outlet for local farmers and producers to sell their food.



(iii) Improve opportunities for community food growing

Community food growing provides people with a source of local and healthy food, contributes to physical activity, provides dietary and mental health benefits and can improve opportunities for community cohesion and social engagement (Davies et al., 2014; Litt et al., 2011; Van de Berg 2010).

There are 42 allotment garden sites across Bath and North East Somerset. The Council is responsible for just the 23 sites in Bath. Elsewhere allotments are managed by other local bodies, such as Parish Councils and social housing organisations. There are a number of other community food growing projects in Bath and North East Somerset including community gardens, nutteries, orchards and agricultural projects.

In B&NES there is a high demand for allotments with nearly every site across the District now full with a waiting list (the Green Space Strategy research is due to be updated in Spring 2015). Further provision of allotments and community food growing space is needed to meet the demand for community food growing and to enable a wider number of people to benefit from the health and sustainability benefits of food growing.

Current examples of good practice:

- Bath Area Growers and Transition Keynsham are amongst a number of networks and organisations to have set up community food growing projects in B&NES.
- Bath City Farm works with vulnerable people to develop skills in sustainable agriculture and food growing.

Potential Future action:

- Support allotment provision and management via the delivery of the Allotments' Management Plan and by working in partnership with Parish Councils.
- Provide further guidance on local policies

Case Study

The Community Farm is a member-owned community supported agriculture project growing organic vegetables and fruit on 32 acres of land in the Chew Valley area. The social enterprise supplies local, organic vegetable and fruit boxes and wholesale to the Bristol and Bath area and works with a co-operative of Somerset growers to shorten food supply chains and provide an outlet for locally grown produce. The farm fulfils its social remit by providing opportunities for volunteering and learning agricultural skills, as well as school visits and traineeships for disadvantaged adults.



that support the provision and retention of allotments and community food growing space, including site criteria, through the forthcoming Place Making Plan (2016) and develop the work of regeneration to incorporate food growing space into new and existing developments.

- Develop initiatives and guidance to support an increase in community and commercial food growing on public land.
- Continue to incorporate edible and fruiting plants into public spaces to provide residents with a source of fresh, local food.

Delivery theme two: Food provision and access

Food Provision and access

Increase the procurement and provision of good food in the public sector

Increase the procurement and provision of good food in the private sector

Improve the local food retail offer

Support everyone to afford good food

Introduction

For people to make healthy and sustainable food choices good food options must be easily available and accessible. This theme sets out a framework for action to increase access to, and provision of, good food in B&NES by enhancing the procurement and provision of good food, by improving the local food retail offer and by supporting all residents to afford good food. It aims to make the good food choice the easiest choice for residents to make.

Objectives:

- Improve the provision of good food in a wider range of organisations and businesses
- Improve the retail opportunities for good food, particularly in areas of low food accessibility.
- Increase the ability of all groups to access healthy, good quality food.

Action:

- (i) Increase the procurement and provision of good food in the public sector

A third of all meals eaten outside of the home are in publically funded institutions such as schools, universities, hospitals, care-homes and staff canteens. The major public sector bodies in Bath and North East Somerset include B&NES Council, the NHS, Bath

University, Bath Spa University and the Police Service. The provision and procurement of good food by these organisations can significantly influence and improve the nutritional intake of their users, including vulnerable groups such as ill, elderly and low income groups, whilst creating significant economic opportunities for local food and farming businesses.

Current examples of good practice:

- The Council's Food Forum has an important role supporting schools, colleges and early year settings to increase the quality and uptake of lunchtime meals and to reduce the amount of unhealthy food that children consume within educational settings. The Food Forum has also supported the implementation of the School Food Plan, including support to implement universal free school meals for all key stage 1 primary school children from September 2014. This will help to reduce cost for all families and help children to be healthy and ready to learn.

[Case Study: Council Catering Service Food For Life Partnership Award](#)

The Council catering service which procures and provides meals for 61 primary schools in the district has received the Soil Associations' Bronze Food For Life Catering Mark for providing healthy meals sourced from fresh, local and organic ingredients, produced to high animal welfare standards.



- B&NES Council have recently developed a "Think Local" procurement policy to help overcome the barriers that prevent local, small and medium sized businesses from tendering and winning contracts. The policy aims to create a more level playing field for small and local businesses.
- With Council support, Fairtrade status has been awarded to Bath and North East Somerset district, Bath City, Keynsham, Norton Radstock and Chew Magna.

Potential Future Action:

- Continue to support schools, colleges and Early years' settings to improve the quality of food provided and eaten in educational settings by supporting the implementation of the school food plan, by developing the Director of Public Health Award and by developing initiatives to support secondary schools,

academies and colleges to adhere to Food For Life Catering Mark Standards as a minimum.

- Include sustainability criteria in the use and award of all public sector food contracts including the use of local, fair trade and higher-animal welfare products.
- Support all public sector organisations to serve freshly prepared, nutritious meals that comply with an accredited quality and sustainable food standard such as the Food For Life catering mark.

(ii) Increase the procurement and provision of good food in the private sector

The provision of good food in retail and catering outlets and workplaces enables people to make healthy and sustainable food choices when food shopping, dining out and at work. By sourcing more good food, individual food businesses can positively influence the nutritional intake of B&NES citizens and provide significant market opportunities for the sale and provision of local food, contributing to the local economy

Current examples of good practice:

- Delivery of the “Eat-out, Eat-Well” award by the Council and Sirona supports food outlets and catering businesses to provide a wider range of healthy food options and to reduce the level of trans-fats, salt and sugar provided in their foods.
- Sirona delivers the “Work-Place, Wellbeing Charter” to support workplaces to promote healthy-eating practices.
- A “Baby Welcome” scheme has been established in B&NES to encourage and welcome breastfeeding in cafes and venues across the local authority area.

Case Study: The Great Bath Breakfast

There are 25 businesses enrolled in the “Great Bath Breakfast” - an initiative that recognises Bath businesses that supply locally-sourced breakfast items.

Potential Future Action:

- Identify market opportunities for good food in a wider range of retail and catering businesses including independent shops, supermarkets and convenience stores and facilitate trading links between relevant members of the food supply chain.

- Develop and promote suitable campaigns and communications to encourage the supply of good food by local businesses.
- Continue to monitor and advise on food safety and hygiene issues along with the food standards agency to support food businesses to provide safe and hygienic food.
- Continue to support workplaces to provide healthy food options, improve the dining environment and to provide staff with information about healthy eating and good food.
- Continue to support food-outlets and public environments to welcome breast-feeding.

(iii) **Improve the local food retail offer**

The nature and type of food retail has a significant influence on peoples' food choices and their ability to easily access good food. It is important that communities have easy access to affordable, fresh produce provided by a diverse range of retail outlets and markets.

Nevertheless there is a need to monitor the prevalence of fast-food takeaways to prevent potential over-clustering in the future.

Current examples of good practice

- Freshford community shop is built, owned and managed by the local community. It was set up following the closure of other local shops and serves the community with every-day household needs.

Potential future action:

- Support the establishment of more food markets, fruit and vegetable stalls, independent retail, buying groups and food CO-OPs to increase community access to good, affordable food.

Case Study: South Side Food CO-OP

Southside Food CO-OP offers people in the south & west of Bath an opportunity to buy fresh locally grown produce at affordable prices from their office in Twerton.



- Provide further detail and guidance regarding essential retail provision in the Place-making Plan (2016) to complement existing policies in the Core Strategy.
- Continue to encourage the provision of healthy street food such as fruit and vegetable stalls and healthy food takeaways.
- Continue to monitor the prevalence and distribution of fast-food takeaways in B&NES and inform policy making accordingly.

(iv) Support everyone to afford good quality food

In Bath and North East Somerset residents living in areas of multiple deprivation are more likely to suffer from poor diet and unhealthy weight than those that do not (See appendix 6). Rising food prices, high costs of healthy food and a lack of access to cooking and transport facilities are all factors that can make it harder for low-income groups to eat healthily and sustainably. Although there are a number of organisations working to tackle food poverty in Bath and North East Somerset including food banks, community kitchens and food re-distribution services further action is needed to reduce diet-related inequalities across the local authority area.

Current examples of good practice:

- The National Healthy Start Voucher and vitamin schemes providing free milk, fruit, vegetables and vitamin supplements, are available for eligible low income families during pregnancy and with children under the age of five.
- There are a number of food banks and community kitchens that provide emergency food hand outs and meals to people in need such as the Bath Food Bank, Food Cycle and Julian House.

Potential future action:

- Prioritise low-income groups in the delivery of projects.
- Increase the use of healthy start vouchers by eligible families.

Case study: Bath Food Cycle

Bath Food Cycle provides a weekly free three course meal to people in need using surplus food provided from numerous businesses including Bath Sainsbury's.



- Increase the acceptance of healthy start vouchers in retail establishments across B&NES including at fruit and veg market stalls, farmers' markets, convenience stores and independent shops.
- Continue to support the implementation of the school food plan to provide free school meals to all key stage 1 pupils.
- Continue to support the redistribution of fit-for-purpose waste food working with supermarkets, charities, food banks and community kitchens.
- Provide training opportunities for low-income groups to develop skills and knowledge in cookery, growing and healthy eating (See delivery theme 3).

Delivery theme three : Promote a healthy and sustainable food culture

Healthy and sustainable food culture

Provide enjoyable opportunities for residents to learn about food and nutrition and to develop skills in cooking and growing.

Increase public awareness of good food and the benefits that it provides

Support residents, businesses and public sector organisations to reduce and recycle food waste

Introduction

This work stream sets out a framework for action to promote and develop a healthy and sustainable food culture, to increase the demand for and use of healthy and sustainable food.

Objectives

- Increase the demand for local, healthy and sustainable food.
- Increase the number of people with the skills, knowledge, confidence and desire to create a healthy diet.
- Raise the profile of good food and the range of benefits that it provides.
- Increase the number of residents, businesses and organisations participating in sustainable food behaviours such as food waste redistribution, reduction and recycling.

Action

(i) Provide enjoyable opportunities for residents to learn about food and nutrition and to develop skills in cooking and growing

Improving opportunities for people to learn about good food and to develop skills in cooking and growing is essential to promoting positive dietary behavioural change and to make cost-savings on food (Hartmann *et al.*, 2013; Reese 2012).

Current examples of good practice:

- The B&NES Council Food Forum delivers a range of programmes in schools and early year- settings to engage children in food-related activities such as cooking, growing, composting, farm visits and healthy eating. Targeted programmes include the Director of Public Health Award, SHINE and HENRY.
- The Council commissions the Cook-it Service; a five week programme teaching families in identified children's centre areas to cook affordable, healthy meals.
- A pilot model between Age UK and Chew Valley Secondary School has been launched to engage older people in schools to share knowledge and skills around cooking and food skills.
- There are a number of farms and community gardens that hold demonstration and engagement days for members of the public to learn about local agriculture and food growing,

Case study: Food For Life Partnership in B&NES

The majority of schools in B&NES are enrolled in the **food for life partnership** programme which raises food awareness amongst children and engages them in food growing, cooking and composting activities. A national evaluation of the FFLP programme showed that following their participation in FFLP programme, the proportion of primary school children eating 5 or more pieces of fruit and veg a day increased by 28%.



Potential Future Action:

- Continue to support schools and other places of education to embed food food-related skills and education into the curriculum using a whole-school approach.
- Seek further training opportunities for residents to develop cooking, hygiene and food growing skills.
- Seek further opportunities to engage the community with food and farming education opportunities including farm demonstration days and communal food growing activities.

(ii) Increase public awareness of good food and the benefits that it provides

Increasing communications and marketing, and supporting food events and festivals will help to raise resident awareness of good food.

Current examples of good practice:

- B&NES Council has set up a B&NES Environmental Sustainability Network website that includes a local food topic group for interested members to share information, projects and events related to good food.
- A number of communal food events and festivals are held in B&NES including the Great Bath Feast , the Keynsham Food Festival, and communal harvest celebrations.

Potential Future Action:

- Encourage more events, festivals and markets that appeal to a wider range of audiences and are accessible to all particularly those which celebrate the link between local food and the local countryside in which they are produced.
- Continue to develop the B&NES Environmental Sustainability Network website's food section to build membership across the community and to promote particular food related campaigns, events and projects
- Continue to co-ordinate and provide health and nutrition advice and communications specific to people at all life stages.

iii) Support residents, businesses and public sector organisations to reduce, redistribute and recycle food waste

Encouraging people to reduce their food waste will help them to save money, whilst reducing carbon emissions and diverting waste from land-fill (Wrap, 2012). Although great progress has been made in B&NES to reduce food waste, there are many households, businesses and organisations that continue to waste fit-for-purpose food and do not participate in food waste recycling.

Current examples of good practice:

- The Council has partnered with the national Love Food Hate Waste campaign to support residents to reduce food waste via educational road shows, events, competitions and door knocking.
- The Bath BID provide a collaborative trade waste and recycling service to support Bath-based businesses to recycle their food waste.

Potential Future Action:

- Continue to deliver public awareness and engagement campaigns to support residents to reduce food waste.
- Continue to develop the waste collection service to support more schools, residents and businesses to reduce their food waste.
- Seek opportunities and initiatives to support retailers, businesses and residents to reduce food packaging waste.
- Continue to support the redistribution of fit-for-purpose waste food by farmers, supermarkets and retailers, charities, food banks and social enterprises

Case Study: FareShare South West

Fare Share South West redistributes surplus fit-for-purpose food to 10 organisations in Bath, helping to address food poverty and reduce food waste



Section 4: Next Steps for the strategy

This strategy serves to communicate the ESP's strategic approach to local food in Bath and North East Somerset. A proposed B&NES Local Food Partnership will be established to oversee the development and implementation of the local food action plan. The strategy will be updated as needed to reflect any changes in our strategic approach, every three years.

For more information please contact the sustainability team at Bath and North East Somerset Council: sustainability@bathnes.gov.uk.

The strategy will be made available upon request in a range of languages, large print, Braille, on tape, electronic and accessible formats. Please contact Sophie Kirk: Tel: 01225477932 or Sophie_Kirk@BATHNES.GOV.UK

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5.3 Local Food Growing Space planning policies (draft)

Local Food Growing Space

Local food growing spaces are not only an important leisure resource, but they are recognised locally and nationally for their value as open spaces, especially in urban areas and for their contribution to sustainable development and health objectives including; local food production, physical activity promotion, community cohesion, green infrastructure networks, biodiversity and their potential for educational opportunities.

Local food growing space includes public, open and/ or residential space used for community or individual food growing. Local food growing space includes both allotments and informal local food growing space:

- **Allotment gardens** have a statutory definition, and are made of allotment plots.

- **Informal food growing spaces** are not statutory and include community gardens, community orchards, private gardens, green roofs and other shared public and/or open space that can be used for food growing. Unlike allotments informal food growing space may be available on either a permanent or a temporary basis, enabling community groups to cultivate land awaiting development on a meanwhile basis. Examples of land used for informal food growing space includes:
 - Communal land in residential areas/ housing estates
 - Land within parks and public green spaces
 - Land awaiting development
 - Rooftops, private gardens balconies
 - Hospital grounds
 - School grounds

There are 42 allotment garden sites across Bath and North East Somerset. The Council is responsible for just the 23 sites in Bath. Elsewhere allotments are managed by other local bodies, such as Parish Councils and social housing organisations.

Research underpinning the Green Space Strategy clearly demonstrated that there has been a large increase in demand for allotments with nearly every site across the District now full with a waiting list (the Green Space Strategy research is due to be updated in Spring 2015).

Further provision of allotments and informal food growing space is needed and any loss should be resisted, as once lost, this land is unlikely to be replaced within accessible locations in the urban areas.

i) Aims

The aims of this policy approach are as follows:

- Protect existing allotments
- Support the delivery of suitable new allotments
- Support the increased provision of informal food growing space

This policy approach has been informed by consultation with local stakeholders, including the Parks Department and the Bath Allotment Association. The policy has refers directly to a number of new documents:

- **B&NES Local Food Strategy (2014)**
- **B&NES Allotment Management & Design Guide** (forthcoming) – which outlines how the Council will manage its allotments, and involve stakeholders and local people in the process. The guide will also inform the process for allotment design and design principles
- **B&NES Allotment Site Selection Criteria** (available in draft alongside this consultation) – outlines the selection criteria used to find potential allotment sites, also to be used to assess on site provision as part of development schemes

The following policies CR8 and CR9 supersede saved Local Plan policy CF.8.

ii) Preferred Policy Approach

CR8 Protect Existing Allotments

Development resulting in the loss of land used for allotments will not be permitted, unless:

- i) The importance of the development outweighs the value of the site as allotments and suitable, equivalent and accessible alternative provision is made elsewhere within a reasonable catchment area (as defined by the Green Space Strategy) and in line with CR9; or***
- ii) The site is allocated for another use in the Placemaking Plan and suitable, equivalent and accessible alternative provision is made in line with CR9.***

Any loss of amenity land related to allotments should not compromise the proper function of allotment gardens including access, storage of tools and other communal areas, unless there can be satisfactory mitigation delivered.

Development resulting in the loss of vacant land identified as an allotment on the Policies Map or where there is evidence that the site has last been used for allotments will not be permitted.

Existing formal allotments are identified on the Policies Map.

CR.9 Support the provision of new allotments and community food growing space

- i) New allotments sites must be identified in line with the B&NES Allotments Site Selection Criteria and must;**
- ***Be suitable for productive use***
 - ***Be accessible to the area they are intended to serve.***
 - ***Be suitable for use as allotments through appropriate design (e.g. considering ecology and landscape).***
- ii) New allotments must be well designed and managed in line with the B&NES Allotments Management & Design Guide and must have a Site Management Plan.**
- iii) All new major residential development (as defined by the GPDO and purpose built student accommodation) will be expected to incorporate opportunities for informal food growing and to make contributions towards allotment provision where they are generating demand.**
- iv) Informal food growing space will be supported in principle including the temporary use of vacant sites for amenity land and informal food growing.**

New allotments will be added to the Policies Map.

iii) Alternatives considered and rejected

Policy CF8 supersedes well used Local Plan policy CF.8 therefore it is considered that this policy should be retained and enhanced.

CF9 is a new policy to guide the provision of new allotments and community food growing space. This priority has been identified in the Green Infrastructure Strategy and the Local Food Strategy. This policy supports the delivery of the forthcoming Allotment Site Selection Criteria, Allotments Management & Design Guide.

Alternatives considered:

- Not including either policy CR8 and CR9
- Providing less detail in these policies.
- Referring only to allotments is not considered feasible given that there is a need for more flexible community food growing approaches given the pressure on land.
- A requirement for all major development of 140 dwellings or more should provide allotments on site in line with the requirements of the Green Space Strategy, as a priority, ahead of a financial contribution is being considered (in many cases this is already being utilised for example MOD sites and Somerdale)