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Dear Inspectorate,

Below are my comments on The Draft London Plan. I am a community food grower - I grow food with the community, for the community. At the heart of my submission is a desire to protect and support the flourishing of London's diverse communities.

## 1: MEANINGFUL PUBLIC PARTICIPATION

There is no mention of public participation in the planning system in the London Plan policy boxes. Currently public participation is often top down and too late in the planning process. As noted in 1.1.5. there is a need for public participation early in the planning process.

Those involved in planning and development must seek to inform and empower communities to participate in planning processes. This must be done meaningfully from the beginning of these processes. We suggest an additional policy in GG1 and support Just Space's (in Towards a Community Led Plan for London: Policy directions and proposals) call for:

### G)

- **The mayor to enter into a Social Compact with Londoners agreeing to a programme of effective, meaningful and continuous engagement that enables all Londoners to work with the Mayor and officers in a spirit of cooperation and in coproduction of the new London Plan and its related strategies.**
- **Develop a Mayor's Statement of Community Involvement, which will provide a formal framework for developing, implementing and reviewing effective and inclusive community participation**
- **Provide resources to facilitate the informed involvement of communities and user groups to include training, learning and technical advice as well as administrative support, to enable more people to have influence over the development of their areas.**

This is supported by amongst other things the Aarhus Convention and a Supreme Court ruling in 2014 confirming the 'Sedley' or 'Gunning' principles.

## 2. BEST USE OF LAND

We propose the following edits to the policies in GG2:

GG2:

**To create liveable-density, mixed-use places that make the best use of land, engaging those involved in planning and development, which should incorporate local community representation, and which must:**

- **A. prioritise the environmentally and socially sustainable development of all London land with a view to optimising the use of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.**
- **B. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach and prioritising the development of lifetime neighbourhoods with pro-active food supply hubs.**
- **D. Protect London's open spaces, including the green belt, metropolitan open land, designated nature conservation sites, allotments, public gardens and other local green spaces, and promote the creation of new green infrastructure and urban greening activities which value the productive use of green space, such as integrated food growing hub development, which supports and enables health and well-being in the city.**
- **E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock sustainable growth.**
- **F. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance as well as the well-being and livelihood of communities living in the area.**
- **G. be mindful of the need to optimise the use of space, so that intensification planning at borough level incorporates sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a 'world city'.**

The narrative for GG2 will need to change to read as follows:

- 1.2.2. The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently, **but also better for the people who use them, creating lifetime neighbourhoods which recognises the need for developments to reflect the social and cultural impact of any proposed changes.** This will mean creating and **rehabilitating** places of higher, **but still liveable, densities in appropriate locations to get more out of limited land, encouraging a mix of land uses, including those associated with increasing London's food security in accordance with the good sense of the Sustainable Development Goals** and co-locating different uses to provide communities with a wider range of services and amenities.
- 1.2.6. As London develops, the Mayor's Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, **to recognise the critical importance of the food system of London as being critical to the maintenance of London's food security, as it has been since London's inception and improvements to green infrastructure, which centres the productive use of green space for food growing,** biodiversity and other environmental factors, delivering 50 per cent **productive** green cover across London, will be important to help London become a National Park City **which is also attentive to the need to provide for food security and the provision of a way for Londoners to have an accessible way to support and promote health and well being.**

- 1.2.7 London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, **and contribute to shaping**, such as cultural, historic or natural elements, can be used positively to guide and stimulate **further** growth, **mutual respect and cohesion**, and create distinctive, attractive and cherished places

The changes here must be supported by wording in GG1 to the effect of anchoring the proposals in a discussion about Lifetime Neighbourhoods, social cohesion through respect of diversity and supporting accessibility in a broad way. It also needs to embellish the idea that a home is place from which the occupants can easily access productive opportunities, which contribute to growth of the local economy and which accord with the other aspirations of the plan with regards to sustainability, walking, cycling and use of public transport and supporting local heritage and culture.

### 3. HEALTH AND FOOD

We support the following changes to GG3 policies:

GG3: To improve Londoners' health and reduce health inequalities, **all those** involved in planning and development, **which includes community representation**, must:

- B. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. **Developing Food Hubs which are centred on local food growing and development of integrated food trading places, provides a range of healthy and local economic and social activities across London**
- D. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of **Social and Health Impact Assessments**.
- E. plan for improved access to green spaces and the provision of new green infrastructure **integrated into all new and rehabilitated developments**.
- G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options **by working closely with the food sector and communities to allow for more widespread awareness of the importance of creating a more food secure city in terms of quality and quantity**.

These changes also need to be supported by the following changes in the narrative:

- 1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. **Londoners also shape that environment by how they are able to live**. Transport, housing, education, income, working conditions, unemployment, air quality, green space provision and access, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by an inclusive planning system, and local authorities are accordingly responsible for planning and public health.
- 1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city, **so this will need to be regulated and improved by the creation of green opportunities as a part of all housing development and rehabilitation**. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good, **inclusive**, planning can help address all of these issues. **Such planning means**

**councils having to work alongside food sector expertise and communities and work across sectors in a joined up way.**

- **1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will ensure that green spaces are more widely distributed across London and that their use can be productive, providing Londoners with the opportunity to grow food and be environmental stewards, providing for good mental health activity.** It will also ensure that streets become more social spaces for all Londoners.
- **1.3.6. A healthy food environment is underpinned by a London wide integration of the sub-systems which enable people of all classes, ages, genders and ethnicities to eat a diversity of healthy foods. This includes the knowledge systems which educate everyone on healthy eating practice. Whilst this cannot be centrally controlled for, the Spatial Development Strategy (The London Plan) calls for a good understanding of London's food history and a systemic understanding of how people access food in way that supports their sovereignty, dignity, social cohesion and health. This should strongly inform how policies across the different sectors can support not only every Londoner's health, but also contribute to a thriving London economy and support a decentralised social infrastructure that embraces the other Good Growth policies in each sector. This calls for a greater degree of inter-sectoral working on behalf of the different elements of the plan; housing, transport, heritage and culture, etc as well as by recognising the distinct nature of how each Londoner accesses opportunities for health and ensuring each sector supports this diversity.**

#### 4. GREEN SPACE DEFINITION

##### D1.A.7

The phrase 'green and open spaces needs to be more closely defined so as not to be misinterpreted. As it stands it is ambiguous and open to interpretation. We know of examples where an area of 'open space' consists of concreted paving stones with a tree in the middle of it.

We suggest this policy should read:

**Create, provide and maintain green and open spaces as defined below for varied and multifunctional uses such as informal recreation, social interaction, play, relaxation, physical activity, food growing as well as areas reserved for cultural or environmental retention that may provide some limited recreation opportunities**

**Suggested definition of 'green spaces' to include small areas of open space that are accessible to local residents, generally providing for recreation including passive recreation, children's play and relaxation, which also can provide an identity and a sense of place for a community especially where it incorporates an important landscape feature or historic characteristic** (Design Principle – Parks and Open Space:

<https://www.healthyplaces.org.au/userfiles/file/Parks%20and%20Open%20Space%20June09.pdf>,

<http://www.greenspacescotland.org.uk/definition.aspx>). They also include derelict, vacant and

contaminated land which has the potential to be transformed

(<http://www.greenspacescotland.org.uk/definition.aspx>)

**Suggested definition of 'open spaces' is any open piece of land that is undeveloped (has no buildings or other built structures) and is accessible to the public. Open space can include green space (land that is partly or completely covered with grass, trees, shrubs, or other vegetation). Green space includes parks, community gardens, and cemeteries. Open space also includes schoolgrounds, playgrounds, public seating areas, public plazas, vacant lots, allotments and growing sites. (EPA**

<https://www3.epa.gov/region1/eco/uep/openspace.html>)

We believe that food growing spaces are vital green spaces and should be brought into the definition. They contribute positively through productive food growing, bringing community together, providing employment, lessening pollution both locally and in terms of air miles, contributing to local economy, giving people skills and training for employment, lessening isolation, supporting mental health problems and the costs that go with them, reducing waste and using it productively, and making the community more self sufficient and less dependant on services.

We believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

## 5. CIRCULAR ECONOMIES

### D1

Although the transitioning of London to a Circular Economy is heavily weighted in the narrative (3.1.11) there is no specific policy that relates to it.

We suggest an addition policy in D1 which says:

**C. All developments must be built following the principles of a Circular Economy; by assessing design, making, selling, re-using and recycling what we use including air, water, waste including human waste, household and the food chain to determine how to get the maximum value from them, both in use and at the end of their life as shown in Figure 3.1.**

A Circular economy will be only partial without a deep and penetrating connection to the food chain which can be and needs to be incorporated

We suggest the following points be incorporated into the narrative of D1:

**To promote a circular economy London Plan must:**

- **Help provide services to food producers in and around cities, including technical training and financial assistance (credit, technology, food safety, market access, etc.) to build a multigenerational and economically viable food system with inputs such as compost from food waste, grey water from post-consumer use, and energy from waste etc. while ensuring that these do not compete with human consumption. (MUFPP, 2015)**
- **Provide policy and programme support for municipal public markets including farmers markets, informal markets, retail and wholesale markets, restaurants, and other food distributors, recognizing different approaches by cities working with private and public components of market systems. (MUFPP, 2015)**
- **Improve and expand support for infrastructure related to market systems that link urban buyers to urban, peri-urban and rural sellers while also building social cohesion and trust, supporting cultural exchange and ensuring sustainable livelihood, especially for women and young entrepreneurs. (MUFPP, 2015)**
- **Acknowledge the informal sector's contribution to urban food systems (in terms of food supply, job creation, promotion of local diets and environment management) and provide appropriate support and training in areas such as food safety, sustainable diets, waste prevention and management.(MUFPP, 2015)**

We believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

## 6. BROWNFIELD DEVELOPEMENT

The definition of a brownfield site is very broad. It is “Land which is or was occupied by a permanent [structure](#), including the [curtilage](#) of the developed land (although it should not be assumed that the whole of the [curtilage](#) should be developed) and any associated fixed surface [infrastructure](#).”([https://www.designingbuildings.co.uk/wiki/Brownfield\\_land](https://www.designingbuildings.co.uk/wiki/Brownfield_land))

The listing and reclassifying of brownfield sites must be carefully monitored because this definition covers most sites. Misuse of this category is already creeping into the system with the loss of playing fields, allotments, green and open spaces and parks to the ‘brownfield’ category,

We look to the London Plan to protect built on land for uses other than housing. To ensure this we ask for further policy measures to be included in the London Plan. It is also important for the London Plan to use a Social Impact Assessment when deciding on change of use as in the case of brownfield sites

### H1.B.2

We suggest the following change to this policy:

**Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions only after they have been opened for consultation and public scrutiny, have been subject to a Social Impact Assessment with a favourable outcome and have been voted on by local residents.**

**We believe that this is essential to the London Plan's over-arching good growth principles: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land),and GG6 (Increasing efficiency and resilience).**

## 7: FOOD HUBS

Food production hubs can play a useful role within the city. These might be integrated light industrial developments which involve food growing, local food processing and markets based upon these which provide alternative food systems not subject to the whims of large industry. Food hubs can act as a distribution point for small-scale agroecological producers, provide opportunities for SMEs and start-ups, provide good food for all, act as community centres, and provide education, training and jobs. Even imported foodstuffs obtained from regional wholesale centres can be processed in these food hubs. Food hubs can provide social spaces as well as job opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice.

The promise of community food hubs has been highlighted in reports such as “Community Food Hubs: Helping make Edinburgh a Sustainable Food City” by The University of Edinburgh and “Good planning for good food: How the planning system in England can support healthy and sustainable food” by Sustain. Food hubs are being promoted in other cities. It is vital that these initiatives are supported through the planning system in London.

In relation to E9.B:

We suggest the addition of a 10th pt:

**In Development Plans, boroughs must 10) support the establishment and continued existence of community food hubs as sites which combine spaces for the growing, preparation and eating of healthy foods in an inclusive environment alongside distribution points for small-scale agroecological community produced food.**

We feel this needs designing into the sections on health and social care facilities (S2), education and childcare facilities (S3), sports and recreation facilities (S5) and suggest the following policies:

**In development plans and in planning decisions, boroughs must:**

- 1. Encourage the start-up of food hubs which are located in Town Centres which work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food waste, and addressing food poverty, providing a variety of skills to encourage localised, self-reliant development within each borough, but also facilitating advantageous cross borough connections which can benefit London as a whole and households across each region.**
- 2. Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, improved mental health and social enterprise.**

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

## 8: LONDON'S MARKETS

London's markets are a remarkable source of healthy and cheap food and other goods, serve a social benefit, support independent business, provide local employment and an opportunity for start-up businesses.

We support a strengthening of E9.B.7 to:

In development plans, boroughs **must:** 7) support **and protect** the range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone.

We support the strengthening of this policy with the additions that:

- Local authorities must seek to retain control of management and rent-setting and must consult with traders and customers on future proposals.**
- The London Plan must include a database of protected markets.**
- Boroughs must specifically seek to protect clusters of small and independent businesses and ethnic and migrant traders which have a unique and irreplaceable character.**

We support the additional policy in the Heritage and Culture chapter

## HC8:

### A. Boroughs must:

1. **protect traditional markets where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres and Creative Enterprise Zones**
2. **support proposals for new traditional markets to stimulate town centre regeneration, cultural quarters and mixed-use development.**

### B. Applications that propose the loss of traditional markets with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the space being used as a market in the foreseeable future.

### C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the traditional market that would compromise the operation or viability of the traditional market use should be resisted.

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

## 9: SOCIAL AND ENVIRONMENTAL IMPACTS OF RETAIL

The social and environmental impact of the food we eat in London is huge, extending across the globe as well as on to dinner tables across London. The poor labour and environmental practices of certain forms of retail are well documented. The planning system must be used to take this into account and to support more sustainable and just forms of retail as supported by Sustain's research "Good planning for good food: How the planning system in England can support healthy and sustainable food"

We propose an additional 11th pt in relation to E9.B:

### **In Development Plans, boroughs must**

**11) base planning decisions related to food retail on thorough upstream and downstream environmental and social impact assessments which examine the impact of food retail both downstream on citizen access for all to culturally-appropriate and nutritious foods and upstream on the environmental and social (including labour practices) impacts of different retail routes.**

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

## 10: GREEN INFRASTRUCTURE TRAINING AND JOBS

In G1 we support the additional policy:

D Local Authorities and the GLA to support education programmes for a new generation of skilled Green Infrastructure workers to develop a globally innovative urban ecology by funding and enabling:

- Schools programmes in gardening and outdoor play
- Accredited training e.g. agroecological food production, food forestry, biodiversity management,



renewable energy

- Paid work placements: apprenticeships and shorter-term placements that support people to further develop skills in the work environment and provide sustainable employment opportunities.
- Associated “next steps” training — e.g. enterprise training, community development training.

To develop the biodiversity, green space, urban greening, and woodland programmes outlined in the London Plan draft this necessitates a new generation of skilled workers to implement Green Infrastructure strategies.

Inequality is widening in London (TrustforLondon 2017) and the creation of green infrastructure training and job opportunities will be part of a multifunctional strategy of:

- responding to unequal economic opportunities in the capital
- making London a global leader in resilience planning for climate change
- enabling Londoners to be directly involved in the shaping of their lived environment

The RSPB report (2010) highlights how children’s contact with nature contributes to pupil’s development and future economic well being (Ofsted 2008), increases health and well-being (Bird 2007) and aids the development of personal and social skills (Ward Thompson et al. 2007).

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space:

GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

## 11. FOOD GROWING

We support the following change to policy and addition of B, C and D directly from the Milan Urban Food Policy Pact (2015) to which London is signed up to with 162 other cities:

A. In Development Plans, boroughs **must**:

- protect existing allotments, **community gardens, agroecological food production sites and community kitchens with secure long-term agreements (e.g. 100 years)**
- Identify potential sites **with partner organisations that could be used for long-term (e.g. 100 years) community managed gardens, agroecological food production and community food hubs with cooking and training facilities in urban, peri-urban and greenbelt areas**

GLA and boroughs to work with partners to set up Community Land Trusts and land banks that enable secure community-led access and tenure of land suitable for needs (ie sunlight and water requirements).

Secure land tenure for the above activities will contribute to enterprise, job-creation, training schemes, and London’s efforts to address climate change.

**B. The GLA and boroughs will encourage interdepartmental and cross-sector coordination at municipal and community levels, working to integrate urban food policy considerations into social, economic and environment policies, programmes and initiatives, such as, inter alia, food supply and distribution, social protection, nutrition, equity, food production, education, food safety and waste reduction**

**C. The GLA and boroughs will work to develop sustainable food systems that are inclusive, resilient, safe and diverse, that provide healthy and affordable food to all people in a human rights-based framework,**

**that minimise waste and conserve biodiversity while adapting to and mitigating impacts of climate change**

**D. The GLA and boroughs to *work with community partners and networks* to review and amend existing urban policies, plans and regulations in order to encourage the establishment of equitable, resilient and sustainable food systems**

London signed up to the Milan Urban Food Policy Pact in 2015 which stated that: ‘current food systems are being challenged to provide permanent and reliable access to adequate, safe, local, diversified, fair, healthy and nutrient rich food for all; and that the task of feeding cities will face multiple constraints posed by inter alia, unbalanced distribution and access, environmental degradation, resource scarcity and climate change, unsustainable production and consumption patterns, and food loss and waste.’

The Pact (2015) suggests action to: ‘Protect and enable secure access and tenure to land for sustainable food production in urban and peri-urban areas, including land for community gardeners and smallholder producers, for example through land banks or community land trusts; provide access to municipal land for local agricultural production and promote integration with land use and city development plans and programmes.’

The proposals are aimed to support and expand the multiple benefits of the community food sector which can help to meet GLA and borough council strategic outputs including: mental and physical health, access to nutritious food, low environmental impact, job creation, access to green space, training opportunities, resilient local economies, community spaces.

There are numerous projects in London running community gardens, community food hubs and community kitchens developing activities to meet the aims of the Milan Urban Food Policy Pact and can be effective partners with the GLA and boroughs to expand programmes to meet strategic aims of the London Plan. These projects can be found through Just Space, Capital Growth, Women’s Environmental Network, London Coalition against Poverty, Community Food Growers Network, Federation of City Farms and Gardens.

We believe that these amendments are essential to maintaining the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

In addition to these points, I strongly support the need for protection of community spaces more generally. These are the heart of our communities and to be truly inclusive can not be forced into commercial spaces through which we have to interact through money.

I call for The London Plan to:

- Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.
- Recognise that the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.
- Value and resource community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

- Recognise that community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.
  - Reflect that community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.
  - Understand that housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.
- These points are all vital to the following areas of the Draft London Plan: Policy GG1 Building strong and inclusive communities, Policy S1 Developing London's social infrastructure, Policy HC5 Supporting London's culture and creative industries, Policy HC7 Protecting Public Houses

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