

# **London Food Strategy Integrated Impact Assessment Post-Adoption Statement December 2018**

## **Introduction**

### The London Food Strategy

The London Food Strategy (LFS) is a non-statutory strategy and replaces the previous version published in 2006. It comprises the Mayor's vision for how to make food better in London. It contains actions the Mayor will take to deliver and support change and actions to be led by external partners, all under each of the six priority areas:

1. Good Food at Home, and Reducing Food Insecurity
2. Good Food Economy, Shopping and Eating Out
3. Good Food in Public Institutions and Community Settings
4. Good Food for Pregnancy and Childhood
5. Good Food Growing, Community Gardens and Urban Farming
6. Good Food for the Environment.

The LFS aims to help all Londoners, London boroughs and other partners to adapt the city's food system to meet the challenges which lie ahead. It interlinks with other Mayoral strategies and visions including the draft London Plan, Health Inequalities Strategy, Diversity and Social Inclusion Vision, Economic Development Strategy, London Environment Strategy, Tourism Vision and A Vision for London as a 24-Hour City.

### Development of the London Food Strategy

The LFS has been developed by the Mayor of London in partnership with London Food Board. To ensure the strategy is robust and reflects the needs of all Londoners, a full consultation process was undertaken in summer 2018. A draft version of the strategy was published for an eight-week period and almost 150 stakeholders and thousands of members of the public responded. The final LFS has taken all responses into account.

### Integrated Impact Assessment (IIA) of the Draft London Food Strategy

An IIA of the draft LFS was commissioned from Temple Group in May 2018.

The LFS is not a statutory document and therefore not legally required to have an IIA undertaken. The GLA has however decided to undertake an IIA to inform its development to ensure that the overall effects of the draft LFS are considered when developing the final strategy.

The IIA assessed the potential environmental, social and economic impacts of the draft LFS using a framework developed by the GLA. The IIA report was published for a four-week period alongside the draft LFS and comments were invited from stakeholders.

The IIA of the draft LFS assessed those actions which the Mayor will take to deliver change and actions the Mayor will take to support change. It did not assess those actions listed in the draft LFS which will be undertaken by external partners or those actions covered by IIAs of other strategies.

Typically, an IIA comprises Strategic Environmental Assessment (SEA), combined with other assessments that may include assessments of impacts on equality, human health, the economy and community safety. Drawing these elements together contributes to a more balanced and inclusive assessment and better-informed policies and actions.

The GLA has developed an IIA framework that has been used to assess the Mayor's strategy documents (whether statutory or not) on a robust and consistent basis. The framework includes 24 different topics, each of which has a specific objective. A number of these topics were scoped out in the IIA of the draft LFS given their lack of relevance to the document. The following topics were included:

- **Environment:** air quality; climate change adaption; climate change mitigation; energy use & supply; geology and soils; materials & waste; natural capital and natural environment;
- **Economic:** economic competitiveness & employment; education & skills; infrastructure; culture; sustainable land use; and
- **Social:** equality & inclusion; social integration; health & health inequalities; accessibility.

### Purpose of the Post Adoption Statement

This Post Adoption Statement sets out the recommendations from the IIA of the draft LFS and details how these have been addressed in the final LFS.

The following section provides a summary of the findings of the IIA of the draft LFS. The Post Adoption Statement then sets out the recommendations from this IIA and details how they have been considered in the final LFS.

## Summary of findings of the IIA of the draft LFS

The key findings of the IIA of the draft LFS were that no significant adverse effects were identified in relation to implementation of the draft LFS in respect of its potential environmental, economic or social impacts. Similarly, there were no significant adverse effects likely on target equalities groups in relation to the implementation of draft LFS.

Minor positive impacts were identified in relation to several of the IIA objectives, particularly those relating to health and health inequalities, and the equality and inclusion objective.

### Summary of contribution to IIA objectives

IIA Objective	Draft LFS contribution to the IIA objective
<p><b>Air Quality.</b> To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure</p>	<p>Minor positive contributions through support for sustainable food production, increasing healthy food availability and consumption and urban farming including local and seasonal food.</p>
<p><b>Climate change adaptation.</b> To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks</p>	
<p><b>Climate change mitigation.</b> To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050</p>	
<p><b>Flood risk.</b> To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</p>	<p>Minor positive contributions associated with urban food growing having minor flood attenuation role and sustainable food production supporting soils protecting from development. The scale and quantum of additional urban food growing involved means the contribution at the London scale is very marginal.</p>
<p><b>Geology and soils.</b> To conserve London's geodiversity and protect soils from development and over intensive use.</p>	
<p><b>Energy use and supply.</b> To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system</p>	<p>Neutral – the actions as currently proposed will have a very marginal positive impact in reducing energy consumption associated with food production and consumption such that the impact can be considered neutral given the scale.</p>
<p><b>Materials and waste.</b> To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates</p>	<p>Very minor positive contribution to this objective (Note that the majority of food waste actions referenced in the strategy are being implemented under the London Environment Strategy and the IIA for that Strategy assessed the London Environment Strategy as having significant positive impacts on this objective).</p>
<p><b>Natural Capital and Natural Environment.</b> To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity</p>	<p>Positive impacts are identified; sustainable food growing is likely to impact positively on natural capital including landscapes and to support biodiversity.</p>
<p><b>Economic competitiveness and employment.</b> To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all</p>	<p>Positive impact from multiple actions meeting economic competitiveness objective by supporting London's food economy. Minor positive impact from support for skills and employment in the food sector, also</p>

<b>IIA Objective</b>	<b>Draft LFS contribution to the IIA objective</b>
<b>Education and Skills.</b> To ensure the education and skills provision meets the needs of London's existing and future labour market and improves life chances for all	education and awareness about local seasonal food. Potential for minor positive impact associated with increased knowledge about healthy food e.g. for those receiving social prescriptions and from more connection with food and knowledge about food sourcing.
<b>Infrastructure.</b> To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	Minor positive contribution associated with improved London food infrastructure.
<b>Culture.</b> To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	Minor positive impact given actions to support food which meets Londoner's cultural needs and London as a food destination.
<b>Sustainable Land Use.</b> Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	Potential for very minor positive impact, given scale, associated with focus on sustainable food system and London food growing.
<b>Equality and Inclusion.</b> To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population	Minor positive impact through equality and inclusion in healthy food, particularly children, the elderly and those on low incomes, also support for food social enterprises and food to meet all Londoners' needs.
<b>Social Integration.</b> To ensure London has socially integrated communities which are strong, resilient and free of prejudice	Minor positive contribution to social cohesion as people are more connected through food. For example, through community food growing, community settings and London food start-ups.
<b>Health and health Inequalities.</b> To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the city and between communities	Minor positive contribution to improving health outcomes and reducing health inequalities particularly over the longer term with the potential for this to become a major contribution. Main contribution is associated with health eating. Community food growing also brings health and well-being benefits.
<b>Accessibility.</b> To maximise accessibility for all in and around London	No identifiable contribution.

The likely impacts of the draft LFS were also assessed in terms of the effects on various equality groups and the findings are summarised below.

<b>Protected characteristic</b>	<b>Groups with protected characteristic</b>	<b>Potential impacts</b>	<b>Assessment</b>
Age	Children and young people (0-15) Children and young people (16-25) Older people (65+)	The draft LFS is directly targeted to improve the food conditions for children and young people. Many of the commitments will have direct positive impact for this category.	++
Disability	People defined as disabled, including: Wheelchair users and people with severe walking difficulties People with mental health problems or learning disabilities	The draft LFS references people with disabilities benefit from improving food provision in London including associated mental wellbeing and social cohesion benefits associated with food. There are likely to be positive impacts for this category.	+
Gender reassignment	Transgender people	This EQIA category is not brought out in the draft LFS document. There is room to strengthen this issue in the sections referencing diversity e.g. Glossary.	0
Marriage & Civil partnership	People in civil partnerships or marriage between same sex or opposite sex	This category is not directly targeted by the draft LFS, there are likely to be indirect benefits through improvement of food.	0
Pregnancy & maternity	People who are pregnant or expecting a baby and who have recently given birth	There is a focus on improving health for pregnancy and maternity groups in London and the draft LFS draws out and focuses on this group. The draft LFS is likely to improve conditions for this category.	++
Race	Black, Asian and Minority Ethnic (BAME) groups	Draft LFS does mention this EQIA category within the disadvantaged groups, there are likely to be indirect impacts for this category but there may be more opportunities to strengthen for this category	+
Religion & belief	Faith groups	This category is not directly referenced in the draft LFS. It's possible there will be indirect benefits to this category.	0
Sex	Men or woman, recognising that women are more frequently disadvantaged	There are aspects of draft LFS for example, the focus on pregnancy and maternity, involved in projects in Gender Equality, and the support of young families that are likely to have some positive impact on this category.	+
Sexual orientation	Lesbians, gays, bisexual people	This category is not directly referenced in the draft LFS, there could be indirect benefits to this category. However, this category could be more directly brought out and focused on.	0
Low income	Low income groups	This category is a direct target of the draft LFS in relation to food poverty and should experience direct benefit from the LFS.	++

## **Recommendations and how these have been addressed in the final LFS**

### Groupings of the actions for the IIA

The IIA of the draft LFS grouped the actions in the draft LFS into eight areas of emphasis. These were considered to be the areas which were primary or key impact areas for Londoners. The eight areas of emphasis are as follows:

- A. Health and wellbeing benefit from healthier food.
- B. Hunger and poverty.
- C. Equality/ vulnerable groups.
- D. Food business and London's food economy.
- E. Food in London's workplaces.
- F. Food growing.
- G. Food's environmental impact.
- H. Research and strategic issues

The table below sets out the recommendations under each of the eight areas along with how these have been addressed in the final LFS.

Area of emphasis	Relevant IIA objectives	Comments/discussion	Recommendation	GLA response/Changes made
A. Health and wellbeing benefit from healthier food	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• Climate change adaptation</li> <li>• Climate change mitigation</li> </ul>	<p>This group of actions have been grouped together as they have a significant emphasis on healthy food bringing about healthier living.</p> <p>The first action above has a largely neutral or very minor positive effect on the objectives listed left given its focus on a sustainable food system.</p>	<p>Potential to highlight and link to the actions in the Mayor's London Environment Strategy, either to combine delivery or enhance delivery of both strategies.</p>	<p>Links to the London Environment Strategy have been strengthened in the LFS through:</p> <ul style="list-style-type: none"> <li>- A background section which contains specific wording on links to other Mayoral strategies has been included in the document.</li> <li>- Further references to the London Environment Strategy have been made in the LFS.</li> <li>- The GLA's Environment team has been closely involved in the development of the LFS and several actions will be delivered in close collaboration with the Environment Strategy.</li> </ul>
	<ul style="list-style-type: none"> <li>• Health and health inequalities</li> </ul>	<p>Minor positive contribution to improving health outcomes and reducing health inequalities particularly over the longer term where the benefits are likely to be major positive.</p>	<p>Potential to draw on evidence or support other bodies who also have a remit to monitor levels of awareness about healthy eating and access to healthy food amongst low income households. Refer also to Health Inequalities Strategy</p>	<p>References to the Health Inequalities Strategy have been made in the LFS, including in the background section to the document.</p> <p>A commitment from the Mayor to measure Household Food Insecurity in London has been included in the LFS which will help monitor access to healthy food among low income households, and to devise interventions which may help improve food security in those households.</p> <p>Officers leading on the delivery of the LFS will work closely with officers leading on delivery of the Mayor's Health Inequalities Strategy and external partners such as Public Health England to draw on health indicator monitoring.</p>

Area of emphasis	Relevant IIA objectives	Comments/discussion	Recommendation	GLA response/Changes made
B. Hunger and poverty	<ul style="list-style-type: none"> <li>Equality and inclusion</li> </ul>	Strong potential for positive impact through equality and inclusion for children and young people and those on low incomes.	Potential to provide more detail, including measuring and monitoring of the Kitchen Social scheme e.g. whether the processes of 'engaging' children is effective or whether it could be strengthened to reach more families and have a wider impact.	<p>The LFS contains strategic actions and does not provide detailed information on how these actions will be delivered. The accompanying Implementation Plan provides further detail – including on the Kitchen Social programme. In addition the resources available on the Kitchen Social website <a href="https://www.mayorsfundforlondon.org.uk/programme/kitchen-social/">https://www.mayorsfundforlondon.org.uk/programme/kitchen-social/</a> provide further detail on measuring and monitoring.</p>
C. Equality/vulnerable groups	<ul style="list-style-type: none"> <li>Social integration</li> </ul>	Strong positive outcomes increasing over time through the support of vulnerable groups, including specific measures around social isolation.	Potential to further strengthen through the reference and support of other groups with protected characteristics in the Equalities Act (e.g. Disability, older people).	<p>Further actions have been added in the final LFS, and existing actions have been strengthened to ensure vulnerable people are supported as far as possible. This includes highlighting the fact that visible food insecurity can make young people vulnerable to exploitation.</p> <p>In the actions the Mayor will take to deliver change (chapter 1), the first-ever research on London Household Food Insecurity has already commenced following the end of the consultation on the draft London Food Strategy, and will deliver its findings in early 2019.</p> <p>In the actions the Mayor will take to support change, an action has been added in chapter 1 that the Mayor will work with partners to help prioritise and join up action to reduce food insecurity and hunger, including piloting work with schools to tackle child poverty.</p>
	<ul style="list-style-type: none"> <li>Health and health inequalities</li> </ul>	Health and health inequalities would incur major positive effects over time, through the	Potential to further strengthen through the reference and support of other	

Area of emphasis	Relevant IIA objectives	Comments/discussion	Recommendation	GLA response/Changes made
		promotion of access to healthy foods, reducing social isolation, tackling obesity etc.	groups with protected characteristics in the Equalities Act (e.g. Disability, older people).	<p>The introductory narrative to Chapter 1: Good food at home has been strengthened to include reference to London's more vulnerable groups.</p> <p>The narrative has changed to acknowledge the particular food insecurity challenges which may be faced by marginalised groups such as older people, homeless people, disabled people, asylum seekers, unemployed people, teenagers and young adults. The narrative notes that for all these groups, and others, food plays a vital role in avoiding isolation and building communities.</p> <p>The narrative has also been expanded to emphasise that physical (geographic/spatial) access to good food is also critical to help address food insecurity, emphasising the importance of meals provided in community settings and public institutions, who often cater for vulnerable population groups.</p> <p>Food education and skills remain a crucially-important part of how we help Londoners to eat better at home, and schools have an important role to play in helping children and their families to improve their skills and food knowledge.</p>
D. Food business and London's food economy	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• Climate change adaptation</li> </ul>	First two actions in list above have a very minor positive impact on these objectives given the focus on a sustainable, local and seasonal food (indicated as 'neutral' due to scale).	Potential to highlight the Mayor's London Environment Strategy	<p>Links to the London Environment Strategy have been strengthened in the LFS through:</p> <ul style="list-style-type: none"> <li>- A background section which contains specific wording on links to other Mayoral strategies has been included in the document.</li> <li>- Further references to the London Environment Strategy have been made.</li> </ul>

Area of emphasis	Relevant IIA objectives	Comments/discussion	Recommendation	GLA response/Changes made
	<ul style="list-style-type: none"> <li>• Economic competitiveness and employment</li> <li>• Education and skills</li> <li>• Culture</li> </ul>	<p>Positive impact from multiple actions meeting economic competitiveness objective by supporting London's food economy.</p> <p>Minor positive impact from support for skills and employment in food sector, also education and awareness about local seasonal food.</p> <p>Minor positive impact given actions to support food which meets Londoners' cultural needs and London as a food destination.</p>	<p>There are opportunities to provide more detail and proposals about how the actions will be delivered and supported e.g. defining 'values-driven food businesses' and details on London's position and potential as a world leading food destination.</p>	<p>The GLA's Environment team has been closely involved in the development of the LFS and several actions will be delivered in close collaboration with the Environment Strategy.</p> <p>No changes have been made to the LFS in relation to this point discussions are ongoing with London and Partners, the Mayor's international promotional agency, regarding how London's food offer can be used to attract visitors, or help visitors have a better food experience while they are here.</p>
E. Food in London's workplaces	None	None	None	N/A
F. Food growing	<ul style="list-style-type: none"> <li>• Health and health inequalities</li> </ul>	<p>Minor positive impact associated with local and community food growing including physical activity</p>	<p>Strengthen reference to physical and mental well-being benefits associated</p>	<p>References to the physical and mental well-being benefits of food growing have been strengthened and added in the introductory narrative in Chapter 5: Food Growing.</p>

Area of emphasis	Relevant IIA objectives	Comments/discussion	Recommendation	GLA response/Changes made
		benefits and being in natural environment.	with food growing and being connected to natural environment for all (not just those who receive social prescriptions).	
G. Food's environmental impact	<ul style="list-style-type: none"> <li>• Climate change mitigation</li> <li>• Materials and waste</li> </ul>	Very minor impact (marked as neutral due to scale and given that Mayor supported actions rather than delivered actions).	Include a target for increased no. of drinking water fountains at e.g. 3- and 5-year intervals, depending on monitoring and any support for take up which might be needed.	<p>The action relating to drinking water fountains in Chapter 3 has been strengthened and further targets included.</p> <p>Up to 20 water fountains will be delivered in partnership with Thames Water in 2018 and a further 100 will be in place by the end of 2021.</p>
H. Research and strategic issues	<ul style="list-style-type: none"> <li>• Climate change mitigation</li> </ul>	Potential for minor impact, marked as neutral due to nature of actions (research/ dialogue based) and scale	Identify action(s) associated with low-carbon food transport network e.g. promotion of local, seasonal and British food.	<p>Further actions have been included in Chapter 6: Good food for the environment and chapter 5: Good food growing, which promote local, seasonal and sustainable food. These include:</p> <p>An action in chapter 6 to 'lead by example by promoting sustainably and ethically-sourced food across the GLA group, aiming to reduce the contribution of food to climate change and its impact on ecosystem services.'</p> <p>An action in chapter 5 'Through London Food Board, work with the Dynamic Food Procurement National Advisory Board to explore the potential to integrate more SME food</p>

Area of emphasis	Relevant IIA objectives	Comments/discussion	Recommendation	GLA response/Changes made
				producers into GLA Group and public-sector contracts.'
	<ul style="list-style-type: none"> <li data-bbox="392 411 598 544">Economic competitiveness and employment</li> </ul>	Addressing London's food insecurity or risks to this would support economic competitiveness. Marked 'neutral' given that being researched and assessed with through above actions.	Actions from research would support objectives	<p data-bbox="1243 411 1962 580">As indicated in the comments, addressing risks to London's food security is covered by the action in the final LFS to 'Assess London's food security, to help improve London's resilience to potential shocks which could destabilise food supplies.'</p> <p data-bbox="1243 612 1688 639">No further changes have been made.</p>

## **Reasons for adoption of the final LFS and monitoring arrangements**

### **Adoption of the final LFS**

As identified on page 3 of this Post Adoption Statement, the key findings of the IIA of the draft LFS were that no significant adverse effects were identified in relation to implementation of the draft LFS in respect of its potential environmental, economic or social impacts.

In addition, as set out in the LFS Consultation Report, there were no major areas that stakeholders and the public were opposed to in the draft LFS. The changes made to the final LFS are mostly minor and strengthen the strategy further rather than changing its content or structure significantly.

### **Monitoring arrangements**

An Implementation Plan has been published alongside the final LFS. This Implementation Plan sets out the actions that the Mayor will prioritise between 2018 and 2023 to help implement the actions set out in the strategy. It also provides delivery timescales and information on how progress will be measured and reported on. The Implementation Plan will be updated every two years to reflect the successive and cumulative London-wide activity required to achieve many of the strategy's longer-term objectives.

Delivery of the strategy will be overseen by officers working on the GLA's Food Programme working closely with London Food Board. The London Food Board (LFB) consists of 17 individuals who advise the Mayor of London and the GLA on the food matters that affect Londoners. Membership is made up of leaders from sectors spanning the breadth of the food system who reflect the diversity and dynamism of London.