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Title: London's food policy: leveraging the policy sub-system, programme and plan

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Abstract

This article explores the spaces for, and boundaries to, London's food policy. Leveraging the concept of institutions as policy-structuring forces, it positions immediate policymaking capacity and potential as delineated by broader historical, social and legislative institutions. Using new data, the findings identify structuring effects including: the strategic force of different policy areas; the Mayor's remit and interests; relationships between the London authority and the boroughs, as well as in relation to the national level; and requirements for integration. Within the metropolitan government space, distinguishing between the food policy sub-system, programme and plan provides a conceptual device to understand how food policy in London extends beyond its limited direct levers and resources - reflecting and responding to the city's longstanding complicated and multi-tiered governance. Food policy is enabled through a sub-system consisting of a set of dedicated food governance structures and mechanisms - a permanent team of staff, plus policy networks, advisors and street-level implementers - which utilise different modes of policy integration to bolster the programme of activities around food. A new cross-cutting food plan - the London Food Strategy - was developed in 2018 to coordinate these different actors and activities. The case study enables critical reflection on the potential for urban food policy to address a range of food systems outcomes. While some harder policy interventions are possible, there remains a multi-level disconnect in policy authority between the local borough, metropolitan and national levels. There are constraints on how far transformation can take place, raising questions about the re-balancing of national-local power sharing which will be required for a more coherent and transformative approach.

Highlights

- London's metropolis-wide food policy activities and actors are described
- The concept of institutions as policy-structuring forces is applied
- Enablers of and constraints on London's food policy are examined
- A heuristic: sub-system, programme and plan, within wider government structures, is proposed
- Re-balancing of national-local powers for food systems transformation is explored

Keywords: Food Policy; London Governance; Institutions; Food Systems

1. Introduction

London, with a population of almost nine million people, is one of a burgeoning number of large metropolitan cities around the world that are prioritising policy activities around food. This prioritisation goes beyond providing an ample food supply, to the *consequences* of how the city and its inhabitants are fed. The catalyst is a recognition that food is implicated in many of the most important health, environmental, economic, social and political challenges today, from obesity to climate change. London's most recent food strategy makes this plain: '*child obesity is rising, Londoners' reliance on foodbanks is increasing and global Greenhouse Gas emissions from food production are contributing to London's poor air quality*' (GLA 2018 p7).

The local level has emerged as an important site for food policy activity and collaboration over recent decades (Hinrichs & Lyson 2007). The idea that food policy could be changed at the municipal level slowly took hold from the 1980s onwards, the London Food Commission being one of the fore runners in developing a city or urban-based food policy (Dahlberg 1994). Local food policy groups such as food policy councils and partnerships of different kinds - established by local government, civil society groups, or a combination of the two - have proliferated in cities (Halliday 2015; Santo & Moragues Faus 2019). Local government has grown as a force for reshaping food supply; characterised by closer democratic accountability and a strong focus on policy, fed by bottom-up ideas from street-level implementers. Over 200 cities worldwide have signed up to the Milan Urban Food Policy Pact, which highlights that '*food policies are closely related to many other urban challenges and policies, such as poverty, health and social protection, hygiene and sanitation, land use planning, transport and commerce, energy, education, and disaster preparedness*' (Milan Urban Food Policy Pact n.d).

Cities are responding to increasingly complex food system challenges by seeking to leverage their powers and responsibilities to improve the urban food environment (Halliday and Barling 2018) through more coordination of policies around food, and creating new food governance structures to deliver food policy. This article is aimed at augmenting observations on how cities intervene in their food systems, and how the policy levers available to them vary, '*depending on subnational structure and distribution of powers and service responsibilities between national, regional, and local levels*' (Cairney 2012, in Halliday & Barling 2018 p179).

London's food policy involves a range of interventions spanning social, environmental and economic development objectives, supported by a dedicated team of public sector employees working on food, and a set of further supportive mechanisms including an advisory board. The city's current policy activities and goals around food were brought together in the London Food Strategy (LFS) in 2018. The process of developing the LFS involved an innovative integrated approach to embedding food issues and actions across the city government; called the Greater London Authority (GLA).

Adopting an historical institutionalist approach, and leveraging the concept of *institutions as policy-structuring forces*, the objective of this study is to understand both the boundaries to and spaces for urban food policy within London's legislative authority. The nature of London's place within the broader food economy and its governance responses are reviewed, providing historical context to current policy activities. The city's immediate programme of food policy activities, and the LFS, are positioned as delineated by broader government institutions, which dictate local government policymaking capacity and potential (Morgan & Sonnino 2010), updating and extending existing

studies of London's food policy approach (e.g. Reynolds 2009; Morgan & Sonnino 2010; Halliday & Barling 2018).

It describes how the role and powers ascribed to the GLA and London's 33 boroughs, and the approach to integration ascribed in the 1999 GLA Act which established the GLA and '*built the logic of 'joining up' into the institutional design of this new strategic authority*' (West et al 2003 p480), influence the city's food leadership, and provides insights into how the city is championing an integrated policy approach to food. In doing so, the paper expands the '*slender body of literature*' examining how '*local government arrangements and political priorities affect the ability of food policy groups to operate as intended*' (Halliday & Barling 2018 p182).

A heuristic is presented to support a critical place-based analysis of urban food governance that examines the importance of the political context - in this case articulated as the institutional arrangements of government - on capacity to engender systemic change. The heuristic distinguishes the different components of food policy in terms of *organisational aspects* and *activities*, and the broader (metropolitan) government structure within which these are situated. As well as structuring the research and enabling more precise discussion of the case, the heuristic provides a tool for more precise comparative analysis of urban food policy across jurisdictions going forward.

The historical and political context presented enables us to pose questions about remit and functions within current city food governance, and to critically understand the potential for urban food policy to address a range of food systems outcomes, given current powers and pressures. This, in turn, opens up a conversation about future directions: the changes to national-local power sharing and allocation of policy authority around food related responsibilities which may be required for a more coherent and transformative approach. Here, we propose that the distinction between the urban food policy sub-system, programme and plan, and emphasising their *interrelationship*, provides a tool to clarify research and further assist understanding.

2. Theoretical and Methodological Approach

Given the '*staggering complexity of the policy process*' (Sabatier 2007 p4), applying a model enables the policy analyst to simplify what might otherwise be overwhelming in its scope. Institutionalism is one such model, and emphasises how organisations, and the practices and norms associated with them - which include formal rules (such as the structures of government) and informal rules of how things should be done - shape policymaking opportunities (Cairney 2019). Institutionalism can be compared to alternative models which position policy as shaped predominantly by: rationality (individuals pursuing their preferences); policy entrepreneurship; paradigmatic ideas or discourse; networks/coalitions of actors; or even chance (Thissen & Walker 2013; MacRae 2016).

The strand of *historical* institutionalism (HI) emphasises the historical roots of policymaking structures and practices, noting that organisations cannot be understood simply on the basis of the functions they currently perform (Pierson 2000b; Thelen 1999, 2001, in Thelen 2002). This is because the architecture and practices of policymaking *reify* ideas present at the time of their formulation. What appear to be small choices in institutional arrangements – often taken unthinkingly or unwittingly – can, later down the line, have remarkable consequences, and may prove irreversible (Peters et al 2005). Put simply, early policy decisions 'lock-in' a policy onto a particular path; the notion of 'path dependency'. Under HI, attention is directed to: the way governance structures are

organised; the standard operating procedures (processes) of policymaking; and the relationships (policy networks) between governance actors (policymakers, the private sector and civil society), and how these influence policymaking opportunities and capacity for change. Thelen (2002) describes this kind of analysis as an important corrective to more functionalist perspectives, which can spuriously explain existing arrangements - including in this case how food policy in a city is organised - simply on the basis of the rational functions they perform, or as related to the most important policy issues at that particular point in time (Pierson 2000b; Thelen 1999, 2001, in Thelen 2002).

HI therefore offers a complimentary lens to theories of reflexive governance linked to a more forward looking, future-oriented research agenda (Feindt & Weiland 2018), while remaining in the place-based tradition of recent urban food policy scholarship. By highlighting structural institutional constraints on urban-level policy change (Ehnert et al 2018), institutionalism offers a counter to food governance analyses more aligned with an optimistic or problem-solving philosophy which may overlook institutional deadlocks (Candel 2014, in Moragues Faus et al 2017). This is not to conflate institutionalism with pessimism, but rather that it illuminates the complex institutional landscape and its relationship to agency, including how the distribution of power at national and local scales creates opportunities for, and obstacles to, urban sustainability transitions around food (Ehnert et al 2018). Doing so can inform a more radical agenda on the transformations of governance – including power sharing between policy levels – which may be required for urban food systems change.

While urban food scholarship has tended to underplay these aspects, there is a growing awareness that agency to generate local level change must be understood in relation to the realities of governmental structures and the constraints and opportunities these provide (Sonnino & Coulson 2019). This includes an agent's capacity to intervene in urban food systems within a political structure where certain system levers are retained by national government. With some exceptions, for example Brazil's efforts to redesign its food governance, there has been little endeavour to join up local action on food with national objectives (Sonnino et al 2014; IPES-Food 2019).

The theoretical lens outlined above directly informs the research design. While many analyses treat 'policy' as a bounded set of activities happening at a particular juncture in time (and in the case of urban food policy studies often in a particular place) in this paper the focus is broadened to cover the wider context within which food policy activities take place. Applying the institutionalist lens to the empirical case of London's food policy grounds the analysis in an assumption that understanding why a food policy involves a particular process and content requires interrogating the structure of broader political institutions.

The research utilises a case study method, supported by qualitative document analysis, interviews and participant observation, to open up the 'black box' of London's food policymaking¹ (Wellstead et al 2013). Examining how policies are made, not simply the end product, allows a critical reflection on their content, and enables lesson drawing (Rose 1991) (including for the growing number of cities wishing to understand the scope of their own food policies). The case study method is deemed appropriate for this article, given the aim to *'illuminate a decision or set of decisions: why they were*

¹ The black box metaphor is utilised in political science, to describe endeavours to make the opaque process of policy development at the early phases of the 'policy cycle' more transparent, and direct analysis toward the process of policy rather than - as is more common - only the *content* of the end-products of this process

taken, how they were implemented and with what result' (Schramm 1971, in Yin 2015 p15). While the geographical dimension of the case – London – is self-explanatory, further clarification is provided on the operationalisation of 'food policy'.

Because there is 'no unique policy level or scale but rather several levels that may be examined as 'policy'' (Kay 2005 p556), the research operationalises urban 'food policy' utilising a heuristic distinguishing the *sub-system*, the *programme*, and *plan*. These categories can all be articulated as urban 'food policy' or 'food governance'. These three distinct but overlapping components of urban food policy are layered under a metropolitan government within the broader national political system, which – in the institutionalist tradition – is seen to shape policy opportunities.

Table 1: Urban Food Policy: Local Government Structure; Sub-system; Programme and Plan

	Component	Details
Organisational Structures	Urban-Metropolitan Government Structure	Broader government structure of the Greater London Authority
	Food Policy Sub-System	Actors involved in food policy in the city, including the GLA Food Team, advisory bodies such as the London Food Board; partners, such as the NGO Sustain; plus actors in other departments involved in food-related policy
Activities	Food Programme	Activities undertaken by the Food Team and partners, including oversight and funding of delivery of on-the-ground activities (e.g. food growing; holiday hunger provision); providing guidance (e.g. Healthy Catering Commitment); monitoring (e.g. Good Food for London; Beyond the Foodbank reports); junk food advertising ban on the Transport for London network; plus individual borough-led activities on food
	Food Plan	The 2018 London Food Strategy

Source: Authors

The '*sub-system*' denotes the organisational arrangements which relate to food policy. The '*programme*' is about activities (of the food policy sub-system) and includes the application of funding, advisory, monitoring and regulatory levers. The term '*plan*' is used to capture a single dedicated strategy, to distinguish this from the portfolio of food-related policy activities, acknowledging that while many cities and countries have a programme of activities related to food, they may not have a dedicated food 'strategy' or 'plan' in place. The food policy sub-system can then be understood as nested within a broader political system of institutions which encompass power-sharing, electoral and budgetary arrangements and political parties (all with historical roots).

Positioning the wider food policy sub-system and programme, and also a specific food plan (the LFS), within this over-arching political system, allows a multi-layered view of food policy in the city, which focusing on one or the other would not. The case study is situated in its wider context through an overview of the historical development of London's food policy and its broader political institutions. The results are combined with data on the current food policy approach from three additional sources: publicly-available policy documents; interviews; and participant observation.

A document analysis of key GLA strategies and other publications, including grey literature such as civil society reports and media coverage, was conducted. Along with the LFS itself, and accompanying documents - such as the report on the consultation process for the LFS, and the implementation plan, London's non-food strategies (statutory and non-statutory) were reviewed and any references to food noted. Because policy documents rarely describe the development process or wider influences on them, document analysis was complemented by five interviews with actors involved in development of the LFS. The reliance on additional data sources of policy documents and participant observation, and the in-depth specialist knowledge and the policy-related roles of the interviewees, meant that five interviews were deemed to be sufficient to build the case.²

Interviews were transcribed and coded into themes, and quotes anonymised to allow interviewees to speak freely. Additional data was collected via participant observation by one author, who sat in on three LFS meetings and workshops of the London Food Board in 2017, and analysed minutes of meetings not attended. This data was used to build additional understanding of influences on the LFS; for example on how ideas for actions which could be proposed were constrained by the scope of GLA powers to intervene in the city's food system.

What follows is an examination of London's urban food policy organised according to the heuristic, followed by an exploration of the structuring effects and other interactions between the components.

3. *The development of London's government and food governance*

Food has been a key feature in London's governance and culture for centuries. In the 19th century, with on-going urban growth, a decades-long struggle to improve food safety ensued, only completed by legislation at the century's end (Paulus 1974, Lang 2006), highlighted by recurring studies of food poverty and deprivation in the nation's capital (Stedman Jones, 1971; Booth, 1890; Spring Rice, 1939). The first elected government for London was the London County Council (LCC) and 28 Metropolitan Boroughs in 1889, with power shared between them. This was a response to how London's '*system of government had not kept pace with the geographical, demographic and social change of the previous century*' (Pilgrim 2006 p224). For the first time, this provided an overarching and elected government framework for action on physical and social infrastructure and began coordination of diverse London borough roles, giving the LCC powers to shape schools, transport and food flows, via markets.

A key theme of London's broader metropolitan government is ongoing tensions around the relationships between both the parts of the city (its boroughs) and the whole, and that whole and the national level (Pilgrim 2006), and the attempts to re-design its institutions in response. The LCC was superseded in 1964 when increased powers were given to the new Greater London Council (GLC) to liaise with and coordinate London's expanded number of 32 subsidiary boroughs. London's central authority, and boroughs, both being elected and therefore party political (with a range of political parties of different ideologies required to cooperate on the city's policy), means governance-sharing relationships in the capital are inherently political (White 2008). The GLC had expanded economic powers from 1965, and began to experiment with a new wave of democratic

² Interviewees: INT1 – London Food Board Member; INT2 – London Food Board Member; INT3 – GLA Staff; INT4 – GLA Staff; INT5 – London food Board Member. Interviews conducted in 2018.

engagement with food, including an economic plan involving food for jobs and health (GLC 1985), and a Food Commission to strategise on food as a nexus of many policy concerns from quality and safety to children and fast food (LFC 1987, Lobstein 1988, Lang 1997). Famously, the GLC was abolished in 1986 by Conservative UK Prime Minister Margaret Thatcher, at a time when the GLC was dominated by the opposition political party Labour.

Following an unusual period of weakened governance, where powers were shared between boroughs, various London bodies and national government, without an elected central authority, a new political framework – the Greater London Authority (GLA) – was created in 1999. The GLA assumed some local responsibilities from central government (transport, planning, police, emergency services). The new authority was designed to address failings of the past muddled governance-sharing approach and allow it to generate strategic action on pan-London issues and solve problems of coordination (Rydin et al 2003). An elected Mayor and Assembly would *‘consult widely and work closely with London organisations – boroughs, the private sector and voluntary bodies – in a new inclusive style of politics’* (Pilgrim 2006 p226). This was designed to *‘provide London-wide government, without handing too much power to a single figure who could use it as a platform against central government’* (Worthy et al 2019). The hope was to avoid conflict by emphasising that *‘the London boroughs and the City were with some exceptions to remain responsible for the delivery of local services’* while *‘expected to work closely with the Mayor and Assembly to ensure that there was good information to inform strategic decisions and to assist in the delivery of ‘agreed London-wide policies’ and ‘restricting the activities of the core GLA bureaucracy to setting strategies, making sure that arm’s length bodies (the London Development Agency, the London Fire and Emergency Planning Authority, the Metropolitan Police Authority and Transport for London) ran those London-wide services which had passed to the GLA’* (Pilgrim 2006 p227).

The role and powers of the Mayor were created under GLA Act 1999, with later revisions, and Mayoral elections every four years. The Mayor is permitted a supporting team of 10 political advisors, which have been described as ‘deputy mayors’, or the ‘Mayoral cabinet’ (Sandford 2018), with oversight provided by a 25-member Assembly with *‘power to hold the Mayor and his/her key advisers to account on a regular basis’* (Sandford 2018). The new elected Mayor – the same person who had led the GLC into abolition – restarted food work by supporting the creation of a new London food body to investigate food issues in the capital. At the launch it was noted *‘London has lacked a strategic overview since the former London Food Commission was replaced by the national Food Commission’* (Sustain n.d). This body - now titled the London Food Board - has operated since 2004 under three elected Mayors: Ken Livingston (2000-08), Boris Johnson (2008-16) and Sadiq Khan (2016-present).

The current role of Mayor has been summarised as:

‘Strategic direction of policing, fire, and transport services, and strategic responsibility for planning, housing, waste, climate change, energy, culture, and tourism... a nonstrategic duty to improve health and reduce health inequalities, and a duty to promote economic and social development, skills, and environmental improvement’ (Halliday & Barling 2018 p186).

London’s complicated and multi-tiered government requires its Mayor to traverse not only many central/GLA departments and bodies, and its boroughs, but also to negotiate policies with Central

government - regarded to have *'by far the greatest impact on the strategic issues facing London'* (PMSU, 2003 in Pilgrim 2006), indeed:

'in key areas such as infrastructure, skills, people, economy and service provision, the Mayor of London had less power than central government and in many cases less power than local government' (Pilgrim 2006 p232).

London's success therefore involves both 'soft' as well as 'hard' power, and the seven strategic plans the Mayor is required to produce rely on others for implementation (Blick & Dunleavy 2017). Of the resources available to the Mayor - summarised by Sweeting (2002) as: authority; legitimacy; profile; patronage; control of policymaking; control over budget setting; and the ability to staff a mayor's office - *'only the last three of these could be termed 'formal', involving specified powers or finance. The remainder are institutional in nature, relating to the tenor of relationships between actors and the prevailing organisational culture of the GLA'* (Rydin et al 2003 p59). Even the budgetary powers are *'far less than their Parisian or New York counterparts, being 'squashed' between jealously-guarded central government funding and borough budgets'* (Travers 2004, in Worthy et al 2019). Along with the resources available, the Mayor also influences policymaking through their own personal agenda and a manifesto, over a relatively short-term electoral cycle (Rydin et al 2013). As a result:

'Mayors have made creative use of the powers they possess, especially in the field of transport. The congestion charge (introduced by Ken Livingstone) is a good example of innovation in this area. Their 'soft power' advocacy has also been influential, for instance in encouraging take up of the London Living Wage' (Blick & Dunleavy 2017 p4).

Both Mayor's Livingstone and Johnson used publicity to make up for weak powers (Worthy et al 2019).

Finally, and with pertinence for the food policy integration strategy used in London, the 1999 GLA Act built the logic of 'joining up' into the institutional design of this new strategic authority, with *"integration written through it like Brighton through rock"* (interviewee in West et al 2003 p2), through a requirement the Mayor ensure its range of strategies *'meshed into a coherent overall strategy for promoting London's economic, social and environmental well-being'* (West et al 2003 p1).

London's Food Policy Sub-System

Food is not designated a statutory policy area for delivery, but there is a formal Mayoral programme on food, run by a dedicated staff. This 'Food Team' of civil servants within the central authority is the core of London's food policy sub-system. There is no dedicated department for food within the GLA structure; the team sits within Social Integration, Social Mobility and Community Engagement. In the past it has been located in the Environment team, and in Economic Development. Each of the individual boroughs also has its own activities around food, which range from an established body, such as the Islington Food Partnership (Islington Council n.d), to more ad hoc arrangements.

The sub-system also consists of various advisory groups and partners which support the Food Team. The main advisory group is the London Food Board (LFB), first established 2004 (Halliday & Barling 2018) to advise the Mayor on food priorities for London. Its members are food experts drawn from across business, academia and the third sector (GLA n.d). Membership was revised in advance of LFS

development, through an open application process. The board is made up of representatives from across the food system in London, and several members work directly with the Food Team to deliver its programme. Historically, the LFB Chair has also played an important role in linking the Food Team and its programme to the Mayor’s office, in the absence of any Deputy Mayor for food, though the role of Chair has been re-designed more recently and links are no longer as clear.

The central team and boroughs are connected by a mechanism called the Boroughs Food Sub-Group (of the London Food Board) (BFSG), consisting of representatives of the London boroughs (primarily from public health).

The Food Team works with outside partners from ‘*various parts of London’s food system, developing and delivering projects which use good food to improve the lives of London*’ (GLA n.d). These include actors from the private and third, including significant support from key partner Sustain: the Alliance for Better Food & Farming, a civil society alliance of food and farming organisations. Sustain handles much of the delivery, and has enabled the measurement and monitoring approach through the Good Food For London and Beyond the Food Bank borough league tables (Sustain 2019a; 2019b).

London’s Food Policy Programme

London’s programme of food-related activities spans multiple food system dimensions, including health, social welfare, and the environment, and utilises a policy mix spanning: communicative tools for overarching vision and strategy (e.g. the LFS); oversight and funding of delivery of on-the-ground activities (e.g. food growing; holiday hunger provision); providing guidance (e.g. Healthy Catering Commitment); monitoring (e.g. Good Food for London and Beyond the Foodbank food poverty reports), and a junk food advertising ban on the Transport for London (TfL) network.

Beyond the direct food programme and plan (see below), the Food Team stretches the boundaries of the food policy sub-system by integrating food into multiple policy remits to ensure ‘*the positive role that food can play in everyone’s lives has been integrated across the full range of Mayoral strategies*’ (GLA 2018), supported by the mechanism of a strategy coordination working group. This includes the seven statutory strategies the mayor must publish, plus other discretionary strategies. Table 2 presents how food is featured in the range of non-food strategies produced by the Mayor.

Table 2: Food-Related Issues in London’s Sectoral Strategies

	Mayoral Strategy	How food issues are integrated/addressed
Statutory	Environment Strategy	Importance of Food Growing Spaces Reducing Food Waste and Single Use Packaging Drinking Water Refill Schemes and Water Fountains
	Health Inequalities Strategy	Role of Food in Health Inequalities Access to affordable healthy food Access to drinking water Homelessness as a barrier
	Spatial Development Strategy	Tackling food takeaways near schools and deprived areas

		Improving the health of catering offer Food growing as part of a healthier food environment Retail diversity sector which promotes sustainability
	Economic Development Strategy	Food insecurity Jobs and growth in hospitality and food sectors New forms of retail Importance of distinct and diverse food offering
	Culture Strategy	Food Markets Role of food and drink in diversity
	Housing Strategy	No mention of food
	Transport Strategy	No mention of food (The Transport for London Advertising Ban was introduced after this strategy was produced)
Non-Statutory	Equality, Diversity and Inclusion Strategy	Role of food and drink in diversity Importance of healthy food for children and reliance on food banks
	Skills Strategy	No mention of food
	Sport and Physical Activity Strategy	Only mentions food tangentially
Visions	Vision for a 24-hour City	Barriers to accessing good food at night Role of food industry in night time economy
	Tourism Vision for London	Distinctive and diverse food offering
	Every Child a Healthy Weight (Report from London's Child Obesity Taskforce)	Eating healthily and drinking water Causes of childhood obesity span multiple policy sectors

Authors, adapted from Parsons & Hawkes (2019)

London's Food Policy Plan

London's explicit food plan is the LFS, initiated in 2016 by new mayor Sadiq Khan, whose election manifesto promised to tackle food poverty, child obesity and unhealthy food environments. The LFS was developed during 2017-2018 through series of meetings and workshops with advisors and partners, building on a previous food strategy from 2006. The LFS sets out the Mayor's plans '*to help all Londoners access healthy, affordable and sustainable food - regardless of their background and circumstances*' (GLA 2018). Objectives and activities are divided into six chapters covering: food at home/food insecurity; economy, shopping and eating out; community settings and public institutions; pregnancy and childhood; growing, community gardening and urban farming; the environment. Actions are then divided into '*what the Mayor will do to deliver change, what the Mayor will do to support change, and priorities to be led by external partners*' (GLA 2018). The LFS was informed by an eight-week public consultation (May-June 2018) which, along with a traditional

call for views, broadened inclusivity through an online public forum, survey and focus groups (Parsons & Hawkes 2019).

4. *Discussion: exploring how London's urban food policy opportunities are structured*

London's programme of food policy issues and activities appears somewhat partial at first examination; certain food-related issues are addressed, while others are not. By adding the institutionalist lens to the programme, a range of potential structuring effects from the wider GLA institutions are magnified, highlighting how policy issues and tools utilised to address food are not selected by chance, or necessarily directed to the most pressing issues in the system. These include: the relationship between central authority and boroughs; the requirement for integration; the strategic force of different policy areas; and the remit of the Mayor. The most interventionist policy in the programme - the TfL advertising ban - is made possible by the Mayor's powers over transport, described by previous Mayor Livingstone as the only area where the Mayor has real power (West et al 2003). Likewise, planning policy has been a successful sector into which to embed food. Food features relatively heavily in the wide ranging London Plan (London's statutory Spatial Development Strategy), which - as West et al (2003) note - is the only one of the eight strategies the Mayor is obliged to produce with defined statutory force, making it a key target for embedding food.

Equally, the findings suggest where the political system constrains action. Echoing the conclusions of urban food policy literature cited in the introduction, the complex sharing of responsibilities for food policy presents a barrier to effective food policymaking in London. There were occasions during the LFS development where proposals to improve the city's food system were not advanced because they were not within the 'gift' of the Food Team to intervene, meaning:

'... there were quite a lot of discussions about things that were never going to happen because they weren't within the remit of the Mayor or the Strategy (INT3).

An example is limitations to improving school food without recourse to the national level, reiterating earlier recognition of constraints (Morgan & Sonnino 2010), and research on food growing in London's schools, where levers were deemed to be held by national level body OFSTED (Pitt et al 2018). In comparison, more robust powers to intervene in school food exist in New York, where the Mayor '*used his direct power to develop mandatory nutritional standards for meals served in schools and other city institutions*' (Freudenberg & Atkinson 2015).

Another area where urban action is hampered by levers residing at national level is food insecurity. While the London programme involves holiday hunger provision, deeper root causes - for example the national level Universal Credit Policy - are beyond reach of local government (INT5). The findings echo existing literature on how food partnerships are constrained by levers being held at national level, such as the power to implement universal 'Real Living Wage' or financing food system infrastructure (such as processing facilities, wholesale markets and street trading) (Coulson & Sonnino 2019).

Tackling the system coherently is also challenged by the waxing and waning of particular policy issues, as the ongoing tension between responding to critical food-related issues of the day on the one hand, and the diffuse nature of the policy levers over multiple policy levels on the other, is played out. An example is childhood obesity: the establishment of a London Health Improvement Board to support a pan-London approach, with childhood obesity an initial priority, was

subsequently abandoned with acknowledgement that most work in this area would be carried out at local borough level, undermining London-wide coordination on childhood obesity issues (Freudenberg & Atkinson 2015). More recently, a London Child Obesity Taskforce has been established, and various ambitions for borough-level activities published (London Child Obesity Taskforce 2019), reinstating the issue back at the centre.

The institutional convention of four-yearly Mayoral elections also exerts an impact here, both positive and negative. The programme must be re-aligned to fit the Mayor's personal priorities, particularly given that producing a food strategy is a discretionary exercise, and a reliance on exhortation to make policy change happen. For example, the political priorities of the latest Mayor, Sadiq Khan, were around economic fairness and social inclusion, and *'those two mantras run through the whole of his agenda'*, as one interviewee described. The efforts of the Food Team were directed to demonstrating how food fits that political agenda to persuade the Mayor that food was an important way for him to work towards those overarching goals of economic fairness (INT4):

'Quite quickly, not least by virtue of the fact that there was the recession of 2008, the food team began to show ... the importance of food is not just about growing, and it's not just about the environmental impacts, it's about... ..it's about the economy, about jobs. Of course it's about health. But it's about helping Londoners who are at the bottom, as well. So there is a really strong driver, which is being strengthened by the mayor's narratives to help people who are struggling, who most need help to access food, and to not be bombarded by unhealthy food everywhere they go' (INT4).

The Mayor's foreword to the 2018 LFS flags food as *'a key part of my social fairness and economic equality agenda as it affects the health, happiness and prosperity of us all'* (GLA 2018 p5). Speaking of the importance of political will to making progress on food policy, (INT5) explains that:

'If you are battling in a world where there isn't a statutory requirement you need the massive support of the boss...there would not have been the Capital Growth [urban agriculture] scheme had Boris Johnson not said 'well, great idea'...and he was endlessly being photographed chucking cabbages around...there was no legal demand to do that, there was no nothing, it was just an idea'.

This example is contrasted with later efforts to intervene around provision of food for the elderly, where it was not even possible to get a meeting with the subsequent Mayor. *'Its politics for you'* remarked INT5. The limitations of the Mayor's powers, which *'mean he can play only an advocacy role over policy that is determined at the level of the boroughs'* (Reynolds 2009), and his reliance on soft power influence on other policy levels, highlights the importance of framing food as a way of achieving other policy goals (the essence of the 'food in all policies' integration approach).

At the plan-level, the creation of a new dedicated food strategy provided an opportunity to clarify sharing of responsibilities within the sub-system of actors. Placed in the context of the wider political eco-system, the LFS specifications of who would deliver what elements can be understood as a device to articulate the limited powers to intervene directly on food issues, as INT4 explained: *'In each of the six chapters, at the end of each one, it says, this is what the mayor will do...what he will do to support or inspire change, and what other partners will need to do...that's not washing his hands of responsibility, that's being honest and realistic'* (INT4).

The non-statutory nature of food both constrains and enables food policy – presenting opportunities for flexibility as well as challenges around resources and fit in relation to the wider system. For example, there is an opportunity to integrate food into other strategies which *are* designated as statutory. The historical roots of this integration tactic are the earlier London Food Commission’s positioning of food at the nexus of wider city issues, including health and jobs. The use of other statutory and discretionary strategies to address food-related objectives is also a response to constrained resources available to tackle complex food system challenges with a small team and budget for the programme. Other departments of the GLA *‘have wider remits than food, and they have more money and more staff behind them’* (INT3).

Integration was part of the institutional design of the GLA, although how much this influenced or enabled the food policy integration method utilised is not clear. Integration was not ascribed by any interviewees as an overt requirement of the Authority, yet there are suggestions it filtered down:

‘The integrated approach ... came from the Mayor’s office from the start. The Mayor wanted a set of strategies that were fully integrated and so there has always been an awareness that when developing strategy, you can’t take a siloed approach’ (INT2).

The LFS plan represents a consolidation, and formalisation, of the team’s policy integration style of embedding food in other statutory strategies which, again, reflects the relative lack of food system levers and resources available for the food programme directly. The limitations of the Mayor’s powers, and limited resources available for the discretionary activity on food, also manifest in strong policy networks around food. An inbuilt flaw in the design of the GLA necessitates strong partnership working to make change – given the Act *‘paid only scant attention’* to the GLA’s ability to implement strategies covering areas over which it actually had little influence (West et al 2013 p483).

Dividing the LFS into six “settings” – at home; the economy and eating out; in the community and public institutions; pregnancy and childhood; urban food growing; and the environment – is also connected to reliance on policy networks within the food policy sub-system, because *‘it really helps you define who the players are’* (INT4), who need to take responsibility for delivering food-related goals and then define how to deliver them.

Conversely, the needs of the LFS can also be seen to shape the food policy subsystem: while an earlier iteration of the LFB was described as becoming somewhat unwieldy and unstructured, a refresh of membership in advance of the LFS purposefully targeted expertise which would be required for delivery. A similar approach was taken with the LFS Implementation Plan, where LFB members were asked *‘to map their connections across strategy headings and where they could help with implementation...what bits could they lead on and how that’s going to happen’* (INT1).

Wider influences are also discernible in the use of food advisory groups. Like the reliance on the LFB to facilitate partnership working, the Boroughs Food Sub Group (BFSG) is needed to forge links between individual borough food-related activities and GLA food policy. This mechanism plays an important role in managing the fragmented nature of policy powers given that, ultimately, in policy areas where the Mayor has no direct powers, the boroughs are under no obligation to act in line with GLA preferences (Halliday & Barling 2018).

The links between the food team, the LFB and the BFSG are an important facilitator of the current food policy approach, and *‘on-the-ground knowledge from the boroughs subgroup is particularly*

important, and many of the GLA's explicit actions on food, including the proposed ban on advertising on Transport for London and the Healthy Catering Commitment programme, were ideas fed through from this group' (Parsons & Hawkes 2019). INT1 describes the bottom up chain of events which led to the TfL advertising ban, which began with the creation of Olympic Boroughs at the time of the 2012 Olympics:

'...that then became Growth Boroughs...they funded the idea of a local authority Declaration on Healthier Foods....which boroughs would sign up to...which tackles sponsorship and advertising...but boroughs were saying 'the problem we've got with our advertising is a lot of it is on bus stops and we're not responsible for bus stops'...so there were meetings, and some research was done....and then the boroughs group met the public health team at the GLA...and the next thing there was this proposed ban on unhealthy food [advertising] across the whole of TfL, which is extraordinary' (INT1).

The group is therefore *'really powerful...and it's the ground knowledge'* (INT1). This also illustrates how certain food-related activities which may be considered symbolic in nature (such as food served at the London Olympics) can be a launching pad for more direct intervention. Conversely, the ad ban has had impact within the City and beyond, with the boroughs of Haringey and Southwark adopting the TfL policy on their own advertising estate, and other local authorities, UK and international cities looking to replicate it (Sustain 2019a p17). Viewed in its historical context, the ad ban looks a more interventionist departure from the types of activities traditionally favoured by the food programme; a potential shift to engagement with parts of the food system – in particular the food industry which advertises – in a fashion it has previously been criticised for shying away from (Morgan & Sonnino 2010).

The group is also a vital part of the implementation process, given the Mayor's limited powers (the political system). As one interviewee remarked:

'...it's all very well having London Food Board of experts...to advise the Mayor on what should be in the food strategy, but unless you have the buy-in of London's local authorities, of third sector partners and charities...there's no point in rewriting the strategy...to have any influence in the food system you do have to work in partnership' (INT2).

The links between the city's centralised food programme and food policy at borough level is reinforced by the Good Food for London and the Beyond the Food Bank (Sustain 2019a; 2019b) monitoring and coordinating tools. These tools *'help to reflect on how boroughs are performing'* (INT1) and, as an interviewee remarked, have grown in effectiveness, given that, in lieu of any direct powers:

'one of the things you can do as a big city is this kind of measuring and repeating. And again, nobody paid much attention to start with. But that started to have real force. And the boroughs did not like being bottom' (INT5).

Yet relationships between the boroughs and central authority are fragile, in part due to an intrinsic political tension whereby *'boroughs led by a different political party to that of the Mayor of London could be unwilling or unable to get on board with the latter's flagship agenda topics'* (Halliday & Barling 2018 p193). In addition, earlier research identified low engagement in the food programme (Halliday & Barling 2018), suggesting the relationship strengthens and weakens over time.

5. Policy Implications

Through a case study of London's food policy, this article has demonstrated the explanatory value of embedding food policy in a wider context than current actors and activities, enabling an analysis which goes beyond functionalist explanations. This provides a platform on which to judge whether the current policy approach is the most appropriate, and to consider how it may be reconsidered in future.

Urban food policy in London can be understood as a nested set of components, consisting of a plan, a programme of activities, and a sub-system, all shaped by the institutions of broader government – the Greater London Authority and its relations with other tiers of government authority, below and above. Exploring how the institutional influences structure the programme and plan, highlights how they reflect and respond to the city's longstanding complicated and multi-tiered government system, in addition to the complexity of the modern food system with its multiple and connected challenges, objectives and activities.

Food's position at the nexus of multiple social, economic and health considerations presents both an opportunity and a challenge: food is flexible enough to fit almost anywhere, making it vital to understand and demonstrate food's relevance to other policy sectors and political priorities; particularly when addressing issues where soft power is the only route to change. Yet it requires extension into almost all policy areas through an integrated approach and strong policy networks; an ongoing challenge. That there is no obvious 'fit' for food - because it touches on many other policy areas - means the focus and location of the programme can shift with political priorities. The case study reiterates how policy related to food is diffused across multiple policy sectors and levels of government, which presents a challenge to creating a coherent 'food policy' at city level. That London's food governance powers fit ill with the complexities of the modern food system reflects a wider critique of the path dependent system of government in the UK capital, which has not kept pace with geographical, demographic and social change (Pilgrim 2006 p224).

Urban food policy in London is shaped by the patchwork of powers to intervene in the city food system; echoing socialist reformer Sidney Webb's characterisation of London's government as '*a strange hotch-potch of lunatic asylums and the fire-brigade, main drainage and industrial schools, bridges and baby farms*' (History Today n.d). It results in a programme of activities around food where hard policy measures such as banning advertising to address one issue (obesity), sit alongside softer tactics such as 'chucking cabbages' publicity (urban agriculture) and league tables (food poverty) for others. Limitations on the scope of London to challenge national policymaking powers in Westminster, built into design of the GLA and its Mayor (Worthy et al 2019), are also relevant, raising the question of what reimagining of powers will be needed in cities to deal with modern realities like obesity and food poverty, where primary levers may be held by national government.

While some 'harder' interventions are possible in London, for example via advertising on transport and planning restrictions, there are limits to how far food systems transformation can take place without greater powers and influence at national level. Overall, the case study reveals and augments existing literature on the multi-level disconnect between food system changes being advocated for at local level (which often require policy changes beyond the institutional powers of city government) and the limited governance spaces available for local voices at national level. Better connections between the national and local will therefore be an important part of a systems

approach to food in the future. Addressing this disconnect will allow policy developments at local level to filter up to national policy. Though tensions between pressure to deliver local action on the ground and the resources required to push for policy changes will need to be addressed (Pitt et al 2018).

While it allows for policy entrepreneurship and opportunism, the discretionary nature of food (cf other 'core' policy sectors like health and economic development) also means there is not a natural 'fit' for food within the current political framework. Hence it may at once fit 'everywhere' but in no one place particularly well, as highlighted by the way the Food Team has moved around the departments of City Hall. Where food policy is located within a wider authority also impacts how food issues are viewed, and framed. The team currently sits within Social Integration, Social Mobility and Community Engagement but a historic view reveals a shifting location: the Food Team previously sat in the environment team. While this made sense in terms of the links between food and the environment, it also framed the food programme in a particular way, as INT4 explains: *'...there was a perception among some people that the programme was kind of well-meaning hippies, and that it was all about the environment. It was just about growing food and hugging each other and sharing our homegrown carrots and all that stuff'*. A subsequent re-location to economic development meant the programme: *'got taken more seriously. Because the environment was...okay, it's probably more important now, but always before it was seen as a sort of wuzzy collection of people who wandered around wanting to plant trees...but once you were there [economic development] in City Hall, you were seen as a much more important force... and that was important'* (INT5).

Urban food policy - in the face of these opportunities and challenges - is enabled in several ways in London. Though the special institutional character of London may place some limitations on transferability, these enablers can be considered as a set of exemplars or tools which can be utilised by cities to strengthen and extend the reach of their programme of activities, and push at the boundaries of the food policy sub-system. The first enabler is a set of dedicated food governance structures and mechanisms including a permanent team of staff (currently three) for food - relatively unusual for food policy at city level - solidifying food as a policy issue, both in importance and breadth. This negates some common challenges around unstable food policy partnerships/councils which struggle to maintain momentum over time, often due to lack of dedicated resources (Sustainable Food Cities 2017). The longevity of a permanent Food Team assists with raising the profile of food as a policy issue and integrating food into other policy areas to access power and funding extends the scope of the food policy programme beyond its immediate activities. This consistency is particularly important in light of the changing historical focus on different food-related issues, such as those associated with changes in Mayor.

A further enabler is the use of different modes of policy integration; a combination of 'Bringing Together' through the LFS, a specific food plan within the wider programme, and a 'Food in all Policies' method applied to broaden the food policy sub-system (Parsons 2019). The LFS brings together the range of activities and actors, and provides a mechanism through which to clarify responsibilities of actors in the sub-system. The 'Food in all Policies' approach can be understood as a response to – and a route out of – the Mayor's relatively weak powers to intervene on food issues. Demonstrating how food can contribute to the goals of other policy sectors, and how other policy sectors are in turn relevant to food, has been a core tactic. A longstanding Food Team supports this

policy integration approach, as relationships between food and other policy areas and actors are built over time through personal contacts. This in turn enables the clout of food policy to be magnified, by leveraging power and resources from other policy areas to expand the programme of activities taking place around food. Integrating food into other policy areas to access more power and funding is primarily achieved through personal relationship building. LS4 explains how the Food Team has spent:

'... ten years showing people, building relationships and making friends across City Hall...literally helping different teams across the building to achieve against their agendas. So if they had things that they were working towards, the team would come along and say, "ah our food thing can really help you on that in this way"' (INT4).

The 'Food in all Policies' strategy employed in London shows promise, but further research will be needed to examine how the food policy integration strategy plays out in practice, and how implementation/responsibility for food-related activities and goals in other strategies in other parts of the policy system will be managed (more generally, see West et al 2013).

Finally, leveraging the sub-system's advisors and street-level implementers also extends the reach of food policy. The Food Team relies heavily on partner organisations in this regard. Indeed, its partner Sustain is responsible for significant level of delivery of the programme – an important consideration for lesson drawing, given that not every city has an organisation to support this level of programme delivery. The importance of bottom-up policy innovation from street-level implementers, highlighted by the function played by the BFGS, is also relevant for other cities to consider – in terms of whether they have the established mechanisms in place within their own food policy sub-system to feed ideas from the ground into the central authority.

6. Conclusion

Urban food policy is associated with the proposition that *'city governments and urban mayors are the most effective political agents for 'getting things done' at a time when national governments are mired in ideological gridlock'* (Moragues Faus & Morgan 2015). The findings of this investigation into the way policy opportunities are structured by the wider political and historical context suggest that - while the impetus for food system change at the local level is undeniable - the scope for 'getting things done' is shaped by a set of broader institutions. Consequently, addressing certain food-related issues may require a combination of connected levers from multiple governance levels for success. Food champions wishing to catalyse change at the metropolitan level of local government will therefore need to actively and politically engage with additional levels of governance in order to have the greatest chance of success (Moragues Faus & Carroll 2018).

To develop realistic food policies, cities - and in particular a large metropolis - need to map out and understand how their wider local governance structures impact on what policy interventions can be made. The role of agency remains important and the evidence presented in this study shows that it is exercised within the institutional constraints and openings of the particular political structures and allocations of legislative authority. However, imaginative use of legislative authority by policy actors can generate softer policy interventions that are an important way to achieve food policy change. This includes the mobilisation of a variety of local political actors.

Any development, or re-design of a city food policy should clarify where responsibilities lie, and where powers and authority are located, including paying attention to local and national levels of government. This is likely to be challenging without any governance structures to support links between local and national levels of food policy.

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