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# Food policy coherence in local government: Who does what and why?

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## ABSTRACT

**Background:** In the UK, food policy is often made by national government, but typically interpreted and implemented by councils. This research explores which local government functions are involved in food policy, how they work together and how coherent their policy positions are. It builds on earlier work to map the food policy actors at national government level and to understand local government's many functions.

**Methods:** The researchers conducted a literature review using search terms including 'local authority', 'local government', 'food' and 'food policy' across two academic databases: Scopus and Web of Science, plus results from *Food Policy* on Science Direct. The total number of papers identified and analysed was 99. They then conducted 30 semi-structured interviews with employees of local authorities and representative bodies covering the various functions of local government. They analysed the interviews using NVivo to highlight the themes, which included priority food policy issues for councils; local government functions and how they relate to each other; external stakeholders; and success factors.

**Findings:** Despite the high degree of complexity, fragmentation and granularity in local government, there appears to be a high degree of food policy coherence within and between individual councils. However, there is policy incoherence between central and local government, where a lack of national strategy and piecemeal approach to devolution have hindered councils' efforts to improve the food system. Some functions of councils are particularly 'joined up', with good multi-function and multi-agency working arrangements in public health, trading standards, environmental health, economic development, planning and sustainability. Other functions, notably adult social care, markets and emergency planning, have been harder to engage; interview responses suggest food policy is not a priority for these functions.

**Conclusions:** For food policy interventions in local government to be successful, they need to be accompanied by adequate long-term funding; a coalition of support; and to be seen as a priority by relevant stakeholders. Partnership arrangements provide good opportunities to make use of existing networks. Councils could do more to increase joint working between neighbouring councils.

## 1. Introduction

### 1.1. Policy coherence

Policy coherence means how well (or otherwise) two or more policies are aligned with each other. At a minimum, they should be complementary and, ideally, mutually reinforcing. The purpose of achieving policy coherence is to give policy interventions the greatest chances of success by proactively considering enabling factors, barriers and risks. Drafting policies in isolation, without considering their context and interaction, can result in conflict arising between them. This is known as *policy incoherence* and can undermine efforts to improve systems through policy interventions (Hawkes and Parsons, 2019).

The *goal* of policy coherence (which can be more simply thought of as 'joined-up thinking' by policymakers) is not new. However, the *concept* of policy coherence, and ideas about how to analyse and improve it, are more nascent. Policy coherence originated in the field of international development, where supranational organisations like the OECD, EU and UN started to address it around 20 years ago and have steadily added it to their policymaking processes and legislative frameworks (Brooks, 2014; Hawkes, 2017; OECD, 2017, 2019, 2021; Hawkes and Parsons, 2019). Since 2015, the importance of policy coherence, and the ways in which it can be addressed, have been the subject of much more study. At the same time, it has started to percolate down among national governments and NGOs and beyond the traditional confines of the development sector to be a much more recognisable, and valued, concept

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(Mackie et al., 2017; Hawkes and Parsons, 2019; OECD, 2019; Righettini and Lizzi, 2022).

We note that the term ‘food policy’ is very broad and may mean different things to different people. Our definition comes from the Centre for Food Policy, where we are based. In its briefing document on tackling food systems challenges, the Centre defines food policy as “all the policies which influence the food system and what people eat” and notes that it “spans a complex web of institutions, infrastructure, people and processes” (Hawkes and Parsons, 2019, p. 2). This complexity and multi-agency impact is particularly relevant to the research presented below.

### 1.2. Structure of local government in the UK

Councils are public sector organisations that deliver a wide range of services to people near to where they live. They are made up of elected politicians (councillors) who decide how their council should best meet the needs of its residents, within a framework of statutory powers and responsibilities (LGA, 2023a). The terms ‘local government’ (collective), ‘local authority’ (individual) and ‘council’ (colloquial) are used interchangeably throughout this document, just as they are in practice.

In some parts of England, there are two *tiers* of local government, known as *counties* and *districts*. Counties are made up of multiple districts; powers are split between the county and the district councils within it (NAO, 2017). Each council is a distinct organisation; *what it does* is largely prescribed in legislation, but *how it does it* is up to the council to determine (NAO, 2017). The list of functions provided by councils is at Table 1, below. The distribution of different types of council is shown at Fig. 1.

Local government in the UK is a complex patchwork of powers and responsibilities (NAO, 2017; ONS Geography, 2022). It is part of a multi-level governance framework, as defined by Hawkins and McCambridge (2021) comprising decision-makers at supranational (EU), central (Westminster), devolved national (Holyrood, Cardiff and Stormont), local and parish levels. While food policy is often *made* at the central and devolved national government level, by ministers and departments representing the national interest (Parsons et al., 2020), it is often *interpreted and implemented* by councils (Parsons, 2019; Parsons et al., 2020). In the UK context, ‘central government’ means the national government of the United Kingdom (at Westminster), and the national governments of the devolved administrations (at Cardiff, for Wales; at Holyrood, for Scotland; and at Stormont, for Northern Ireland) (BBC, 2024).

Food policy implementation at the local government level is complex, inconsistent and not transparent. The goal of this paper is to explore how food policy is put into practice by local authorities in the UK. We conducted a series of interviews with practitioners experienced in local government food policy to understand how food policy gets made, interpreted and implemented by councils. By acknowledging and accounting for the complex policymaking environment inherent in UK local authorities, food policy practitioners will be able to design better, more coherent policies, that have a greater chance of success.

There is no single, agreed approach to analysing policy coherence, but it can include reviewing policy documents and other literature, statistical modelling, interviews and workshops (Hawkes and Parsons, 2019). For our analysis, we used the framework developed by Hawkes and Parsons (2019) which built on earlier work by the OECD (Morales and Lindberg, 2017), summarised in Table 2, below. We used this framework to explore food policy (in)coherence in local government as described by our interviewees.

### 1.3. Devolved administrations

The UK is made up of four nations: England, Wales, Scotland and Northern Ireland, with the latter three often described as the ‘devolved nations’. This paper examines policy coherence in all four. Scotland,

**Table 1**

Functions of local government, based on work by Institute for Government (Paun, Wilson and Hall, 2019).

Function identified by IfG	# of times noted in literature review	Potential sources of interviewees
Arts and recreation	1	National Museums Association; Chief Cultural and Leisure Officers Association; Arts Marketing Association
Births, deaths, and marriage registration	0	Local Authority Registration and Coroner Services Association
Building regulations	0	Local Authority Building Control; Association of Consultant Approved Inspectors
Burials and cremations	0	Federation of Burial and Cremation Authorities; Institute of Cemetery and Crematorium Management
Children’s services	2	Association of Directors of Children’s Services
Coastal protection	0	LGA Coastal Special Interest Group
Community safety	0	LGA
Concessionary travel	0	Confederation of Passenger Transport; Rail Delivery Group
Consumer protection	12	Consumer Protection Association; Citizens Advice
Council tax and business rates	1	Chartered Institute of Public Finance and Accountancy
Economic development	28	Chief Economic Development Officers Society
Education and skills	22	Department for Education; Local Authorities Caterers Association; The University Caterers Organisation
Elections and electoral registration	0	Association of Electoral Administrators
Emergency planning	1	Emergency Planning Society
Environmental health	17	Chartered Institute of Environmental Health; Association of Chief Environmental Health Officers
Highways and roads	1	Chartered Institution of Highways and Transportation; National Highways
Housing	3	Association of Local Authority Chief Housing Officers; National Housing Federation
Libraries	0	Chartered Institute of Library and Information Professionals
Licensing	8	Institute of Licensing
Markets and fairs	6	National Association of British Market Authorities; Local Authority Event Organisers’ Group; Farm Retail Association
Museums and galleries	0	National Museums Association; Chief Cultural and Leisure Officers Association
Parking	0	British Parking Association
Planning	22	Town and Country Planning Association; Royal Town Planning Institute; Planning Officers Society
Public toilets	0	British Toilet Association
Public health	53	The Kings Fund; The Health Foundation; Faculty of Public Health
Social care	5	Association of Directors of Adult Social Care
Sports centres and parks	0	Sport and Recreation Alliance; Chartered Institute for the Management of Sport and Physical Activity
Street cleaning	0	CleanUpUK; Keep Britain Tidy
Tourism	1	Chief Cultural and Leisure Officers Association; Visit Britain
Trading standards	13	Chartered Trading Standards Institute; National Trading Standards; Association of Chief Trading Standards Officers

(continued on next page)

Table 1 (continued)

Function identified by IfG	# of times noted in literature review	Potential sources of interviewees
Transport	2	Association of Transport Co-ordinating Officers; Transport Planning Society
Waste collection and recycling	11	The Local Authority Recycling Advisory Committee; WRAP;
Waste disposal		National Association of Waste Disposal Officers
Climate change (We added this category <i>after</i> the literature review, based on interview feedback, so there are no results to count)		Local Government Association

Wales and Northern Ireland have discrete powers devolved to them by the UK Government in Westminster (Torrance, 2022). The powers vary from one devolved nation to the next: for example, local authorities in England are responsible for public health, but this remains a function of the healthcare authority in other parts of the UK. In Northern Ireland, some functions delivered by councils in England, Wales and Scotland (notably education, social care and libraries) are delivered by the Northern Irish national government (Paun et al., 2019; Torrance, 2022).

Devolution also affects the agencies that work with local authorities, for example, the Food Standards Agency (FSA). The FSA works in England, Wales and Northern Ireland, but with different responsibilities in each. Food Standards Scotland is independent of the FSA but must work closely with it in the interests of coherent policymaking (FSA, 2023a). This complexity is set out at Fig. 2, below. Similar complexity exists across many government departments and agencies (NAO, 2017).

The structure of local government also varies between the devolved nations; England has a mixture of two-tier (county and district) and single-tier (unitary) councils (ONS Geography, 2022). Scottish, Welsh and Northern Irish local authorities are all single-tier authorities (gov.scot, 2023b; gov.uk, 2023a; NIDirect, 2023; WLGA, 2023). This makes navigating the policymaking environment considerably easier, not least because stakeholders outside local authorities (such as healthcare providers) are often organised in such a way that their boundaries align with council boundaries (gov.scot, 2023a). Our interviewees included people based in, and familiar with, all four nations of the UK. While it was not a representative sample, we are confident that we have a wide enough range of views to draw reasonable conclusions.

#### 1.4. Literature review – Existing research into food policy at the UK local government level

We conducted a literature review to understand the role of local authorities in making and interpreting food policy in the UK, particularly which functions are involved and the relationships between them. We found that many functions of local government have an impact on, or are impacted by, food policy. The literature shows a few ‘focus’ areas, like public health, planning, regulatory services and economic development, though this does not feel like a complete picture. We believe a gap exists in understanding the full extent of food policy interests across council functions. We believe no-one has analysed policy coherence analysis at the local government level.

Our primary research question is:

- How is food policy made, interpreted, and implemented in local authorities in the UK?

Our secondary research questions are:

- What can policymakers do to increase the success of proposed interventions delivered by local authorities?

- What are the main areas of food policy incoherence in councils; how can they be resolved?

By ‘success’ we mean the degree to which the objectives of the policies have been met; we do not make a judgement on whether these policies were ‘good’ or whether they had the ‘right’ objectives.

## 2. Methodology

The main research method we used was 30 qualitative, semi-structured interviews with representatives of the local government functions identified, and/or with those bodies that frequently interact with them. Examples of these functions and organisations are set out in Table 1.

Nine interviewees were working in councils alongside roles in representative organisations. This sometimes made the interview complicated, but it was beneficial to the research because individuals were often able to share a range of perspectives, including from the national and local levels. Interviewees came from across the UK and included practitioners from England, Wales, Scotland and Northern Ireland.

We asked interviewees about the food policy issues that their specialism covered and the role played by local authorities in developing, interpreting, responding to and implementing food policy interventions. Having transcribed the interviews, we coded them using NVivo. We used the IfG list of local government functions as a starting point but developed our coding taxonomy iteratively, based on interviewees’ responses.

## 3. Results

### 3.1. Functions of local government

The first ‘lens’ through which we considered the interview findings is that of the functions of local government. Table 3, below, shows the number of interviewees who mentioned functions of local government (other than their own) that they believe have, or should have, an interest in food policy. When we began the search for interviewees, we contacted the representative bodies for all the functions on the list – around 50 in total, listed at Table 1. We received responses from 22 organisations, of which 18 said they had no interest in food policy, of which four qualified that by saying ‘...but maybe we should’. Some of those sending negative responses surprised us. A representative of adult social services providers advised that they ‘don’t have any links with food policy at all,’ despite their function being responsible for feeding millions of vulnerable adults (even if via third-party providers).

We started the interviews by asking interviewees which *other* functions *their* function frequently interacted with on matters of food policy. Fig. 3, below, is a systems diagram showing the frequency with which different functions were mentioned by interviewees, and the relationships between functions set out by interviewees. The circle size corresponds to the number of interviewees mentioning that function; connections denote relationships between functions mentioned by more than one interviewee. The diagram is somewhat simplified, by eliminating the ‘long tail’ of functions with only one mention, to aid readability.

Public health was the most mentioned function (23). Six interviewees worked in a public health-related role, but most interviewees noted the importance of and links with public health for their function. This frequency echoes the findings of the literature review: public health is among the most researched topics in local government food policy. Five interviewees noted that the public health function, which was only moved into English councils in 2010, still has a ring-fenced budget. This means they still have capacity and resources to undertake proactive public health interventions, typically in tackling obesity (alongside cutting smoking and encouraging exercise). Two interviewees noted that

UK: Local authority districts, counties and unitary authorities,<sup>1</sup> 2022

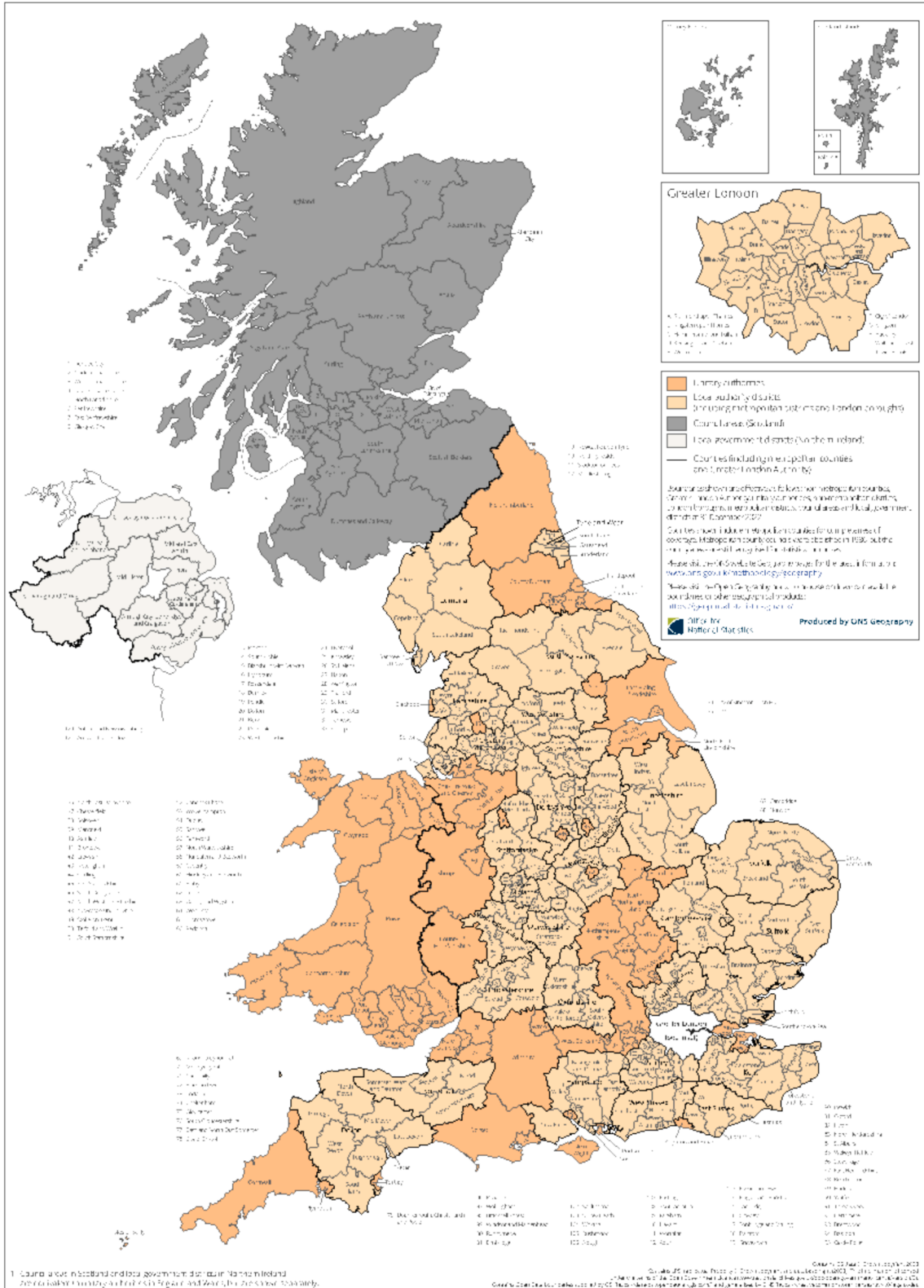


Fig. 1. Local authority districts, counties and unitary authorities © Crown copyright 2023.

this ringfencing has lasted an unexpectedly long time; most other local government functions are funded from the same core budget, meaning adult social care is increasingly drawing funds away from less immediate concerns.

The public health budget can legitimately be used to fund other parts of the council that have a public health element to them (Finch and Friend, 2023). 12 interviewees described how their councils are doing so to fund elements of the trading standards and environmental health

**Table 2**  
Four dimensions of policy coherence (based on Hawkes and Parsons, 2019).

Dimension	Description
Horizontal	Policies that exist at the same level of policymaking authority
Vertical	Policies that exist at different levels of policymaking authority
Geographic	Policies that apply to different places at the same time, or that are made in one place but impact other places
Temporal	Policies with different time horizons (now vs future; short-term vs long-term)

teams, such as working with restaurants to improve the health profile of dishes or tackling food hygiene or food fraud problems. One officer working across functions said of his council’s public health lead: “she got this disparate team together that weren’t traditionally food or health and safety and were perhaps a little bit more flexible in their approach to work and what they would do.”

In contrast to public health (with its relatively large budget), regulatory services, like trading standards and environmental health, have been cut drastically in recent years (Coyne, 2019; NAO, 2023). One trading standards specialist said: “Nobody has got any money to do anything and the primary driver for that is not only the budget squishing but also the massive increased demands in adult social care... The overspends are because of increasing demand and consistent failures in government to come up with a long-term strategy around adult social care.”

Economic development and planning were also raised by a high number of participants (20 each). Together with public health, these functions were often described as being interrelated. A frequent example given was that of public health teams wanting to restrict fast-food takeaways being sited near schools. If their economic development colleagues are concerned about limiting job growth and business rate income from these restaurants, planning officers may take the side of economic development over public health in supporting unhealthy food businesses to proliferate. This relationship has been the subject of some research already, as noted in the literature review (Caraher et al., 2010, 2013, 2016; Caraher, Lloyd and Madelin, 2014; Boelsen-Robinson et al., 2021).

Discussing this example with people representing the other functions added nuance to this argument. According to interviewees with experience in planning, they often feel this characterisation as acting against public health to be unfair, with one interviewee noting that planning as a distinct discipline has its roots in public health and that some councils

host these functions within the same directorate.

The concept of sustainability was emphasised by a significant number of interviewees, 16 individuals, to such an extent that we decided to include it as a separate function within a modified IfG list. This was often in the context of councils finding ways to tackle their carbon emissions through interventions in the food system. 13 interviewees discussed food waste specifically, with four noting the challenge created by England’s two-tier local government structure (the devolved nations of Scotland, Wales and Northern Ireland have single-tier councils, making things slightly simpler). Lower-tier authorities (district councils) are responsible for waste collection and recycling, whereas top-tier authorities (county councils) are responsible for waste disposal, which inevitably leads to confusion and conflict. Waste was described by four respondents as being especially politically divisive, with any changes to bin collections expending a great deal of political capital and goodwill for only marginal gain.

**Table 3**  
Number of interviewees mentioning functions of local government (aside from their own) with an interest in food policy.

Function	Count of interviewees
Public health	23
Economic development	20
Planning	20
Environmental health	17
Education and skills	16
Sustainability, climate change	16
Waste collection and recycling	13
Trading standards	12
Waste disposal	10
Highways and roads	8
Social care	8
Sports centres and parks	7
Children’s services	6
Housing	6
Licensing	6
Tourism	6
Transport	5
Arts and recreation	4
Markets and fairs	4
Council tax and business rates	3
Libraries	3
Births, marriages, deaths	2
Emergency planning	1
Museums and galleries	1



Fig. 2. FSA’s devolved responsibilities.

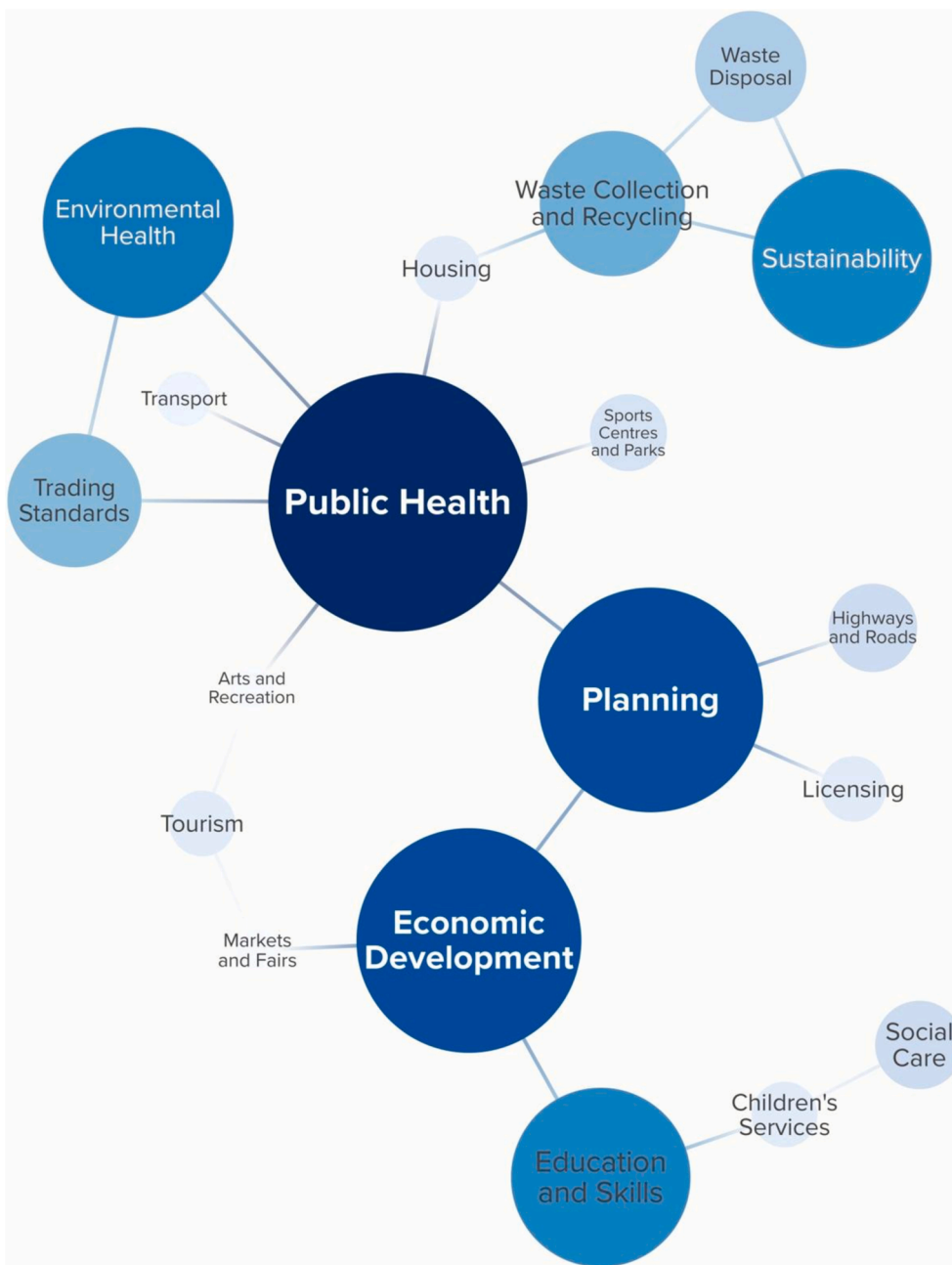


Fig. 3. Simplified system diagram showing the main functions with an interest in food policy and links between them.

There were several functions that we struggled to engage with and for whom we believe food policy is (or should be) a much more important consideration. As described above, we could not persuade anyone with experience of adult social care to participate in the interviews, though this function was mentioned by eight interviewees, nor for children’s services (mentioned by six interviewees).

### 3.2. Food policy issues

The second lens through which we analysed the results is that of the food policy issues raised (summarised at Table 4, below). We used one category to cover sustainability, ethics and climate change because these terms were often used interchangeably by interviewees. This made sustainability the most-mentioned issue (by 23 out of 30 interviewees), often in the context of cutting food waste but also looking at the carbon emissions involved in our food system.

Many respondents (20) discussed healthy eating and nutrition as a significant focus of their work and it spanned many council functions and professional disciplines. For example, in the context of public health, practitioners discussed the importance of promoting healthy eating and supporting local populations to access a balanced diet: “... we’re working on something this year to look at [healthy eating] and trying to do things from the system perspective, [delivering] something that’s got the social elements, the environment elements, the health element and everything woven together in a way that doesn’t feel overwhelming but ... actually ticks the other boxes as well”.

Interviewees also frequently mentioned national leadership (20), alongside legislation and powers (15), with a clear differentiation between respondents in England compared to the devolved nations. In England, many respondents cited the lack of leadership (or even interest) by the Government in matters of food policy, and in particular the rollercoaster of expectation and disappointment arising from the

**Table 4**

No. of interviewees mentioning the food policy issues with which their function is concerned.

Food policy issues	Count of interviewees
Sustainability, ethics, climate change, food waste	23
Healthy eating, nutrition	20
National Food Strategy, national government	20
Poverty, equality, food insecurity	20
Growing, production, allotments	19
Catering, procurement	18
Early years, school food, Healthy Start	17
Obesogenic food environments	17
Legislation, regulation, powers	15
Covid response	12
Food banks, emergency food aid	12
Food security, resilience	12
Obesity	10
Free school meals	9
Education	8
HFSS marketing	8
Food safety, hygiene, adulteration	7
Out-of-home advertising	7
Labelling	5
Allergens	4
Innovation, NPD	3

National Food Strategy and its subsequent abandonment by the Government. When asked what would make a difference to the food system, this response from an English interviewee was typical: "A National Food Strategy would be great!" Interviewees in Scotland and Wales noted the clearer policy position, supported by legislation, of their respective governments. This gives them confidence to be bold in implementing positive food system change in support of health, economic and environmental priorities. For respondents commenting on England, the opposite was true; the absence of national leadership means English councils struggle to effect change without the 'cover' provided by the support of government.

Poverty, inequality and food insecurity was a concern for 20 interviewees, with many noting the increasing importance of councils providing food in institutional settings, especially at schools and in other early years settings (17). This was often via free school meals (9), for which the policy positions and generosity of the Welsh and Scottish Governments made this an easier intervention than in England (Nourish Scotland, 2022; gov.wales, 2023) (free school meals are provided by national government, i.e. Stormont, in Northern Ireland). Respondents highlighted a range of approaches by councils in trying to tackle poverty, including support for food banks (12 respondents) and other voluntary organisations, as well as direct distribution of food in times of crisis.

19 interviewees mentioned support for growing and food production, ranging from support for individual food growing spaces on allotments and community gardens, through to providing system-wide support for industrial food businesses. Interestingly, agriculture was often an afterthought for many interviewees, even those working in rural local authority areas. This may partly be because farms are typically more engaged with national agencies like Defra and the Rural Payments Agency than they are with their local authority. However, interviewees with experience in farming described a lack of engagement by many local authorities. One described the situation thus: "There's two big things that local authorities love. And one of them is they want to plant up the whole area with trees. And the other one is that they want everyone in the district to be vegan." The point she was making, not unreasonably, is that councils are rarely engaged with the complexities of farming life. A myopic focus on two issues, both of which, they argued, could undermine food production and rural livelihoods, is unhelpful.

Catering and procurement was another frequently discussed food policy issue (18 respondents), especially in the context of the council's

role in procuring and serving food, including: for consumption in schools and other institutional settings; provided as part of adult social care services; delivered as food aid; served in council-run leisure centres; and stocked in vending machines in council buildings.

Obesogenic food environments (17 respondents), obesity (10) and out-of-home advertising (7) were also described as consistent focus areas for councils, particularly from a public health perspective. Interviewees who raised this issue recognised that councils could make a significant impact through influencing the planning system but found the system hard to navigate. One public health specialist described having two full-time planning officers helping them respond to local planning applications with a public health implication in the correct format and at the correct time.

### 3.3. Enablers and success factors

Interviewees identified 15 success factors in achieving food systems change. These are summarised in Table 5, below. The most frequently cited (26 respondents) was having the capacity, resources or funding to do the work. A decade of austerity measures has fallen particularly hard on councils, whose budgets were cut in real terms by 21 per cent from 2009/10 – 2021/22 (Atkins and Hoddinott, 2023). Except for ring-fenced public health activities, this has presented councils with difficult choices about what to prioritise. Based on interview responses, those councils who are giving food policy the attention it deserves are having to demonstrate the value of doing so, lest funding be diverted to other areas.

Political leadership and cross-council support was another frequently mentioned success factor (22). Of these, 16 respondents described the need for political leadership to secure funding and undertake the work involved, as one might expect. However, six respondents noted a *lack of engagement by politicians* as being more helpful. Councillors 'getting out of the way' or simply not paying attention to food policy matters, perhaps due to more pressing priorities elsewhere, and therefore 'not interfering', was desirable for many local government officers. One interviewee in an English council had this to say about the process of getting its cabinet to sign off a landmark food policy document: "I think a lot of them just go, *oh yeah, it's just a strategy* and they didn't really think about it, though we did put it on all of their seats."

Priorities (22 mentions) and localism (18 mentions) also scored highly as enabling factors. These related terms effectively mean the ability of local authorities to decide what to focus on based on the unique needs of their local population. A good example is the Welsh Government's push to develop Welsh horticulture, described above. Although well-established in England, horticulture in Wales is currently underdeveloped and presents an opportunity for sustainable growth (gov.wales, 2022; Food Sense Wales, 2023). Left to the government in

**Table 5**

Number of interviewees describing various success factors for food policy interventions to be successful.

Success factors	Count of interviewees
Capacity, resources, funding	26
Political leadership, cross-council support	22
Priority	22
Localism, devolution	18
Partnerships	18
Named champion	16
Systems thinking	16
Coalition of support, stakeholder engagement	15
Personalities	12
Relationships	9
Good food culture	8
Long-term thinking	8
Cocreation	6
Luck, coincidence	4
Timing, window of opportunity	2

Westminster, this focus would be unlikely to materialise, according to two interviewees based in Wales. But devolving this area of policy to the Welsh Assembly enables it to develop targeted interventions to support local priorities.

As mentioned earlier, forming partnerships, especially with local businesses, charities, community groups and healthcare providers is noted by many interviewees (18) as being critical to their success. These partnerships often come in the form of Sustainable Food Places, though even informal partnerships can achieve more than councils or other partners could do working in isolation. The council often acts as an ‘anchor institution’ (CLEs, 2023) in a local partnership, acting as a provider of capacity, resources and expertise but also being an operator of services, a major employer and a buyer of food. Building a coalition of support, proactively engaging stakeholders, was cited by 15 interviewees as being an important precursor for food policy interventions to be successful and sustainable. Having a named champion (16), having the right personalities involved (12) and building relationships (nine) were described in similar terms. Co-creation (or co-production) is a fashionable term in public service and the voluntary sector and means involving service users in the design of the services they will use (LGA, 2023b). Co-creation was mentioned by six respondents as an important enabling factor for achieving successful food policy interventions.

A common refrain in describing ‘what works’ is adopting systems thinking (16). Birmingham has done more of this than perhaps any other council, having established a specific function to look at the food system and adopted a Food Systems Strategy (Pullen et al., 2022). For many interviewees, systems thinking has helped them to understand the food system better but also to make more tangential links within and beyond the council, building coalitions of support and leveraging all the assets at a council’s disposal to achieve change. Examples included housing providers working with local schools to provide spare land for community growing; using food festivals to drive footfall, develop local economies and promote healthy eating messages; mapping small growers and producers in relation to council catering venues to match local supply with demand; and simply making food policy within the council coherent across the different departments to present a consistent view to residents and businesses.

## 4. Discussion

### 4.1. Critical analysis

This research builds on work to systematise food policy coherence analysis (Hawkes, 2017, 2018; Hawkes and Parsons, 2019) and to map central government departments with an interest in food policy (Parsons, 2021). Although some research exists to understand food policy at the local government level, this is far from comprehensive. Relatively little was known about how the various functions of local government work together, and with central government and other agencies, to implement food policy. This research explores those functions and relationships to identify the stakeholders involved, the areas of coherence and incoherence, and the factors making food policy objectives most likely to be realised.

### 4.2. How is food policy made, interpreted and implemented in local authorities in the UK?

Food policy is made, interpreted and implemented in UK local authorities in a complex network of stakeholders and organisations. Perhaps the most obvious, and most linear, policy development route is that of central government (which includes the central governments of the devolved nations, as well as Westminster) setting food policy priorities for councils to interpret and implement. A good example of this is the English Government setting out restrictions on marketing HFSS foods, which local authorities are then expected to enforce (gov.uk, 2023b).

This ‘top-down’ approach is not the only way food policy gets implemented in local government, however. Many councils have proactively developed their own food policy interventions, either separate to, or in the absence of, national government leadership. As one interviewee in an English council put it: “At a local level, it would be easy to say *There’s only so much we can influence; we have to wait for national government* and there’s a big degree of that, that the big stuff has to be agreed nationally, but you can’t wait for that. You have to get on and do as much as you can locally.”

Examples here are the Food Justice Action Plan developed by the London Borough of Lewisham (Lewisham, 2023) and Birmingham City Council’s Food System Strategy (Pullen et al., 2022). Many councils also act as facilitators of ultra-local grassroots policy interventions, convening partnerships of voluntary organisations, businesses and academics to set out the changes they would like to see in their location. Recent work in Sheffield (Treuherz, Yap and Rowson, 2023), Carmarthenshire (SFP, 2023b) and Belfast (SFP, 2023a) typifies this approach, which recognises the agency that local authorities have to prioritise food systems change in the absence of a legislative mandate.

Local authorities can influence national policy development, sometimes via the representative bodies mentioned above. A good example of this would be free school meals, in which individual councils (Duncan, 2023; Griffith, 2023), regional government (Mayor of London, 2022) and national representative bodies (LGA, 2023a) have lobbied government for more equitable provision of free school meals. Such advocacy, while not always immediately successful, helps to demonstrate the strength of public opinion to central government.

### 4.3. What can policymakers do to increase the likelihood of success when proposing interventions delivered by local authorities?

As noted earlier, by ‘success’ we mean the degree to which the objectives of the policies have been met; we do not make a judgement on whether these policies were ‘good’ or whether they had the ‘right’ objectives.

The first and perhaps most important theme identified in our research is the need to ensure those tasked with implementing the policy have the capacity and/or resources to do so. Again, a good example of why this issue matters is the UK Government’s spasmodic introduction of marketing restrictions for HFSS foods, and assumption that local authorities would conduct the necessary enforcement action (ACS, 2023; DHSC, 2023). The Government allocated meagre funding for this to take place and did not create mechanisms to support councils (or even record how much enforcement action was taking place). As a result, the Chartered Institute of Trading Standards (a national representative body) said this was likely to be a low priority for its members (Parr, 2022; Quinn, 2023).

To some, this is exactly how localism is supposed to work, with councils being given a nationally agreed framework of powers but discretion to focus on local priorities (DCLG, 2011). A less optimistic reading of the situation would say this is indicative of a fragmented and under-resourced system, in which national government devolves powers without resources, allowing them to claim credit for successful interventions while blaming local authorities when they do not go according to plan. As one interviewee put it: “businesses which are impacted [by the HFSS marketing restrictions], they’ve invested a lot of money ... to comply with these policies, have changed their whole stores. And it feels strange if trading standards aren’t really enforcing that policy after you’ve committed to it.”

A second theme for those wishing to effect food policy change at the local level is navigating the complexity of actors and relationships between them. Local government has a wide range of functions with wide discretion on how to structure and deliver them. Food policy issues, as described above, frequently span several functions, often in ways that do not sit neatly together. The potential conflict between public health, planning and economic development is a good example of this

challenge: the planning department is often more closely aligned to either public health or economic development, leading to tension when trying to tackle obesogenic food environments (Caraher et al., 2013). This is especially the case for trying to influence the content of adverts on council-owned assets, following the example from TfL. One interviewee noted the example of a council that delegated responsibility for managing adverts (and the income they generate) to dozens of departments, including transport, highways, libraries, leisure centres, schools and art galleries – in fact, any council department that had even one advertising location. Effecting change in such environments requires tenacious and persistent stakeholder engagement.

Another example of the complexity of local government is the two-tier setup found only in England. This is especially apparent in efforts to tackle food waste, where the conflict between waste collection (districts) and waste disposal (counties) has led to a vast patchwork of arrangements at a granular scale not suited to the expensive, long-term interventions needed to deal with waste efficiently. In response, the waste charity WRAP has evolved from a campaigning organisation to being an important ally of local authorities who want to reduce waste and improve recycling, providing marketing materials, good practice guidance and even benchmarking data to help with these waste reduction efforts (WRAP, 2023a).

A third, consistent theme of our interview responses was the need to engage a wide network of stakeholders to build a robust coalition of support. The importance of partnership working and relationship building came up frequently, with a related theme of having a named champion and/or someone with the right personality to galvanise support and act as a figurehead for proposed improvements to the food system. This is widely demonstrated by the network of 90+ Sustainable Food Places partnerships in operation across the UK (SFP, 2023a). At least 10 interviewees represented organisations that are Sustainable Food Places, all of whom suggested that this is an effective way to build a food-focused coalition of support.

#### 4.4. What are the main areas of food policy incoherence in UK local authorities?

Our expectation at the start of this research was to find many examples of policy incoherence. While some examples of policy incoherence clearly exist (set out below), it is worth noting that all the interviewees we spoke to were very clear about how *most* local government food policy *should* align reasonably coherently. Feeding the population a safe, healthy diet which provides gainful local employment and is also environmentally sustainable *should* be possible (Willett et al., 2019; Dumbleby, 2021) – these are all prime local government food policy concerns about which there is little argument (at least in principle) (LGA, 2022b). For sure, the policymaking landscape is incredibly complicated, and councils must make tough decisions about what to prioritise and what to drop. However, this does not have to mean policy incoherence – just that some desired interventions may not be affordable. Or, as Kingdon (2014) describes, it might be that the *problem* (unhealthy, unsustainable diets), *proposed solution* (interventions to make the public realm less obesogenic) and the *political support* (especially from national government) have not yet coalesced to enable a *policy window* to open and reforms to be implemented.

We identified some promising areas where councils are working to connect different functions and policy priorities, a good example of which is in trading standards and environmental health. Despite historic media portrayals of bureaucracy and red tape, we identified numerous examples of councils working hard to make the best use of their resources and present a coordinated, coherent approach to regulation and enforcement. For example, in one council for which tourism is a high priority and a big contributor to the local economy, trading standards and environmental health teams have devised processes to reduce the number of visits by different colleagues to the same premises.

The most frequently cited and well understood example of policy

*incoherence* is the tension between public health, planning and economic development in tackling obesogenic food environments through planning policy. 17 interviewees confirmed that this is indeed problematic, with a high degree of incoherence between pro-business policies intended to boost trade and health-focused policies to cut fast food consumption (Caraher et al., 2013). On the face of it, this is horizontal incoherence, in that it occurs at the same level of authority within councils.

However, as noted by several interviewees, the issue is more nuanced. First, for economic development officers, the presence or absence of a few takeaways is immaterial to a council's prosperity, so they are unlikely to object. Second, more forward-thinking economic development officers recognise the potential for high streets selling healthy food to be a point of differentiation and a way to grow footfall and sales (TPIHC, 2018; ALEHM, 2023). Instead, as noted by six interviewees, it is the Planning Inspectorate that interferes in local planning cases and typically sides with the restaurant operator rather than the council. The Planning Inspectorate is a central government function within the Department for Levelling Up, Housing and Communities. In overruling the council's powers to shape its high streets and curtail the growth of fast-food outlets, the Planning Inspectorate is moving this from a simple case of horizontal incoherence (that could be managed entirely within the council) to vertical incoherence, which is much harder for a council to address unilaterally. Interestingly, the Planning Inspectorate recently sided *with* the local authority (Tyneside) and *against* the fast-food operator Papa Johns, for the first time (Gill, 2023), so perhaps this situation is now starting to change.

The interviews revealed several other examples of vertical incoherence. Efforts to improve food waste collection are often thwarted by the lack of national legislation or guidance. Waste collection nationally is atomised and fragmented, with arbitrary regional groupings that exist only for that function (Widdowson et al., 2015). Navigating this system, one of many examples of fragmented and multi-layered governance, makes interventions to cut food waste especially challenging. This is despite strong evidence of what works (segregated and frequent food waste collections, ongoing communications about the benefits) (WRAP, 2023b). However, in the absence of national leadership, local authorities lack the political cover needed to make potentially unpopular changes to local services. In England, the atomised, two-tier nature of local government further confounds efforts to coordinate and harmonise waste management policies, leading to incoherence within and between neighbouring councils. This issue of national leadership is thrown into sharp relief in the devolved nations: Scotland and Wales have both passed legislation to establish clear food policy priorities. They have made considerable progress in developing local food strategies and have clear goals for improvement. In contrast, the English government largely abandoned its long-awaited National Food Strategy, resulting in a lack of coordination and vision (LGA, 2022b).

One might expect to find a fair amount of geographical policy incoherence, given the fragmented nature of local government in the UK. Based on the literature review and the interviews, we found relatively few areas of geographical incoherence. That said, we were struck by how few interviewees noted 'neighbouring councils' among their stakeholders. Despite many councils having excellent links with the charities, businesses, healthcare organisations and so on that operate *within their boundaries*, there is very limited joint working *between councils*. As one London-based interviewee said of their council: "I generally don't think that we do enough work with other London councils. We have a big voluntary sector in [borough], this is quite a defining thing about the borough ... and so we think that's generally our sphere of influence which seems to be quite community-based."

When councils do work with their neighbours, it is often a noteworthy exception (such as Buckinghamshire and Surrey's joint trading standards function) (Buckinghamshire Council, 2023). Six interviewees who did not work for local authorities noted the propensity to have the same conversation over and over again as they engaged with different

councils. An interviewee representing farmers had this to say of the process of engaging multiple neighbouring councils: “And the people in charge had been saying *we don't even think about our neighbours, we've not thought about the authorities beyond us, really, because we're only in charge of our authority*. So I think that it's going to come down to Natural England to stitch the edges together. Which, I don't know if that's the best way of doing it, or whether there could be less of a burden if the authorities work together, or whether they're going to rely on me to keep it consistent across all the ones that are next to each other... it's pretty complicated.”.

The only exception to this siloed working (that we found) comes from trading standards. Through the primary authority principle, in which a multi-site business only needs to seek advice from one council's trading standards department (usually the one in which their head office is located), the amount of time businesses spend dealing with local authorities is dramatically reduced. This also benefits local authorities, as they do not have to ‘reinvent the wheel’ when their opposite number in another council has already provided support and guidance. Other council functions could benefit from adopting a similar approach.

The final dimension of incoherence noted by Hawkes and Parsons is temporal (in other words, conflict between policies with different timescales). The planning / public health / economic development relationship is a good example of this kind of incoherence: employment figures, business openings, busy high streets and receipt of business rates are typically immediate results; the deferral of obesity-related ill health is much longer term and harder to attribute to a particular individual, organisation or policy intervention. Where councils are struggling to reconcile the views of economic development officers and public health teams, this temporal trade-off is often at the heart of the debate.

#### 4.5. Incoherence... or lack of interest?

As noted in our results, three local government functions that we felt *should* have had an interest in food policy do not (or at least, the representatives of those functions that we spoke to did not). These functions were social services (including adults and children), markets and resilience.

Councils in the UK spent £26.9bn in 2021/22 on providing adult social care (The King's Fund, 2023), a sizeable chunk of which is used to buy and provide food. Co-ordinating the procurement activity to align this expenditure with other council food policies (such as favouring local growers and producers or limiting HFSS foods) could have a huge impact, not least on the population receiving care (The King's Fund, 2023). There is a similar opportunity in children's services: councils in the UK are buying millions of meals for children in their care. They could use this expenditure to improve the health and experience of a large population through provision of better, healthier food.

The markets function is another that we were surprised not to see mentioned more often in the literature review and that we struggled to penetrate with interviews. Data from 2017/18 (the most recent available) states there were 1,173 markets in the UK, of which 82 per cent are operated by local authorities. In that year, consumers spent more than £3.1bn at markets, much of it on food (Savage, 2018). As some councils are finding, the promotion of markets provides opportunities to support residents with cost-of-living challenges, drive footfall to town centres, encourage consumption of fruit and vegetables, support local businesses, encourage local growers and producers and even promote active travel – a wide range of food-related policies that could be addressed by influencing a stakeholder group that is licensed, regulated and promoted by the council (Messer, 2017; LGA, 2022c; Lewisham Council, 2023; Mission 4 Markets, 2023).

#### 4.6. Study limitations

We limited our research to the UK. While there are likely to be some consistent themes and parallel issues in other countries, it would not

have been feasible to address them here. This research therefore probably has limited relevance outside the UK, though similar issues are likely to occur elsewhere. We hope it may serve as a useful model for research in other countries.

The main constraint on the research was the availability of interviewees and our time to speak to them. We took a pragmatic approach to scheduling interviews, prioritising umbrella organisations who could validate or correct assumptions across multiple local government functions and potentially make introductions to important interviewees. However, we could have spent more time (*ad infinitum*) conducting more interviews. While we are pleased with the coverage we achieved, an absence of evidence in the interview data is not evidence of absence of links between functions.

Many of the interviewees were self-selecting, or chosen from a small group of focused, passionate individuals involved in a co-ordinating body for their profession. Many described joined up, well-resourced work in councils across the UK. However, it is probably fair to say that this level of high performance is not typical of *all* local authorities, many of which are under huge financial pressures and are struggling to even deliver the basic services (Hoddinott, 2023; Wallis, 2023).

## 5. Conclusion

The system of local government in the UK is complex (Paun et al., 2019). This is complicated further by devolution, both to central governments of the devolved nations, as well as more recent developments to create regional metro areas in England (Torrance, 2022). England's local government is complicated further still by the patchwork of unitary and two-tier councils (ONS Geography, 2022; gov.uk, 2023b). As noted by our interviewees, understanding which part(s) of local government need to be involved, and how best to access them, can prove challenging.

Our literature review showed a paucity of research into food policy in UK local government. To address the research gap, we interviewed 30 people who work in or with local authorities and whose function or domain experience includes food policy matters. The interview feedback revealed several consistent themes. The first was that some local government functions (notably public health, trading standards, environmental health, planning, economic development, education, sustainability and waste) have a much greater interest in food policy than others. There are also some functions that we believe *should* have a strong interest in food policy, but we could not get anyone representing those functions to discuss it (notably adult social care, markets and emergency planning).

The interviews also highlighted a wide range of food policy concerns, including sustainability, healthy eating, national government leadership, poverty, food production, institutional catering, early years nutrition and obesogenic food environments. Overall, interview feedback suggested a high degree of policy coherence between different functions within councils, though with some exceptions (notably planning, public health and economic development in tackling obesogenic food environments). Incoherence tended to occur vertically (i.e. between councils and government agencies) more than it did horizontally (within and between councils).

Interviewees cited many examples of good practice, much of which is enabled by robust partnership working arrangements and with support from the voluntary sector (notably SFP, 2023f). They also helped to identify some consistent success factors for implementing food policy interventions in local government, namely funding and resources, political leadership, stakeholder engagement, systems thinking, prioritisation, and localism (as well as partnership working).

There are many places around the UK where councils are doing innovative, forward-thinking and joined up work to bring about positive change in our food system (such as SFP, 2020, 2023c, 2023d, 2023a). Policy coherence is higher than we had expected at the outset, though the sheer complexity of local government in the UK can still frustrate efforts to effect change beyond the boundary of a single local authority.

The Government's abandonment of the National Food Strategy (LGA, 2022b), and frequent prevarication on legislating for change (Parr, 2022; ACS, 2023; Quinn, 2023), have hampered efforts by local authorities to do more. More robust legislative interventions by the devolved governments of Scotland (Good Food Nation (Scotland) Act, 2022) and Wales (Well-being of Future Generations (Wales) Act, 2015) put the English Government's efforts into sharp relief. While many green shoots are now sprouting (e.g. Pullen et al., 2022; Bradford Council, 2023; Bristol Food Network, 2023; Treuherz et al., 2023), our interview findings suggest local authorities could better co-ordinate their work, both with each other and within their own functions, to reduce duplication, replicate what works and improve our food system.

This research is perhaps the first study of policy coherence looking specifically at local government in the UK. It moves beyond understanding policies and functions as isolated entities to look at the relationships between them, and proposes success factors for food policy interventions in UK local government. The findings show it is possible to effect meaningful change in local government food policy. There is already a high degree of policy coherence across many council functions but improving connections between some outliers (notably social services and public health) would aid policy coherence. At the local scale, we hope this research may help to effect the changes in local food systems that are increasingly being called for (Dimbleby, 2021; Parsons, 2021; Zerbian et al., 2022).

## 6. Policy Implications

The evidence from our interviews suggests that more national co-ordination would be beneficial. The FSA does this already to an extent (FSA, 2023b), but more in the absence of any other government department for food (Lang, 2021) than as a clear part of its mandate. National representative bodies all help with this but without a clear food policy focus. Despite food policy coherence being reasonably high, the organisations working on it are disjointed and their strategies fragmented, according to our interviewees.

The literature review, supplemented with interview evidence, also illustrates the remarkable level of complexity in local government in the UK. Policymakers should be aware of this complexity when designing interventions, rather than hoping to eliminate it. They should be clear on which tier of government is responsible for the intervention they are proposing, and where this sits in the system (particularly in relation to devolved governments).

Where good practice has been highlighted, it is almost always taking place in the context of a local food partnership. Local authorities, voluntary organisations and citizens may find going through the partnership to be an easier way to effect change than trying to do so unilaterally (SFP, 2023f). Where partnerships do not exist, setting them up may increase coherence locally (Jones et al., 2022). There are now tried-and-tested means of doing so (Sustainable Food Places, for example).

While we found policy coherence to be relatively high (particularly within councils), there are other obstacles to achieving successful food policy change. Chief among these obstacles is the need for capacity, resources and funding. Local government receives the lowest level of funding and is responsible for more functions than has been the case for decades (Atkins and Hoddinott, 2023). As a result, individuals and whole departments are stretched (CTSI, 2023; Economist, 2023). For stakeholders outside local government (like national government departments) seeking to implement policy interventions that will be delivered by councils, these interventions are unlikely to be successful unless backed by robust, long-term funding (Zerbian et al., 2022). Local authorities, particularly in England, could take bolder steps to achieve more with less, for example by moving to unitary council structures, sharing teams (in the model of Surrey and Buckinghamshire Trading Standards) or even merging neighbouring councils.

## CRedit authorship contribution statement

**Rob Kidd:** Writing – review & editing, Writing – original draft, Visualization, Resources, Project administration, Methodology, Investigation, Formal analysis, Data curation, Conceptualization. **Christian Reynolds:** Writing – review & editing, Supervision, Data curation, Conceptualization.

## Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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