BPLN0039_VDTP1 by Cyrus Wong

Submission date: 05-Sep-2022 12:17PM (UTC+0100) Submission ID: 185704360 File name: BPLN0039_VDTP1_3828312_747976191.docx (1.67M) Word count: 17337 Character count: 99278

University College London Faculty of the Built Environment The Bartlett School of Planning

The Role of Planning for Culinary Diversity: Evidence from London and Berlin

VDTP1

Date: 5 September 2022

	Word count
Main body of dissertation	10951
Appendices	0

Being a dissertation submitted to the faculty of The Built Environment as part of the requirements for the award of *MSc International Planning* at University College London:

I declare that this dissertation is entirely my own work and that ideas, data, and images, as well as direct quotations, drawn from elsewhere are identified and referenced.

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Acknowledgements

I would like to thank my dissertation supervisor, Dr. Tse-Hui Teh, for all the kind support she has provided throughout the research process. I would also like to express my infinite gratitude to all the interviewees who spare time for the conversations. Last but not least, I would like to thank all my friends and family for the constant support and encouragement.

Abstract

The purpose of this dissertation is to clarify the role of urban planning in contemporary societies through the lens of culinary diversity. Research indicated that culinary diversity could fuel urban economy and strengthen place identities of city dwellers, especially under the context of global migration. Despite the growing body of academic work regarding food governance and its link with urban planning, the role of planning as enablers and facilitators for culinary diversity has remained widely unexplored.

To answer the research question: what is the role of planning in areas with culinary diversity, this research employed a triangulated analytical framework to examine different contextual factors of culinary diversity in two case studies: Mercato Metropolitano in London and Preußenpark in Berlin. After empirically analyzing the planning policies at various levels, planning process and socio-economic factors at two venues, this study found that planning interventions were largely determined by the values of culinary diversity for the area. Findings also suggested varying tools have been experimented with in different planning systems and land use management culture. Despite the diverging planning contexts, diversified food offerings in both cities are the outcome of inter-related socioeconomic contexts, including mixed-use development, agglomeration and market appeal. As such, this study concluded by highlighting the need for place-based interventions that are sensitive to the local contexts and aspirations, as well as for collaborative planning to better understand the experience, needs and vision of stakeholders, both of which are paramount amid strong market economies and socially diverse environments.

Introduction

Eating has been treated as a commensality and cultural expression of ones' identity in ethnic, regional, and religious groups (Jones, 2007). In their book Consuming geographies: We are where we eat, Bell and Valentine (1997) argued that cultures of food are inherently connected with places. This idea was later elaborated that food is vital for the construction of our sense of identity and sense of place (Henshaw, 2014; Roe et al., 2016; Steel, 2009). In the other words, culinary diversity can be regarded as a collective social and economic asset that defined the characters of the city. This is even more significant in the context of immigration, where "emigrants are displaced in the sense of being temporarily without places of their own" (Byrne and Goodall, 2013, p.65). While the world is seeing ever-increasing permanent migration flow (OECD, 2016), new waves of immigrants have been hitting European countries such as Germany, the United Kingdom, France and the Netherlands and Sweden. (Koopmans, 2010). This poses challenges to metropolises with a 'world-in-a-city' population, where the demand for ethnicaly and culturally specific food is inherently higher (Morgan and Sonnino, 2010). Following this line of thought, protecting the spatial footholds where diverse cuisines are provided is highly relevant in contemporary societies.

As a viable part of urban living and economy, food issues have been gaining increasing attention in academia, ranging from the characterisation of foodscape in urban environments (Bell and Valentine, 1997; Burgoine & Monsivais, 2013), to exploring its governance model (Moragues-Faus and Morgan, 2015; Dorninger et al., 2020, Cohen and Ilieva, 2021) and its link with urban planning (Burgoine et al., 2014; Cabannes and Marocchin, 2018). While cities around the world have started experimenting with different ways to incorporate food into their planning agenda (Gaspard, 2019; Quaglia and Geissler, 2018; Cohen, 2018), these policies mostly focus on the health and sustainable aspect of food governance and correspondingly, culinary diversity has remained a foreign field in planning. Food also assists our understanding of the interrelated socioeconomic, cultural and political processes (Lang et al, 2009). Using the lens of culinary diversity, focusing on the extent to which planning policies influence it, this research study explores the role of urban planning amid strong market

economies and socially diverse environments. By triangulating the findings of planning policy, planning process and small-scale businesses responses, this dissertation joins the wider conversation of positioning urban planning in contemporary societies.

This topic is also underpinned by the noticeable convergence of urban food governance. With more and more trans-local assemblages formed to promote better urban foodscapes, cities around the world are showing signs of "cross-overs of learning and reflexivity" in their food policy (Sonnino et al., 2016). For instance, the establishment of the pioneering food strategies in Milan has inspired other cities to formulate their policies (Quaglia & Geissler, 2018). 175 and counting cities have signed the Milan Urban Food Policy Pact (2015) to date and are committed to the development of sustainable food systems that are inclusive, resilient, safe and diverse. This translates to increasing urges for more comparative and comprehensive analysis in food planning and research (Sonnino, 2009).

Evidence from London and Berlin

Both London and Berlin have a high concentration of foreigners and a presence of culinary diversity. As the most ethnically diverse region in England, London has 56.6% of its population identified as non-White British, which is far more than that in England overall at 21.6% (Office for National Statistics, 2021). Although Germany no longer collects ethnic statistics of its population out of consideration of multiculturalism (*MultiKulti*) (Escafré-Dublet and Simon, 2011), racial diversity is reflected in the official data on their nationalities. In Berlin, 20% of its total population is foreign-born (Berlin-Brandenburg Office of Statistics, 2022). The city's Senate Department for Urban Development and the Environment also identified that Berlin is composed of "socially mixed neighbourhoods" and "this will continue to be the unique selling point which sets it apart from other European cities (Senatsverwaltung für Stadtentwicklung und Umwelt, 2013; p. 9). The racial diversity also translates into the presence of a diversified urban foodscape in both cities. In London, it is officially recognised by the mayor that "we (London) have every cuisine from around the world - something of which we should all be proud." (GLA, 2018; p. 5), whereas Berlin's official capital portal

stated that the city offers full gastronomic diversity at around 5000 restaurants and other establishments (Berlin.de, 2022).

Additionally, London and Berlin share similar political contexts in food governance. Firstly, both cities have developed their own food policies at city level in recent years, namely the London Food Strategy (GLA, 2018), which was adopted in 2018, and Berlin Nutrition Strategy (Berlin isst so - Unsere Ernährungsstrategie), which is still undergoing stakeholders' engagement as of this research study is conducted. Moreover, both cities have joined the global movement in promoting a better foodscape by signing the C40 Good Food Cities Declaration in 2017 and Milan Urban Food Policy Pact (MUFPP) in 2015.

Research Question and Objectives

This dissertation will explore the role of planning in the development of culinary diversity in London and Berlin. The overarching question of this research study is **what is the role of planning in areas with culinary diversity?** The study set out to achieve the following objectives:

- 1. To identify the link between planning policies with food and culinary diversity
- 2. To identify different factors that affect culinary diversity at operational level
- 3. To examine the varying impacts on the presence of culinary diversity in different contexts

Literature review

This chapter sets out to review the current development of literature to identify the research gap and direction. As the primary goal of this study is to examine the role of planning in culinary diversity, it is necessary to first develop an understanding of the value of culinary diversity in modern cities, which brings about the need to govern and plan for it. The review then proceeds to the contemporary movement in food governance and its interface with urban planning, which relies on case studies from around the world. To situate this study in the field of urban planning research, the last part of this chapter examines the challenges of planning for diversity, which correlates to the debate over the functions of urban planning in demographically diverse societies and market economies.

Value of Culinary Diversity in Urban Planning

The rationale for a diversified urban foodscape is relevant to the key concepts in the school of planning. Firstly, the need to bolster culinary diversity is not dissimilar to the earliest notion of bottom-up planning advocated by Jane Jacobs (1961), who believed planners should beware of the distinctive yet complex characteristics that determine places and reflect the identity of the people. This corresponds to the strand of literature relating to urban planning for equality. In the book *Ethnic minorities in Britain: diversity and disadvantage*, Modood et al (1997, p.358) emphasised one of the dimensions of equality is "the right to have one's difference recognized and supported in both the public and private spheres". In contemporary urban planning, this can be translated into the ideology of Just Planning. According to A Manifesto for the Just City (Rocco et al, 2021), planning a modern city should respect the needs of various communities and embrace diversity. A diversified foodscape that caters for the needs of communities is therefore deemed significant in developing place identities and creating equal and just urban environments.

Apart from addressing the cultural differences among individuals, culinary diversity can also be an economic asset of contemporary cities. In the rise of neoliberal urban governance in the late 1990s, cities around the world began to ways to enhance their

global competitiveness and develop their knowledge economy, which was a "politically seductive" strategy for world cities (Peck, 2005, p. 766). As the creative class is more likely to be attracted to places with "tolerance and openness to diversity" (Florida et al, 2008: p. 616), cities have taken on the initiative to promote inclusive multiculturalism to attract global investment and tourism, otherwise known as cosmopolitan urbanism (Binnie at al., 2006). An empirical case study of Solo City in Indonesia demonstrated how a diversified foodscape can help promote cultural harmony, and then become the economic power amongst the Javanese, European, Chinese and Arabic communities (Priyatmoko, 2020). In the American city of Houston, Texas, culinary diversity is used as a management tool to promote place reputation and make it a creative destination that is attractive to both residents and tourists (Nelson, 2015). In order to create a socially and economically sustainable urban food system, planning intervention should be used to protect and increase the diversity of food offerings.

Modern food governance in urban planning

In order to understand how urban planning can protect and increase culinary diversity, it is important to understand where modern food governance stems from. The earliest attempt to incorporate food into urban planning can be traced back to the Garden City Movement (Howard, 1902), which placed elements of the food system, including production, distribution, consumption and waste recycling, as "an integral part of the city" (Cabannes and Ross, 2018: p. 19). However, food issues had since remained foreign in the planning field (Pothukuchi and Kaufman, 2000). Traditionally, "food has not been considered within the remit of municipal responsibilities" (Moragues-Faus and Morgan, 2015, p.1568). One of the reasons, according to Morgan (2014), is that many governments previously confused food policy with agricultural policy. As urban areas and food systems continue to expand, food policy has begun to gain traction in urban planning. The use of planning tools can also be reasoned by the unintended effects of planning decisions on foodscape. In the case of East Harlem, New York, rezoning decisions aiming to create housing or redevelop industrial sites were found to have significant consequences for neighbourhood food environments (Cohen, 2018).

Most recently, both foodscape management and urban planning are experimenting with horizontal restructuring. Considering the multifunctional character of food, the food system and its governance are heavily implicated in many public policy arenas (Morgan, 2014). As such, societies are seeing increasing advocacy for interdisciplinary and multi-scalar initiatives in food governance (Dorninger et al, 2020). Progressive cities like New York are experiencing a political shift toward a broader notion of food policy to address structural issues such as social justice (Cohen and Ilieva, 2021). In the book *Integrating Food into Urban Planning* that documented case studies across the world, Cabannes and Marocchin (2018) concluded that the most successful food policies are those fully integrating food system with other sectors. In response to the call for cross-sectoral solutions to address urban foodscape, planners have been increasingly exploring the use of sectorial planning tools, which are believed to be of particular relevance to food systems from the case of Fortaleza, London and Toronto (Gaspard, 2019).

On top of the horizontal restructuring of food governance, recent research has been calling for vertical re-scaling of food governance (Lever et al., 2019). A UK case study found that micropolitics is a key determinant of the transformative and emancipatory potential of food partnerships (Coulson and Sonnino, 2019). This corresponds to the rise of localism in the planning systems. For example, the British government passed the Localism Act in 2011 to decentralise power to local councils, communities and residents in plan-making and decision-making on future development of their area. Global initiatives such as Local Agenda 21, which encourages local-based initiatives to promote sustainable development, have resulted in more and more policies at municipality level in Europe and North America (Morgan, 2014). As a result, there have been burgeoning demands for place-based interventions in both food and urban planning.

Different interfaces of food and urban planning

The interface of food policy and urban planning varies from area to area. In Rosario, for example, land mapping techniques are used to develop a municipal land bank as knowledge generation to inform planning decisions. Physical planning tools are also found to be commonly used in cities with pioneered food strategies that promote urban health, such as Fortaleza, London and Toronto (Gaspard, 2019). The reason being that concrete planning devices such as zoning is useful to materialise a food vision into spatial terms (Cabannes and Marocchino, 2018). For authorities whose planning power is limited, developing informal networks of food system stakeholders and forging connections across food sectors can be the key to an inclusive and strong local food system (Moragues-Faus and Morgan 2015).

The degree of success of regulating urban foodscape by planning depends largely on the planning contexts. In countries such as the United States where the nature of planning is mostly advisory, the effectiveness of policy support for food systems can be limited (Raja et al, 2018). On the other end of the spectrum, Milan is a successful case of forging multiple integrations between urban planning with food systems. In the strategic plan *Piano del Distretto Rurale di Milano*, food governance is inextricably tied to land use planning to enhance food production, marketing and landscape quality (Regione Lambardia, 2011). Land regulations at regional level have helped Milan Agricultural District to protect urban and peri-urban agricultural land, whereas the use of collaborative planning to establish an internationally renowned food system. Its success can be attributed to well-crafted and diverse planning instruments, as well as political will (Quaglia and Geissler, 2018).

Planning for diversity: challenges and limitations of urban planning

The last strand of literature that is important for the discussion is the challenges of urban planning in the demographically diverse society and market economy. Despite its significance, planning for diversity is limited by the apparent diverse demographics, resulting in the inaction of institutions. For example, a study in the UK argued that 'national policies and much local practice have shifted from explicitly engaging with diversity' (Lewis & Craig, 2014: p. 21). Some studies attempted to reason for the

conservative altitude, suggesting the implementation process of planning typically faced multiple challenges raised by the difference amongst the diverse ethnicities (Fincher & Iveson, 2008). The challenges of planning for diversity are encapsulated by Susan Fainstain in Planning and diversity in the city: redistribution, recognition and encounter (2015, p.6): due to the tension between local authenticity and cultural pluralism, "planners appear caught in an insoluble dilemma — either leave the market to take its course or impose an oxymoronic diverse order".

The argument made by Susan Fainstain also highlighted the potential of market in addressing diversity issues, which is related to the debates on the role of urban planning in market economies. In London, for example, authorities are seeking marketled solutions to address problems associated to diversity (Raco et. Al, 2014). In the age of austerity, local planning authorities are relying to investors to implement planning policies due to financial reasons (Heurkens et al., 2015). Studies showed that urban foodscape, similar to other urban systems, is complicated in nature, as it is influenced by a multitude of internal and external factors (Derek et al., 2020; Kowalczyk, 2020) and shaped by economic and social geometries of power (Heynen et al, 2006; Swyngedouw and Heynen, 2003). Considering the global food business is a quarter billion US dollars industry (Lock, 2022), market plays a vital role in contributing to the diversified urban foodscape. However, contemporary planning shows a tendency to "respond to market pressures as opposed to shaping markets through well-informed plans" (Barrett and Fudge, 1981; Adams and Tiesdell, 2013, 65). To answer the question of what the role of planning for culinary diversity is, the findings in this literature review reminded us that economic and social context matters. After all, urban planning is "inherently a governance activity, situated in a complex landscape" of government, community and private organizations" (Healey, 2005; p. 304).

Methodology

Overall research framework

In response to the complex nature of urban planning and urban foodscape, the research framework of this study is designed to harness a robust and comprehensive account of the paradigm within which culinary diversity is created. This is achieved by adopting a triangulated analytical framework with two layers of qualitative research methods (Figure 1).



Figure 1. Triangulated analytical framework

In this study, the design process of data collection is built on the hypothesis that culinary diversity is a product of multi-tier policies and various stakeholders' actions. Using multiple methods or data sources about the same phenomenon, which is referred to as Triangulation of methodologies (Carter et al, 2014, Polit & Beck, 2012), has been proven to enable a more **comprehensive grasp of phenomena** (Flick, 2018) and hence **increase the credibility and validity** of the research (Noble and Heale, 2019). Triangulation research can help reveal the interaction among different factors, specifically the planning policies, planning process and socio-economic factors, which result in the presence of culinary diversity. The framework also corresponds to the call for multi-scalar approaches in food research (Dorninger et al, 2020). It is achieved by

collecting data from multiple sources, namely planning policies at city and neighbourhood scale, planning applications and documents of the sites and interviewee responses to reflect market behaviour at the individual business level.

As these data varied in nature, each of them requires a specific type of analytic method, resulting in the need of mix-methods research design. Two qualitative research methods are employed in this study, namely archival research, and semi-structured interviews. Archival research is conducted to aid the analysis of planning policies and documents that recorded the planning process. The analysis guides the design of the interview questions for food vendors to comment on.

Empirical research design

The use of case study analysis in urban planning research is significant. Case study analysis offers a rich understanding of complex social phenomena, organizational and managerial processes (Yin, 2003). In this research study, two case study analyses were conducted in two venues that embody culinary diversity: Mercato Metropolitano in London and Preußenpark in Berlin. Both venues are made up of multiple street vendors, serving international cuisines and being visited by people of different backgrounds. Their similar nature has made them suitable for comparative and iterative research on how they were created and operated in different contexts. To achieve this, a three-step process is conducted in each case study: contextualising culinary diversity in two cities, examining the planning documents related to the development of the venues, and consolidating these findings with interviewee responses.

Contextualising Culinary Diversity in two cities

To understand the value of culinary diversity in two cities, this research study began by identifying respective planning contexts for culinary diversity. Research showed that Britain and continental Europe have different ways in which town planning is conceptualized, which can be attributed to diverging legal systems (Booth, 2007). In



response to this, archival research of planning policies at different scales is conducted (Figure 2).

Figure 2. Empirical Research Design

Two city planning strategies, namely the *London Plan 2021* and *Berlin Strategy 2030*, are analysed. The sections in which food and diversity are mentioned will be analysed to contextualise culinary diversity in respective planning systems and cultures. This section also helps develop the understanding of how the values of food and diversity are perceived in urban planning. The ultimate objective is to develop the planning, market and social context of culinary diversity in the two cities, which can be triangulated by later findings.

Case study archival research

The archival research continues with the review of relevant planning documents of both markets, including local development plans and planning applications. Planning documents at neighbourhood level offers more spatial contexts, whereas planning application and relevant documents revealed the direct impact of planning on the development of both venues. They were accessed on the local authority's official website. For example, Preußenpark, decision notices and drafted master plan were made publicly available by the District Office of Charlottenburg-Wilmersdorf. An additional reason for choosing Mercato Metropolitano as a case study is that it has multiple locations across London, such as in the Borough of Southwark and the City of Westminster. This provides an additional layer of how the interfaces of urban planning and culinary diversity vary among different neighbourhoods in the case study of London.

Semi-structured interviews

The findings were then taken to the semi-structured interviews with food vendors, whose responses were used to test and consolidate the findings on planning documents and to reveal the socio-economic factors. A total of 8 interviews were conducted with food vendors in Mercato Metropolitano and Preußenpark (Table 1).

Interviewee	City	Case	Study	Cuisine Served
IL1				American
IL2			Elephant & Castle	Italian
IL3	London	Metropolitan Mercato		Taiwanese
IL4			Morfair	Italian
IL5			Mayfair	Asian
IB1				Thai
IB2	Berlin	Berlin Preuß	enpark	Singaporean
IB3				Thai

Table 1. Interviewee details

The questions were specifically designed and pre-tested to ensure participants' experiences were demonstrated to the best degree. As semi-structured interviews allow for more 'leeway' in producing answers from different angles (Brinkmann, 2014) and subjective experiences (Auerbach & Silverstein, 2003), the response from food vendors provided additional insight into factors other than urban planning that influence the culinary diversity, allowing the development of planning implications and recommendations.

Research ethics

This study presented a low ethical risk to research participants. Participation in the interview was entirely voluntary and could be terminated at any time throughout the process. All responses were anonymised with no personal data collected, except for the cuisine each vendor is selling. Prior to the interview, each participant was briefed on the purpose and aim of the research. Consent was sought for their interview material to be analysed. A Risk Assessment Form and Ethical Clearance Form were completed and attached to this study.

Finding/Result

Contextualising Culinary Diversity in London

"Food helps to make London such an exciting city. Our restaurants, markets and street food are a snapshot of vibrant, multicultural communities. And we have every cuisine from around the world" (GLA, 2018; p. 5).

In the first line of the *London Food Strategy*, the Mayor highlighted the diversity of the city's food offerings. While there are many possible explanations for it, the culinary diversity in London could simply be that Greater London is the one of largest conglomerations in the UK and Europe, and more than half of its 9.5 million population are identified as non-White British (Office for National Statistics, 2021). However, the subsequent parts of the *London Food Strategy* only mentioned culinary diversity explicitly twice: one focusing on its economic value ("The Mayor is proud of London's amazing range of food and wants businesses within the food sector to thrive. We will continue to promote the excellence and variety of London's food." (GLA, 2018, p. 24) and one focusing on tourism management ("Continue to work with business to find solutions to the challenges that Brexit poses and work to enhance London's reputation as a world-leading food destination, to help food play a key role in our tourist economy." (GLA, 2018, p.27). It is also worth noting that the strategy also recognised the value of food in improving social integration.

After establishing how culinary diversity is valued in food governance, the next question would be how is spatial management involved? As the Spatial Development Strategy for Greater London, the London Plan 2021 is part of the statutory development plan for London and informs decisions on planning applications across the capital. Throughout the plan, Mayor's Food Strategy is only mentioned once in Policy G8 Food Growing, which stated that "the Mayor's Food Strategy prioritises the need to help all Londoners to be healthier and for the food system to have less of a negative environmental impact" (GLA, 2018; p. 331). This finding hinted that, in terms of the interface of urban planning and food governance, the diversity dimension of urban foodscape may not be the top concern in planning interventions.

This is also shown in the only other policy in the London Plan that is explicitly related to food governance: Policy E9 Retail, markets and hot food takeaways, which aims at creating a healthier food environment. In response to this policy, more and more London boroughs have imposed regulations on hot-food takeaway distribution, marking the first use of planning tools to directly regulate the diversity of urban foodscape. An official report revealed that many London boroughs have included some degree of regulations on food outlets in their adopted or draft Local Plans (Barnet Council, 2018). The planning tool used is typically the supplementary planning document (SPD), which is a material consideration in the determination of the planning application. For example, in the Hot Food Takeaway SPD of London Borough of Waltham Forest, which is believed to be the first local authority in the UK to use its planning powers to limit the location of new hot food takeaways (Morgan, 2014), criteria for accessing hot food takeaway planning application are set out, including considerations of over-concentration, clustering, proximity to certain facilities and protection of residential amenity (Waltham Forest Council, 2009a). In the consultation statement of this SPD, it is shown that the policy is 'largely supported by the local residents out of health and hygiene reasons, yet "Lack of Retail diversity" is specifically identified by some respondents (Waltham Forest Council, 2009b, p. 4). This shows that culinary diversity, to a small extent, can be considered as a material consideration in the decision-making of planning across London.

While the findings so far demonstrate that culinary diversity is not an explicit product of city-level planning, the market is seemingly responding to the increasingly diverse demands of culinary offerings across London. An example in point would be Bang Bang Oriental Market in Colindale, which was the first organic Satellite Chinatown in a London suburb (RPS Planning, 2006). A sociological study has shown that by offering culturally specific cuisines in northwest London, this ethno-commercial site has helped preserve the identity of the Chinese residents in ways more effective than structural changes in governance (Luk, 2008). Across Inner London, contemporary and modern dining halls that offer international dishes are also becoming prevalent. Other examples include Arcade Food Hall in Tottenham Court Road, Seven Dials Market in Covent Garden and the expanding Market Hall restaurant group with locations in Oxford Street, Victoria and Canary Wharf. In 2016, Mercato Metropolitano joined the city's diversified food scene and quickly expanded across London: two in

Elephant and Castle (MM Elephant and Castle, MMy Elephant Park), one in Mayfair (Mercato Mayfair), one in Canary Wharf (MMy Wood Wharf), and an upcoming location in Ilford.

The story of Mercato Metropolitano

Initially, the team behind Mercato Metropolitano envisioned it to be a sustainable format of organised food retail and experimented with the idea in a four-month pilot project during the World Expo in Milan in 2015. The market was designed just for Expo and sited in a former railway station not far from the Expo in Porta Genova neighbourhood. As an open-air street food market, Mercato Metropolitano attracted thousands of visitors and was widely acclaimed for its sustainable placemaking. Mercato Metropolitano is "one of the best-planned modern urban markets" by combining heritage street-food stalls with a mix of authentic and artisan restaurants (Albright, 2015). The project, described by the team, is a success in terms of retaining the site's original appearance and character, promoting its urban history and protecting the local community's affection (Mercato Metropolitano, 2022). This approach has remained at the core of its later expansion to London.

Following its recorded success at the Expo, the team launched its first market in London in 2016. Set in a former paper factory, MM Elephant and Castle is offering a diverse range of dishes from European to Asian, from Latin-American to Middle Eastern (Figure 3).

European Food:	
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Badiani	Italian
Dez Amore	Italian
Fresco	Italian
Little Sicily	Italian
The Italian Job	Italian
Santo Kitchen	Italian
German Kraft	German

Latin-American Food

Guasa	Venzuelan
Rudie's Jerk	Caribbean
Ceviche Bar	Peruvian
Argentinean Grill	Argentinean
Hermanos Tacos	Mexican

٩s	ian	Food	

Asian Poou.	
Rice on	Korean
Vietnamese	Vietnamese
Himalayan Dumplings	Hymalayan
Yuzu	Japanese
OshPaz	Uzbek
Tandoori Tadkaa	Indian
Karapincha	Sri Lankan

Middle Eastern Food

Lebanese	Lebanese
Arnabeet	Syrian
Duman Doner	Turkish

We Love Dwogs	American
Kapanna	South African

Non-specific.	
Butchers Grill	Grilled meat
The Big Melt	Toastie
Wrap Mi	Bao
Molo	Seafood
That's Food	Drinks
French Corner	Drinks
Ethika	Drinks

Figure 3. Food vendors in MM Elephant and Castle (as of 31 August 2022)

The first market: Policy support for temporal use

An archival analysis of the planning applications submitted for the site of MM Elephant and Castle revealed that a key factor for its running is the permission for temporary change of use. From the onset, the site is a Class B8 Warehousing. However, the local authorities have been granting planning permission for the temporary change of use to a mixed use development comprising a food market for 6 years to date (Table 2).

Application Summary	Application Date	Proposal	Decision	Decision Issued Date	Application Reference
Redevelopment	12 Dec 2013	Request for an Environmental Impact Assessment (EIA) Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), for the proposed redevelopment of the site	Scoping Opinion - EIA Regs	19 Mar 2014	13/AP/4359
Change of Use	22 Apr2016	Temporary change of use for a two year period from Warehousing (Class B8), Office (Class B1) and Café (Class A3) to a mixed use development comprising a food market, []	Granted	28 Jul 2016	16/AP/1576
Change of Use	17 Jun 2019	Temporary change of use until 21 August 2020 from warehousing (Class B8), office (Class B1) and cafe (Class A3) uses to a mixed use development comprising a food market, []	Granted	07 Aug 2019	19/AP/1802
Change of Use	06 Jul 2020	Temporary change of use from 21 August 2020 until 21 August 2021 from warehousing (Class 88), office (Class B1) and cafe (Class A3) uses to a mixed use development comprising a food market, []	Granted	25 Aug 2020	20/AP/1852
Change of Use	22 JUI 2021	Temporary change of use from 21 August 2021 until 21 August 2022 from Use Class B8 (warehouse) and Use Class E (office and café) to a mixed use development including Use Class E (food market, [])	Granted	10 Sep 2021	21/AP/2607
Redevelopment	03 Feb 2022	Redevelopment of the site to provide a mixed use development consisting of residential, commercial space, a landscaped public area and underground car parking.	Scoping Opinion - EIA Regs	24 Mar 2022	22/AP/0414

Address: 40-56 Newington Causeway London Southwark

Table 2. Planning Applications for MM Elephant and Castle site (as of 31 August2022) (Publicly accessible on Southwark Council website)

The archived application revealed that redeveloping a site can be a lengthy process. On the site of MM Elephant and Castle, the first and most current applications to seek green light for redevelopment are 9 years apart (from 2013 to 2022). Most currently, an application is submitted to build four blocks of heights between 10 and 46 storeys on the site, yet it has received many critiques from neighbours and community groups during the consultation (Russell, 2022). As shown by this planning process, vacant land is common in the early phases of redevelopment, giving rise to meanwhile uses,

which refers to a range of temporary uses of vacant sites for social or economic gain before they can be brought into new use. The case of MM Elephant and Castle demonstrated how a food market can take up a site with a prime location to provide food for the residents before it is redeveloped.

The support for meanwhile uses is consistent in the local development plans of the area. In 2012, Southwark Council adopted *Elephant and Castle Supplementary Planning Document*, which sets out the vision for the opportunity area over the next 10-15 years, to ensure coordinated and sustainable urban regeneration (Southwark Council, 2012). The block in which MM Elephant and Castle locates was identified as a potential development site. In *Southwark Plan 2019-2036*, development management policy P18 sets out that "Development should be permitted for appropriate temporary 'meanwhile uses' where they deliver community benefits." (Southwark Council, 2022; p. 138). Meanwhile use is supported not just in Southwark Borough, but also across London since a similar policy can be found in the *London Plan 2021* (D8.M) that local authorities should promote the best use of land by "identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm" (GLA, 2021, p. 135).

The findings are further confirmed by IL1, a food vendor at MM Elephant and Castle, who said that "we chose this place partly because it is easier compared to opening up an actual restaurant outside". The comment made by IL1 shows that the flexibility offered by the local authorities towards meanwhile use has favoured the operation of small-scale business owners. The notion of allowing flexibility for the market is also consistent with the rationale of the recent update of land use classes in the UK. In 2020, the UK government renewed its *Town and Country Planning (Use Classes)* by recalibrating commercial use into more than 10 specific sub-categories, one of which is Class E(b) Sale of food and drink for consumption (mostly) on the premises. Since the change to another use, or mix of uses, within this class will not require planning permission, repurposing urban spaces will become easier. The industry is already predicting more regeneration projects in high streets and town centers in the eye of the greater flexibility allowed (Pinsent Masons, 2020). This means that areas with diverse commercial offerings and greater flexibility in land use, which are found to be

favourable conditions for Mercato Metropolitano, will be more prevalent across London and the nation.

What fuels its expansions?

After opening in MM Elephant and Castle, the group quickly expanded to three more locations within 5 years: Elephant and Castle (MMy Elephant Park), Mayfair and Canary Wharf. The location of Mercato Metropolitano hinted that culinary diversity may be a product of economic development for two reasons. Firstly, all the locations chosen by the group, interestingly, are within London's Central Business District (CBD) delineated by Greater London Authority (See Figure 4).



Figure 4 – Location of Mercato Metropolitano overlayed with the map of CBD of London (Source: GLA Economics, 2008 and author's illustration)

The location of Mercato Metropolitano hinted that culinary diversity may be a product of economic development as all the location of Mercato Metropolitano, interestingly, are within the London's central business district (CBD) (See Figure 1). This highlighted two links between culinary diversity and urban economy: the spatial configurations and favourable policies.

London's CBD is loosely defined as the Central Activity Zones (highlighted in red in Figure 1) and Canary Wharf (GLA Economics, 2008). The latest statistics showed that London's CBD is home to nearly 1.5 million job opportunities and one-third of London's employment, making it distinctive from other areas in the terms of business nature, density and use of space. While Mayfair is a traditional central economic area, the 'More London' development in the early-2000s resulted in the southwards expansion of economic activities, transforming Southwark and elephants and castle through regenerations. To the east, the redevelopment of the London Docklands is "an explicit attempt to create a new business centre in Inner London" (GLA, 2008; p.38), resulting in the strong presence of internationally oriented financial and business service in Canary Wharf nowadays.

Interestingly, the siting of Mercato Metropolitano matches the recent trends of urban expansion powered by economic development. While Mayfair is a traditional central economic area, the 'More London' development in the early-2000s resulted in the southwards expansion of economic activities, transforming Southwark and Elephant and Castle through regenerations. To the east, the redevelopment of the London Docklands is "an explicit attempt to create a new business centre in Inner London" (GLA, 2008; p.38), which results in the strong presence of internationally oriented financial and business services in Canary Wharf nowadays. This location analysis showed that culinary diversity could be attributed to the happenings of economic activities in the metropolitan area.

Effective management of the economic clusters

To answer the question; 'what about the area that attracts the siting of Mercato Metropolitano?'; it is important to firstly look at planning policies that create the urban environments that attract food vendors to set foot in. According to the report that was designed to support policymaking in Central London by GLA (2008), Central London has a distinct economic geography containing a range of distinct concentrations of

activities. This resulted in a tailored set of policies for the placemaking with stronger emphasis on pedestrian experience, accessibility, infrastructure and the public realm.

A more concrete example would be the case of Mercato Mayfair, which falls within the West End Retail and Leisure Special Policy Area in the *City Plan 2019-2040*, produced by the Westminster City Council. As the area is anticipated to absorb much of future commercial growth, there is a policy explicitly supporting planning applications that can "diversify the food and beverage offer to complement the retail environment" (Westminster City Council, 2021; p.37). This demonstrated that planners recognised the agglomerated effects of commercial activities and the economic gains of culinary diversity in these areas. The implementation and benefits of clustering are confirmed by the interviewee responses. IL4 from *Mercato* Mayfair expressed that "the location of Bond Street attracts me the most. A lot of people would come with shopping bags. We have to friends come visit us before going to the cinema or SOHO." From the perspective of business operation, it seems that effective management and favourable policies such as intensification of economic activities will have a direct impact on the food vendors' business.

Land use mix and densification

The notion of clustering is not exclusive to economic activities, but also applies to different land uses. In *Elephant and Castle Supplementary Planning Document* (Southwark Council, 2012, p. 72), a policy is specifically set out to "provide a range of arts, cultural, leisure and entertainment uses, including food and drink uses which make a positive contribution to the evening economy". The presence of different land uses around MM Elephant and Castle has helped food vendors on the site.

IL2: "We are opposite Southwark Playhouse, sometimes people come here after seeing a show. There is also the Ministry of Sound, so people will stay here for a bite before clubbing. There are also many students coming from the University (London South Bank University)." IL4: "As we are investing in the area, we are most concerned about how the surrounding affects our business, how many people can we attract. At the end of the day, people just come to eat before or after somewhere else."

The notion of compact development to create land use synergy is built under the auspice of the Town-centre First Approach in the *London Plan 2021* (GLA, 2021). With an aim to enhance the vitality of existing town centres in London, town centres first approach is a sequential approach that prioritises future development around the existing activities nodes, followed by edge-of-centre and out-of-centre development. This development principle was set to ensure a more sustainable pattern of development as out-of-centre development can be detrimental to town centres, such as undermining their economic performance and encouraging car use (Greater London Authority, 2021). As a result, places across London are seeing compact and mixed use developments.

The relation between clustered urban functions and culinary diversity can be a virtuous cycle. As IL5 highlighted, "at the end of the day, people just come to eat before or after somewhere else". *Culinary* diversity is one of the many elements in our urban systems and environments. While clustered urban function promotes footfalls for venues like Mercato Metropolitano to strive, the presence of culinary diversity can further accentuate the economic and urban development of its surrounding. In the other words, culinary diversity is not only benefited by approaches such as land use mixing and densifying development, but also contributed to the growth of an aggregated urban environment.

A Food Destination: Whom is it serving?

When they are asked what ethnicity their customers are, all interviewees felt that it is not the most relevant concern to them. The comment made by IL5 - "You cannot tell where people are from these days", highlighted the complexity of ethnic makeup in contemporary cities. Added to the complication is the market consideration mentioned by IL3, who felt that traditional Taiwanese food can only attract a niche market. As

such, they are offerings food tailored to the mainstream flavour, which is relevant to the cultural assimilation of ethnic cuisine (Abrmitzky and Boustan, 2016; Boch et al., 2021).

This ethnic indifference of food vendors can be confirmed by the siting and scale of operation of Mercato Metropolitano. With four locations across the London metropolitan area, MM and its vendors are not focusing on particular ethnic groups, but serving as an international-facing product. This can be proven in two ways. Firstly, it is observed that a few restaurants have more than one store in different markets of Mercato Metropolitano. Secondly, the food scene is not necessarily reflective of the area's population. Take Elephant and Castle as an example, despite the areas surrounding Mercato Metropolitano have considerably higher proportions of Black people (over 40%) than London's average (13.3%), this is not fully reflected in the food offered in the Mercato Metropolitano. Only two out 25 of food vendors are selling Caribbean and South African food (Table 3). As these contemporary food halls are recreating popular international concepts to gain market appeal, these vendors are seemingly targeting the group of people who enjoy international cuisine, rather than specific ethnic groups. In this case, despite its significance in social bonding, culinary diversity is more of a product to gain market appeal in the cosmopolitan society.

As the analysis of vendor-mix shows culinary diversity could be out of economic consideration, it prompted an important question – on what ground does the culinary diversity serves to "improve social integration" as perceived in the *Mayor Food Strategy*. According to its *Impact Report 2019* (Mercato Metropolitano, 2019), Mercato Metropolitano brings as much economic growth as it delivers important social programmes to the local community. For example, it offered free cookery classes via the Migrateful programme and hosted people via Hestia and Age UK for community lunches. The team also ran over 90 events in 2019 with over 5000 attendants, including cookery classes, zero waste workshops, cheese and wine evenings, pumpkin carving sessions etc. This shows that places with diversified food offerings have become a social hub for the surrounding communities, who may not mind the type of food offerings.

Place identity and collaborative regeneration

The more important identity that Mercato Metropolitano is forging could be place identity. When IL1 and IL2 were asked to provide the reason for opening their business in MM Elephant and Castle, they expressed that the regenerated factory has attracted a specific niche of customers who enjoy the industrial atmosphere of the food hall. Similarly, IL4 mentioned that the fact that Mercato Mayfair was redeveloped from the ornate St. Mark's Church is a unique selling point as not many markets offer such experiences in London. This is related to the strand of urban gentrification research that individual and social capital are becoming more central to the development of creative urban areas (Storper and Scott, 2009).

In the making of these locations, the team of Mercato Metropolitano has been working closely with local authorities, strategic partners and local communities to deliver inclusive and representative regeneration within city centres (Mercato Metropolitano, 2017). The regeneration model is also brought to Ilford, where a disused car park is being converted to the latest Mercato Metropolitano and is due to open in late 2022, and more locations in the future (Boyle, 2021). The case of Mercato Metropolitano reveals the social significance of diversified food offerings. By repurposing sizable sites in the middle of a global city, Mercato Metropolitano has transformed the paper factory, church and car park into nodes that can promote the place identities of the residents. The goal of these placemaking projects is two-fold, reinforcing place identity during the redevelopment process and bridging local communities by food in the long run.

In the future

By 2025, Mercato Metropolitan is to expand its business to Berlin, Lisbon and Milan in Europe alongside 4 American cities. Future markets are also planned for secondary cities in the UK in the longer-term (McAllister, 2021). As the model of Mercato Metropolitano will be seen in different cities, the economic contexts of London and its implication for planning support for food markets like Mercato Metropolitano will provide be of great references.

Contextualising Culinary Diversity in Berlin

As the German largest city, Berlin is home to 3.6 million inhabitants, a quarter of which is of foreign nationalities. Since the fall of the Berlin Wall in 1989, Germany and its capital have been welcoming waves of immigration due to the nation's migration policy reform (Green, 2013). However, studies have shown tht massive immigration did not result in higher immigrant-native segregation, in the contrary, residential intermixing of different races are common in Berlin (Marcińczak and Bernt, 2021). Added to the complication is the fact that Berlin Wall had divided the city culturally, socially, politically, and more importantly geographically for over three decades. This has resulted in different designs, uses and meanings of urban spaces in different parts of the city (Pugh, 2008). With the modern contexts mixed with the ramification of political events, the neighbourhoods in Berlin remain enormously diverse.

While historical events and policies have their impacts on Berlin's cityscape, the ethnic diversity in a spatial sense may be a planned product. Berlin adopted its first zoning regulation in 1887. From the onset, the zoning policy in Berlin, which demonstrated a strong resemblance to the planning in other German cities, was advocating for mixed land use and not establishing a business centre explicitly (Ladd, 1990; Hirt, 2013). This tradition continues today and is exhibited in the *Land Use Plan Berlin 2015*, which it is mentioned "areas zoned for mixed uses on the inner ring of railway and motorway complement the urban blend of uses in the centre" (Senatsverwaltung für Stadtentwicklung und Umwelt, 2015, p.11).

This shows that mixed use development is still strongly promoted and implemented in core urban areas in Berlin, which is bounded by S-Bahn-Ring. The notion of sustaining the polycentric urban structure is also reflected in *Berlin Strategy - Urban Development Concept Berlin 2030*. In the urban development concept, "reinforcing neighbourhood diversity" is specifically identified as one of the seven key strategies (Senatsverwaltung für Stadtentwicklung und Umwelt, 2013). The strategy elaborated that neighbourhood centres in Berlin are characterised by the diverse and distinct mix of restaurant, retail and cultural offerings that are determinant to economic, social and cultural identity. To promote the strong identities in individual neighbourhoods, particular emphasis is put on the development of and support for local shops and

services. This shows that safeguarding and promoting heterogeneity of urban areas is amongst the top concern in planning interventions. In short, with the influence of *Land Use Plan Berlin* and *Berlin Strategy: Urban Development Concept*, Berlin continues to be a multi-centred configuration in which "neighbourhoods are known for their unique social, multi-ethnic and multi-functional mix" (Senatsverwaltung für Stadtentwicklung und Umwelt, 2013, p.38).

To build a city for all, planning authorities exercise a strong degree of collaborative planning approach, which is found to be consistent throughout the *Berlin Strategy*. With a strong notion to strengthen social cohesion and diversity at local levels, the plan advocates for participatory planning approaches. More specifically, "forces are pooled to safeguard the social mix and to promote the distinct characters of different neighbourhoods. Goals and measures are agreed upon and implemented through local partnerships." (Senatsverwaltung für Stadtentwicklung und Umwelt, 2013, p.41).

Local partnership is especially important for Berlin as the city has been largely shaped by urban informality. This can be traced far back to historical events, such as the inherent contradiction between the governance regime and people's aspirations in East Berlin in the later 1960s, and the squatter movement that emerged across West Berlin as a response to a severe housing crisis in the 1970s (Pugh, 2008). An iterative case study of Berlin showed that informal practices across the cities exercised the power to stretch legality, and be appropriated and institutionalised in planning regimes (Haid, 2017). To date, the ramification of informal use of urban space can still be seen in places such as Görlitzer Park, Tempelhofer Freiheit, and Preußenpark.

The Story of Preußenpark

Preußenpark in Wilmersdorf is a typical example of Berlin's urban culture in its originality and diversity. Locates in the district of Charlottenburg-Wilmersdorf and within the S-Bahn-Ring, Preußenpark has been a meeting place for members of diverse groups since the beginning. The earliest resemblance of Preußenpark as a bustling food destination can be traced back to 1992 when it was a hotspot called it "die Thaiwiese" (Thai-Meadow) for German-Thai families to picnic (Haid, 2017). Since

then, more and more Berliners of East Asian origin, mainly from Thailand, Vietnam, Philippines and Laos, have been attracted to this park in Inner Berlin to set up weekend stalls, resulting in its modern shape (Hatairatana, 2019). Its historic development can also be reflected in the authentic range of Asian street foods Preußenpark offers, predominantly Thai, Indonesian, Singaporean and Chinese.

In 2017, district council (Bezirksverordnetenversammlung) of Charlottenburg-Wilmersdorf passed three *Decision Notices (DS no.: 0455/5, DS no.: 0768/5, DS no.: 0813/5)*, recording the institutionalisation and planning processing of the street market. The first *Decision Notice (DS no.: 0455/5)* required its district office (Bezirksamt) to develop a concept of use, which kicked start the redesign process of Preußenpark. In 2018, the redesign vision was delineated to retain the Thai street food market as an intercultural meeting place and to develop a market concept to establish legal options for selling food in *Decision Notice (DS no.: 0813/5)*.

Decision Issued Date	Focus	Title	Decision	Reference
13 Dec 2017	Develop initial planning basis	A concept for Preußenpark to start the participation process "Beteiligungsverfahren für ein Konzept für den Preußenpark starten"	The district office is requested to be part of the creation of a concept for use of Preußenpark together with those affected. (Das Bezirksamt wird aufgefordert, im Rahmen der Erstellung eines Konzepts zur Nutzung des Preußenparks gemeinsam mit den Betroffenen.)	DS no.: 0455/5
30 Aug 2018	Aug 2018 Initiate Participation Process Design of Preußenpark as part of public participation Preußenparks als Teil der öffentlichen Beteiligung" The district office is asked to submit a plan to the responsible committees, which shows the future design of the square and the course of supply lines (water, sewage, electricity, gas). (Das Bezirksamt wird aufgefordert in den zuständigen Ausschäusen einen Plan vorzule- gen, der die zukünftige Gestaltung des Platzes sowie den Verlauf von Versorgungslei- tungen (Wasser, Abwasser, Strom, Gas) aufzeigt.)		DS no.: 0768/5	
30 Aug 2018	Identify Values of die Thaiwiese (Thai-Meadow)	die Thaiwiese (Thai-Meadow) with a future - a joint concept for Preußenpark "Thaiwiese mit Zukunft - ein gemeinsames Konzept für den Preußenpark"	The district office is requested to maintain and further develop the "die Thaiwiese"(Thai-Meadow) in the Preußenpark as an intercultural meeting place and "food market". In particular, to actively involve those currently working in the park and to support them in finding legal and independently organized options for selling food and to establish drinks. (Das Bezirksamt wird aufgefordert, die sogenannte "Thaiwiese" im Preußenpark als interkulturellen Treffpunkt und "Food-Market" zu erhalten und weiterzuentwickeln.ierfür insbesondere die aktuell im Park Tätigen aktiv einzubinden und dabei zu unterstützen, legale und selbstständig organisierte Möglichkeiten des Verkaufs von Speisen und Getränken zu etablieren.)	DS no.: 0813/5

Table 3. District Council decision related to Preußenpark as of 31 August 2022

(publicly accessible on Berlin.de)

In 2018, the street market underwent a place rebranding campaign, which adopted a new logo and the official name "des Thaiparks" (Thai Park). Preußenpark is being operated by Berlin's Thai Association, which has close ties with the food vendors, under the supervision of the District Office of Charlottenburg-Wilmersdorf. In the beginning of 2020, the council commissioned Nexus Institute to carry out the participation process for park redesign. Later that year, a *Status-Quo Report* was released by Nexus (2020). As of 2021, a *Drafted Master Plan* was released in the public meeting hosted by the district office (Bezirksamt Charlottenburg-Wilmersdorf von Berlin, 2021).

In the beginning: pre-planning enforcement

The path to its modern-day shape is not straightforward. Starting off as a picnic hotspot, food vending in Preußenpark had remained an informal practice until it gained legitimacy in recent years. According to the empirical research done by Haid (2017), Charlottenburg-Wilmersdorf authorities had long been tolerating illicit food dealings. In 2006, although a road map was set out to restrict the area of food preparation and prohibit food-vending as an attempt to minimise disturbance to residents and land use conflict, the enforcement effort remained weak. It is found that the Department of Public Order (Ordnungsamt) barely refrained them from selling food. While there has not been official recognition of the market, let alone policy support, the practices of food vending has grown organically by adapting to the ambiguine rules and enforcements. This uncertainty is still felt by the food vendors, the report has shown (Nexus, 2020). As Haid (2017) highlighted, the informality of the market is produced by the local government – through tacit tolerance and the installation of park rules. As a result, the market has slowly manifested into its shape today. In the other words, the food market is rooted in the citizens' everyday practices of informally occupying, using and redefining urban spaces as a response to the planning actions or, in some cases, inaction.

Value of legitimacy in planning

The role of planning has only begun to change as the food market is recently gaining its legitimacy. The three *Decision Notices* made by the district council were related to the development of an initial planning basis, participatory process and development vision. These decisions revealed that the practices in Preußenpark follow the path of institutionalisation of urban informalities.

Formalisation of food vendors into the land use plan means its future development will have to abide by regulation and development strategies at higher level. When the location of food market is identified as commercial land use, different sets of regulations and management guidelines apply. For example, in Berlin's protected parks, such as the Prussian Park, Green Spaces Law (Das Grünanlagengesetz) applies, which prohibited activities such as noise-causing uses, cycling or letting dogs run freely. From the perspective of planning authorities, officially designating areas for culinary diversity can facilitate effective management of the places and the social and cultural practices.

The legitimacy granted to Preußenpark also helps sustain the practices using public funding. As shown in the *Drafted Master Plan*, a permanent building will be erected in the northern part of the park. This finding corresponds to the literature review that zoning, as a concrete planning device, is useful as it materialises a food vision into spatial terms (Cabannes and Marocchino, 2018). The new building, which is reported to cost €1.5 million (Silver, 2021), will comprise some 60 mobile stands and other social amenities. In June 2020, the district also applied for the energy and climate fund, which was approved by the budget committee of the German Bundestag at the end of November. As a result, an additional €3 million are expected to be made available for the redesign of the Preußenpark. This highlighted that the official recognition of culinary practices can increase its likelihood to receive longer-term planning interventions, such as securing government funding for placemaking in the case of Preußenpark.

Collaborative planning and co-design

Throughout the redesign process, a collaborative planning approach has been employed. The first *Decision Notice* explicitly stated that the concept and vision creation "should be made together with those affected, such as users and residents of the park, integration officer and migration advisory board etc". Active public participation continued to be the top theme in the following *Decision Notices*.

A wide range of participatory tools was devised, according to the *Status-Quo Report* released by Nexus (2020). For example, citizens' meetings, over 400 surveys in the park, online participation, mobile discussion points and other informal representations of neighbours and surrounding facilities under the Preußenpark citizens' initiative. Nexus also endorsed collaboration among different groups by holding thematic specialist discussions, in which specialist offices, the planning office, relevant actors and representatives of the relevant user groups were brought into a joint dialogue. As such, the wide variety and spectrum of stakeholder engagement encourage representations of different central user groups during plan-making.

Co-design also facilitates the achievement of collective vision, especially in areas with significant social values. In mid-December 2020, the Thai Park vendors collectively applied to be the market operator of the Thai Park on behalf of the Thai Association in Berlin. From preparing a financial plan to attending public hearings, the bottom-up coalition is heavily involved in the co-design process. The experience of daily operation can be utilised and addressed, such as the need for certain amenities and stands layout.

A Food Destination: Whom is it serving?

While it has been an intercultural meeting place, the economic dimension of Preußenpark is not neglected. As highlighted in the *Decision Notice (DS no.: 0813/5)*, the key redesign vision is to demarcate a clearly defined market area while preserving its special atmosphere. The district council also specified the statutory consultation with representatives of economic development as one of the conditions. This highlighted the authority not just recognised the economic values of the market, but was also devoted to enhancing the quality of the environment for its operation.
When the vendors were asked what makes Preußenpark a vibrant a food destination, all interviewees mentioned the festival atmosphere and social settings. As highlighted by IB2's comment, "we are like a big Thai village in Berlin, people love this", the appeal of clustering food vendors is strongly felt by the food vendors and visitors. Additionally, it is observed that the menus of most food vendors are trilingual (Thai, German and English), confirming the food vending is not targeting specific ethnic groups but all visitors. Meanwhile, IB3 felt that the cultural aspect is a selling point that "most food here is made with traditional recipes and ingredients, it's simply something you can't find elsewhere". With the rise of locavore movement and quality food revolution, modern consumers have become more conscious of "good food and its associations with place and provenance" (Morgan, 2015, p. 3). Food that is produced in line with long-standing traditions, rather than industrial processes, can be more appealing to the consumer market (Morgan, Marsden and Murdoch, 2006). As a result, Preußenpark is significant in the sense that it offers an authentic experience of Southeast Asian cooking, tastes and cultures to visitors, whether they are from Asia or Berlin, at the heart of a German city.

Its relation with local food production

Apart from place branding, a diversified foodscape also influences the wider food system. This is reflected in the interviewee responses of IB1 and IB2.

- *IB1:* We buy things with other food vendors. They know someone in the wholesales to sell us fresh vegetables at a cheaper price. [...] They are from local farmers in Germany. To be honest I only know it from the other vendors.
- IB2: We all share similar ingredients, especially fruits and herbs. Sometimes we even have group orders and ship ingredients together.

The practice of food sourcing together revealed hereby is related to the knowledge spill-over and input sharing in the school of urban agglomeration economies (Duranton and Puga, 2004). By sharing market information and sourcing local small-scale

businesses, food vendors in Preußenpark also contributed to the wider food industry, especially in terms of local food production. This is significant to the debate in two ways: On one hand, local food production is highly related to urban planning as they have direct changes in urban morphology. On the other hand, if culinary diversity is built upon the availability of ingredients to cook dishes from different cultures, it is hinted that culinary diversity is built under the auspice inclusive system, including cultrally-responsive food production. Local-scale solution is often identified as the most suitable scale for achieving more just and sustainable food systems (Allen, 2010; Hendrickson, 2002),

By changing land use and activating new opportunities, local food production such as urban gardening has been strongly advocated by Berlin's authorities. In 2021, the city's first community garden programme was launched by the city's Senates. The initiative brought together community gardeners, district councils, officials from different Senates and the public (Bohn, 2021). This responded to the previous finding that inter-sectoral collaboration is becoming more common in the literature review. Moreover, the initiative is widely acclaimed by the community, especially its nature of participatory creation and cross-sectoral collaborations (Bohn, 2021). In Berlin, the diversity of the gardens is strongly attributed to the social background of the actors, as well as the social structural conditions (Müller, 2017). By facilitating culinary diversity, urban planning plays an important role of facilitating the local food production and its inclusivity of different dietary cultures.

Discussion

The first objective of this study sets out to examine the planning contexts in relation to food and diversity in London and Berlin. This study found out that the economic value of culinary diversity was found to be a recurring theme in London's planning, whereas policies in Berlin emphasise its socio-cultural impacts. This difference gives rise to different shapes of planning tools.

Wider economic context in London

As we have seen from the case study of Mercato Metropolitano, the city of London has represented fertile ground for the commercialisation of culinary diversity. The overlay of the locations of Mercato Metropolitano with the CBD boundary hinted that culinary diversity could be a product of economic development. At the same time, planning policies that focus on the economic return of restaurant clusters, such as intensification of commercial activities, are shown to have direct and indirect impacts on the food vendors' business. As a result, modern dining halls that offer international dishes like Mercato Metropolitano are becoming more prevalent in central London. This corresponds to the London Plan that the power of urban planning is limited in terms of the operation of social facilities in the market economy, and "broader actions are often required in terms of management and investment" (GLA, 2021; p.270). This is especially relevant to the argument that the power of local authorities is becoming more and more limited in the age of austerity (Byrne, 2019). As such, the case of London shows that culinary diversity can be created as a deliberate market product and sustained under the strong presence of private actors.

Wider social context in Berlin

In the case of Preußenpark, social and cultural values of culinary diversity are central in the making and planning of the market. From the onset, the practice of food offerings was created informally and developed organically by the vendors. This has naturally resulted in a diversified food scene that holds enormous social and cultural values today. The inaction and tacit tolerance of authorities back then not only allowed for the informal practices to sustain, but also reinforced the rigidity of food-vending in Preußenpark, as vendors were forced to adapt to the changing contexts. This also confirmed Moragues-Faus and Morgan's point (2015) that when planning power is limited, informal networks of food system stakeholders can be the key to a strong local food system.

More recently, different policies that bolster the running of Preußenpark have emerged, such as institutionalising urban informality, improving infrastructure and collaborative planning. These findings accord with the historical movements of citizens exercising substantiate power over the design and use of urban spaces across Berlin, as well as the strategy of reinforcing neighbourhood diversity and social identities in the *Berlin Strategy*. With the support of relevant policies, Berlin will continue to be a multi-centric city made up of culturally and socially diverse neighbourhoods.

Interrelated socio-economic systems

It is important to note that London and Berlin share certain similarities in their market and social context. Much the same as in London, the market appeal of diverse food offerings is strong in Berlin, since local food as a market dimension is becoming increasingly prevalent for destination and tourism management (Björk and Kauppinen-Räisänen, 2019). Apart from its value to place branding, the diversified and strong culinary scene also contributes to the local economy by supporting the retail environment in the case of Mercato Metropolitano and local food production in Preußenpark. As for the social contexts, while the population of both cities is ethnically diverse, food is found to be an anchor for different groups and communities. This is seen in social events hosted by Mercato Metropolitano and the close vendor relationships in Preußenpark. As such, culinary diversity is demonstrated to be the outcome of interrelated socioeconomic contexts in both London and Berlin.

Despite the different degrees of emphasis on economic or socio-cultural value, food has always been an integral part of both the urban economy and modern society in both cities. This research study found that there are only very few explicit policies that explicitly and directly promote culinary diversity in both cities. However, the role of planning at city level has guided the creation of an environment and conditions that are favourable to the operation of food vendors. The commonalities of the case studies hence allow for the analysis of the key factors that bolster culinary diversity and the varying roles of planning.

Flexibility in land use regulation

Both case studies confirmed that flexibility in land use regulation can facilitate the presence of small-scale vendors. MM Elephant and Castle demonstrated how flexible development management benefits food vendors and culinary diversity through temporal use. In Preußenpark, local authorities turned a blind eye to the activities of unlicensed food vendors in the past, which essentially allows urban informality to sustain and eventually be constitutionalised. Instead of directly creating culinary diversity, urban planning seems to provide favourable conditions to facilitate the operation of food markets. It should be aware that while setting out parameters and obligations for flexible land use, planners should beware of the longevity of planning decisions so as to maximise the benefits for the community.

Densification and land use mix

Another similarity between London's and Berlin's planning cultures is the strong notion of a compact city by promoting densified and mixed-use development. In the case of London, the trace of compact urban development was found in the policies such as the Town Centre approach in London Plan (2021) and the recalibration of commercial uses under Use Class Order updates (2020). Interviewees in Mercato Metropolitano expressed the economic gains of locating a restaurant in an area surrounded by retails, park, nightclub or theatre. Similar, the balance between commercial, social and recreational uses is shown in the *Drafted Master Plan* of Preußenpark. Compatible land use is key to a sustainable urban system, especially in areas with high population density such as Central London (11355 person/km2) and Berlin's inner-city (11700 person/km2) (GLA, 2018, Berlin.de, 2018). The analysis also show that urban planning can take up an important role to harness land use synergy and accentuate the functions of food offerings in the wider urban environments.

Place-based Interventions

One of the most notable recurring themes in both cases is the use of place-based interventions. While the analysis of MM Elephant and Castle highlighted the complexity of ethnic makeup in contemporary cities, its metropolitan-facing nature has reinforced the place identities of the local communities regardless of their ethnic groups. In Preußenpark, the placemaking process has harnessed the social capital to create a design that offers the best food-vending and visitors' experience. In both cases, place-based interventions can help promote local characters, which is a key for the food businesses especially in creating a festive and social atmosphere compatible with surrounding development.

Collaborative planning

In areas with a strong market economy, planning authorities have created synergies with private organisations, local actors and communities using collaborative planning. The strategic redevelopment by Mercato Metropolitano would be a good example of public-private-public collaboration. In the context where the power of urban planning is limited in terms of the operation of social facilities in the market economy (GLA, 2021; p.270), Mercato Metropolitan represents how the private sector can be involved in redeveloping specific sites and managing urban foodscape. This also corresponds to previous finding that micropolitics is a key determinant of the transformative potential of food partnerships in the UK (Coulson and Sonnino, 2019). Collaborative planning is therefore vital to address issues at larger scale, especially in the age of austerity.

In terms of planning for diversity, stakeholder engagement is vital. In Preussen Park, planning authorities harnessed its social capital and devised collaborative planning for the redesign of public space. At the same time, urban farmers and many new players were found to emerge in the city's local food system. These are related to the argument

made by David Chandler (2014) that as cities shift beyond neoliberalism, bottom-up coalitions are increasingly common to create resilience. In some cities, local food actors have demonstrated the ability to liaise with private interests and influence municipal policies for structural change (Carey, 2013). As such, planners need to raise awareness among the multiple urban stakeholders and understand their needs. In terms of culinary and ethnic diversity, an inclusive planning system would require policies such as planning documents and support should be made available in different languages on request.

Research Limitations

Constrained by the nature of case study analysis and the scope of this study, other ways of planning influencing culinary diversity cannot be fully explored. Previous studies show that even within the same city planning department, variations exist in the application of discretion in planning decisions, resulting in different approaches and outcomes (Biggar and Siemiatycki, 2020). As much as this study is aware of the within-group heterogeneity, the analysis was conditioned by the publicly available planning documents of the two venues. Analysis in this study is also limited to the British and Germanic planning contexts.

Future research should also be conducted at other scales to identify other interfaces of urban planning and culinary diversity. The interview sample of this restudy was composed of a marginal share of the actors involved in culinary diversity. While food vendors interviewed represented the experience of culinary diversity at business level, bigger players in the food industry, such as multinational chains and supermarkets, may be affected by different sets of factors (Johnston and Baumann, 2014). Other forms of culinary diversity, such as the increasing popularity of mobile food trucks in urban foodscape (Tway, 2011), and their interface with planning were not covered in this study. Lastly, due to the qualitative nature of this research design, the method fails to quantify the value of culinary diversity, such as their contribution to the local economy, and the impact of planning policies.

Conclusion

As urban planning is becoming increasingly relevant in food governance, this study raised the need for a critical review of the interface of planning and the diversity of food offerings. Planning tools that directly and indirectly help food vendors to thrive are derived from the work of different tires of planning authorities. Some of these findings were confirmed by the interviewee responses when food vendors were asked whether certain planning outcomes have impacted their locational preferences and operation.

As observed in the two case studies, different planning interventions have emerged from different planning and socio-economic contexts. However, as food is an integral part of the urban economy and modern society, most planning devices highlight both aspects of culinary diversity. A more significant insight from the comparative analysis is that policies that bolster the spatial footfalls of culinary diversity can be the results of the diverging discretionary or regulatory planning frameworks. For the former, planning decisions are made based on local discretion, resulting in the ability to control the longevity and conditions of planning permissions. For the latter, concrete planning devices such as zoning and enforcement were seen to be used to assert certainty.

This study found that the role of planning varies on the functions of culinary diversity for the area. As the value of culinary diversity is perceived differently by local authorities, planning interventions of different shapes were created to bolster culinary diversity. The case of Mercato Metropolitano and Preussen Park showed that culinary diversity has been viewed as a powerhouse for urban economy, a catalyst for social harmony and an engine for urban redevelopment. This highlights the need for placebased interventions that are sensitive to the local contexts and characters. It also highlighted the value of collaborative planning in understanding the experience, need and vision of stakeholders at operation level. With that, the values of culinary diversity in the areas could then be identified and addressed.

When planning for culinary diversity in the market economy, the success of protecting and promoting culinary diversity relies on the ability to provide favourable conditions for businesses. Flexible land use regulations issued by the Southwark Council were shown to increase the economic gains of the site before redevelopment. In demographically diverse societies like Berlin, collaborative planning approaches are shown to be particularly useful in addressing the heterogeneity within different groups. In the rise of urban managerialism, collaborative planning and place-based interventions will become more and more useful amid strong market economies and socially diverse environments.

In the future, food will remain an integral part of urban living and development, whilst the increasing trend of global mobility seems to perpetuate. Amid the age of uncertainties, whether planning authority can bolster the economic and social assets of a place will rely on its ability to identify the functions of culinary diversity and its interrelationship with the wider systems.

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Ethical Clearance Pro Forma

It is important for you to include all relevant information about your research in this form, so that your supervisor can give you the best advice on how to proceed with your research.

You are advised to read though the relevant sections of U<u>CL's Research Integrity guidance</u> to learn more about your ethical obligations.

Submission Details

1. Name of programme of study:

International Planning MSc

2. Please indicate the type of research work you are doing (Delete that which do not apply):

Dissertation in Planning (MSc)

3. Please provide the current working title of your research:

The role of planning for a diversified urban foodscape: Evidence from London and Milan

4. Please indicate your supervisor's name:

Dr. Tse-Hui Teh

Research Details

- 5. Please indicate here which data collection methods you expect to use. (Tick all that apply/or delete those which do not apply.)
 - o Interviews
 - o Documentary analysis (including use of personal records)
 - Secondary data analysis
- 6. Please indicate where your research will take place (delete that which does not apply):

UK and overseas

7. Does your project involve the recruitment of participants? 'Participants' means human participants and their data (including sensor/locational data and observational notes/images.)

Yes

Appropriate Safeguard, Data Storage and Security

8. Will your research involve the collection and/or use of personal data?

Personal data is data which relates to a living individual who can be identified from that data or from the data and other information that is either currently held, or will be held by the data controller (you, as the researcher).

This includes:

- Any expression of opinion about the individual and any intentions of the data controller or any other person toward the individual.
- Sensor, location or visual data which may reveal information that enables the identification of a face, address etc. (some post codes cover only one property).
- Combinations of data which may reveal identifiable data, such as names, email/postal addresses, date of birth, ethnicity, descriptions of health diagnosis or conditions, computer IP address (of relating to a device with a single user).

No

9. Is your research using or collecting:

- special category data as defined by the General Data Protection Regulation*, and/or
- data which might be considered sensitive in some countries, cultures or contexts?

*Examples of special category data are data:

- which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership;
- concerning health (the physical or mental health of a person, including the provision of health care services);
- concerning sex life or sexual orientation;
- genetic or biometric data processed to uniquely identify a natural person.

No

10. Do you confirm that all personal data will be stored and processed in compliance with the General Data Protection Regulation (GDPR 2018)? (Choose one only, delete that which does not apply)

I will not be working with any personal data

11. I confirm that:

- The information in this form is accurate to the best of my knowledge.
- I will continue to reflect on and update these ethical considerations in consultation with my supervisor.

Yes

^{_}UCL

RISK ASSESSMENT FORM FIELD / LOCATION WORK

DEPARTMENT/SECTION: BARTLETT SCHOOL OF PLANNING LOCATION(S): LONDON, BERLIN PERSONS COVERED BY THE RISK ASSESSMENT: CYRUS WONG

BRIEF DESCRIPTION OF FIELDWORK (including geographic location): INTERVIEWS WILL BE CONDUCTED WITH FOOD VENDORS IN LONDON (MERCATO METROPOLITANO) AND BERLIN (PREUŚENPARK)

COVID-19 RELATED GENERIC RISK ASSESSMENT STATEMENT:

Coronavirus disease (COVID-19) is an infectious disease caused by coronavirus SARS-CoV-2. The virus spreads primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes. Droplets fall on people in the vicinity and can be directly inhaled or picked up on the hands and transferred when someone touches their face. This risk assessment documents key risks associated fieldwork during a pandemic, but it is not exhaustive and will not be able to cover all known risks, globally. This assessment outlines principles adopted by UCL at an institutional level and it is necessarily general. Please use the open text box 'Other' to indicate any contingent risk factors and control measures you might encounter during the course of your dissertation research and writing.

Please refer to the Dissertation in Planning Guidance Document (available on Moodle) to help you complete this form.

Hazard 1: Risk of Covid -19 infection during research related travel and research related interactions with others (when face-to-face is possible and/or unavoidable) Risk Level - Medium /Moderate

Existing Advisable Control Measures: Do not travel if you are unwell, particularly if you have COVID-19 symptoms. Self-isolate in line with NHS (or country-specific) guidance.

Avoid travelling and face-to-face interactions; if you need to travel and meet with others:

- If possible, avoid using public transport and cycle or walk instead.

- If you need to use public transport travel in off-peak times and follow transport provider's and governmental guidelines.

- Maintain (2 metre) social distancing where possible and where 2 metre social distancing is not achievable, wear face covering.

- Wear face covering at all times in enclosed or indoor spaces.

- Use hand sanitiser prior to and after journey.
- Avoid consuming food or drinks, if possible, during journey.
- Avoid, if possible, interchanges when travelling choose direct route.
- Face away from other persons. If you have to face a person ensure

that the duration is as short as possible.

- Do not share any items i.e. stationary, tablets, laptops etc. If items need to be shared use disinfectant wipes to disinfect items prior to and after sharing.

- If meeting in a group for research purposes ensure you are following current country specific guidance on face-to-face meetings (i.e rule of 6 etc.)

- If and when possible meet outside and when not possible meet in venues with good ventilation (e.g. open a window)

- If you feel unwell during or after a meeting with others, inform others you have interacted with, self-isolate and get tested for Covid-19

- Avoid high noise areas as this mean the need to shout which increases risk of aerosol transmission

of the virus.

- Follow one way circulation systems, if in place. Make sure to check before you visit a building.
- Always read and follow the visitors policy for the organisation you will be visiting.
- Flush toilets with toilet lid closed.
- -'Other' Control Measures you will take (specify):

NOTE: The hazards and existing control measures above pertain to Covid-19 infection risks only. More generalised health and safety risk may exist due to remote field work activities and these are outlined in your Dissertation in Planning Guidance document. Please consider these as possible 'risk' factors in completing the remainder of this standard form. For more information also see: <u>Guidance Framework for Fieldwork in Taught and MRes Programmes</u>, 2021-22

Consider, in turn, each hazard (white on black). If **NO** hazard exists select **NO** and move to next hazard section.

If a hazard does exist select **YES** and assess the risks that could arise from that hazard in the risk assessment box.

Where risks are identified that are not adequately controlled they must be brought to the attention of your Departmental Management who should put temporary control measures in place or stop the work. Detail such risks in the final section.

e.g. terra neigi outsi	IRONMENT location, climate, in, hbourhood, in ide organizations, ition, animals.	The environment always represents a safety hazard. Use space below to identify and assess any risks associated with this hazard Examples of risk: adverse weather, illness, hypothermia, assault, getting lost. Is the risk high / medium / low ? AS THE INTERVIEW WILL BE CONDUCTED INSIDE THE FOOD MARKET, THE ENVIRONMENTAL RISK IS LOW.
		Indicate which procedures are in place to control the identified risk
X	only accredited of participants will v refuge is availabl work in outside of	orporates Foreign Office advice sentres are used for rural field work wear appropriate clothing and footwear for the specified environment le organisations is subject to their having satisfactory H&S procedures in place OL MEASURES: please specify any other control measures you have
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	FIGENCIES	
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EQUI	PMENT	Is equipment used?	NO	If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks			
e.g. clothing, outboard motors.							
	TROL SURES	Indicate which p	orocedui	res are in place to control the identified risk			
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LONI	E WORKING	Is lone working a possibility?	YES	If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks			
0	alone or in		difficult	to summon help. Is the risk high / medium /			
	ion interviews.	low?					
				RISK OF GETTING LOST IN BARCELONA			
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LL HEALTH	space below to identify and assess any risks associated with this Hazard.						
e.g. accident, illness,	Examples of risk: injury, asthma, allergies. Is the risk high / medium / low?						
personal attack, special personal considerations or vulnerabilities.							
CONTROL MEASURES	Indicate which pro	ocedu	res a	are in place to control the identified risk			
participants ha to be physical participants ha may encounte participants w	ave been advised of ly suited ave been adequate a er ho require medicatio TROL MEASURES:	the phy advice o n shou	ysica on h Id ca	lations/ carry appropriate prophylactics al demands of the research and are deemed armful plants, animals and substances they arry sufficient medication for their needs cify any other control measures you have			
TRANSPORT	Will transport be	NO		Move to next hazard			
	required	YES	X				
e.g. hired vehicles				Use space below to identify and assess any risks rising from lack of maintenance, suitability or			
e.g. hired vehicles		accider	nts a	Use space below to identify and assess any risks rising from lack of maintenance, suitability or			
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DEALING WITH THE	Will people be	YES	If 'No' move to next hazard				
PUBLIC	dealing with public		If 'Yes' use space below to identify and assess any				
e.g. interviews, observing	Is the risk high / me DUE TO THE INTE WILL BE A LOW F	risks Examples of risk: personal attack, causing offence, being misinterpreted. Is the risk high / medium / low? DUE TO THE INTERPERSONAL NATURE OF THE INTERVIEW, THERE WILL BE A LOW RISK OF VERBAL ASSAULT OR BEING MISINTERPRETED.					
CONTROL MEASURES	Indicate which pro	ocedure	s are in place to control the identified risk				
X OTHER CON implemented	NTROL MEASURES:	please s	ns or where neither party could be at risk pecify any other control measures you have IAT THE INTERVIEW PROCESS CAN BE				
FIELDWORK	3		May 201				

WORKING ON OR	Will people work on	NO	If 'No' move to next hazard				
NEAR WATER	or near water?		If 'Yes' use space below to identify and assess any				
	risks						
e.g. rivers, marshland, sea.	Examples of risk: d medium / low?	lrowning,	malaria, hepatitis A, parasites. Is the risk high /				
CONTROL MEASURES	Indicate which pro	ocedure	s are in place to control the identified risk				
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participants hav	ve received any appro ROL MEASURES: pl		oculations acify any other control measures you have				
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substances risks E.g. plants, chemical, biohazard, wasie Examples of risk: ill health - poisoning, infection, illness, burns, cuts. Is the risk high / medium / low? CONTROL MEASURES Indicate which procedures are in place to control the identified risk CONTROL MEASURES Indicate which procedures are in place to control the identified risk the departmental written Arrangements for dealing with hazardous substances and waste are followed all participants are given information, training and protective equipment for hazardous substances they may encounter participants who have allergies have advised the leader of this and carry sufficient medication for their needs waste is disposed of in a responsible manner suitable containers are provided for hazardous waste OTHER CONTROL MEASURES: please specify any other control measures you have implemented: OTHER HAZARDS Have you identified any other hazards? If 'No' move to next section i.e. any other hazards Hazard: Risk: is the risk If 'Yes' use space below to identify and assess any risks CONTROL MEASURES Give details of control measures in place to control the identified risks what action was taken DECLARATION The work will be reassessed whenever there is a significant change and at least annually. Those participating in the work have read the assessment. Select the appropriate statement: X I the undersigned have assessed the activity and associated risk	SUBSTANCES	Will participants work with	NO	1	If 'No' move to next hazard If 'Yes' use space below to identify and assess any
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GENERAL COMMENTS

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