



Dec 2, 2016

To the Centre Plan Team,

On behalf of the Halifax Food Policy Alliance, I would like to state that overall we are pleased with the most recent draft of the Centre Plan. Outlined below are the points which we see as positively contributing to healthy, just, sustainable food systems in Halifax and those which could be strengthened.

In particular, we find that the following points contribute positively to building healthy, just, and sustainable food systems in the Halifax region and we are pleased to see their inclusion in the plan.

- *2.1.1 Land Use*
 - *B) Compact Development*

Compact development in areas with good access to public transit and active transportation should facilitate residents' access to healthy food retail.

- *2.3.1 Public Places and Spaces*
 - *J) Permit urban food production, food distribution, and farmers markets in all land use zones, with the exception of industrial and environmentally sensitive areas.*

This is a positive development, as there has been a lack of clarity on this issue in the past.

- *2.5 Housing*
 - *All points*

It is very positive to see policies supporting a diversity of housing options in the Halifax region, especially affordable non-market housing and special care facilities. Access to affordable housing contributes to increased household food security.

- *2.6.5 Land*
 - *C) Animals (permitting domestic fowl and bees)*
 - *D) Community Gardening*
 - *E) Greenhouses*
 - *F) Edible Landscaping*
 - *G) Industrial Food Activities*

All of the activities above should support and increase food production in the city.

- 2.7.4 *Community Services and Support*
 - C) *Mobile Food Markets*

It is positive to see reference to the expansion of the Mobile Food Market program to help to address gaps in food access in underserved communities. However, it is important to note that Mobile Food Markets are one in a suite of interventions to improve food access in underserved communities and do not replace the need for more permanent healthy food retail.

The following points have potential to support healthy, just, and sustainable food systems; however, they require stronger wording to be effective in this regard.

- 2.1.2 *General Built Form Character*

- O) *Integrate natural and green infrastructure*

Consider including edible landscaping, such as fruit trees and berry bushes, amongst the natural and green infrastructure listed.

- 2.3.1 *Public Transit*

- A-E) *Various Public transit policy directions*

Improved public transit has positive implications for increased and affordable access to food retail. Public transit routes should take into account access to grocery stores and other food retail and, in particular, connectivity between food retail outlets and underserved communities.

- 2.3.3 *Parks and Open Spaces*

- F) *Multi-functional*

Consider including a specific reference to opportunities to gather around food, e.g. BBQ pits and outdoor ovens next to community gardens, to the list of park functions. Please also consider adding a reference to breastfeeding friendly spaces.

- 2.6.3 *Waste*

This section is lacking a reference to composting. Consider adding a point, similar to g) *recycling receptacles*, that specifically references composting.

- 2.7 *Jobs and Economic Development*

Consider policy levers to encourage the development of healthy food retail options, especially in underserved communities. There are several underserved neighbourhoods in the Halifax region that are considered *food deserts*, areas lacking in food retail, and/or *food swamps*, areas with excess unhealthy food outlets (e.g. fast food restaurants).

- 2.7.4 *Community Services and Support*

- *Bonus Density for Community Amenities*

Consider the inclusion of food-related community amenities when the bonus density strategy is developed. Examples include space for community gardens, edible landscaping, rooftop gardens, etc.

- *4.1.1 Land Use By-Laws Uses (Landscaping Requirements)*

Consider offering relaxations from the standard landscaping requirement for developments to incorporate edible landscaping.

- *4.12 Monitoring*

- *A) Baseline data and indicators*

There is only one specifically food-related indicator proposed, “percent of population living within 1 km of a grocery store”, in the Complete Communities section. This is a good indicator; however, we would propose an additional indicator in the Sustainability section, such as number of active community gardens on HRM-owned land and/or number of fruit trees and edible shrubs planted and maintained.

Thank you for your attention to this feedback.

Sincerely,

Marla MacLeod
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Ecology Action Centre

On behalf of the Halifax Food Policy Alliance