



May 3, 2018

To The Centre Plan Project Team,

On behalf of the Halifax Food Policy Alliance, we are pleased to provide feedback on the Halifax Regional Municipality's Centre Plan Package A materials.

Formed in 2013, the [Halifax Food Policy Alliance](#) (HFPA) is a partnership of individuals and organizations representing different sectors related to the food system. Food systems represent the activities and relationships that shape our food experiences. Using this systems thinking, the HFPA works to:

- Build awareness of existing and emerging food system opportunities at the municipal level;
- Connect and foster dialogue with diverse people and organizations to strengthen collaboration and advance action across the food system; and
- Inform and support food related policies and initiatives that benefit residents of Halifax.

The HFPA commends the Centre Plan Team for recognizing the role of the municipality and land-use planning in building healthy, just, and sustainable food systems. There are several policy directions included in the Centre Plan Package A materials that work towards improving community food security in HRM through enhancing urban agricultural capacity, increasing access to healthy foods in all neighbourhoods; and, improving community-scale food infrastructure and services.

Upon review of the materials, the HFPA has identified the following opportunities to strengthen the direction and policies outlined in Package A which are detailed below.

#### **Community Food Infrastructure and Public Benefits**

- Include language around food in the discussion on *Complete Communities* (SMPS 2.1) to reinforce the importance of food for health and wellbeing as well as its role in fostering community connections and social cohesion<sup>1</sup>.

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<sup>1</sup> The Celebration principle in the [Draft Food Charter for HRM](#) outlines the role of food in building community.

- Consider spaces for residents to gather around food in new multi-family housing developments by incorporating 'communal indoor and outdoor kitchens' within the "Amenity Space" definition (LUB Part XIII, Chapter 1). This would reinforce the other food systems components already included within the definition (i.e. greenhouses, planters and plots for gardening, and barbeque areas).
- We are supportive of commercial kitchens being included as an appropriate Work-Live Unit use (LUB Part III, Chapter 1, 60) however based on the current wording we are unsure if this is included.
- Consider infrastructure for food storage, such as community freezers, to strengthen the local food system and prevent food waste.
- Related to this, consider adding a food system component to the list of 'Public Benefit Categories' associated with the density bonus mechanism (Part XI, Chapter 1, 197).
- Community kitchens, greenhouses, gardens, and food storage facilities would all be suitable for consideration, including as appropriate benefits to allocate cash-in-lieu contributions.

### Community Economic Development

- Link food systems with community economic development by including a statement about food businesses and small-scale healthy food retail within SMPS, Section 7. While there may not be a clear way to incentivize this, there could be consideration for incentives for at-grade-food retail beyond restaurants as a percentage of increase in densities with multi-unit infill developments.
- Consider including a statement around investigating options to support healthy food retail<sup>2</sup> initiatives such as streamlining the permit and license process for food-related businesses and pursuing additional legislative authority if needed.
- Include mobile healthy food vending such as food trucks and mobile food markets in Commercial Use definitions. Permit these uses in all Package A zones.
- Broaden the definition of farmers markets to include dairy products, grain products, meat, poultry and fish to provide opportunities for local producers to sell their products and to provide access to a variety of healthy foods.

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<sup>2</sup> Healthy Food Retail refers to a retail service or establishment which primarily provides healthy foods and beverages which may be prepared on-site or available for take-out and may also offer other convenience and household goods and contributes to improving the availability and accessibility of healthy foods and beverages included in Canada's Food Guide which are low in sodium, sugar, and saturated fat.

## Urban Agriculture

- Include specific language around access to good quality compost to support urban agriculture. This could be referenced in section 9.2 and reinforced through requirements for recycling and compost collection infrastructure in mixed use and multi-family developments within the LUB (Part III, Chapter 1, 49).
- Include specific requirements around the type and amount of edible landscaping, including a separate definition<sup>3</sup> for this component. While edible landscaping is encouraged in the SMPS (Section 9.2) and is incorporated into the LUB to an extent through the landscaping definition (includes “fruit and vegetable plants”), the opportunity exists to strengthen this recommendation.
- Consider developing guidelines to provide direction on what is meant by the statement “at a scale appropriate with the local context” for urban agriculture and food production uses (Section 9.2, framing language).

## Food Environments

- Consider including a policy that restricts the creation of food deserts (limited food access) or food swamps (limited access to healthy food; high density of unhealthy foods<sup>4</sup>) as poor health outcomes are linked to unsupportive food environments. Currently there is no best practice for this; however, other Canadian jurisdictions have proposed “Minimum Distance By-laws”<sup>5</sup> to specify proximity of fast food restaurants in relation to schools.
- Building on prohibitions to fast food drive-through developments (SMPS Section 4.7, Policy 70), which tend to serve unhealthy foods, consider LUB definitions<sup>6</sup> differentiating “fast food restaurants” and “drive-through restaurants” from other restaurants as a lever to tailor permitted uses for zones in close proximity to schools.
- As suggested in the Package A materials, implement ongoing monitoring procedures to measure the number of housing units located within 1.2 km from a grocery store and the total number of community gardens on HRM land.

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<sup>3</sup> Suggested definition: the use of edible plants (fruits, vegetables, nuts, and herbs) that replace ornamental plants, are planted alongside decorative plants, and/or populate public barren areas.

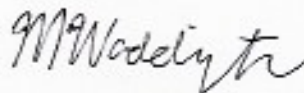
<sup>4</sup> For the purposes of this document, healthy food includes foods in Canada’s Food Guide that are low in sodium, sugar and saturated fat and unhealthy food includes foods high in sodium, sugar, and saturated fat, such as sugar sweetened beverages, cookies, cakes or other sweets, potato chips etc.

<sup>5</sup> See [School Zone Report](#)

<sup>6</sup> See [Zoning By-law 8200](#) from District of Saanich, BC which excludes “fast food” and “drive-in” from restaurant definition and prohibits these uses in school/commercial zones

We would like to thank you for considering our feedback. Overall, the proposed policies in the Centre Plan Package A materials demonstrate promise in improving community food security in HRM and will contribute to achieving the vision in the Draft Food Charter for HRM. Effective, sustainable solutions to improve community food security will require a comprehensive Food Strategy that leverages existing resources and assets, harmonizes policies and programs, and helps to connect and coordinate efforts across the region. We continue to work with HRM on exploring the development of a Food Strategy. We also look forward to building on the positive opportunities in Package A through reviewing and providing feedback on Package B, particularly the inclusion of food production and gathering spaces in HRM Parks and Open Space, as well as chicken keeping and heritage farm uses. If we can be of any assistance in the future work, please do not hesitate to contact us.

Sincerely,



Madeleine Waddington  
Co-Chair



Aimee Gasparetto  
Co-Chair