



“Connecting our Community to the Work of Building a Healthy Food System”

Ken Seiling and Regional Councilors  
Region of Waterloo  
150 Frederick Street  
Kitchener, ON N2G 4J3

**Re: Draft Regional Official Plan**

January 14, 2009

Dear Councilors,

Thank you for inviting public input on the draft Regional Official Plan (ROP). The Waterloo Region Food System Roundtable is pleased to provide our input on this important document. We have reviewed the ROP with a particular view to how it might help bring about a healthier food system, and are generally pleased that, overall, it is a step in the right direction.

The Roundtable consists of 18 members from diverse sectors of the local food system, including farmers, food distributors, food retailers, restaurants, food service managers, university researchers, consumers, food banks and health professionals. Our goal is to help create a healthy food system in Waterloo Region, which we define as one in which “all residents have access to, and can afford to buy, safe, nutritious, and culturally-acceptable food that has been produced in an environmentally sustainable way and that sustains our rural communities”. We think that good land use policies in the ROP are an essential part of the path to achieve that goal.

When we think of planning for the next twenty years, and the outcomes that are expected to accompany climate change and peak oil, we are very concerned about the ability of our food system to feed our growing population. As Region of Waterloo Public Health’s *Towards a Healthy Food System in Waterloo Region* (2005) documented, our current food system relies heavily on food to be imported from distant places, which will not be sustainable in a future with more restrictions on fossil fuel use. Further, we have a population that consumes inadequate fruits, vegetables, beans and whole grains, which has resulted in many of our citizens being unhealthy or obese. The same report found that our Region’s farmlands can supply a large proportion of those healthy foods we should be eating – if our population demands it, and if our farms shift production into those healthy foods for the local population.

So prudent planning would aim to steer our society towards communities where more of our food comes from our own Regional farms, both so that our farmers can make a living by growing food and are encouraged to stay on the land, and so that our residents’ health is improved. A variety of policies are required to make all this a reality, and land use policy is a crucial part of the solution.

Overall, we are pleased with the vision and direction of the draft ROP, and feel that, if adopted in its current form, it will help bring about a healthier food system in Waterloo Region. More

specifically, we support the policies it proposes to intensify urban development within the cities and prohibit development beyond the countryside line. Directing our projected population growth to our urban centres and encouraging Transit Oriented Development will improve opportunities for local food distribution and retail, and encourage people to access healthy food without having to drive. We encourage the Region to resist the temptation to water down the vision contained in the draft document.

We would like to direct some specific comments to two sections of the ROP: Access to Healthy Food (2.F.6), and Protecting the Countryside (Chapter 6). The sections complement each other: policies that support better access to healthy and local food retail in the city will provide markets for regional farmers and processors. Protecting the countryside from urban development and helping farmers earn a viable income from farming help ensure that there is enough farmland and farmers to grow food to feed our growing population. Both are essential elements of a healthy food system.

### **Access to Healthy Food**

First, we would like to applaud the Region for proposing to add a new section on Access to Healthy Food. If adopted, the Region will be one of the first municipalities in North America to have such policies in its Official Plan. Please do not shy away from being a leader in this area, as food issues are going to become even more important in the future. The American Planning Association adopted a policy paper in 2008 advocating that land use planners adopt the very kind of policies proposed in this section,<sup>1</sup> and the Canadian Institute of Planners' Annual Conference in September 2009 will have a special stream on agriculture and food systems. So we fully expect that other municipalities will be following our lead very soon.

While we fully support the adoption of the Access to Healthy Food section, we are concerned at the same time that it may not be strong enough. In general, we feel the language is vague and allows area municipalities to avoid implementing the intent of the section. For example, paragraph a) requires municipalities to designate "potential" locations for small and medium-sized food stores in secondary plans and station area plans, but not to *require* that each plan contain a food store. Paragraph b) requires municipalities to provide opportunities for small and medium-sized food stores in new developments, but such stores could be variety stores that provide only packaged snacks and highly-processed food. Tightening up this language would be in the best interests of providing access to healthy and local food for all residents. We encourage that paragraphs a) and b) be modified to require small and medium-sized food stores or venues that sell healthy, locally-grown or processed food.

We recognize that the implementation of clearer language in this section will require some precise definitions of what constitutes "healthy food" and "small and medium-sized food stores". Our members are willing and able to work with Regional and area municipal Planning staff to develop specific definitions which ensure these policies attract the appropriate food stores to all neighbourhoods of the Region. In saying all residents should have access to "healthy" food, for example, we mean that the food should be primarily from local farms. At the same time, we recognize the difficulties of requiring stores to sell only certain kinds of foods: some form of incentives may be preferable in some cases. We would like to find a way to make having stores which sell healthy and local food in neighbourhoods a "badge of honour" that developers would

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<sup>1</sup> See: <http://www.planning.org/policy/guides/adopted/food.htm>.

be proud of (similar to the LEED designation for energy-efficient buildings), thus attracting new residents who are drawn to such progressive measures.

### **Protecting the Countryside**

We want to express our strong support for the establishment of the countryside line in the draft ROP. We support the idea that urban development will not happen beyond the countryside line. Further, we support the “Protected Countryside” designation described in 6.B.1 and shown on Map 7. In fact, we believe that the Protected Countryside designation should be extended to all prime agricultural lands in the Region, since there is no reason to allow urban development on our best farming lands.

We also believe that protecting the countryside must extend beyond protecting the land from development: we need policies to ensure that farmers can earn a viable living by producing food on their lands. The ROP’s promise to “support on-farm diversification as a means of supplementing farm income” in the preamble to Chapter 6 is an excellent step in the right direction.

We applaud the new exception for roadside produce stands in the proposed policy governing “Secondary Uses” for Prime Agricultural and Rural Areas in 6.C.7. We believe roadside stands are an important way for farmers to supplement farm income, and we support the proposed policy they be limited to selling goods *primarily* produced on the farm. Precedent for this has already taken place in North Dumfries township, with very successful results for both farmers and consumers.

Finally, we wish to thank Regional Planning staff for their work on the ROP to date. We ask Regional Councilors to take our comments – and the goal of creating a healthy food system – into consideration as they consider the next draft of the ROP.

Sincerely, on behalf of the Waterloo Region Food System Roundtable,



Ellen Desjardins, co-chair



Steffanie Scott, co-chair