

**Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016**

The Ontario government should further incorporate public health considerations into the proposed policies to better support municipal initiatives to improve population health outcomes. This can be achieved by:

	Recommendation	Rationale	Policy Suggestion
1.	Include access to local and <i>healthy food</i> into the <i>complete communities</i> definition as one of people’s daily needs	<p>A healthy, livable, inclusive community is not complete without addressing all of the basic necessities of life, including <i>healthy food</i>.</p> <p>In addition to being a basic necessity of life, <i>healthy food</i>* is important for overall health and well-being and disease prevention<sup>1</sup>. Focusing on the prevention of disease is important as costs of ill health are rising and increasingly affecting the health care system<sup>2</sup>. As such, <i>complete communities</i> need to be created that provide opportunities for people to make <i>healthy food</i> choices.</p> <p>To better align the proposed plans with the Vision of the Greater Golden Horseshoe to foster community health and individual well-being, it is necessary for the definition of <i>complete communities</i> to include access to <i>healthy food</i> as one of people’s daily needs along with jobs, housing etc.</p> <p>Moreover, <i>local food</i> can have many different meanings. For consistency, consider including the definition for <i>local food</i>** from the Local Food Act, 2013<sup>3</sup> in the Growth Plan.</p> <p>*<i>Healthy food</i> is minimally processed and provides essential nutrients as described by Canada’s Food Guide and do not contain excess amounts of saturated fats, trans-fats, sugar or salt. <i>Healthy food</i> comes from a <i>food system</i> where food is produced, processed, transported and marketed in ways that are environmentally sound, sustainable and just (adapted from the Ontario Food and Nutrition Strategy, 2014<sup>4</sup>).</p> <p>**<i>Local food</i> is food produced or harvested in Ontario, including forest or freshwater</p>	<p><b>1. Modify the “<i>complete communities</i>” definition in the definitions section of the Growth Plan and the Greenbelt Plan and <u>consistently</u> define throughout the Plans as:</b></p> <p><b><i>Complete Communities</i></b> Places such as mixed-use neighbourhoods or other areas within cities, towns and <i>settlement areas</i> that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, <u><i>healthy food</i></u>* and local stores and services, a full range of housing and <i>public service facilities</i>. <i>Complete communities</i> may take different shapes and forms appropriate to their contexts.</p> <p>*Of note, the term ‘affordable’ used to describe food has been removed from the definition proposed. It is recommended to exercise caution in using this term to describe food as it is a subjective term requiring various levels of explanation that may be best addressed in other guiding documents.</p> <p><b>2. Add the two following definitions Section 7 Definitions of the Growth Plan:</b></p>

**Legend**  
Underlined words have been added into previously written policies  
*Italicized* words are currently defined as part of Section 7 Definitions of the Growth Plan or are being proposed as definitions to be added to this section

**Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016**

	Recommendation	Rationale	Policy Suggestion
		food (Local Food Act, 2013 <sup>3</sup> ).	<p><b>Healthy food</b> Provides essential nutrients as described by Canada’s Food Guide and do not contain excess amounts of saturated fats, trans-fats, sugar or salt. <i>Healthy food</i> comes from a <i>food system</i> where food is produced, processed, transported and marketed in ways that are environmentally sound, sustainable and just.</p> <p><b>Local Food</b> Produced and harvested in Ontario, including forest or freshwater food.</p>
2.	Recognize and strengthen the role of food and <i>food systems</i> planning as an integral part of building healthy communities.	<p><i>Food system</i>* planning goes beyond an <i>agricultural system</i> plan outlined in these plans as it aims to coordinate the full spectrum of food issues in one policy framework that integrates food production, processing, distribution, access and waste management<sup>5</sup>. These issues are related to many other planning issues identified in these plans such as land use, transportation, <i>infrastructure</i>, housing, economic development, waste management, greenhouse gas emissions and community health and well-being<sup>6</sup>.</p> <p>Incorporating <i>food systems</i> planning into this planning framework, in turn requires municipalities to consider and integrate <i>food systems</i> planning in the review of local policy documents, such as Official Plans, secondary plans, zoning by-laws etc<sup>7</sup>.</p> <p><i>Food system</i> planning will contribute to the achievement of the vision for the Greater Golden Horseshoe of creating thriving, livable, vibrant and productive urban and rural areas that foster community health and individual well-being in addition to the Provincial Policy Statement’s requirement to avoid development and land use patters which may cause environmental or</p>	<p><b>1. Add a definition for “<i>food systems</i>” in Section 7 Definitions of the Growth Plan and use <u>consistently</u> throughout the Plans as:</b></p> <p><b><i>Food Systems</i></b> A <i>food system</i> is all processes involved in food production and procurement, processing, distribution, access, consumption and waste management. The <i>food system</i> operates within and is influenced by social, political, economic and natural environments.</p> <p><b>2. Recognize the link between <i>food systems</i> and land use by including an additional section under 2.2 Policies for Where and How to Grow:</b></p> <p><b>2.2.10 Food Systems</b> 1. Upper and single tier municipalities, in consultation</p>

**Legend**

Underlined words have been added into previously written policies

*Italicized* words are currently defined as part of Section 7 Definitions of the Growth Plan or are being proposed as definitions to be added to this section

**Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016**

	Recommendation	Rationale	Policy Suggestion
		<p>public health and safety concerns.</p> <p>Furthermore, the Ontario Professional Planners Institute Planning for <i>Food Systems</i> in Ontario Call to Action<sup>7</sup> emphasizes the importance of <i>food system</i> planning for healthy communities and discusses the role of the planner in this.</p> <p>*A <i>food system</i> is all processes involved in food production and procurement, processing, distribution, access, consumption and waste management<sup>4,7</sup>. The <i>food system</i> operates within and is influenced by social, political, economic and natural environments<sup>8</sup>.</p>	<p>with lower tier municipalities, the Province and other appropriate stakeholders, will each develop a <i>Food System</i> Master plan or strategy that aims to coordinate the full spectrum of food issues in one policy framework.</p> <p>2. Municipalities are encouraged to develop and implement strategies that support a viable and sustainable <i>food system</i> when planning for growth, which would consider:</p> <p>a) The impact of growth on all aspects of the <i>food system</i> from food production, processing and food distribution, to food retail access and waste management. Specifically,</p> <p>i) <i>Prime agricultural areas</i> used for food production (growth of <i>specialty crop areas</i>) will be protected from settlement area boundary expansions.</p> <p>ii) Provide opportunities and encourage alternative modes of food access such as community food hubs, <i>urban agriculture</i> and farmers markets as part of <i>complete communities</i> and public open spaces</p> <p>iii) Ensure comprehensive <i>infrastructure</i> for waste management including composting (also in 4.2.9)</p> <p>b) The potential for economic development at each stage of the <i>food system</i>.</p>

**Legend**

Underlined words have been added into previously written policies  
*Italicized* words are currently defined as part of Section 7 Definitions of the Growth Plan or are being proposed as definitions to be added to this section

**Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016**

	Recommendation	Rationale	Policy Suggestion
3.	<p>Incorporate policies and action items into land use plans to:</p> <ul style="list-style-type: none"> <li>ensure convenient access to local and <i>healthy food</i> options,</li> <li>avoid <i>food swamps</i></li> <li>ensure a ratio of <i>healthy food retail outlets</i> to <i>less healthy food retail outlets</i> consistent with health</li> </ul>	<p>The proposed Plans place emphasis on building <i>complete communities</i> that support overall quality of life and health. Currently, policy 2.2.1.3 d iv within the proposed Growth Plan alludes to the importance of ensuring access to <i>healthy food</i> options, however, no further actions are determined beyond this. As such, it is necessary for the proposed Growth Plan to include policy and action items on how this is to be achieved.</p> <p>Intentionally planning for <i>healthy food</i> access for <i>complete communities</i> could result in preventing the formation of unhealthy patterns of <i>food swamps</i>.</p> <p><i>Food swamps</i> (an area with high geographic access to food retailers perceived as promoting mainly minimally nutritious food options, such as fast food outlets and convenience stores<sup>9</sup>) present a public health concern. Recent Ontario studies found that urban adults living within walking distance proximity of a high number of fast food restaurants, where these were the predominant type of food retail had greater chances of increased body weight and diabetes incidence regardless of neighbourhood walkability<sup>10,11</sup>.</p> <p>In a scoping review of retail food environments across Canada, <i>food swamps</i> were prominent across the country<sup>9</sup>. Local level data, such as that from the Region of Peel, demonstrate a higher proportion of food retail selling less <i>healthy food</i> (e.g. fast food establishments, convenience stores) compared to food outlets selling <i>healthy food</i> (e.g. grocery stores). This pattern was seen across both urban and rural areas<sup>12</sup>.</p> <p>The Provincial Policy Statement, states healthy livable and safe communities are sustained by avoiding development and land use patterns which may cause environmental or public health and safety concerns. Given the concern</p>	<p><b>1. Add a definition for “<i>food swamp</i>” in Section 7 Definitions of the Growth Plan:</b></p> <p><b><i>Food swamps</i></b> Areas with high geographic access to food retailers perceived as promoting mainly minimally nutritious food options, such as fast food outlets and convenience stores.</p> <p><b>2. Make the following changes/additions to the Growth Plan within noted sections:</b></p> <p><b>1.2.1 Guiding Principles</b> add a bullet to read:</p> <ul style="list-style-type: none"> <li>Avoid land use patterns that promote <i>food swamps</i>.</li> </ul> <p><b>2.2.1 Managing Growth</b> 2.2.1.2 include a-k and add:</p> <p>i) Providing convenient access to local, <i>healthy food</i> options including <i>urban agriculture</i>, while preventing the development of <i>food swamps</i>.</p> <p>2.2.1.3 d include i-iv and add:</p> <p>v) Avoid land use patterns that promote <i>food swamps</i>.</p> <p><b>2.2.5 Employment</b> 2.2.5.10 b) modify to read:</p> <p>b) Providing an appropriate mix of amenities and</p>

**Legend**

Underlined words have been added into previously written policies

*Italicized* words are currently defined as part of Section 7 Definitions of the Growth Plan or are being proposed as definitions to be added to this section

**Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016**

	Recommendation	Rationale	Policy Suggestion
		<i>food swamps</i> pose to public health, their development or land use patterns that encourage them in new developments, <i>intensification</i> areas, <i>complete communities</i> and <i>built-up areas</i> should be avoided.	<p>open space, <u>including <i>healthy food</i> and recreation options</u> to serve the workforce.</p> <p><b>2.2.9 Rural Areas</b> 2.2.9.7 add: 1. Municipalities are encouraged to plan and offer a variety of opportunities to access local, <i>healthy food</i> including farmer’s markets, food hubs, farm-to-gate and <i>urban agriculture</i>.</p> <p><b>3.2.2 Transportation – General</b> 3.2.2.2 (d) modify to read: d) Offer <i>multimodal</i> access to jobs, <u><i>healthy food</i></u>, housing, schools, cultural and recreational opportunities, and goods and services.</p> <p><b>3.2.3 Moving People</b> 3.2.3.2 (c) modify to read: c) Expanding transit service to areas that have achieved, or will be planned to achieve, <i>transit-supportive</i> densities and provide a mix of residential, office, institutional, commercial development <u>and local, <i>healthy food</i> access</u>, wherever possible.</p> <p>3.2.3.3 include a-b and add: c) Convenient access to local <i>healthy food</i> including <i>urban agriculture</i>.</p>

**Legend**  
Underlined words have been added into previously written policies  
*Italicized* words are currently defined as part of Section 7 Definitions of the Growth Plan or are being proposed as definitions to be added to this section

**Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016**

	Recommendation	Rationale	Policy Suggestion
4.	Provide a definition for <i>urban agriculture</i> within the Growth Plan	<p>In general, past practices/regulations regarding <i>urban agriculture</i>* have mainly addressed community gardens for citizens to grow food for personal consumption or for donation; often regulations do not permit urban growers to sell their produce because of this focus. Recognizing that there is community interest in selling food grown in urban areas, it is recommended that a broader definition of <i>urban agriculture</i> be recognized in Provincial level documents such as these plans. This will facilitate policies/zoning by-laws at a regional/ municipal level. This will support urban growers pursuing some forms of larger, more sophisticated <i>urban agriculture</i> operations within the urban and peri-urban boundary where it is a permitted.</p> <p>For example, see the City of Hamilton’s 2014 Urban Hamilton Official Plan Amendment zoning by-laws that permit <i>urban agriculture</i> (urban farms and community gardens) in certain geographic areas within the City<sup>13</sup>.</p> <p>*<i>Urban agriculture</i> encompasses the production of food, animal husbandry, and fishing in urban and peri-urban spaces for personal consumption, donation, and with the intention to produce food for sale. <i>Urban agriculture</i> operations may be privately, publically, or commercially owned, and can take a number of forms, including household, school, and community gardens; urban farms, backyard chicken coops and beehives; aquaculture, hydroponics, and aquaponics facilities; and rooftop, vertical, and indoor farms<sup>14</sup>.</p>	<p><b>1. Add a definition for “urban agriculture” in Section 7 Definitions of the Growth Plan:</b></p> <p><b><i>Urban Agriculture</i></b> Encompasses the production of food, animal husbandry, and fishing in urban and peri-urban spaces for personal consumption, donation, and with the intention to produce food for sale.</p> <p><i>Urban agriculture</i> operations may be privately, publically, or commercially owned, and can take a number of forms, including household, school, and community gardens; urban farms, backyard chicken coops and beehives; aquaculture, hydroponics, and aquaponics facilities; and rooftop, vertical, and indoor farms.</p>
5.	Require a health assessment as part of: <ul style="list-style-type: none"> <li>1) Building up Areas</li> <li>2) Intensification</li> <li>3) Infill Development</li> <li>4) Settlement area boundary expansion assessments</li> </ul>	<p>Requirements for regions/municipalities to consider health impacts and health criteria when assessing land needs and development proposals should be added.</p> <p><i>Intensification</i> and <i>settlement area</i> boundary expansions have the potential to impact the achievement of <i>complete communities</i>, including <i>healthy food</i> access.</p>	<p><b>1. Make the following changes/additions to the Growth Plan within noted sections:</b></p> <p><b>2.2.1 Managing Growth</b> 2.2.1 include as a separate requirement: 7. A health assessment will be completed in</p>

**Legend**

Underlined words have been added into previously written policies

*Italicized* words are currently defined as part of Section 7 Definitions of the Growth Plan or are being proposed as definitions to be added to this section

**Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016**

	Recommendation	Rationale	Policy Suggestion
		<p>Requiring a health assessment such as the Region of Peel’s Healthy Development Assessment<sup>15</sup> ensures that health indicators are considered when developing <i>compact built form</i> and <i>complete communities</i>.</p> <p>Recently, the Region of Peel conducted a health assessment as part of a settlement boundary expansion. Health impacts of different expansion options were compared to support the decision for expansion.</p> <p>Information on health assessments can be found on the National Collaborating Centre for Healthy Public Policy’s website<sup>16</sup>.</p>	<p>consultation with the local public health department to determine the potential impact of proposed <i>built-up areas, intensification</i> and infill development growth on health, including <i>healthy food</i> access.</p> <p><b>2.2.8 Settlement Area Boundary Expansion</b> 2.2.8 include as a separate requirement: 3. The completion of a health assessment in consultation with the local public health department to determine the potential impact of the proposed <i>settlement area</i> expansion on health, including <i>healthy food</i> access.</p>
6.	Incorporate health indicators into the performance measurement plan to highlight the co-benefits of <i>complete communities</i> for population health	<p>Monitoring the health status of residents (e.g., diabetes prevalence, overweight/obesity) through health-related performance indicators should be considered as they ensure communities are being designed to support positive health outcomes and demonstrate progress towards the creation of vibrant and <i>complete communities</i>, an important vision outlined in the plans.</p> <p>Diabetes prevalence data is readily available at the provincial level (e.g., Ontario Diabetes Database, Canadian Community Health Survey, Canadian Health Measures Survey).</p>	<b>1. When developing Performance Indicators for the Growth Plan, include health-related performance measures such as those related to diabetes prevalence and overweight/obesity rates.</b>

**Legend**

Underlined words have been added into previously written policies  
*Italicized* words are currently defined as part of Section 7 Definitions of the Growth Plan or are being proposed as definitions to be added to this section

***Submission of the Ontario Society of Nutrition Professionals in Public Health:  
Land Use Planning Co-Ordinated Review, October 31, 2016***

**References**

<sup>1</sup>Public Health Agency of Canada. (2011). Healthy living can prevent disease. Retrieved from: [http://www.phac-aspc.gc.ca/cd-mc/healthy\\_living-vie\\_saine-eng.php](http://www.phac-aspc.gc.ca/cd-mc/healthy_living-vie_saine-eng.php).

<sup>2</sup>Public Health Agency of Canada. Against the growing burden of disease. Retrieved from: <http://www.ccgh-csih.ca/assets/Elmslie.pdf>.

<sup>3</sup>Legislative Assembly of Ontario (2013). Bill 36, Local Food Act.

<sup>4</sup>Sustain Ontario. (2014). *Ontario Food and Nutrition Strategy. A Plan for healthy food and food systems.*

<sup>5</sup>City of Vancouver. (2013). What feeds us: Vancouver food strategy.

<sup>6</sup>City of Edmonton. (2012). Fresh: Edmonton's food & urban agriculture strategy.

<sup>7</sup>Ontario Professional Planners Institute. (2011). Healthy communities and planning for food: Planning for food systems in Ontario: A call to action.

<sup>8</sup>Halton Region Health Department. (2012). Research evidence on Regional Government contribution to healthy and sustainable food systems: A systematic review of international literature. Retrieved from: [http://ophla.pbworks.com/w/file/fetch/59817047/Lit%20Review%20Gov%20Role%20Food%20Systems%20Version%202-0%20Complete%20\(May%202%202012\)%20\(3\).pdf](http://ophla.pbworks.com/w/file/fetch/59817047/Lit%20Review%20Gov%20Role%20Food%20Systems%20Version%202-0%20Complete%20(May%202%202012)%20(3).pdf).

<sup>9</sup>Minaker, L., et. al. (2016). Retail food environments in Canada: Maximizing the impact of research, policy and practice. Can J Public Health. 107(Suppl. 1):eS1-eS3

<sup>10</sup>Polsky, J.Y, et. al. (2016). Absolute and relative densities of fast-food versus other restaurants in relation to weight status: Does restaurant mix matter? Preventative Medicine. 82: 28-34.

<sup>11</sup>Polsky, J.Y, et. al. (2016). Relative and absolute availability of fast-food restaurants in relation to the development of diabetes: A population-based cohort study. Can J Public Health. 107 Supp 1( eS27-eS33).

<sup>12</sup>Glazier RH, Booth GL, Dunn JR, Polsky JY, Weyman JT, Tynan AM, et al, editors. (2014). Diabetes Atlas for the Region of Peel Public Health; Exhibit 7.5 Retail Food Environment Index.

<sup>13</sup>City of Hamilton (2014) City Initiative 14-E - Official Plan and Zoning By-law Changes for Urban Agriculture (Community Gardens and Urban Farms) in the Urban Area (PED14161) (Wards 1 to 13, 15). Retrieved from: <http://hamilton.siretechnologies.com/sirepub/cache/2/mgmbImarwajndzwxzittxlw/4677510122016012847756.PDF>

<sup>14</sup>Santo, R., Palmer, A., Kim, B. (2016). Vacant lots to vibrant plots: A review of the benefits and limitations of urban agriculture. John Hopkins Center for Livable Future.

<sup>15</sup>Region of Peel (2016). Healthy development assessment: User guide. Retrieved from: <https://www.peelregion.ca/health/resources/healthbydesign/pdf/HDA-User-Guide-Jun3-2016.pdf>

<sup>16</sup>National Collaborating Centre for Healthy Public Policy. (2016). Health Impact Assessment. Retrieved from: [http://www.ncchpp.ca/54/Health\\_Impact\\_Assessment.ccnpps](http://www.ncchpp.ca/54/Health_Impact_Assessment.ccnpps)