

**Ottawa Food Policy Council comments on the
Draft Amendment to the City of Ottawa Official Plan
(October 15, 2013)**

The Ottawa Food Policy Council (OFPC) consists of Ottawa residents with a wide range of experience and expertise in diverse sectors of the food system. Its mission is to work towards a food system in Ottawa that emphasizes social and economic viability, and environmental sustainability through the entire food cycle and in which food is celebrated and enjoyed. The OFPC is pleased to have this opportunity to comment on the draft of the Revised City of Ottawa Official Plan.

A) Section 1.4 (page 1-11) The City's Strategic Plan proposes to add the following goal for the long-term sustainability for Ottawa:

Food and Agriculture

The local food system is sustainable and provides residents with healthy and affordable food

The OFPC commends the City of Ottawa on the inclusion of this goal.

The OFPC suggests that this newly stated goal be integrated more explicitly in other sections of the Amended Official Plan. This would not only support achieving this goal, but would reflect a recommendation of the *Ottawa Food Action Plan*, which is the result of a three-year community process involving over 300 people in discussion about the local food system: "The City of Ottawa include a guiding principle of 'equitable access to fresh and healthy food (locally produced as available)' in all relevant growth, environment, and development plans, with the objective of explicitly including the consideration of neighbourhood access to food in all new development applications, zoning and by-law amendments, and community planning." This recommendation is the guiding principle that informs the following comments.

The OFPC recommends that the following principles be incorporated where relevant throughout the Official Plan (there wasn't just one section that we felt these would fit in):

- That access to fresh, healthy, and affordable food be incorporated more explicitly into discussions about liveable communities and complete communities throughout the document. In general, the OFPC recommends that provision of food resources (food retail, food production, food processing and preservation) be an element of Community Design/Improvement Plans.
- That the Official Plan acknowledge that diverse scales of food production can be incorporated into other land use designations, such as residential, retirement homes, parks and leisure areas, day care facilities and not solely those identified for Agricultural Uses.
- That the Official Plan also make provisions for permitting renewable energy (including that which uses food and agricultural waste) appropriate to the scale of the site and to support farm operations.

B) Section 1.3 (page 1-5), Health, the OFPC recommends adding the following bullet point: Quality of life is supported by building:

- *community-based food production into urban areas, through edible landscapes, community gardens, and small and mid-scale urban farms.*

Food production to ensure food security does not need to be limited to agricultural lands. There are many opportunities to promote the incorporation of community-based food production into urban areas, through edible landscapes, community gardens, and small and mid-scale urban farms.

C) Section 2.1 (page 2-5): Sustainable agricultural practices can be explicitly promoted, and recognized for their broad environmental benefits throughout the document. Sound agricultural land management and soil conservation practices and other measures that minimize or eliminate the amount of pesticides, nutrients, silt and other contaminants can be encouraged, in order to protect the environment and human health. The OFPC specifically suggests the following changes and additions:

Maintaining Environmental Integrity, OFPC recommends adding the following bullet points:

- *The City will recognize the role that small- and medium-scale farms that practice environmental sustainability play in enhancing the natural environment and protecting human health.*
- *Sound agricultural land management, soil conservation practices and other measures that minimize or eliminate the amount of pesticides, nutrients, silt and other contaminants will be encouraged, in order to protect the environment and human health.*

D) Section 2.1 (page 2-6) Building Livable Communities: The OFPC recommends adding the following statements:

Community-based food production will be integrated into urban and rural areas, through edible landscapes, community gardens, and small and mid-scale urban and rural farms.

The City will recognize the role of small- and medium-scale food production in a sustainable food system and will support the integration of small- and medium-sized market garden and farm operations more broadly into the City rural and urban landscape.

E) Section 2.4.1 (page 2–39) Air Quality and Climate Change

The City of Ottawa can recognize the role both local and sustainable agricultural systems have in mitigating climate change through carbon sequestration and reduced food transportation. The OFPC recommends adding to point 3 (page 2-40): e) *Encourage and support both sustainable and local production practices to mitigate climate change.*

F) Section 2.4.5. Greenspaces (page 2-49), in support of the concept of edible landscapes, the OFPC recommends adding point 7.d *Replace dead, dying and diseased trees with food-producing trees, such as fruit trees, nut trees and maple trees.*

G) Section 2.5.1 (page 2-50) Designing Ottawa, OFPC recommends adding *community gardens* to the list of open spaces.

H) Section 2.5.6 (page 2-68) – Collaborative Community Building and Community Design Plans the OFPC recommends adding *community gardens* to the list of requirements for public facilities in 4g.

J) Section 3.2.3 (page 3-8) Urban Natural Features, #3 “Uses that do not adversely affect the natural characteristics of the area, such as open air recreation; scientific, educational, or conservation uses associated with the environmental features; agriculture operations **established at the time of adoption of this Plan**; or forestry as defined by the Forestry Act are permitted, subject to the policies below” the OFPC suggests that *sustainable food production* be a permitted additional use, regardless of whether or not it exists at the time of the adoption of this Plan.

K) Section 3.6.1 (page 3-14) General Urban Area, 9c has a reference to “other community-oriented uses.” The OFPC suggests that this explicitly includes *community gardens*.

L) Section 3.7.3 (3-49) Agricultural Resources and Access to Farmland. A trend in farmland ownership in the last 20+ years has been toward larger and larger farms, with farmers purchasing adjacent farms and severing the home with a small non-farmable lot to sell to finance the purchase. The OFPC suggests that sections on severance, consolidation of agricultural land, and lot creation can be redrafted to *support a balance between large and small to mid-scale farms, and the creation/maintenance of a diversity of farm sizes*.

Related to 8,9 - Severances of Surplus Dwelling due to Farm Consolidation, OFPC recommends:

1. Only permit the severance of “surplus” farm houses and outbuildings with a minimum of 20 acres of land cleared for pasture or cropping. This would essentially create a “farm split”, rather than a residential severance.
2. Continue the agricultural zoning of the new parcel, but permit access to the Farm Property Tax Program only if the purchaser is actively farming the land and has a Farm Business Registration Number or exemption (i.e. is not relying on renting the land out to another person for farming purposes). Require annual proof of these criteria.
3. Mandate a right of first refusal to the owner of the new “farmstead lot”, whenever the parcel from which it was severed is re-sold. This would encourage restoration of the original land base of the farm, at a later time.

We believe that this proposal will have several benefits, including:

- a) Assisting beginning farmers with limited resources to get a start on farmland, with access to needed infrastructure,
- b) Slowing the spread of non-farm uses in farming areas
- c) Helping to expand local food production within a reasonable distance from urban markets
- d) Retaining flexibility to reconnect severed farmhouses to additional land as new farms expand,
- e) Discouraging the purchase of peri-urban farmland by non-farmers, and
- f) Ensuring that the tax base is not compromised if the new owner is not personally farming the severed “farmstead lot”.

The OFPC suggests that the section on agricultural land severance be redrafted with these goals in mind.

M) Section 3.8 (page 3-58)– Solid Waste Disposal Sites, # 6, focuses on protecting adjacent communities from solid waste management sites. *The OFPC suggests broadening this discussion to include accommodating a more positive lifecycle approach to dealing with food and agricultural byproducts/wastes, reintegrating these materials into the environment as compost, and using scale-appropriate technologies.*

N) Section 4.11 (page 4-59) Urban Design and Compatible Development, Outdoor Amenity areas , #17 Community amenity spaces should make an explicit reference to *spaces for community food production.*

O) Section 5.2.1 (page 5-3) General Policies, the OFPC suggests the following changes:

b. the protection of the agricultural resources of the Province *and their long-term sustainability*

k. the adequate provision and distribution of educational, health, *food production, food provision, social, cultural and recreational facilities*