

July 30, 2020

To Whom It May Concern:

The intention of the A Place to Grow: Growth Plan for The Greater Golden Horseshoe (APTG) is sound in principle. Sprawl is clearly a problem and densification is clearly part of the solution. However, we believe that the way in which the APTG proposes to prevent sprawl will, in fact, accomplish precisely the opposite. The APTG artificially specifies centres at which densification must occur according to two main criteria. The first priority is districts that have been arbitrarily defined as 'growth areas'. The second priority is areas that currently have municipal infrastructure capacity as defined by the APTG. In our view both of these criteria are fundamentally flawed and the pursuit of these goals will, ironically, lead to both higher costs and greater sprawl.

Our firm was recently engaged by landowners in Cookstown to investigate the feasibility of expanding a complete community on the edge of their historic village. Cookstown is a whole community with dozens of main street businesses, a mixed-age population, and well over a century of village life. Emily Murphy, one of Canada's first women's rights activists, and the first female magistrate in the British Empire was born in Cookstown. This is not a place dreamed up by committee, but a real living, breathing place with a rich history.

Landlab Inc. specializes in designing, building, and incorporating complete communities, so the location of our client's land at 4583 15th Line in Cookstown intrigued us. As we began to study the location it became increasingly clear that the APTG represented the single biggest obstacle to the injection of much needed seniors' facilities, a broader mix of housing options for families of different ages and incomes, the expansion of parks and trail networks, and the economic viability of many professional services. Why? Because the APTG takes arbitrary urban boundaries as gospel, prohibits expansion of municipal servicing outside designated poles, and straitjackets municipal officials from making approval decisions on the basis of local knowledge and discretion. Cookstown has not been designated as a growth centre by the APTG—it requires expanded sewer infrastructure, and our client's land touches the wrong side of the arbitrary urban boundary line. Cookstown is therefore being



overlooked in favour of a prescribed pole at Alcona, a location further north and more remote from Toronto. The logic of arguing against sprawl on the one hand while encouraging forced growth in car-dependent, more removed locations is, to put it charitably, perplexing.

Old villages are often already the “complete communities” that the APTG aspires to create. A village, by definition, houses multiple generations of people from a wide range of demographics. Villages exist because they have—or once had—a number of economic engines that drove their social, cultural, and ecological communities. Villages that failed tended to do so because one or more of their economic engine components failed and, as such, disturbed the surrounding social and demographic order. The solution to restoring villages is not to abandon them, but to fix their engine. The new economy—particularly post-COVID19—is well suited to distribute economic wealth and opportunity without the need for mega-hubs. In fact, multi-polar hubs within municipalities, each with their own economic, cultural and ecological specialty and their own history and social fabric, are more likely to protect the broader landscape of communities from economic, social, or pandemic disruption in the event of a downturn.

In much the same way that the internet as a whole is safe from disruption because of its decentralized nature, a network of villages will protect the broader community from disruption in a way that artificially centralizing populations cannot.

Municipalities view sewer pipes as the most important piece of infrastructure because that’s what they paid for. Citizens view social, cultural, demographic, ecological, and economic infrastructure because those are the things that actually influence the way they live. In regulating growth based on the narrow municipal definition of ‘infrastructure’, the APTG sets aside the most important building blocks of communities in favour of selecting areas of growth by what amounts to a plumbing diagram. In ignoring the existing social, economic, demographic, and ecological infrastructures in many smaller districts and villages, we believe that the APTG will further hinder (or even finally decimate) many villages as economic resources are drawn to the creation of, what amount to, one-dimensional suburbs.



We support the very justifiable concern over the costs associated with municipal water and sewer expansion. Sprawl development has shown that municipalities regularly lose money on servicing monolithic, single-type development. Where multi-dimensional development occurs, however, municipalities benefit from broadened social, economic, and demographic expansion. Targeting areas of development growth based on the existence of sewer pipes is neglecting the broader types of infrastructure that build genuinely complete communities. Sewers can't define a community, they don't create a community, and they certainly shouldn't be the main factor used to determine its location or rate of growth.

Ironically, then, attempting to fabricate complete communities in the way contemplated in the APTG requires the effective confiscation of growth-related resources from already complete communities. It is true that old villages and towns might need an infrastructure upgrade, but surely the best way to protect against the demise of towns and villages is to allow them to grow where demand exists. Encouraging the continued shuttering of complete villages in favour of committee-inspired visions of what can only amount to complete-ish suburbs is neither practical nor wise.

We encourage the government to re-think the implementation of the APTG in favour of local discretion; redefine existing infrastructure in the broader, social, economic, ecological, and demographic sense; and allow local landowners to work with their local citizens to determine what's best for their village.

Sincerely,



**Sean McAdam**

President  
Landlab Inc.

