



PARKS AND RECREATION ONTARIO

## **Feedback on Recommendations:** Improving accessible built environment standards

Parks and Recreation Ontario Submission  
August 29, 2024

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## About Parks and Recreation Ontario

Parks and Recreation Ontario (PRO) is a non-profit association with over 6,500 members that delivers services to more than 85% of Ontario's population. We are devoted to advancing equitable access to quality parks and recreation services for all Ontarians. PRO champions the health, social, and environmental benefits of parks and recreation through evidence-based practices, advocacy, and collaborative cross-sectoral partnerships. Our work includes policy and research, education, training and professional development opportunities, as well as our flagship quality standards program, HIGH FIVE® which includes a stream called the *Principles of Healthy Child Development*. We envision a future for Ontario where every person has equitable access to vibrant communities, sustainable environments, and personal health.

## Introduction

We are writing to share our support for the *Improving Accessible Built Environment Standards – 2023 Initial Recommendations Report*. We would like to express our gratitude to the Ministry for Seniors and Accessibility and the Design of Public Spaces Standards Development Committee for the development of this report. The proposed recommendations clearly indicate the Ministry's commitment to creating a more accessible and inclusive Ontario.

## Feedback on Recommendations

The following document provides commentary and additional considerations pertaining to the proposed recommendations.

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### Long term objectives of the design and public spaces standards

*"The long-term objective of the design of public spaces standards is to enhance the quality of life for everyone in the community, including persons with disabilities, by removing and preventing barriers to accessibility to create safe, convenient and inclusive spaces that promote social engagement, physical activity and mental well-being. This objective will be accomplished by providing obligated organizations with the specifications, guidelines and financial and informational resources needed to design, construct or renovate spaces not governed by the Ontario Building Code in such a way as to create access for everyone."*

**Response:** We **agree** and support this long-term objective and have no further comments.

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### Overarching barriers in the built environment

*"The barriers identified in this section highlight recommendations that are jointly applicable to the design of public spaces standards and the Ontario Building Code."*

*These recommendations were drawn from discussions that focused on the need for ongoing education and resources to support the understanding of accessibility requirements as well as common amendments proposed across both sets of standards.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

### **Recommendation 3: Municipal Site Plan Accessibility Strategy**

*“Intended outcome: To improve the application of accessibility best practices in the site plan approval process.”*

*“The committee recommends:”*

- *“Professionals responsible for creating the accessibility report within the site plan approval submission shall be encouraged to seek the advice of accessibility specialists if they do not have the necessary experience.”*
  - **Response:** We seek clarification on how “necessary experience” will be defined.
- *“The government shall require that municipal staff reviewing site plan submissions to be educated about the design of public spaces standards requirements and how they apply to the site review process, and the government shall certify these educational materials and providers of this training.”*
  - **Response:** We seek clarification on how the government will determine the providers of training. Given PRO’s engagement with municipalities from across the province and our expertise in accessible and inclusive public spaces, our organization is well equipped to support the development and implementation of such training. PRO is eager to dialogue with the Ministry about becoming a certified provider of training pertaining to accessible built spaces.

### **Recommendation 4: Site Plan Reviews by Accessibility Advisory Committees**

*“Intended outcome: To ensure municipalities are supported to meet the requirements related to site plan reviews by Accessibility Advisory Committees, and Accessibility Advisory Committee members are supported to conduct meaningful accessibility reviews of site plans.”*

*“The committee recommends:”*

- *“The government shall ensure municipalities and Accessibility Advisory Committees can be supported to meet this requirement in a timely manner (that is, 30 days), while also upholding Bill 23, More Homes Built Faster Act, 2022 and Bill 109, More Homes for Everyone Act, 2022*
  - **Response:** We are concerned that the time allotment of 30 days will not provide sufficient time to thoroughly review all accessibility considerations of a project. To ensure that Accessibility Advisory Committees have adequate time to conduct a comprehensive review of site plans and consult with relevant stakeholders, we suggest extending the review process to 60 days.

### **Recommendation 5: Mandatory Accessibility Training for Officials/Inspectors**

*“Intended outcome: To ensure officials are always up to date with accessibility best practices to help create spaces that are more accessible for everyone.”*

*“The committee recommends:”*

- *“The province shall require relevant training for officials/inspectors on the accessibility requirements in both the Ontario Building Code and the design of public spaces standards in Integrated Accessibility Standards Regulation and require supplemental training when they are amended.”*
  - **Response:** We seek clarification on what will constitute “relevant training.” Given PRO’s engagement with municipalities from across the province and our expertise in accessible and inclusive public spaces, our organization is well equipped to support the development and implementation of such training. PRO is eager to dialogue with the Ministry about becoming a certified provider of training pertaining to accessible built spaces.

### **Recommendation 6: Authoritative Guidance Materials for Officials / Inspectors**

*“Intended outcome: To ensure that municipal building officials are more knowledgeable about all aspects of accessibility both inside and outside the building.”*

*“The committee recommends:”*

- *“The province shall work with professional organizations to fund and develop authoritative guidance and educational materials to help officials/inspectors better understand and apply the accessibility requirements in both the Ontario Building Code and the design of public spaces standards in the Integrated Accessibility Standards Regulation.”*
  - **Response:** Given PRO’s engagement with municipalities from across the province and our expertise in accessible and inclusive public spaces, our organization is well equipped to support the development of authoritative guidance and education materials pertaining to accessibility requirements in the Ontario Building Code and the design of public spaces standards in the Integrated Accessibility Standards Regulation. PRO is eager to dialogue with the Ministry about contributing to these initiatives.

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### **Design of public spaces standards definition and application**

*“This category of recommendations aims to provide clarity and guidance to organizations on how to interpret and apply the requirements specified in the design of public spaces standards, including defining existing and new terms.”*

**Response:** We agree with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

### Recommendation 16: Consultation

*“Intended outcome: To set out guidelines as to how the consultation process will be conducted.”*

*“The committee recommends:”*

- *“Create new guidelines on consultation for all areas of the design of public spaces standards. These guidelines shall provide details on:*
  - *Targeted outreach to include diverse perspectives. These may include community representatives.”*
    - **Response:** Municipal staff and community organizations are the primary providers of recreation in Ontario, and therefore keenly familiar with how citizens use public spaces and the causes of accessibility issues. Therefore, we recommend that the new guidelines on consultation include requirements to engage with municipal staff and community organizations, particularly those working in parks and recreation.
  - *“Who to engage in consultations and how to make the process accessible and inclusive (for example, sign language interpretation or French language translation, Communication Access Realtime Translation (CART))”*
    - **Response:** When applicable, consultations should be conducted in Indigenous languages. In some communities, it may also be appropriate to conduct consultations in languages commonly spoken in Canada that are not English or French (i.e., Mandarin, Hindi, Spanish, Arabic, etc.).

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### Recreation trails and beach access routes

*“The design of public spaces requirements in the accessible recreation trails and beach access routes standards are intended to provide an inclusive experience for all the natural spaces in Ontario’s communities through both technical and non-technical requirements.*

*Some issues identified by the committee and reflected in these recommendations include clarifying the definitions of wilderness trails and exterior paths of travel and amending technical requirements to improve accessibility.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

### Recommendation 17: Definition of rest area

*“Intended outcome: to define “rest area” in the design of public spaces standards.”*

*“The committee recommends:”*

- *“Rest areas for recreational trails and beach access trails are to include:*
  - *Seating must include armrests and backrests to help persons with disabilities who have difficulty sitting and rising, including enough space within a rest area to accommodate people who use mobility aids and will also allow for non-disruptive flow of pedestrian traffic.”*



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- **Response:** While sometimes an effective accessibility feature, armrests can make seats and benches inaccessible to some people with disabilities, especially those with larger bodies. Additionally, seating with armrests can be interpreted as [hostile architecture](#), as it prevents the ability for a person to lay or elevate their feet. Therefore, we recommend requirements for seating on recreational trails and beaches to include a mix of seating with and without armrests, maximizing accessible options in outdoor recreational spaces.

### Recommendation 18: Distances between rest areas

*“Intended outcome: To ensure persons with disabilities and older adults have consistent access to rest areas that meet their needs.”*

*“The committee recommends:”*

- *“Based on consultation, rest areas include a mix of benches that have open-end for transferring, and benches with a third arm (to allow a person to use both arms when moving from sitting to standing).”*
  - **Response:** This recommendation reads contradictory to Recommendation 17, which requires seating to have armrests. Please provide clarification on both these recommendations.
- *“Rest areas shall be provided every 30m along a path of travel including multi-use trail, sidewalk, recreational trail or beach access route, unless not feasible.”*
  - **Response:** Please provide clarification on how feasibility will be determined.

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### Outdoor public use eating areas

*“The design of public spaces requirements under the outdoor public use eating area standards help to provide an inclusive experience for all where groups tend to gather in public spaces around tables to consume food and/or beverages.”*

*The committee discussed the need for improved measures to guarantee accessible and inclusive gatherings and extending these requirements to small organizations.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below. Additionally, if these recommendations are implemented, smaller organizations will require significant funding and resources to meet these new requirements.

### Recommendation 22: General requirement public use eating areas

*“Intended outcome: To provide persons with disabilities a more inclusive experience in outdoor eating areas where groups tend to gather.”*

*“The committee further recommends:”*

- *“Public use eating areas shall include a variety of accessible tables and seating to accommodate persons with disabilities.”*

- **Response:** While we agree with this recommendation, it could be further strengthened by providing clear expectations regarding the number of tables and seating that should be accessible in a given space (i.e., 25% of tables and seating should have accessibility features).
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## Outdoor play spaces

*“The outdoor play spaces requirements under the design of public spaces standards are intended to ensure that outdoor play spaces are accessible to children and caregivers of all abilities and apply to areas with equipment and/or features like manufactured play equipment or natural play structures (for example, logs and sand).”*

*Committee discussions focused on many aspects of these spaces, including how they could be more inclusive for mobility aid users or those with visual impairments, as well as the need for more prescriptive maintenance requirements.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

### Recommendation 24: Authoritative guidance for outdoor play spaces

*“Intended outcome: To provide authoritative guidance to developers creating accessible outdoor play spaces.”*

*“The committee recommends:”*

- *“The government shall develop in collaboration with accessibility stakeholders and obligated organizations a comprehensive authoritative guidance resource that considers the minimum requirements in regulation in addition to best practices and universal design principles to assist obligated organizations in creating accessible outdoor play spaces.”*
  - *“The development of this resource shall include a thorough scan of current guidelines, best practice documents and all relevant research, and consultation with accessibility professionals, Accessibility Advisory Committees and members of the public.”*
    - **Response:** Given PRO’s engagement with municipalities and community organizations from across the province and our expertise in child development and accessible and inclusive public spaces, our organization is well equipped to support the development of an authoritative guidance resource pertaining to best practices and universal design principles of accessible outdoor play spaces. PRO is eager to dialogue with the Ministry about contributing to this initiative.
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## Exterior paths of travel

*“Current design of public spaces exterior paths of travel requirements aim to create an inclusive and barrier-free environment for all individuals.*

*“The committee discussed how the current design of public spaces standards for external paths may lead to inconsistent accessibility experiences across municipalities as well as obstructions (for example, construction zoning or the placement of waste receptacles) along these paths that create barriers for people with disabilities, among other concerns.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

## Recommendation 27: Expand requirements to small organizations

*“Intended outcome: To require all requirements for exterior paths of travel to be met by obligated small organizations.”*

**Response:** We seek clarity on this requirement. Will there be funds and/or resources allocated to support small organizations in meeting these requirements?

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## Obtaining services

*“The design of public spaces standards obtaining services requirements provide for accessible design of service counters, fixed queuing guides and waiting areas to ensure that services and products are available for people with disabilities.*

*Some of the key areas of concern identified by the committee include the need for resources to support compliance, as well as potential regulatory amendments to address the needs of those who are deaf, deafened or hard of hearing in accessing services.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below. Particularly, we recommend that regulatory amendments are considered to address the needs of those who are blind or visually impaired.

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## Additional recommendations

*“In their discussions, the committee covered several issues that did not fit neatly into the sections outlined in the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act. These included issues around: exemptions under the regulations which may lead to the creation of new barriers, the need to include images and figures in the design of public spaces standards to support understanding and compliance, and municipal challenges in planning and constructing environments that prioritize both sustainability and accessibility among other topics.”*



**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

### **Recommendation 77: Environmental sustainability and accessibility**

*“Intended outcome: To ensure obligated organizations are supported to design for both environmental sustainability and accessibility.”*

**Response:** We seek further clarification on how this recommendation will be actualized. Particularly, we question which stakeholders will be consulted during the development of guidance materials, and how priorities of environmental sustainability will be weighed against accessibility, and vice versa.

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### **Ontario Building Code general recommendations**

*“The Ontario Building Code requires that most buildings except houses meet barrier-free standards when being constructed or in the areas undergoing major renovations.*

*The committee had various discussions on topics that did not fit into the existing requirements set out by the Ontario Building Code. There were discussions focused on how to improve existing reporting and planning requirements that may support greater accountability and consideration for the accessible design of buildings.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

*“The committee recommends:”*

- *“Require government to review and update the Ontario Building Code with more inclusive language to represent the broad spectrum of disabilities.”*
  - **Response:** We seek clarification on how “inclusive language” will be defined. What literature is informing this review and update process?

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### **Exterior and interior building elements**

*“The exterior and interior building elements requirements in Ontario’s Building Code establish the minimum design and construction requirements to provide barrier-free access into and circulation within buildings, including dimensions and accessibility features.*

*Among the barriers identified, committee discussions highlighted the lack of requirements for power door openers on doorways leading to accessible spaces, and inadequate entrance width requirements. Also discussed was the need for Tactile Walking Surface Indicators to be consistently applied across the province.”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

### **Recommendation 93: Fitness / recreation facilities**

*“Intended outcome: To create facilities for fitness and recreation that work for everyone.”*

*“The committee recommends:”*

- *“The province will develop and implement specific accessibility requirements based on a scan of already existing guidelines and best practices (for example, Pan-am guidelines and Para Pan-Am Game Guidelines, municipal guidelines, etc.) for fitness/recreation facilities for accessible changerooms, lockers, exercise equipment, etc. into the Ontario Building Code.”*
  - **Response:** Given PRO’s engagement with municipalities from across the province and our expertise in accessible and inclusive recreation, fitness, and sport spaces, our organization is well equipped to support the development of accessibility requirements pertaining to fitness and recreation facilities. PRO is eager to dialogue with the Ministry about contributing to this initiative.

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### **Interior element services – building controls, alarms and signage**

*“The provisions for exterior and interior building elements in Ontario’s Building Code establish requirements to address the recognition, accessibility and operability of end-user building controls (electrical switches, alarm pulls, thermostats, etc.).*

*Committee discussions focused on accessible placement and operability of building controls, signage and wayfinding to improve navigation of barrier-free paths of travel as well as the accessibility of emergency systems (for example, fire and smoke alarms).”*

**Response:** We **agree** with most recommendations outlined in this section but seek clarification on the recommendations detailed below.

### **Recommendation 99: Assistive communication devices for service areas**

*“Intended outcome: To ensure that assistive communication devices and/or services are provided to accommodate a variety of needs.”*

**Response:** We support this recommendation and encourage the committee to consider the inclusion of communication boards as a requirement for service areas. Communication boards can be an effective tool for a variety of people including, those who are non-verbal, those with developmental disabilities, those whom English is their second language, and others.

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## Conclusion

High quality, parks and recreation opportunities are integral to the health and well-being of all Ontarians. Provided for the benefit of both individuals and communities, parks and recreation are a public good, in the same ways as education or healthcare. This is why advancing accessibility in Ontario remains one of PRO's top priorities. Quality parks and recreation services need to be available to all Ontarians, sustainable and supported at all levels of government. For this reason, we commend the Ministry for the introduction of these recommendations. This initiative represents an important step forward in creating a more inclusive Ontario.

PRO is a uniquely positioned organization. We have both expertise in accessibility and inclusion, along with the largest network of parks and recreation professionals in Ontario. As a result, PRO is well equipped to provide meaningful feedback on many recommendations brought forth by the Design of Public Spaces Standards Development Committee. We would be pleased and eager to meet with the Ministry to discuss our comments and feedback, as well as explore possible areas of partnership and collaboration on this valuable initiative.

Thank you for the opportunity to provide comments on these important recommendations.

Sincerely,

A handwritten signature in black ink that reads 'S. Ane'.

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A handwritten signature in black ink that reads 'Kim Gavine'.

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