

Accessibility Advisory Committee Response to The London Plan

The London Plan, while extremely lengthy and broad falls significantly short of addressing the needs of persons with disabilities and how the anticipated increased demand for accommodation and accessibility will be met within London over the next 20 years.

Concern #1: The London Plan sets out a significant number of standards and expectations for which new development is to adhere. Very few areas address accessibility in detail. ACCAC understands the intent of the plan is to provide a broad overview of future development.

Recommendation #1: When accessible features or accessibility are referenced in terms of broader, general direction, the concept of universal design and access should be referenced. These design principles ensure general levels of accessibility are incorporated as standards within development.

Concern #2: The plan specifically references a number of pieces of Provincial legislation, municipal policies and master plans, as well as various Acts and Bylaws. ACCAC notes there is no significant mention of any accessibility legislations, point of reference, or frameworks. It is critical that as our city grows builders, developers and city staff/council are aware of their responsibilities to accommodate persons with disabilities, and where to obtain such information.

Recommendation #2a: The London Plan be amended to include reference and adherence to:

- Accessibility for Ontarians with Disabilities Act 2005 (AODA)
- The City of London's Accessibility Plan
- 'Age Friendly London' plan

Recommendation #2b: Specific mention be made that all City owned/leased development adhere to the Facility Accessibility Design Standards (FADS), in addition to those listed in recommendation 2a.

Concern #3: Significant portions of the document reference Heritage and Environment. While ACCAC agrees and supports the importance of both these areas as important pillars in the future of London, we are concerned the plan, as written, does not ensure access to these areas by all Londoners, most notably persons with physical disabilities who may not readily have access. We recognize the provision of access may not be possible without significantly impacting the heritage or environmental features, however in select cases access could be incorporated, without significant disruption or impact, allowing everyone access to these local treasures.

Recommendation #3: The following sections of the plan include a statement encouraging accessibility be included whenever possible, whereby the accommodation does not significantly alter the heritage/environmental site.

- Our Strategies
 - o Direction 3
 - o Direction 4
- City Building Policies
 - o Urban Forest
 - o Parks and Recreation
 - o Cultural Heritage
- Urban London Places
 - o Neighbourhoods (particularly in reference to trails and parks mentioned in paragraph 921)
 - o Open Space
 - o Environmental review

Concern #4: The London Plan attempts to ensure diverse and affordable housing options by establishing maximum numbers of unit types. While ACCAC again, in principle supports such efforts, these attempts do little if anything to ensure persons with disabilities has accessible housing options.

Recommendation #4a: The London Plan should be amended to establish a minimum number of accessible units in new development. It is recommended that civic administration be directed to undertake a review of available information and statistics, as well as anticipated changes in population dynamics, to establish this percentage standard. ACCAC notes Canadian Mortgage and Housing Corporation and Statistics Canada may prove valuable in this review. [It should be noted the City currently has a definition of accessible units which could be applied here].

Recommendation #4b: ACCAC further encourages the concepts of Universal Design and “Visitability” be incorporated in new developments. Visitability is an international movement to change home construction practices so that virtually all new homes, whether or not designated for residents who currently have mobility disabilities. Visitability ensure all units have 1) at least one barrier free entrance on an accessible path of travel (e.g. level path from parking to front door); 2) widened doors throughout the main level; and 3) an accessible half or full bathroom on the main level.

Concern #5: The significant shift towards infill design and development can lead to significantly increased demand and usage of services and resources within various neighbourhoods and communities. In many cases existing infrastructure, including crosswalks, sidewalks and roadways, as well as resources such as transit and recreation, are insufficiently maintained or prioritized to meet the needs of persons with disabilities or those requiring accessibility.

Recommendation #5: ACCAC encourages Council that, in collaboration with the adoption of this plan, it ensure sufficient financial and human resources are in place to mitigate the increase demands while simultaneously improving current conditions.