

May 19, 2015

To: **Britt O'Hagan**, Urban Designer

Re: **ACCAC request to review** the Draft Urban Design Manual, and Draft Downtown Design Manual

Note: this review was completed through the Built Environment and Facility Sub-Committee

In general, both plans while very comprehensive and broad, fall 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.

Concern #1:

Each plan sets out a significant number of standards and expectations for which new development is to adhere. Very few area address accessibility in detail. ACCAC understands the intent of these plans 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 also be referenced. These design principles ensure general levels of accessibility are incorporated as standards within development.

Concern #2:

The plans specifically reference 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 (beyond the initial introductory segments referencing the AODA). 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:

Both plans 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 documents 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:

Include a statement encouraging accessibility whenever possible, whereby the accommodation does not significantly alter the heritage/environmental site.

Further to the previous general commentary, our sub-committee has taken time to review each document, and have highlighted statements or indexed paragraphs for your consideration. Following are notes of items that we recognised:

*Important, please do not consider this list as complete, or limited-to. The comments provided are aspects identified by a limited number of ACCAC members upon an initial review.*

### **Draft Urban Design Manual**

- Policy Context, page ii  
perhaps the paragraph regarding AODA could be strengthened or highlighted as a mandatory legal obligation for design and developments in this context (as per mentioned Concern #2)
- Glossary, page iv  
perhaps this glossary of terms include, for clarity, definitions for the many terms associated specifically with Barrier-Free needs (example: the word “accessible” alone may be used or interpreted in context of general access-to versus inclusive-access which has a much different meaning)  
Note: in this regard, ACCAC can be of further assistance to you if need-be
- F Heritage, page 3  
suggest that paragraph 1 also that these sites should strive to be fully accessible (as per mentioned Concern #3)
- F Heritage, page 3  
suggest that paragraph 2 including wording that any/all signage shall meet AODA requirements
- A Site Layout, page 6  
suggest that paragraph 15 also reference that the arrangement of buildings take into account barrier-free designs
- D Parking, page 8  
suggest also that parking must also meet AODA regulations as well as City Bylaws in terms of accessibility and/or proximity to buildings, parks, or features
- K Lighting, page 13  
suggest that paragraph 1 wording include “accessible features such as ramps and walkways”
- Connectivity A, On-Site Circulation, page 30  
suggest that the dimensional requirements of AODA (Reg 191/11, Exterior Paths of Travel) be referenced here to avoid conflicts or assumptions of your suggestions
- Connectivity B, Walkway Design, page 31  
suggest that wording be changed to “accessible design shall be” (instead of “should be”) as this is a requirement of AODA, as well further wording such as “*should be integrated into the pedestrian experience*” be added to enhance this position further
- Connectivity E, Transit Circulation, page 32  
suggest that the wording of point 4 be changed to “shall be” instead of “should be” as written
- Connectivity G, Community Circulation, page 33  
suggest that the wording of paragraph 1 also reference the aspect of accessible connections
- Connectivity G, Community Circulation, page 33  
suggest that paragraph 2 reference the aspect of accessible connections, with the example of “*to walk or travel by assistive device*”

- Connectivity G, Community Circulation, page 33  
suggest that a new paragraph be considered here to emphasize the important of transit connections in this regard
- Connectivity G, Community Circulation, page 33  
suggest that a new paragraph be considered here to emphasize the important of connections to and within public-use facilities (such as, but not limited to educational and medical facilities) in this regard
- Connectivity J, Mixed Development, page 42  
suggest that paragraph 19 also include a reference to accessible needs along with aging-population in this regard, and that all types of residential housing (re: low, mid, high intensity) share equally in this opportunity
- Public Realm A, Streetscapes, page 45  
suggest that wording of paragraph 7 be changed to “pedestrian circulation shall follow” (instead of “should follow”) as this is a requirement of AODA
- Public Realm A, Plazas & Urban Civic Spaces, page 49  
suggest that wording of paragraph 2 be changed to “shall be visible” (instead of “should be”) as this is an important aspect of inclusive design
- Public Realm I, Waiting Areas, page 50  
suggest that a new paragraph be considered here to emphasize the importance of inclusive design in this regard
- Public Realm J, Patios, page 50  
suggest that a new paragraph be considered here to emphasize the importance of inclusive design in this regard
- Public Realm K, Park Design, page 51  
suggest that paragraph 10 (park features) recognise that accessible design and way finding signage are critical aspects of a Park’s inclusivity
- Public Realm K, Park Design, page 51  
suggest that paragraph 12 add wording such as “for children of all ages and abilities”

## Draft Downtown Design Manual

- Introduction, page i  
perhaps the second paragraph regarding the Official Plan, the Downtown Plan, and the Heritage Plan could be strengthened or highlighted as also including AODA, London's Accessibility Plan, FADS, and the Age Friendly London Plan in this context (as per mentioned Concern #2)
- Overview, page iii  
commend you on the paragraph titled Accessibility for Ontarians with Disabilities, suggest that this same paragraph also become part of the introduction overview for the Urban Design Manual  
Note: in this regard any/all dimensions presented further in this Manual must not supersede the dimensional requirements of AODA legislation.
- Overview, page iii  
suggest that a Glossary of Terms, like that in the Urban Design Manual, be considered
- 1.0 Introduction, page 3  
suggest that the paragraph entitled "Factors Affecting Sidewalk Design" include the fundamental aspect of inclusive design as required by AODA
- Other Street, Commercial Segments, page 11  
with regards to paragraph 3, where parallel accessible parking is provided, perhaps the 40cm concrete band may need to be widened?
- 1.2 Streetscape Framework, page 13  
concern here that the specific dimensions requested in your table be cross-referenced with the AODA, Reg191/11 Exterior Paths of Travel minimum requirements
- 1.2 Streetscape Framework, page 14  
concern here that the Absolute Minimum paragraph also include a reference to headroom clearances, and be cross-referenced with the AODA, Reg191/11 Exterior Paths of Travel minimum requirements
- 1.2 Streetscape Framework, page 16  
concern here that On-Street Parking should recognise the dimensional requirements and provision of accessible parking needs
- 1.4 Transit, Transit Facility Locations, page 20  
suggest that accessible "path of travel" routes to bus stops are provided and recognised here  
Note: if bus routes from Dundas Street are eliminated at any time, public access to this area by other means (such as Paratransit) be recognised, as the proximity for users with mobility needs to this important urban setting becomes more problematic as travel distances increases
- 1.5 Street Trees, Planting Guidelines, page 22  
suggest that part 2, open metal grates, include a statement to recognise mobility needs and/or AODA, Reg191/11 Exterior Paths of Travel minimum requirements for surface openings
- 1.6 Placement of Street Furniture, page 23  
suggest that a new paragraph be included to here to recognise the proximity of rest benches from one to another  
Example: a minimum space apart dimension of rest benches for distance travelled be considered
- 1.7 Public Spaces, Plaza Landscaping, page 26  
question only of the dimension in paragraph 3 where planters shall be no more than 0.5m high, in that should that statement read "no less than" instead of no more than?  
Concern here is that a planter lower than 18" high may become a trip-hazard to some

- 2.0 Built Form and Design, Introduction, page 33  
suggest that in paragraph 3 the policies of AODA, and London's Facilities and Design Standard (FADS) be referenced here
- 2.4 Architectural Details, Types of Signage, page 52  
Concern here is with paragraph 6 that allows for moveable sandwich boards "*provided the do not obstruct pedestrian movement*" is perhaps too subjective of a statement, particularly when supported further on that if placed in a public right of way they are assumed to be acceptable as long as they are removed at the end of the day.  
The difficulty with this assumed acceptance is that the public right of way MUST be maintained free and clear of obstructions at ALL times (Re: AODA, Reg191/11 Exterior Paths of Travel, and FADS)
- 2.4 Architectural Details, Lettering Size, page 53  
in this regard any/all references to signage or lettering must also reference the AODA Communication Standard for validation
- 3.2 Patio Design, Application Process, page 66  
suggest that in paragraph 5, design guidelines also reference to the AODA legislation
- 3.4 Patio Design Details, page 78  
suggest that in paragraph 14 a reference to minimum head room clearance also be referenced
- 3.4 Patio Design Details, page 79  
suggest that in paragraph 18, Paving a reference to a minimum vertical change in elevation and/or sloped access to raised surface also be referenced (Re: AODA, Reg191/11 Exterior Paths of Travel)