

Increasing the City's Supply of Accessible Affordable Housing

Date: September 12, 2024

To: Planning and Housing Committee

From: Executive Director, Housing Secretariat

Wards: All

SUMMARY

Toronto is Canada's largest and most diverse city, and home to over 476,000 seniors and over 570,000 people with disabilities.¹ While Toronto is facing a housing and homelessness crisis impacting residents across the City, individuals with disabilities face additional barriers to accessing housing that is affordable, accessible, and livable. These challenges include a shortage of housing options that allow safe and independent living for residents with diverse abilities, inconsistent standards and requirements for accessibility across government programs, and a lack of universal design features that accommodate diverse needs.

In 2019 City Council adopted the Toronto Housing Charter and the HousingTO 2020-2030 Action Plan, and committed the City to furthering the progressive realization of the right to adequate housing. This approach is grounded in the principle of all residents having a right to housing that is accessible and takes into account the specific needs of historically disadvantaged and marginalized groups. A human rights-based approach also engages and empowers rights-holders in the process to identify and/or implement the actions required to address barriers. The HousingTO Action Plan outlined Strategic Priorities and Actions, including to develop interventions that will improve housing outcomes for specific populations, including people with disabilities.

To advance this priority, in 2020 City Council directed the City to establish a working group consisting of community members and advocates with lived experience in accessibility, staff from the Housing Secretariat, City Planning, Toronto Building, CreateTO and stakeholders from the development industry, to explore the feasibility of increasing the percentage of accessible units and incorporating universal design features for new housing development projects part of the City's Housing Now Initiative. The Accessible Housing Working Group (AHWG) was formed to advance this mandate. In 2022, City Council expanded the working group's scope beyond Housing Now to include other accessible housing-related matters.

¹ Statistics Canada. 2022 Canadian Survey on Disability. Accessed through the [Community Data Program](#).

The AHWG has met over 25 times since being established in 2021 to undertake analysis and provide advice to the City, including reviewing existing technical standards for accessibility included in the Ontario Building Code and the City's Affordable Housing Design Guidelines, as well as to conduct assessments of the various industry standards that exist for accessibility. The knowledge and insights of the AHWG members have been instrumental in identifying opportunities to improve the accessibility and livability of new homes, the existing barriers faced by Toronto residents with disabilities in accessing affordable rental housing, as well as actions that the City could take to increase accessibility in the City's existing rental housing stock.

The recommendations in this report were developed in close consultation with the AHWG, who led the process of shaping them. The AHWG provided analysis and advice through information sessions and workshops, with a membership that grew from the original 13 members to include over 45 of the industry's most prominent accessibility experts, advocates, stakeholders, and builders. Out of these sessions, seven recommendations have emerged that seek to align Toronto with leading Canadian and global cities in their approach to accessible housing. Principally, these recommendations will improve housing outcomes for Toronto residents with disabilities by:

- Updating the City's Affordable Rental Housing Design Guidelines with the advice of the AHWG to improve the accessibility performance of new rental homes;
- Implementing a set of design standards, based on Universal Design principles, for affordable rental homes in City-led and City-supported rental housing developments;
- Developing a new City standard which exceeds minimum accessibility requirements for Barrier-Free units contained in the Ontario Building Code to ensure these units are not just visitable, but truly livable for people with disabilities;
- Taking action in partnership with community housing providers to improve the accessibility of existing rental homes, including creating a consistent accessibility inventory across the portfolio of community housing in the City, and;
- Improving access pathways to accessible homes for people with disabilities, with advice from the AHWG, to better match residents looking for an accessible home with affordable housing options that meet their needs.

As Toronto's population continues to age, the need for rental housing that is both accessible and affordable will continue to grow. Taking action to improve the accessibility of new and existing homes respects the dignity and independence of people with disabilities will help enhance independence, quality of life and equitable outcomes for residents with disabilities. In addition, this work will support the City in furthering the progressive realization of the right to adequate housing.

While Toronto takes action, the insufficient rates of social assistance available through the Ontario Disability Support Program (ODSP) remains a core barrier preventing low-income Torontonians with disabilities from being able to afford an accessible home. The level of financial support provided by ODSP has not kept up with the rising costs of living. In 2023, the average market rent for a one-bedroom apartment in Toronto was

\$1,708, and actual asking rents for vacant apartments were much higher². Meanwhile, a single person receiving ODSP is provided \$556 per month for shelter costs. This report recommends Council reiterate its many previous requests that the Government of Ontario improve the adequacy and structure of social assistance programs so recipients are able to meet their basic needs including the high cost of housing in Toronto.

RECOMMENDATIONS

The Executive Director, Housing Secretariat recommends that:

1. City Council direct the Executive Director, Housing Secretariat, in consultation with relevant City Divisions, the Accessible Housing Working Group, community housing providers, private developers, and tenant representatives, to update the City's Affordable Rental Housing Design Guidelines ("the Guidelines") by Q3 2025 to support the delivery of more accessible rental homes for Toronto residents with disabilities.
2. City Council direct the Executive Director, Housing Secretariat, as part of the process described in recommendation 1, to include in the revised Guidelines:
 - a. A new set of universal design standards for affordable rental units, substantially based on the recommendations of the Accessible Housing Working Group included in Column C of Table 1 in Attachment 1 to this report;
 - b. a new standard of accessibility for barrier-free units which exceeds minimum accessibility requirements for barrier-free units contained in the Ontario Building Code;
3. City Council direct the Chief Planner and Executive Director, City Planning, to include in their upcoming report on parking regulations in Q4 of 2024, recommended changes to Zoning By-law 569-2013, that facilitate the creation of additional accessible parking spaces, by providing exemptions to standard parking requirements, as part of accessibility retrofit and improvement projects.
4. City Council request the Board of Directors of Toronto Community Housing Corporation to direct the President and Chief Executive Officer, Toronto Community Housing Corporation ("TCHC"), in consultation with the Responsible Personal Accessibility in Toronto Housing Committee (R-PATH), to evaluate the feasibility of implementing an enhanced accessibility modification program as part of TCHC's turnover renovation program, to gradually support increasing the number of accessible units within the City's social housing portfolio, and report back with any additional authorities or financial impacts as part of future years budget process.
5. City Council direct the Executive Director, Housing Secretariat, in consultation with TCHC, Toronto Seniors Housing Corporation, and community housing providers, to undertake an inventory of community housing units in 2025 to consistently establish the

² Canada Mortgage and Housing Corporation. 2023 Rental Market Report. Average market rent data for the City of Toronto accessed the through [Housing Market Information Portal](#).

accessibility features within the existing community housing stock, for the purpose of improving the unit advertising and matching process with households on the centralized waitlist that are eligible for a modified unit.

6. City Council direct the Executive Director, Housing Secretariat, to continue to consult with the Accessible Housing Working Group to provide advice and oversight to the development of revised Guidelines as described in Recommendations 1 and 2 above.

7. City Council re-iterate its request to the Government of Ontario to improve the adequacy and structure of social assistance programs, based on data and evidence, so that recipients are better able to meet their basic needs, including the high cost of housing in Toronto, and to equalize the benefit rate across the Ontario Works (OW) and the Ontario Disability Support Program (ODSP).

FINANCIAL IMPACT

The recommendations in this report do not have immediate direct financial impacts to the City, however, they will likely lead to future costs associated with their implementation. These potential impacts will be evaluated as part of future reports and Housing Secretariat and TCHC annual budget requests.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial implications as identified in this Financial Impact section.

EQUITY IMPACT STATEMENT

Under the Canadian Charter of Rights and Freedoms (CCRF), every individual is entitled to equal protection and benefit of the law without discrimination, including discrimination based on disability. Similarly, the Ontario Human Rights Code (OHRC) requires housing providers to accommodate the needs of persons with disabilities who are adversely affected by any requirement, rule, or standard. Accommodation is essential to ensure that individuals with disabilities have equal opportunities, access, and benefits.

The City of Toronto has further committed to [creating an accessible city](#), and to equity in housing through the [Toronto Housing Charter – Opportunity for All](#). This policy recognizes housing as essential to human dignity, well-being, and the creation of sustainable, inclusive communities. The City's human rights-based approach to housing is rooted in seven principles, including the principle that "all residents have a right to housing that is accessible and considers the specific needs of historically disadvantaged and marginalized groups."

Housing must be designed inclusively and in an integrated manner to accommodate the needs of persons with disabilities, promoting respect for dignity, independence, individualization, and full participation. While compliance with national or provincial accessibility regulations is mandatory, housing providers must also offer accommodation solutions wherever possible, without undue hardship. This can be

achieved by increasing baseline levels of accessibility for common areas of residential buildings and residential units, and ensuring the adaptability of units, thereby minimizing hardship if renovations are necessary.

Complying with human rights legislation benefits all parties. For people with disabilities, preventing discrimination or providing accommodations means better access to housing, more choice, and the opportunity to participate in society more fully. For builders or housing providers, building accessible or adaptable housing meets the needs of a greater number of potential customers and avoids costly claims or renovations. For the public, accessible or universal design features can benefit all potential residents by providing more space, more usable features, or the ability to age in place.

The City, informed by the recommendations of the AHWG, is advancing recommendations to improve the accessibility of the City's current and future affordable rental homes for persons with disabilities to further this principle that all residents have the right to housing that is accessible.

DECISION HISTORY

On December 17, 2019 City Council adopted with amendments Item PH11.5 - "HousingTO 2020-2030 Action Plan", as the framework to address Toronto's housing and homelessness challenges by 2030. This Plan includes a number of actions and targets to address critical needs across the housing spectrum including emergency shelters and transitional housing, social and supportive housing, market and affordable rental housing and homeownership.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.PH11.5>

On June 29, 2020, City Council approved PH14.3, the "Housing Now Initiative - Annual Progress Report." In this report, City Council requested the Executive Director, Housing Secretariat, to form a working group composed of staff from City Planning, Buildings, and CreateTO, as well as stakeholder organizations representing the disability community and the development industry. The working group was tasked with exploring the options and feasibility of increasing the percentage of accessible units and units with universal design features to be delivered through the Housing Now Initiative and reporting back to the Planning and Housing Committee.

<https://secure.toronto.ca/council/agenda-item.do?item=2020.PH14.3>

On June 15, 2022, City Council, through the approval of EX33.10, directed the Housing Now Accessible Housing Working Group to review the Terms of Reference and membership of the existing group. The scope of the group was expanded beyond Housing Now to include other accessible housing-related matters, ensuring proper representation to accommodate this broader mandate. City Council also requested the Executive Director, Housing Secretariat, to engage third-party accessible housing experts, including those with lived experience, to support the work of the Accessible Housing Working Group.

<https://secure.toronto.ca/council/agenda-item.do?item=2022.EX33.10>

On March 21, 2023, the City's Executive Committee adopted, with amendments, EX3.1, "Housing Action Plan 2022-2026 Priorities and Workplan." This report included a workplan for the City to deliver the 2022-2026 Housing Action Plan approved by Council in December 2022 through CC2.1. The workplan included the Accessible Housing Working Group's recommendations on accessible housing initiatives.

<https://secure.toronto.ca/council/agenda-item.do?item=2023.EX3.1>

On May 10, 2023, City Council adopted, with amendments, PH3.6, "Housing Now Initiative - 2023 Progress Update." This report requested the Executive Director, Housing Secretariat, in consultation with the Chief Executive Officer, CreateTO, to explore opportunities to enhance accessibility and incorporate more universal design features in both affordable and market rental units at Housing Now sites.

<https://secure.toronto.ca/council/agenda-item.do?item=2023.PH3.6>

On November 6, 2023, The Accessible Housing Working Group presented an overview of its mandate and progress to date to the Toronto Accessibility Advisory Committee through item DI4.2 - "Maximizing Accessibility in City-Led Housing Development."

<https://secure.toronto.ca/council/agenda-item.do?item=2023.DI4.2>

COMMENTS

Background: The Need for Accessible Housing

Findings from Statistics Canada's 2022 Canadian Survey on Disability (CSD) showed that 25% of Torontonians aged 15 years and older had one or more disabilities that limited them in their daily activities.³ The CSD also highlighted that seniors aged 65 and over are more likely than other age groups to have a disability. In 2022, 42% of Toronto seniors over 65 indicated that they had one or more disabilities.

Torontonians most frequently reported having a mobility, mental-health, or pain-related disability. Among Canadians with physical disabilities in 2017, 45% required at least one type of aid, assistive device, or accessibility feature within their home. The most commonly used aids or assistive devices related to building modifications or adaptation features were bathroom aids, such as a raised toilet seat or grab bars (32%) or a walk-in bath or shower (17%), as well as an access ramp or a ground-level entrance (12%).⁴

Access to affordable housing is a critical need for individuals with disabilities, as they may face additional barriers to employment. Data from the 2022 CSD indicates that Toronto residents aged 15 to 64 years old who have a disability had an unemployment rate of 19%, compared to 13% for individuals without a disability. Further, the survey indicated that 44% of Ontarians aged 25 and over with a disability had an after-tax

3 Statistics Canada. "Canadian Survey on Disability, 2017 to 2022." December 1, 2023. Custom data provided by Statistics Canada for the Toronto Census Subdivision.

4 Statistics Canada. "The accessibility experiences of Canadians with disabilities, 2017." October 27, 2021,

median income of less than \$30,000, compared to 30% for individuals in the same age range without a disability⁵. Data from the 2017 CSD and the 2016 Census (the most recent data sources available on the housing experiences of persons with disabilities in Canada) demonstrated that people with disabilities had higher rates of being in core housing need, living in unaffordable housing, and living in homes in need of major repairs compared to individuals without a disability.

In 2020, the Canadian Human Rights Commission (CHRC) and the Office of the Federal Housing Advocate (OFHA) interviewed over 60 Canadians with disabilities. Many of the participants indicated that housing was a top issue. The report found that many people with disabilities in Canada face barriers to housing including being forced to live in institutions, not being able to access the support they need to live independently, not being able to find safe accessible homes and not being able to afford their rent.⁶ Further, public consultations for the City's 2025-2029 Disability Inclusion Plan surveyed over 1,400 persons with disabilities, their support persons and community organizations. Accessible and affordable housing was identified as by the respondents as top priority for the City over the next five years.

By 2041, it is projected that the population of seniors aged 65 and over in Toronto will grow by more than 50%. In developing the Toronto Seniors Strategy, the City surveyed over 7,000 seniors around from Toronto. In this survey, 38% of respondents listed housing affordability and availability as their top concern. 18% of respondents indicated that had difficulty paying rent, mortgage, hydro bill or other housing costs in the last year and 14% had to delay home repairs or modifications because they were unaffordable.

The increasing numbers of persons with disabilities and senior citizens points to an increasing need for accessible units, in addition to a current unmet need. Given these trends, the need has never been greater to provide affordable homes that are flexible, adaptable, and easily modified to anticipate a wide range of changing occupant requirements and allow a growing number of renters to live independently and age-in-place.

Legislative/Policy Context

Accessible housing is a critical component of ensuring all citizens, regardless of their physical abilities, can live with dignity and independence. In Canada, the responsibility for support accessible housing is shared across various levels of government, each playing a role in shaping policies, setting standards, and providing funding to meet the needs of persons with disabilities.

Federal Government

The Government of Canada has a broad mandate to promote accessibility across the country. It sets national standards and guidelines, offers financial incentives, and enacts legislation to protect the rights of persons with disabilities. Key initiatives include:

⁵ Statistics Canada. 2022 Canadian Survey on Disabilities. March 2024. Table 13-10-0379-01.

⁶ Canadian Human Rights Commission and the Office of the Federal Housing Advocate. "The right to housing for people with disabilities: Monitoring framework." May 2024.

- [National Housing Strategy \(NHS\)](#): Launched in 2017, the NHS aims to ensure all Canadians have access to housing that meets their needs. The strategy includes specific targets for affordable and accessible housing, with funding earmarked for the development and retrofitting of accessible units.
- [Canada Mortgage and Housing Corporation \(CMHC\)](#): As the federal agency responsible for housing, the CMHC provides funding, research, and support for accessible housing as part of its affordable housing programs. For example, the Affordable Housing Fund requires that projects delivering new homes or repairing existing homes must contain a minimum of 20% accessible units and must have full universal design. CMHC's Apartment Construction Loan Program requires that at least 10% of a project's units must meet or exceed accessibility standards as regulated by local codes.
- [Accessible Canada Act, 2019 \(ACA\)](#): Enacted in 2019, the ACA is a landmark piece of legislation that aims to make Canada barrier-free by 2040. It establishes accessibility standards for federally regulated sectors, including housing, and requires public reporting on progress.
- [National Building Code](#): In 2024, as part of Canada's Housing Plan, the Federal Government committed to updating the 2020 National Model Codes. The updated codes introduced changes to enhance safety, accessibility, and climate readiness in Canadian buildings. Specific accessibility changes included:
 - Building Dimensions: Adjustments to minimum dimensions of building elements have been made to better accommodate a wider variety of mobility devices.
 - Tactile Signage: Requirements for tactile signage have been introduced to improve navigation for individuals with visual impairments.
 - Accessible Entrances: More pedestrian entrances and floor levels must now be accessible, ensuring easier access for everyone.

Provincial Government

The Government of Ontario plays a crucial role in implementing and enforcing accessible housing standards, most importantly through the Ontario Building Code (OBC). It provides the regulatory framework and funding mechanisms to support municipalities and housing providers.

- [Ontario Building Code \(OBC\)](#): The OBC is a set of provincial regulations that govern the construction, renovation, and maintenance of buildings in Ontario, ensuring they meet specific safety, health, and structural standards. Within the OBC, accessibility requirements are outlined to ensure that buildings are designed to be accessible to all individuals, including those with disabilities. These requirements include features such as barrier-free entrances, accessible washrooms, and designated parking spaces, which are mandatory in certain types of buildings. The OBC's accessibility standards are intended to create an inclusive built environment, though they set minimum requirements, and additional measures are often necessary to fully meet the functional diverse needs of the population. Minimum residential accessibility

standards in Toronto are governed by the OBC which applies to new buildings and those undergoing material alteration. The OBC requires that at least 15% of all suites of residential occupancy in a major occupancy apartment building be built to barrier-free standards, including a barrier-free path of travel to the suite entrance and one or more bedrooms, at least one bathroom, a kitchen, and a living space.

- [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#): In 2005 the AODA was passed to improve access and opportunities for persons with disabilities. Under the Act, the City must comply with the Design of Public Spaces Standards. In addition, all municipalities are required to develop and maintain Multi-Year Accessibility Plans outlining strategies to identify, remove and prevent barriers faced by persons with disabilities with a goal to achieve an accessible province.
- [Ontario Disability Support Program \(ODSP\)](#): The Province's ODSP program offers vital funding to help eligible individuals with living expenses including food, rent, health benefits, and employment support. While this funding is vital for residents, the amount has not kept pace with the rising costs of rent in Toronto over the past decade. In 2024, an individual living alone could receive a maximum of \$1,368 per month, including \$582 for shelter costs through the ODSP. In contrast, the average market rent paid for a one-bedroom apartment unit in 2023 in the City of Toronto, as reported by CMHC, was \$1,708 per month.

Municipal Government

The City of Toronto, as the largest municipality in Ontario, has a significant role in ensuring accessible housing for its residents. Toronto actively collaborates with other levels of government, non-profit organizations, community housing providers and the private sector to advocate for increased funding and support for accessible housing. The City also works closely with the Toronto Accessibility Advisory Committee to ensure that the voices of persons with disabilities are included in housing decisions. Key City initiatives include:

- [Toronto's HousingTO 2020-2030 Action Plan](#): This Plan provides a blueprint for action across the housing continuum, and outlines the City's strategy for creating 65,000 rent-controlled, including affordable and rent-geared-to income homes by 2030, with a strong emphasis on accessibility. The plan commits to taking specific actions focussed on improving the housing outcomes for persons with disabilities, and supporting households to make accessibility modifications to their homes to ensure they can age in place.
- [Toronto Accessibility Design Guidelines \(TADG\)](#): The TADG incorporate existing legislated built environment accessibility standards, better practices, and universal design principles to help meet the rights of people with disabilities described by the OHRC and AODA. The TADG are intended to apply to all renovations, and/or construction of City-owned spaces. New residential construction or renovation projects led or funded by the City continue to follow the Affordable Rental Housing Design Guidelines.

- [Affordable Rental Housing Design Guidelines](#): Published in 2015, the design guidelines address requirements for affordable housing projects receiving funding and or financial incentives from the City. They specify the unit mix, size, distribution location, accessibility, adaptability, site circulation, landscaping, and other building design considerations.
- As a Service Manager for the City of Toronto under the *Housing Services Act*, the City also is responsible for administering the City's Centralized Waitlist for Subsidized Housing, known as MyAccessToHousingTO. The City requires housing providers who operate these affordable homes to indicate whether or not they are accessible, and collects information on the accessibility needs of applicants.

Origin and Purpose of the Accessible Housing Working Group

In June 2020, City Council adopted the amended PH3.6 "Housing Now Initiative - 2023 Progress Update", which directed the Executive Director of the Housing Secretariat to establish a working group to explore the feasibility of increasing the percentage of accessible units and incorporating universal design features within the Housing Now Initiative. The group consists of staff from City Planning, Toronto Building, CreateTO, stakeholders from the development industry, and community members and advocates with lived experience in accessibility.

On June 15, 2022, through EX33.10, City Council expanded the working group's scope beyond Housing Now to include other accessible housing-related matters. The Accessible Housing Working Group (AHWG) reconvened in the summer of 2022 to address this expanded mandate.

The key role of the working group is to provide advice on policy and program improvements to the Housing Secretariat in the area of accessible affordable housing, based on knowledge and lived expertise. The group participated in over 15 information sessions. These sessions were typically structured around educational or informative presentations followed by questions and group discussions. Topics covered a wide range of issues in accessibility housing standards, policy and practice. This work established a strong shared foundation of knowledge for the group to shape their recommendations on. The group also participated in over 10 workshop sessions. These sessions were active and focused on problem solving specific policy and design issues. This included, technical standard reviews, a three-part recommendation development workshop, a "developer only" session on challenges with costs and constructability, and regular, less formal round-table discussions and brainstorming sessions.

Findings and Recommendations to Improve Accessible Housing in Toronto

Accessible Design Standards and Guidelines

Among the challenges of building more accessible housing is the lack of harmony between the jurisdiction's many applicable standards and guidelines. The confusion is compounded by the mixed use of terms and varying definitions for concepts such as

Accessible, Fully Accessible, Universal, Barrier-Free, Adaptable, Modified, and Visitable.

Some examples include:

- The AODA currently does not define accessibility. Experts have indicated that this lack of a definition in the legislation leads to some confusion over the legal use of the term requirements of organizations in creating accessible environments.⁷
- The Ontario Building Code (OBC) defines *Barrier-Free* buildings and facilities as those that can be approached, entered, and used by persons with physical or sensory disabilities.
- The Consumer Standards Association (CSA) Group defines *Visitable*, in relation to residential accommodation, as any dwelling that offers a basic level of access to accommodate visitors such as people who use a wheeled mobility aid, people who are elderly, or residents who might have a temporary disability. Visitable dwellings allow a person to enter a dwelling safely, maneuver independently throughout the visitable level, and use the toilet facilities.
- CMHC defines *Accessible* units as housing that enables people of all ages and abilities to stay in their community as long as possible where housing is designed, constructed, or modified to enable independent living for persons with disabilities.
- CMHC defines an *Adaptable* unit as one that is wheelchair-accessible at the entrance level only, in which a person using a wheelchair or other mobility aid, or with the assistance of a caregiver, can move to the inside of each room, and where the architectural features of the building make it possible to add a lift at a later time to make other floors accessible, without requiring major renovations.
- The City's Affordable Housing Design Guidelines utilizes the term *Fully Accessible*. As disabilities are highly individualized and often occur in combination, it is important to note that only a unit that has been modified to meet a tenant's specific needs, can be considered "Fully Accessible."

To this end, the AHWG worked with a third-party consultant, Human Space, to conduct a comparative study of applicable industry design standards and guidelines. This study compared over 45 separate accessible design requirements across 15 different industry standards and guidelines. This provided a unique perspective of accessible housing requirements across the industry and a baseline to facilitate decision making around recommended measures.

The review included the following guidelines and standards:

⁷ The Honourable David C. Onley. "Listening to Ontarians with Disabilities: Report of the Third Review of the Accessibility for Ontarians with Disabilities Act, 2005." January 2019.

- Building Code Act, 1992, S.O. 1992, c. 23, O. Reg. 332/12: Building Code, O. Reg. 88/19, s. 97, Ontario Building Code, Section 3.8 Barrier-free Design, with 2024 amendments.
- Accessibility for Ontarians with Disabilities Act, 2005, O. Reg. 191/11 Integrated
- Accessibility Standards, PART IV.1, 413/12, s. 6., Design of Public Spaces Standards.
- City of Toronto Accessibility Design Guidelines, 2021.
- City of Toronto Draft Inclusionary Zoning Implementation Guidelines, 2021.
- City of Toronto Affordable Rental Housing Design Guidelines, 2015.
- Toronto Community Housing Corporation Accessibility Build Standards, 2019.
- CSA/ASC B651 Accessible design for the built environment, 2023.
- CSA B652 Accessible dwellings, 2023.
- Canada Mortgage Housing Corporation (CMHC), Rental Housing Construction Financing Initiative (RCFi).
- CMHC, National Housing Co-Investment Fund (COI).
- CMHC, Mortgage Loan Insurance Select (MLI Select)
- Rick Hansen Foundation Accessibility Certification (RHFAC) v3.0 Pre-Release, 2020, and v4.0, 2023.
- SAFERhome Standards, 2017.
- CMHC, Universal Design Guide, 2023

The resulting comparison provided a detailed tool to visualize similarities and differences between accessibility standards. It helped to organize and classify the key elements and features applicable to accessible housing and was used to support the AHWG's technical recommendations to the City.

Taking a Universal Design Approach

Any built environment should be designed to meet the needs of all people who wish to use it. This is not a special requirement for the benefit of only a minority of the population, it is a fundamental condition of good design⁸. Universal Design is the design and composition of an environment so that it can be accessed and used to the greatest extent possible by all people regardless of their age, size, ability or disability. Units that adhere to Universal Design better accommodate independent living, aging in place, and a wider range of occupant configuration. Universal Design is a person-centred, affordable, adaptable, and inclusive approach to home design that seeks to address housing inequalities.

While Universal Design is not the same as accessible design, it does make it easier to adapt housing to meet the needs of current and future household members. The requirements of a tenant can change significantly over the course of a single tenancy. By administering Universal Design features from the onset of construction, tenants and owners can reduce significant costs, disruption, and even the need for future unit modifications as tenant needs may change. With the exponential growth of the City's seniors population and the deficit of long-term care space, the imperative to provide

⁸ Centre for Excellence in Universal Design, <https://universaldesign.ie/about-universal-design>

rental homes that are as flexible and adaptable as possible has never been more pressing.

For these reasons, as part of recommended updates to the City's Affordable Rental Housing Design Guidelines (Attachment 1), a set of Universal Design features would be implemented across all City-led or City-supported affordable rental units. This set of features covers common areas in multi-unit residential buildings (such as entrances and multi-purpose rooms), as well as spaces within residential units (kitchens, bathrooms, and bedrooms). The recommend features meet or exceed minimum current requirements and have been reviewed for cost-effectiveness. The features were selected based on the group's comprehensive review of industry standards and guidelines and vetted for cost by the third-party cost consultant, a Developer Sub-Committee of the AHWG, and the Toronto Building division within the City.

Towards an Improved Barrier-Free Unit

Although Universal Design features may increase the accessibility and adaptability of a residential building's common areas and units, they do not necessarily address the needs of people with significant mobility challenges who require larger format mobility devices such as larger wheelchairs or mobility scooters.

Minimum residential accessibility standards in Toronto are governed by OBC O. Reg. 332/12, which applies to new buildings and those undergoing material alteration. The OBC requires that at least 15% of all suites of residential occupancy in a major occupancy apartment building be built to barrier-free standards, including a barrier-free path of travel to the suite entrance and one or more bedrooms, at least one bathroom, a kitchen, and a living space.

The AHWG, among many other accessibility advocate groups, has pointed out that the OBC's barrier-free unit requirements are insufficient in delivering a truly functional, accessible unit. For instance, an accessible unit under the OBC's unit is "visitable" but not necessarily functional for those with mobility considerations.

The standards set out in the OBC are minimums on which other standards and guidelines are layered. Other programs and builders, for instance, have adopted or created standards which increase accessibility over legislated minimums:

- TCHC has adopted its own Accessibility Design Standards (2019) which apply to new and renovated units and common spaces.
- CMHC offers newly relaunched financial incentive programs for the construction of affordable, energy efficient, and accessible housing which use CSA Group's CSA/ASC B651 accessible design for the built environment standard.
- RHFAC uses an in-house Universal Design Guide as benchmarks.
- Developers such as Daniels Corporation, which delivered a presentation to the AHWG, have created their own programs. Daniels' Accessibility Designed Program (ADP), for instance, offers a range of standard accessible layouts at no additional cost which exceed the OBC's minimum requirements.

Accordingly, the AHWG recommended the City continue work to establish a set of enhanced accessibility features to be layered on the OBC's requisite, barrier-free units to improve accessibility, adaptability, and functionality.

Increasing Accessibility in Existing Community Housing and Improving Access

As noted above, Toronto is facing increasing demands for accessible housing, while existing needs remain significant and unmet. Beyond relying on new developments, Toronto's existing Community Housing portfolio has a critical role to play in increasing accessible housing in the city. TCHC, who also delivers capital programs for the Toronto Seniors Housing Corporation (TSHC), has deployed over \$70 million over the past 5 years in common area accessibility projects and residential unit modifications. All of this work is steered by a TCHC tenant-led advocacy group, R-PATH.

Common area modifications are important for people with disabilities to be functionally safe for day-to-day activities such as parking their car, accessing Wheel-Trans drop-off and onboarding areas, retrieving their mail, accessing laundry facilities, disposing of their garbage. These modifications also provide equal opportunity to fully participate in programming available in their own communities. At TCHC, in-suite modifications are based on the specific needs of tenants as confirmed by their medical professionals via a detailed questionnaire. This ensures that hundreds of tenants reside in useable and functional spaces that meet their medical needs, and that they are safer from any falls that may occur in their homes. This is important due to the lack of affordable long-term care spaces available within the city, and can support tenants to live independently longer.

Currently, the City's Centralized Waiting List for subsidized housing units (MyAccessToHousingTO) offers wheelchair accessible units to applicants who are wheelchair users. Applicants who are approved for these units can view and express interest on available accessible units within choice-based housing cycles. At the time of a housing offer, if the accessible unit does not meet the needs of the applicant, the offer can be withdrawn and not count towards a refusal.

While TCHC has served as a leader in terms of its investment and commitment to improving the accessibility of its residential units and building common areas, there is a lack of consistent reporting from the over 200 Community Housing providers in the City on their accessibility investments or the level of accessibility of their residential units and common areas. The AHWG has identified a need for a more comprehensive, city-wide inventory of accessible units within the City's affordable portfolio to better aid in this process. An improved and standardizing inventory, organized around a catalogue of modification features could work to better serve prospective tenants and accommodate a wider range of accessibility requirements. In addition, a review of the forms and process required to be completed by applicants and/or their medical providers to confirm the need for a wheelchair accessible unit would ensure that all applicants who require accessible units are able to access them through MyAccessToHousingTO. This work will be carried out by the Housing Secretariat in 2025 in partnership with Community Housing Providers.

The AHWG also identified several obstacles for accessibility retrofit and modification projects within community housing sites. Notably, planning and building permit approvals for retrofit projects can often run into complex issues that are unique to conversions and that new build projects do not face. Parking bylaw requirements have caused delays for projects that propose a loss of parking to accommodate new accessible parking or wheel trans drop offs. These retrofit projects can lose months to Committee of Adjustment hearings or other planning approvals. Further, these are typically parking requirements that would not apply if these buildings were being built new today. Based on the AHWG's advice, this report recommends that the City make changes to Zoning By-law 569-2013 to facilitate the creation of additional accessible parking spaces, by providing exemptions to standard parking requirements, as part of accessibility retrofit and improvement projects. The City Planning division will be bringing a report to Council to consider these changes.

The Cost of Enhanced Accessible Design

The challenges of building affordable rental housing in Toronto have been well documented at Council and through the work of the Housing Secretariat. Most notably, the cost of constructing residential buildings in the Toronto area have increased by 109% since 2017.⁹

Historical data shows that integrating basic accessibility features during construction is more cost-effective than modifying existing units later. Research conducted by CMHC confirmed that it is more financially advantageous to include adaptability and accessibility features in new homes than to modify existing homes, with the cost of modifications after-the-fact being 7.7 times that of modifications in the design stage of the project.¹⁰ For these reasons, it is imperative to build in adaptability, flexibility, and simple accessibility features from the onset of projects in order to save significant construction and retrofit dollars in the future. This also ensures longer term, sustained occupancy for residents.

The recommended changes to the Affordable Housing Design Guidelines will focus on measures that are low or no additional cost to projects. These cost estimates were confirmed by the third-party cost consultant and a sub-committee of housing developers and constructors. However, the AHWG has advised that many of the most necessary and effective accessibility design features that would have the highest impact require an increase in floor area and a subsequent increase in costs. As such, it is essential for the City to leverage all the Federal and Provincial funding programs available to increase the amount of accessible housing being built and modified to improve the accessibility of existing units and the ability of persons with disabilities to live independently, with dignity and to help seniors age in place.

⁹ Statistics Canada. Table 18-10-0276-01 Building construction price indexes, by type of building and division. 2024

¹⁰ CMHC. Cost of Adaptability and Accessibility Features – Existing Modest House. 2019.

Conclusion: Moving Forward

All individuals have a right to housing that is accessible and that takes into account the specific needs of historically disadvantaged and marginalized groups. Removing design barriers in the City's existing and future affordable housing stock is critical to ensure that residents' dignity and independence can be sustained without impediment. In recognition that advancing accessibility is an ongoing and ever-changing concern, housing design standards need to be treated as living document with an ongoing process of review, revision, and enhancement.

Updating the City's Affordable Rental Housing Design Guidelines will ensure that they are advancing in line with industry best practices, with intermittent revisions to follow as necessary. The Housing Secretariat will consult with the AHWG as part of this work and will explore further collaboration with other organizations and committees who are focused on advancing the accessibility of the City's affordable housing supply, including CMHC, TCHC, the Urban Land Institute's Accelerating Accessibility Coalition, the Ontario College of Art and Design's Inclusive Design Research Centre, and the City's Toronto Accessibility Advisory Committee.

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SIGNATURE

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ATTACHMENTS

Attachment 1 - Recommendations from the Accessible Housing Working Group (AHWG) for Inclusion in the Affordable Housing Design Guidelines

Attachment 2 - AHWG Core Membership and Community Partners