TORONTO

REPORT FOR ACTION

Temporary Ramps for Stepped Entrances - Amendments to Chapter 743

Date: June 25, 2025

To: Infrastructure and Environment Committee **From:** General Manager, Transportation Services

Wards: All Wards

SUMMARY

Many businesses in Toronto are located in buildings where the entrances are not level with the adjacent sidewalks, creating accessibility barriers for individuals using mobility devices, strollers, and carts. The legal requirement to construct permanent ramps is contingent upon new construction or major renovations; in the interim, the buildings remain inaccessible. To address this, some businesses have placed temporary ramps on sidewalks, but these sometimes obstruct pedestrian clearways and pose safety challenges.

The City of Toronto Municipal Code Chapter 743, Streets and Sidewalks, Use of, regulates safe maintenance and operations of our sidewalks and maintenance of the pedestrian clearway. It is Transportation Services' position that a permanent barrier-free entrance into a building should be accommodated on the private side of a property line and should be the responsibility of the property owner or occupier. In many cases, this can entail substantial construction work to retrofit the entrance which may be many years before it is undertaken by the building owner. Transportation Services recognizes the need for interim solutions to provide accessibility.

This report recommends amendments to Chapter 743 to allow the placement of temporary ramps as a permitted encroachment within the public right-of-way. The proposed amendments aim to balance the need for improved accessibility with the necessity of maintaining clear pedestrian pathways. The approach avoids the introduction of new permitting processes that could impose additional financial and administrative burdens and reduce the appeal of building owners or leaseholders providing this accessibility feature.

Many property owners have already informally placed their own ramps, most of which are appropriately sized. This report and its adoption will provide guidance on best practice and hopefully encourage wider uptake, thereby providing an interim solution to the accessibility challenges posed by stepped entrances, while also ensuring that public sidewalks remain safe and accessible for all users.

RECOMMENDATIONS

The General Manager, Transportation Services, recommends that:

- 1. City Council amend City of Toronto Municipal Code Chapter 743, Street and Sidewalks, Use Of, to permit temporary ramps as permitted encroachments, generally as set out in Attachment 1 to the report dated June 25, 2025, from the General Manager, Transportation Services.
- 2. City Council authorize the City Solicitor to make any necessary clarifications, refinements, modifications, technical amendments, or by-law amendments as may be identified by the City Solicitor, in consultation with the General Manager, Transportation Services, in order to give effect to City Council's decision.

FINANCIAL IMPACT

There are no financial implications arising from the recommendations in this report. The guidelines will be implemented using existing resources.

EQUITY IMPACT STATEMENT

The proposed amendments to Chapter 743 aim to improve equity and accessibility in the City of Toronto by addressing barriers created by stepped entrances. These barriers disproportionately affect individuals with mobility challenges, including those using wheelchairs, walkers, strollers, and carts. By allowing temporary ramps as permitted encroachments, the City provides an interim solution that enhances access to establishments and public spaces, particularly for those facing systemic barriers to mobility.

The proposed amendments prioritize maintaining a pedestrian clearway, ensuring that all sidewalk users, including those with disabilities, can navigate safely and efficiently. Features such as slip-resistant materials, high-contrast designs, and cane-detectable elements directly support individuals with visual impairments, reducing the risk of accidents and improving the usability of public sidewalks.

Furthermore, this initiative addresses socioeconomic disparities by providing small and independent establishments with a cost-effective and voluntary option to improve accessibility. The approach recommended in this report minimizes the financial and administrative burdens that a formal permitting process would impose on property owners, while still holding them accountable for ramp placement that protects pedestrian rights of way.

DECISION HISTORY

At its meeting on February 5, 2024, the Toronto Accessibility Advisory Committee (TAAC) received the Item - 2024.DI5.6 on "Storefront Entry Ramps on the Public Right-

of-Way" for information. The presentation provided an update on temporary storefront entry ramps used by businesses with stepped entrances that abut the public right-of-way. The presentation included an overview of the reporting history, consultation findings, and Placement Guidelines for these temporary ramps. <u>Agenda Item History - 2024.DI5.6</u> (toronto.ca).

At its meeting on July 7, 2022, the Infrastructure and Environment Committee adopted the Item - 2022.IE31.23 on "Storefront Entry Ramps on the Public Right-of-Way - Accessibility Feedback." This item requested the General Manager of Transportation Services to report back to the TAAC in the first quarter of 2023 with an update on the development of placement guidelines for interim private storefront ramps on the public right-of-way. Agenda Item History - 2022.IE31.23 (toronto.ca).

At its meeting on June 13, 2022, the Toronto Accessibility Advisory Committee (TAAC) considered the Item - 2022.DI21.3 on "Storefront Entry Ramps on the Public Right-of-Way." The committee recommended that the General Manager of Transportation Services report back in the first quarter of 2023 with an update on the development of placement guidelines for interim private storefront ramps on the public right-of-way. Agenda Item History - 2022.DI21.3 (toronto.ca).

At its meeting on November 7, 2017, City Council adopted the Item - 2017.EX28.23 on "Private Ramps on Public Right-of-Way" without amendments. This item includes requests for the City Manager to explore the feasibility of a grant program to help business owners retrofit entrances for better accessibility, seek potential funding from the provincial government, and advocate for provincial support for small businesses. Additionally, the General Manager of Transportation Services was directed to investigate the feasibility of permitting private ramps on public rights-of-way. Agenda Item History - 2017.DI16.3 (toronto.ca).

COMMENTS

Toronto's urban landscape includes a substantial number of properties where one or more steps must be climbed to reach the entrance (termed 'stepped entrances'). This design feature predates current accessibility standards. These stepped entrances create significant barriers for individuals using mobility devices, as well as for those with strollers, carts, and other mobility aids. The result is that many buildings in Toronto remain inaccessible to a portion of the population, despite growing awareness and legislative efforts to improve accessibility.

The Ontario Building Code (OBC) contains accessibility requirements for new buildings and existing buildings undergoing renovations. However, for existing buildings such as the many historic storefronts found across Toronto, where there is no extensive renovation proposed, accessibility requirements under the OBC do not apply. Many building owners, particularly those leasing premises, do not have the authority or financial capacity to make such modifications. Consequently, the problem of inaccessible entrances remains widespread across the city.

To address this issue temporarily, some businesses have installed ramps that bridge the gap between the sidewalk and the entrance. These temporary ramps offer an immediate but informal solution for improving access to these establishments. However, the placement of these ramps is not currently permitted under Toronto's by-laws and in some places has led to unintended consequences impacting pedestrian safety and accessibility. While many of these temporary ramps are appropriately sized and placed to prevent obstruction of the sidewalk, some ramps extend into the pedestrian clearway, narrowing the space available for foot traffic and creating potential hazards. Individuals with visual impairments are particularly impacted because they rely on following a consistent edge of the sidewalk or building frontage for navigation - a technique known as shorelining.

The City's Transportation Services Division currently does not have a formal application process for permitting interim ramps within the public right-of-way. As a result, there are no guidelines for such ramps; they vary in design, size, and placement. Enforcement is complaints-based, but because the ramps are not currently allowed, any enforcement is limited to ramp removal rather than correcting placement or quality of construction. Such removal undermines accessibility goals for the City and the affected property. The updated bylaw would provide a clear framework for the proper placement of these ramps, creating an opportunity to encourage these modest accessibility measures while ensuring they do not create accessibility barriers.

The installation of temporary ramps, while beneficial, can introduce challenges in the public right-of-way, particularly in the absence of placement criteria from the City. These challenges include:

1. Pedestrian Clearway Obstruction:

Temporary ramps often encroach into the pedestrian clearway, the area of the sidewalk reserved for unobstructed pedestrian movement. The City requires a clearway of 2.1 meters on major and minor arterial roads and 1.8 meters on local roads to ensure safe pedestrian flow. Ramp encroachments reduce the effective width of the sidewalk; a clearway of at least 1.8m is required for two people using wheelchairs to pass; a clearway of less than 0.9m prevents movement by a single person using a wheeled mobility device and increases difficulty of navigation for people with visual impairments. A reduced clearway creates crowding and poses a risk to all pedestrians, with some choosing to enter the roadway to pass others.

2. Shorelining Disruption:

Individuals with visual impairments often use shorelining, a navigation technique that involves following the edge of the sidewalk or building frontage. Temporary ramps disrupt this navigation, as do other objects at the building frontage, such as marketing displays and small frontage cafes.

3. Inconsistent ramp design:

Many of the ramps on our streets are not constructed to any recognized guidelines or standards, such as minimum widths, slopes, or slip-resistant surfaces. In the absence of clear design and placement criteria, some businesses may install ramps intended to span multiple steps, resulting in bulkier designs that extend further into the pedestrian clearway.

4. Maintenance Responsibilities:

Temporary ramps can present maintenance and safety risks, particularly when constructed from inadequate materials that may not support the necessary loading. Care and attention is required from the ramp owner to prevent ramps from deteriorating or becoming obstructed by debris or snow, especially in winter, creating slip hazards.

In the absence of formal guidance, temporary ramps are being installed with inconsistent design, placement, and maintenance. By establishing clear placement criteria in the updated bylaw, the City will be able to provide direction on how ramps should be designed and installed, helping to mitigate these challenges and improve safety and accessibility for everyone.

Consultation Process

In November 2017, City Council directed the General Manager of Transportation Services to explore the feasibility of permitting private ramps on the public right-of-way and to develop guidelines that would ensure their safe and effective use. This directive led to a comprehensive consultation process involving various stakeholders, including business improvement areas (BIAs), accessibility advocacy groups, and organizations that create temporary ramps.

The consultation process revealed significant concerns among stakeholders regarding the introduction of a formal permitting process for temporary ramps. Business owners, particularly small businesses, expressed concerns about the potential financial and administrative burdens associated with obtaining permits. There was also apprehension that a permitting process could discourage businesses from improving accessibility, thereby perpetuating the problem of inaccessible storefronts.

Stakeholders emphasized the need for a more flexible approach that would allow any building owner or leaseholder to install temporary ramps without the need for a formal permit, provided that the ramps adhere to specific safety and placement requirements. This approach would strike a balance between improving accessibility and maintaining the integrity of the pedestrian clearway.

On June 1, 2022, the Infrastructure and Environment Committee considered Item 2022.IE31.23, which addressed the potential for permitting temporary ramps for stepped entrances within the public right-of-way. The Committee requested the General Manager of Transportation report back to the Toronto Accessibility Advisory Committee with an update on the development of placement guidelines for interim private storefront ramps on the public right-of-way, following a consultation process.

In February 2024, the Toronto Accessibility Advisory Committee reviewed an educational strategy aimed at encouraging storefront businesses and BIAs to use temporary ramps where feasible. The strategy emphasizes education, with businesses expected to follow placement guidelines for the correct use and upkeep of temporary ramps. A communications campaign will support outreach, encouraging awareness and engagement.

The BIA office has reviewed the Recommended Practices for the Placement of Temporary Ramps (see Attachment 2) as have Transportation Services enforcement staff. Enforcement will be complaint driven and staff will respond if any issues are reported.

Research Findings

The KITE (Knowledge, Innovation, Talent and Everywhere) Research Institute, in collaboration with Toronto Rehab and the University Health Network, conducted a study in 2017 to assess the extent of the stepped entrance issue and to identify potential solutions. The study identified thousands of storefronts across Toronto with stepped entrances. This study was commissioned by the City of Toronto's Transportation Services, which hired KITE to investigate the issue, gather data, and provide insights to inform policy decisions and accessibility improvements.

KITE's research methodology involved comprehensive site surveys across Toronto to document the prevalence of stepped entrances, consultations with stakeholders including business owners and accessibility advocates, and experimental ramp installations to assess their impact on pedestrian flow and safety. The study also included safety and usability testing of different ramp designs, as well as a review of existing policies and best practices.

The research recommended a placement guidelines approach for temporary ramps rather than a full permitting process. Key findings included:

- 1. Ramp Placement: The study recommended that temporary ramps be placed within the frontage and marketing zone, the area of the sidewalk directly adjacent to the building façade. This placement minimizes the impact on the pedestrian clearway while still providing necessary access.
- 2. Pedestrian Clearway Requirements: To ensure pedestrian safety, the study recommended that the minimum clearway of 2.1 meters on major and minor arterial roads and 1.8 meters on local roads be maintained at all times. Temporary ramps that could not be placed while maintaining these clearway requirements would not be permitted.
- 3. Safety Considerations: The study highlighted the importance of using slip-resistant materials for ramps, ensuring high color contrast for visibility, and incorporating canedetectable features to prevent accidents.
- 4. Maintenance: The study underscored the need for clear guidelines regarding the maintenance of temporary ramps. Building owners or leaseholders choosing to place a ramp must be aware of their responsibilities in ensuring the ramps are safe, well maintained, and do not pose a hazard to pedestrians.





These images illustrate proper placement of a temporary ramp that meets the minimum clearway requirement, features high contrast, includes cane-detectable elements, and aligns with the landing at the top.

Proposed Amendments to Chapter 743

Based on the findings from the consultation and research processes, this report proposes amendments to Chapter 743 to allow temporary ramps as a permitted encroachment within the public right-of-way. See Attachment 1 for details.

This proposal to allow temporary ramps without a formal permit or fee applies the same approach taken in Chapter 742 for small frontage cafés, small curbside standing cafes, and small marketing displays, as well as the approach in Chapter 743 for hockey nets and basketball nets.

In order to be considered a permitted encroachment, the temporary ramp must comply with the criteria in the proposed amendments to Chapter 743 for the placement and maintenance of these ramps, that are generally as follows:

- 1. Location and Placement: Temporary ramps must be placed entirely within the frontage and marketing zone, directly in front of the building for which they are placed. The ramps shall not extend into neighbouring frontages or block entryways and must be positioned in a way that does not interfere with the pedestrian clearway.
- 2. Ramp size: A temporary ramp must be stable, with its slope oriented only perpendicular to the building entrance or the step, and its top surface must align evenly with the step landing. Some entrances may be too elevated to accommodate a temporary ramp, which is intended only for small height differences. This means there will be buildings for which no temporary accessibility ramp is possible.
- 3. Pedestrian Clearway: The minimum pedestrian clearway width of 2.1 meters on major and minor arterial roads, and 1.8 meters on local roads, must be maintained at all times. Ramps that reduce the clearway below these minimum widths will not be permitted, in order to ensure that pedestrian movement is not unduly obstructed.
- 4. Safety and Visibility: Temporary ramps should be constructed from slip-resistant materials and should have a high color contrast to increase visibility. Ramps are to be brought inside after business hours, particularly during the winter, to allow for snow clearing and to maintain a safe and unobstructed pedestrian space.
- 5. Maintenance and Liability: Building owners or leaseholders that choose to place temporary ramps are responsible for ensuring that their ramps are properly maintained, free of debris, and stored safely during adverse weather conditions. They are also responsible for any liability arising from the use of these ramps. The proposed amendments emphasize the importance of regular maintenance to prevent accidents and ensure the ramps remain in good working order.
- 6. Voluntary Participation: While the use of temporary ramps is encouraged, it remains a voluntary measure. Building owners or leaseholders that choose to install ramps must do so in compliance with the criteria in the proposed amendments to Chapter 743 but are not required to seek additional permits or pay fees, thereby reducing the financial and administrative burden of this modest accessibility measure.

While temporary ramps address one accessibility barrier, they may also inadvertently create another. However, given current regulatory gaps that do not require buildings to construct permanent ramps unless undergoing renovations, and the lack of an incentive or grant program to support such upgrades, allowing temporary ramps remains a positive measure at this time.



This image shows an example of improper ramp placement and design. The ramp does not align with the landing, lacks high color contrast, appears damaged, unstable, and is not slip-resistant, making it unsafe for use.

Equity and Accessibility Considerations

The proposed amendments to Chapter 743 are designed to enhance accessibility across Toronto, particularly for individuals with disabilities, for whom stepped entrances create a barrier to access. By allowing temporary ramps as a permitted encroachment, the City is providing an interim solution that improves access while maintaining pedestrian safety. This approach aligns with the City's broader commitment to creating an inclusive and accessible environment, as outlined in the Accessibility for Ontarians with Disabilities Act (AODA).

The proposed amendments also consider the needs of all sidewalk users, minimizing the potential that temporary ramps will create new barriers or hazards. The emphasis on maintaining pedestrian clearways and incorporating safety considerations in ramp placement reflects the City's commitment to balancing the needs of the wider pedestrian community and the businesses and people who wish to access them.

Conclusion

The proposed amendments to Chapter 743 represent a balanced approach to addressing the accessibility challenges posed by stepped entrances across Toronto. By allowing temporary ramps as permitted encroachments and providing clear criteria for their placement and maintenance, the City can enhance accessibility while ensuring that public sidewalks remain safe and navigable for all users.

CONTACT

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SIGNATURE

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ATTACHMENTS

Attachment 1: Amendments to Chapter 743 of the Toronto Municipal Code to allow temporary ramps as a permitted encroachment within the public right-of-way

Attachment 2: Recommended Practices for Placement of Temporary Ramps on City's Sidewalks