



Accessibility Plan **(draft)**

2024 ▶ 2025 ▶ 2026 ▶ 2027 ▶ 2028

Compliance + Inclusion



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1.0 Introduction

1.1 Context

The City of Peterborough has a population of 83,651 (2021), with an older average demographic of 24.2% of people aged 65 years and over. Peterborough is a growing community with population growth expected to be driven by immigration and intra-provincial migration, where residents move to Peterborough from elsewhere in the province. The City is projected to grow to a population of 125,000 people by 2051.

Get in the Hearing Loop

The City of Peterborough installed window intercom systems with integrated counter style hearing loop systems at Social Services, the Transit Terminal and City Hall in support of a national 'Get in the Hearing Loop' movement to improve communication.



1.2 Purpose

The main purpose of the 2024 to 2028 Accessibility Plan is to build on previous plans to identify, remove and prevent barriers for people with disabilities. The five-year plan articulates the City's commitment, long-term vision, short-term road map and ongoing compliance work to help make Peterborough more accessible and inclusive.

The City's commitment statement to accessibility works together with various sections of the plan to reflect the rapidly increasing rate of disability and to reach the long-term vision of an accessible Peterborough. Various sections of the plan work together to frame the secondary purposes of the plan:

- Approve the use of a **compliance + inclusion model**, as budget and resources permit.

Inclusion work is building momentum as Peterborough's Inclusion Framework continues to develop. The compliance + inclusion model helps the City prevent barriers where barriers are not otherwise addressed by minimum statutory requirements.

- Approve the use of an **accessibility lens** and **inclusion lens** on all City business, as budget and resources permit.

The best available disability data confirms the need for the lens tools to prevent barriers for people with disabilities and people with disabilities who have other overlapping identities.

- Recognize the **decision-making power** of City Council and the **influence** Senior Leadership has to advance accessibility in Peterborough.

Together, Council and Senior Leadership have decision-making power and influence to apply the compliance + inclusion model, the accessibility lens and the inclusion lens on City services, programs, projects and facilities. City Council and Senior Leadership understand the connection between accessibility work and a strong economy.

The Accessibility Plan is a living document. The plan evolves to stay aligned with all City plans and policies, including the Peterborough 2050 Strategic Plan. The plan is adjusted to consider IASR compliance deadlines, reflect changes to relevant statutory requirements and keep pace with shifts in municipal inclusion work across Ontario.

Commonly used acronyms in the 2024 to 2028 Accessibility Plan:

AAC - Accessibility Advisory Committee

AODA - Accessibility for Ontarians with Disabilities Act

IASR - Integrated Accessibility Standards Regulation

1.3 Executive Summary

- The City of Peterborough is committed to meeting its accessibility and human rights obligations. The most recent compliance report filed with the Government of Ontario confirms full compliance with the AODA and IASR.
- Meeting the goals of the Accessibility Plan will contribute to the vision, mission and all four pillars of the Peterborough 2050 Strategic Plan.
- Strong governance and administrative leadership plays a key role to implement the plan. City Council and Senior Leadership will work together to ensure all City business aligns with the commitment, long-term vision, short-term road map (priorities) and ongoing compliance work listed in the City's Accessibility Plan, as budget and resources permit.
- The priority areas identified in the short-term road map are sidewalks, transit, streets/intersections, parks and employment opportunities for people with disabilities.
- The transition from a 'compliance model' to a 'compliance + inclusion model' is building momentum as Peterborough's Inclusion Framework continues to develop. The City recognizes that accessibility laws do not prescribe every detail on how to prevent barriers. In some instances, a basic level of accessibility may mean going beyond AODA compliance to prevent new barriers and meet human rights obligations.
- The City understands that while implementing the Accessibility Plan will help take care of the most vulnerable people, it has the welcome effect of benefiting everyone, and a larger effect of building a stronger economy and community.

Accessibility is the law. Accessibility is a human right. Accessibility builds a stronger economy. Accessibility benefits everyone.

1.4 Land Acknowledgement

We respectfully acknowledge that we are on the treaty and traditional territory of the Mississauga Anishinaabeg. We offer our gratitude to the First Peoples for their care for, and teachings about, our earth and our relations. May we honour those teachings.¹

Reconciliation

An important step in advancing reconciliation is to be aware of what it means to be both Indigenous and disabled in Nogojiwanong, Ojibwa. The City of Peterborough will strive to use an inclusion lens to help address the magnified barriers faced by Indigenous people. Implementing the Accessibility Plan may help local Indigenous people access basic needs such as food, housing, health care, education, employment and the natural environment.

Learning from Indigenous People as Inclusion Leaders

The term “disability” is a deficit-oriented idea that has been created and accepted by colonialism, a perspective that does not necessarily align with the traditional views of many Indigenous groups. In many Indigenous languages, a word does not exist for ‘disability.’ People were given attributes and gifts of difference, and those gifts were a special way to experience the world. Indigenous communities hold gifts of difference in a position of high regard.

For traditional Indigenous communities, health and ability extended far past one's physical qualities. Health and ability were measured against relationships with people, the land, culture and the spirit. Many Indigenous cultures would have really celebrated disability as gifts from the Creator.

1.5 Language

This Accessibility Plan aims to use inclusive, accessible, and respectful language. The language used in this plan is rooted in good intentions to treat people with dignity and respect. The 2024 to 2028 Accessibility Plan uses person-first language, such as “persons with disabilities”, to align with the language used in the AODA. Where possible, language focuses on a person’s ability or the environmental barriers.

¹ City of Peterborough, [Land Acknowledgement Statement](#)

“Gathering” by Michael Belmore

“Gathering” was created as part of the Nogojiwanong Project in Millennium Park next to the Trans Canada Trail, near the south end of Water Street.

The Nogojiwanong Project is a collaboration undertaken in the spirit of kinship between local First Nations, Indigenous peoples, and the City of Peterborough in recognition of the 200th anniversary of Rice Lake Treaty No. 20. A fully accessible gathering space was created in 2019 that encourages learning and reflection with a series of interpretive panels highlighting the evolution of local treaties and inherent rights of Indigenous peoples. Michael Belmore’s work “Gathering” provides the focal point for that space.



1.6 Message from Peterborough's Accessibility Advisory Committee

The Accessibility Advisory Committee (AAC) is proud to present the 2024 to 2028 Accessibility Plan for the City of Peterborough. The Accessibility Plan allows us to celebrate accomplishments, develop priorities for the next 5 years, maintain AODA compliance and check alignment with the long-term vision of an accessible Peterborough.

The AAC supports a City commitment to accessibility that goes beyond minimum requirements. AODA compliance deadlines have all passed, and it's time to formally transition from a compliance model to a **compliance + inclusion model**. Some recent City projects have shown that an inclusion model that assesses the experiences of people with disabilities is helping to minimize barriers, especially in instances where it is known that meeting minimum standards still leaves barriers along the path to basic needs for people with disabilities. In instances where accessibility laws leave out details on minimum standards, it may be necessary to consider that Ontario's Human Rights Code provides people with disabilities the right to equal treatment with respect to services, goods and facilities, without discrimination.

Peterborough is fortunate to have a rich history of people advocating for the rights of persons with disabilities, including the establishment of the Council for Persons with Disabilities in 1989, the long list of Holnbeck Award winners and the countless AAC members who volunteer their time to share lived experiences and accessibility expertise.

The AAC is pleased to participate in a consultation process that helps the City understand the lived experiences of people with disabilities who encounter barriers to accessibility. Through the updated 2024 to 2028 Accessibility Plan, the AAC is energized to continue its important advisory work to help make Peterborough more accessible and inclusive for everyone.

1.7 Alignment with Peterborough 2050 Strategic Plan

Meeting the goals of the Accessibility Plan will contribute to the vision, mission and all four pillars of the Peterborough 2050 Strategic Plan, approved by Council in April 2023.

2050 Strategic Plan: Vision

“Build a Future-Ready City with a forward-looking, contemporary community, thriving in creativity and a modern economy. The Peterborough of tomorrow will be bold, innovative, progressive, caring, vibrant, inclusive, prosperous, and sustainable, a place that respects its past, heritage, culture, and readily embraces its future with excitement and renewed vigor. Leading Today for Tomorrow will ensure our City’s fair share of respect and economic growth, locally as well as globally.”

2050 Strategic Plan: Mission

“The Corporation of the City of Peterborough is committed to deliver proactive, effective, and efficient service delivery through a collaborative, engaged, and value-driven organizational culture to Peterborough’s growing and diverse community.”

Examples of Accessibility Plan and Strategic Plan Alignment

Pillar 1: Growth and Economic Development

- Removing barriers allows people of all abilities to contribute to the economy.
- A program may generate employment opportunities for women with disabilities.
- A diverse workforce that includes people with disabilities leads to higher productivity.

Pillar 2: Infrastructure

- High quality accessible parks and trails will attract new people to our City.
- Good quality accessible transit options will attract new businesses to our City.
- Investing in sidewalks helps people of all abilities to access basic needs.

Pillar 3: Community and Well-being

- An accessible playground allows children with disabilities to socialize with others.
- An accessible park provides access to nature for people of all abilities and incomes.
- Integrating accessible units into housing developments fosters a sense of belonging.

Pillar 4: Governance and Fiscal Sustainability

- Accommodating people with disabilities ensures compliance with Human Rights.
- Compliance with the AODA minimizes risk of financial penalties.
- Incorporating accessibility into projects opens up significant funding opportunities.

2.0 Long-Term Vision: Compliance + Inclusion

2.1 Commitment to an Accessible Peterborough

The City of Peterborough is committed to demonstrate leadership for accessibility in the community. Our goal is to meet the diverse needs of everyone while following the principles of dignity, independence, integration, and equal opportunity. We will strive to achieve an inclusive environment for our services, programs, facilities, information, employment and transportation systems.

2.2 Compliance + Inclusion Model

There is a shift in municipal accessibility work across Ontario. Municipalities are moving from a 'compliance model' to a 'compliance + inclusion model', sometimes referred to as 'more than compliance' or 'beyond compliance'. Inclusive organizations have moved away from a check box method to implement and measure accessibility, recognizing that meeting minimum standards will sometimes still leave barriers along the path to basic needs for people with disabilities. The compliance + inclusion model assesses the experiences of people with disabilities and uses the best available resources to help minimize barriers and meaningfully measure accessibility.

The City of Peterborough will continue to meet AODA requirements through implementation of the compliance + inclusion model. The compliance side of the model sets minimum statutory requirements as a base line and the inclusion side of the model uses an accessibility lens and an inclusion lens to determine what barriers still exist with the base line design. The barriers identified in the base line design will be addressed with enhanced features that embrace universal design principles, as budget and resources permit. The compliance + inclusion model can be used to achieve a universal design for City services, programs, projects and facilities.

Accessibility work that goes beyond minimum requirements is already happening across the Corporation. The Accessibility Plan formalizes Council direction to move to a compliance + inclusion model. Over the next 5 years, the compliance + inclusion model will focus on situations where accessibility laws leave out details on how minimum prescribed standards are to be achieved and when meeting minimum standards still leaves barriers along the path to basic needs for people with disabilities. In instances where accessibility laws leave out details on minimum standards, it's necessary to consider that Ontario's Human Rights Code provides people with disabilities the right to equal treatment with respect to services, goods and facilities, without discrimination.

2.3 Budget and Financial Implications

Costs associated with implementing the 2024 to 2028 Accessibility Plan will be covered through annual Departmental requests for budget and/or external funding opportunities.

Implementation of the compliance + inclusion model may sometimes require additional budget for City services, programs, projects and facilities compared to implementing a compliance-only model. The compliance + inclusion model will be implemented as budget and resources permit.

The Accessibility Plan's long-term vision, short-term road map (priorities) and ongoing compliance work has no impact to the Access Fund administered by the Accessibility Advisory Committee. Staff may continue to seek financial support from the Access Fund for accessibility work that removes or prevents barriers not otherwise addressed by minimum statutory requirements, or for accessibility work that exceeds minimum statutory requirements.

The Accessibility Plan requires City Council and staff to **work together** to produce the best results and outcomes for accessibility planning work in Peterborough, while factoring in the cost to **implement inclusion at the start** compared to post-completion, the **economic benefit** to accessibility and the need to **meet human rights obligations**.

Commitment to Inclusion

The City's commitment to inclusion took a step forward when it joined the Coalition of Inclusive Municipalities in December 2019. Inclusion work was formally launched when the City hired its first Diversity, Equity and Inclusion Advisor in July 2021.

Inclusion work is starting to have an impact on all City business, creating environments that consider the diverse needs of everyone, so they are usable by everyone.

The City is also building in-house expertise on inclusion by creating a diverse team. An inclusive City of

Peterborough will inspire all employees to perform at their highest level. Diversity allows the City to consider different perspectives and create more effective solutions.

Diverse teams are more innovative, perform at higher levels, benefit from new ideas and from more debate and make better business decisions.

A diverse team that includes employees with disabilities can help Council and staff understand and respond to the accessibility needs of residents and visitors.



2.4 Accessibility and Inclusion Tools

Accessibility Lens

A narrow filter or perspective to examine how a City service, program, project or facility may negatively impact people with disabilities. The lens is intended to ask questions about problems that may arise and identify potential barriers. The examination work includes consulting with people with disabilities.



Accessibility Lens

Inclusion Lens

A wide filter or perspective to examine how a City service, program, project or facility may negatively impact people with disabilities with overlapping identities, experiences and backgrounds – such as race, income, sexual orientation and gender. Through critical thinking, self awareness and reflection, the lens is intended to ask deeper questions about how these diverse communities of people may experience marginalization and discrimination.

- Who might be impacted and who is not included?
- What is contributing to this exclusion?
- What changes can be made to ensure inclusion?



Inclusion Lens

An inclusion lens can be used on all diversity, equity and inclusion work. For the purpose of the Accessibility Plan, the inclusion lens is intended to apply to people with disabilities with overlapping identities. It is sometimes referred to as an ‘intersectional accessibility lens’ in accessibility planning documents.

Who should use the accessibility and inclusion lens?

City Council, Senior Leadership, staff, volunteers and anyone who represents or acts on behalf of the City (i.e., Director overseeing a Manager delivering a parks rejuvenation project, staff developing a recreation program or a consultant for a website project).

When should the accessibility and inclusion lens be used?

They are most effective at preventing new barriers when used at the beginning of a project or when planning a new service, program or facility (i.e., budget planning stage, bid document stage, concept design stage). They can also be used when contemplating changes to a project (i.e., construction stage), post project completion (i.e., evaluation stage) or to help identify and remove existing barriers.

2.5 Strong Governance and Leadership

Accessibility is a priority for both the political governing body and the administrative leaders of the City of Peterborough. The roles of City Council and staff are intertwined and dependent on one another to produce the best results and outcomes for accessibility planning work in Peterborough.

Strong governance from City Council, as the collective decision-making body of the municipality, plays a key role to advance accessibility through direction to City staff about policies, programs and services. Council has decision-making power to impact the level of accessibility the City achieves.

Strong leadership from the Chief Administrative Officer, Commissioners, Directors and Managers, plays a key role to implement the Accessibility Plan, as directed by Council. Senior Leadership has the ability to influence the level of accessibility directed by Council, as part of their responsibility to provide professional advice and technical expertise to Council.

City Council and Senior Leadership have a shared purpose and responsibility to serve the best interests of the City. Together, they have the decision-making power and influence to apply the 'compliance + inclusion model,' the 'accessibility lens' and the 'inclusion lens' on City services, programs, projects and facilities. The Accessibility Plan requires City Council and staff to work together to ensure all City business aligns with the commitment, long-term vision, short-term road map (priorities) and ongoing compliance work listed in the City's Accessibility Plan, as budget and resources permit.

In addition to the duty to be aware of accessibility compliance and human rights obligations, City Council and Senior Leadership are responsible for understanding the value of accessibility and the effect it can have on building a stronger economy and community. They recognize a universal design approach to City services, programs, projects and facilities helps make Peterborough a destination of choice to live, visit and do business, and brings prosperity to our community.

City Council and Senior Leadership understand the benefits of including people with disabilities in the work force, including at leadership levels. Internally, the City will celebrate the attributes and gifts of differences in employees and strive to assist employees with disabilities who have leadership qualities to reach their full potential.

2.6 City Structure and Governance

The Accessibility Plan's success is a **shared responsibility** across the Corporation between City Council, Senior Leadership (CAO, Commissioners, Directors, Managers), accessibility staff, and departmental/divisional staff.

The City has a dedicated Accessibility Compliance Specialist to help staff incorporate accessibility into City business by using an accessibility lens and an inclusion lens. The City also has a dedicated Diversity, Equity and Inclusion Advisor to help apply an inclusion lens. Staff regularly seek feedback from the AAC and collaborate with accessibility related organizations and experts. An accessibility lens is overlaid onto all City business, from major arena construction projects to recreational Zumba classes.

The Accessibility Compliance Specialist has overall responsibility for monitoring and reporting on the Accessibility Plan. The Accessibility Compliance Specialist also coordinates compliance efforts at the corporate level, while departmental/divisional staff are accountable for ensuring compliance within their service area. In some instances, the AODA requires consultation with the public, people with disabilities and the AAC.

Who does the Accessibility Plan apply to?

The City's Accessibility Plan applies to the Mayor and Members of Council, Advisory Committees of Council and the Chief Administrative Officer, including People & Culture, City Departments and Divisions.

The Accessibility Plan applies to all City Departments and Divisions:

Finance & Corporate Support Services

- Emergency & Risk Management
- Strategic Communications & Service Peterborough
- Financial Services
- Facilities & Property Management
- Materials Management
- Information Services

Legislative Services

- City Clerk
- Court Services
- Municipal Law Enforcement Services
- Realty Services
- Legal Services

Planning, Development & Growth Management

- Engineering & Capital Works
- Asset Management & Capital Planning
- Planning, Development & Urban Design
- Building Services

Municipal Operations

- Public Works
- Transit
- Environmental Services
- Airport

Community Services

- Arts & Culture (includes Peterborough Museum & Archives² and Art Gallery of Peterborough, excluding the AGP Board)
- Recreation & Parks (includes arenas, marina and Peterborough Sport & Wellness Centre)
- Fire Services
- Peterborough Public Library, excluding the Board³
- Social Services

² The Peterborough Museum & Archives has a supplementary Accessibility Plan, as required by the Community Museum Operating Grant administered under Regulation 877 of the Ontario Heritage Act.

³ The Peterborough Public Library filed a separate Accessibility Compliance Report in 2023, as required by the Government of Ontario.

Unless otherwise directed by Council, the City's Accessibility Plan and Accessibility Compliance Report does not apply to:

- Peterborough Police Service and Police Services Board
- Peterborough Housing Corporation and the Board of Directors
- Peterborough Public Health
- Fairhaven
- Business Improvement Area Boards
- City of Peterborough Holdings Inc. and its subsidiaries:
 - Peterborough Utility Services Inc.
 - Peterborough Utilities Inc. & its subsidiaries
 - Peterborough Utilities Commission, including the Riverview Park and Zoo
- Peterborough & the Kawarthas Economic Development
- Peterborough Public Library Board
- Art Gallery of Peterborough Board

Accessibility Planning and Reporting for Agencies, Boards and Commissions

The City's local agencies, boards and commissions have two options to develop an Accessibility Plan and to file compliance reports:

- **Option 1:** Develop their own accessibility plan and submit separate accessibility compliance reports to the Government of Ontario.
- **Option 2:** Adopt the City's Accessibility Plan. Where permitted by law, the City will work with the agency, board or commission to prepare an accessibility compliance report and the City will submit a compliance report on behalf of the agency, board or commission. Where not permitted by law, the agency, board or commission will submit a separate compliance report.

2.7 Notable Compliance + Inclusion Work

Over the last few years, there have been signs of the **compliance + inclusion model** at work across the City. The following list highlights some important recently completed projects that applied an **accessibility lens** and **inclusion lens** to help prevent barriers for people with disabilities with overlapping identities that may experience a higher rate of marginalization and discrimination. All projects exceeded minimum AODA and IASR requirements and embraced the spirit of a ‘more than compliance’ model to help make Peterborough more welcoming, accessible and inclusive to everyone.

City programs, services, transit and facilities

- Social Procurement: added assessment of inclusion/diversity in purchasing process.
- Heritage Conservation District Study: promoted best practices and creative solutions to remove barriers in the built heritage.
- Transit route planning: implemented trip planning and real time bus arrival systems.
- Specialized transit: changed name to Peterborough Accessible Community Transit.
- Broadway Park and Earlwood Park development: incorporated shade structures.
- Affordable housing, 681 Monaghan Rd: doubled minimum required barrier-free units.
- Beavermead Campground washroom: included universal laundry/dishwashing room.
- Peterborough Public Library: maximized accessible parking spaces around building.

City road and walkway networks

- Bethune St (McDonnell to Townsend): constructed a bicycle/pedestrian priority street.
- Lansdowne St W reconstruction: converted curb-faced sidewalks to buffered paths.
- Monaghan Rd at Kenner Collegiate: added a pedestrian crossover.
- Armour Rd at Thomas A. Stewart Secondary School: added a pedestrian crossover.
- Fairbairn St at Highland Rd: added traffic signals and pedestrian crossings.
- Pedestrian signals: Added countdown signals at busy intersections across the City.
- Crosswalks: Installed ladder crosswalk pavement markings at busy intersections.
- Cycling masterplan: applied a transportation equity and all ages/abilities approach.
- Parking payment system: added HotSpot app to make payments and add time.

AAC Access Fund

- Peterborough Public Library: purchased handheld magnifiers (\$925).
- Parkway Trail: added trail benches (\$8,192).
- Peterborough Memorial Centre: updated wayfinding/washroom signage (\$5,641).
- TiMS training: delivered Time in My Shoes training to various staff areas (\$500).
- Heritage Park: added enhanced accessibility features to the project (\$50,000).
- Peterborough Museum & Archives: improved the walkway network (\$10,204).
- Beavermead Park beach: replaced accessible beach access mat (\$10,000).
- City Hall: added a hearing loop system at the main reception desk (\$2,625).
- City day camps: reduced systemic barriers for 2023 summer camp season (\$8,966).

Collaboration, Funding and Training Initiatives

- Peterborough Musicfest: collaborated on implementing an accessible viewing area.
- Parks Canada Lock 19 upgrades: advised on enhanced walkway network details.
- Otonabee Conservation: audited Jackson Creek trail, advised on enhanced features.
- Trent University: advised on amphitheatre and West Bank shoreline trail projects.
- Kawartha Pine Ridge School Board: beyond compliance talk w. advisory committee.
- Enabling Accessibility Fund: Art Gallery of Peterborough accessibility enhancements.
- Active Transportation Fund: Rotary Greenway Trail Link lighting/safety upgrades.
- Curb ramps/depressed curbs: developed a course to train the development industry.

Rotary Greenway Trail Lighting

Thank you to the generous sponsors who donated to lighting a section of the Rotary Greenway Trail from Hunter Street East to Douro Street in Peterborough's East City.



2.8 Project Example / A Story of Success

High Street was selected as one of the pilot areas to study traffic calming measures through the City of Peterborough's Traffic Calming Policy development. High Street is being trialed as a one-way street, with traffic permitted in the southbound direction between Sherbrooke Street and Frank Street. A protected pedestrian pathway was installed between Sherbrooke Street and Frank Street in the sections that did not have a sidewalk. The High Street work also included a pedestrian crossover at Chamberlain Street, road safety signage and enhanced pavement markings.

The policy is intended to improve safety for pedestrians, cyclists and motorists, as well as to reduce aggressive driving behaviour in local neighbourhoods to improve liveability.

High Street Traffic Calming

View of High Street, looking north towards Sherbrooke Street with a view of a new pedestrian crossover and crosswalk at the Chamberlain Street intersection.



3.0 Short-Term Road Map: 2024 to 2028 Priorities

The Accessibility Plan priorities, approved in principle by City Council, set a five-year road map to address the main barriers for people with disabilities. The priorities are designed to help people with disabilities access basic needs such as food, housing, health care, education, employment and the outdoors.

Priorities are based on a mix of listening to the needs of people with disabilities (through feedback forms, public consultation and AAC meetings), engaging with accessibility professionals and disability related organizations, attending accessibility workshops and conferences, monitoring legislation, research and data.

The 2024 to 2028 Accessibility Plan identifies priorities in five key areas:

- sidewalk infrastructure;
- transit system and stops;
- streets and intersections;
- park access and features; and
- employment opportunities for people with disabilities.

Costs associated with implementing the priorities will be covered through annual Departmental requests for budget and/or external funding opportunities. Priorities will be implemented as budget and resources permit.

3.1 Sidewalk Priorities

The sidewalk barrier	The action plan
Segments are missing in the sidewalk network.	Implement the 2022 Transportation Master Plan which recommends an aggressive investment in the sidewalk network, with emphasis on the downtown, new growth areas and major intensification corridors. Continue to implement the Sidewalk Strategic Plan to add missing sidewalk links.
Segments in the sidewalk network need repair.	Continue to reconstruct 3 to 4 kms of sidewalk annually. Explore opportunities to increase annual sidewalk reconstruction.
Some downtown sidewalks are cluttered and without a clear path.	Implement the 2023 Central Area Urban Design Guidelines for development work and the downtown temporary outdoor patio program. Collaborate with DBIA to educate businesses on optimal signage placement.
Many central area buildings have steps from the sidewalk level to the building interior.	Encourage building owners and developers to apply for the City's Façade Improvement Grant, Municipal Incentive Grant and Residential Conversion & Intensification Grant programs (3 programs of the City's 2021 Central Area Community Improvement Plan Program) to address barriers to building access. Work with applicants to find solutions where property constraints may require changes to City property.
Curb-faced sidewalks are often obstructed by waste bins on pick-up days.	Pilot an alternative waste bin placement option on a segment of a local street with curb-faced sidewalks that are less than 1500 mm wide.
No or poor walkway network on major sections of arterial streets (Brealey Drive, Lansdowne Street, Charlotte Street, Sherbrooke Street, Chemong Road)	Reconstruct: <ul style="list-style-type: none"> • Brealey Drive (Lansdowne to Sherbrooke) • Lansdowne Street W (Park to Lock) • Charlotte Street (Water to Park) • Sherbrooke Street (Glenforest to west City limit) • Chemong Road (Parkhill to Sunset)
Segments of sidewalk lack shade.	Support tree planting in street boulevards, wherever possible.

3.2 Transit Priorities

The transit barrier	The action plan
Not all transit stops are accessible.	Upgrade 90 to 150 transit stops by 2028 with concrete pads and links to sidewalks. Continue to monitor and leverage funding opportunities.
Lack of transit information at transit stops.	At all transit stops, add bus route information and the schedule of each bus that services the stop. Add transit route maps at transit stops with shelters.
Lack of waste bins, benches and bicycle racks at transit stops.	Continue to leverage sponsorship opportunities. Ensure furnishings do not obstruct clear paths of travel on municipal sidewalk zones.
Transit stop signage can be difficult to distinguish from other street signage.	Explore upgrades to transit stop signage, such as unique shape, size, colour and layout.
Community bus hours don't match conventional service.	Phase in extended hours of service for community bus routes and increase frequency on route 23 "Red".
Accessible transit must be booked by telephone only.	Add a communication tool for riders of all abilities to independently make a reservation (online and mobile trip booking app) by January 2025.
Demand for specialized transit, Peterborough Accessible Community Transit service (PACT vans), exceeds availability during certain days and times.	<ul style="list-style-type: none"> • Continue to encourage PACT users to ride conventional transit on days they are able to. <ul style="list-style-type: none"> ○ Promote conventional transit at events. ○ Implement a travel training program. • Add one additional PACT van to the service by June 2026. • Increase the number of PACT vans in service during peak service hours. • Continue to increase staffing levels. • Order newer style vehicles with different accessibility options to allow more flexibility on how vehicles can be used across the range of transit services. • Explore options for a dedicated peak-hour shared PACT route to support customers with recurring rides to popular programming in the community.

3.3 Streets and Intersection Priorities

Street/intersection barrier	The action plan
Lack of crossing infrastructure can add hundreds of metres to a pedestrian route.	Continue to expand number of mid-block pedestrian crossing facilities, where appropriate, including the Rotary Trail Crossing at Hunter Street East.
Lack of accessible pedestrian signal (APS) infrastructure. As of June 2024, 35 of the City's 144 traffic signals have APS devices.	Include accessible pedestrian signals at all new and retrofitted signalized intersections, as required by the AODA. Coordinate retrofit work with road reconstruction projects, where possible.
Some intersections along key pedestrian routes require pedestrians to press a push button to activate signals.	Expand the number of pedestrian signals that automatically activate with traffic signals. Explore opportunities to coordinate upgrades with the traffic signal controller replacement program and the smart traffic signal project.
Vehicle speeding is a safety risk for pedestrians with disabilities.	<ul style="list-style-type: none"> • Implement a Road Safety Strategy (safe school zones, safe neighbourhoods, safety for vulnerable users, safe corridors and safe intersections). • Collaborate with Peterborough Police on targeted speed enforcement locations. • Continue to add enhanced crosswalk markings at street intersections. • Continue to implement traffic calming measures, where appropriate. • Pilot a red-light camera enforcement system and/or automated speed enforcement program. • Continue to implement the City's Urban Design Guidelines for new development and redevelopment projects.

The City's **Urban Design Guidelines** play a key role in shaping the built environment, including streets and intersections, with a universal design approach that works for all ages and abilities.

[<https://www.peterborough.ca/en/doing-business/urban-design-guidelines.aspx>]

3.4 Park Priorities

The park barrier	The action plan
<p>Many parks do not have a walkway network.</p>	<p>Incorporate walkways and/or multi-use paths into new parks and park rejuvenation projects, including sports field projects. Connect walkways to the municipal sidewalk network and all site amenities (i.e., accessible benches, tables, shade features).</p> <p>Projects include:</p> <ul style="list-style-type: none"> • Willowcreek Subdivision Park (new park) • Bonnerworth Park (redevelopment) • Knights of Columbus Park (redevelopment) • Earlwood Park (rejuvenation) • Dominion Park (rejuvenation) • Denne Park (rejuvenation) • Morrow Park (improvements) • Riverside Park and East City Bowl (rejuvenation) • Eastgate Memorial Park (connect Eastgate fields 3 and 4 in Walker Park to the Eastgate parking lot) • Ashburnham Memorial Park (connect Heritage Pavilion to the walkway network) <p>Apply the City’s Urban Design Guidelines to park projects.</p>
<p>Many parks do not have accessible site features and play equipment.</p>	<p>Implement the park development standards of the 2019 Municipal Parks and Open Space Study and Urban Design Guidelines into newly developed parks and park rejuvenation projects, where possible. Include pedestrian scale lighting, accessible site furnishings, such as seating with arm rests and back rests and walkway connections to waste/recycle bins.</p> <p>Include accessible play features into park rejuvenation projects, such as adaptive swings, tactile elements and ramps to elevated play features.</p>
<p>Most parks do not have an enhanced accessible ground surface below playgrounds.</p>	<p>Plan for a showcase accessible playground at a regional or community park and continue to upgrade existing playground sand surfacing to a higher quality surface, such as engineered wood fiber.</p>
<p>General lack of modern public washroom facilities at regional and community parks.</p>	<p>Construct new washroom building at Jackson Park and Knights of Columbus Park. Renovate the Eastgate Park washroom building.</p>

3.5 Employment Priorities

The employment barrier	The action plan
Job seekers with disabilities may not feel welcome to work for the City.	Increase use of social media to promote inclusive recruitment and employment at the City of Peterborough, including a recruitment series using images of employees with disabilities.
Working-age adults with developmental disabilities often lack work experience to help with the job searching process.	Explore opportunities with local secondary schools and alternative learning educational institutes to provide cooperative education (co-op) opportunities for students with disabilities.
Qualified job seekers with disabilities have difficulty finding meaningful work.	Explore opportunities with networks that specialize in accessible employment, such as the Ontario Disability Employment Network and Discover Ability Network, to connect qualified job seekers with disabilities to job opportunities at the City of Peterborough.
Interview process is not always fair for people with various types of disabilities.	Monitor best practices and explore opportunities to minimize barriers for job candidates with disabilities.
Some employees with disabilities expressed the City is not committed to meeting their need for accommodations.	Annually promote the individualized accommodation plan process to employees. Explore opportunities within existing processes and resources, such as the performance review process and Divisional newsletters.
City walkway infrastructure does not always connect to employment lands.	Implement policies of the Official Plan and Urban Design Guidelines to create barrier-free access to new employment uses. Implement through the new development and redevelopment application processes.

The City acknowledges there are other types of barriers not listed as a priority and will work towards removing those barriers as part of ongoing accessibility work, as budget and resources permit.

4.0 Relevant Data, Research and Consultation

4.1 Disability Statistics

General

Statistics Canada collects data on disability every 5 years, showing the disability rate in Canada is quickly increasing.

The 2022 Canadian Survey on Disability showed 27% of the Canadian population aged 15 and older has at least one disability, an increase of 5% since 2017. The rate was 22% in 2017 and 14% in 2012. Further, the rate of disability is higher among women (30%) than men (24%), and women are likely to have a more severe disability than men.

The disability rate for seniors (65 and older) was 40%. The increases measured in 2022 were partially attributed to both the aging population and the large increase in mental health related disabilities among youth and working-age adults.

People with disabilities who use wheelchairs make up about 1 to 2% of the total population, and about 5 to 10% of the population with disabilities.

The majority of people with disabilities have disabilities that are less visible or entirely invisible. These include limited vision, limited hearing, cognitive disabilities, mental health, or neurodiversity.

In 2022, 72% of people with disabilities reported that they experienced 1 or more of 27 types of barriers to accessibility at least sometimes in the past year.⁴

The 2022 Canadian Survey on Disability is the best current available data on Canadians living with disabilities, aged 15 and over.

Accessibility is not just a seniors' issue. Accessibility is not just about wheelchairs and ramps. Accessibility is not just about being blind and guide dogs.

⁴ Statistics Canada, [2022 Canadian Survey on Disability](#).

Youth

Youth, aged 15 to 24, experienced the largest increase in disability rate. In 2022, 20% of youth had a disability, up from 13% in 2017, representing the largest increase in percentage points across disability types. Mental health related disabilities were the most common type of disability among youth at 68%.

Newcomers

Statistics on newcomers with disabilities are generally not available. Integrating into a new country is not a simple process for newcomers, and those with disabilities typically experience more challenges and systemic barriers related to sponsorship, language, employment and social integration - factors that impact health. Barriers are exacerbated for women newcomers, children of newcomer parents with disabilities and refugees who originate from war-torn countries. Exposure to traumatic events and adverse experiences further compromises health, and for newcomers with disabilities, can further complicate access to the supports and services needed.⁵

Indigenous

In pre-contact times, Indigenous people enjoyed good health due to an active lifestyle, healthy traditional diets and healing practices shaped by the natural environment. The arrival of Europeans to North America introduced unfamiliar diseases that strained Indigenous healing systems. Laws that criminalized and prohibited Indigenous healing practices, combined with poor living conditions, poverty, racism, loss of land and declining access to food resources, had devastating consequences on their health.

Changes continue to affect the health of Indigenous people today. In 2017, 32% of First Nations people aged 15 years and older living off reserve had a disability. The same was true for around 30% of Métis people. In contrast, 22% of non-Indigenous Canadians aged 15 years and older had a disability in 2017.

Indigenous people are more likely to have disabilities in light of discrimination, historic oppression, trauma and intergenerational trauma. Indigenous people are also more likely to acquire a disability than to be born with one.

4.2 Employment Statistics

There is some potential good news in labour force statistics. People with disabilities are more likely to be employed than in the past. 62% of working-age adults with disabilities (25 to 64 years of age) were employed compared to 78% of people without disabilities. The gap between the employment rates of people with disabilities and people without disabilities narrowed from a 21% gap in 2017 to a 16% gap in 2022. Statistics Canada

⁵ Canadian Journal of Disability Studies, [Challenges Encountered by Newcomers with Disabilities](#).

noted the COVID-19 pandemic impacted the labour market through labour disruptions and increased remote work opportunities in some sectors from 2017 to 2022.⁶

While progress has been made, there is still work to be done when it comes to understanding and accommodating disabilities in the workplace, especially invisible disabilities. Research shows that 88% of employees with invisible disabilities choose not to disclose their disability at work to avoid discrimination, stigma and lack of support. Employees who choose to disclose their hidden disabilities often report feeling excluded at work, resulting in reduced productivity and lower morale. They are also more likely to receive fewer benefits or access to training and opportunities for advancement.

Research has also found that employers lack awareness about the needs of employees with hidden disabilities and are often ill-prepared to provide the necessary accommodations and support. As a result, employees with hidden disabilities may struggle in silence, be misunderstood, and feel unsupported, leading to decreased job performance and satisfaction.⁷

Applying the Compliance + Inclusion Model

Question: I'm a new Director at the City. There are no accommodation plans on file for staff in my Division. Should I assume accommodations are not required for the team?

Answer: Apply the compliance + inclusion model

1. **Start with base line compliance:**
 - The City makes relevant policies and procedures available to employees.
 - Wait for an employee with a disability to request an accommodation.
2. **Use an accessibility lens.** Ask yourself questions about accessibility barriers:
 - Are employees with disabilities encouraged to request an accommodation?
 - Will an employee with a disability be concerned about accommodation costs?
 - Will a request for an accommodation trigger stigma for an employee?
3. **Use an inclusion lens.** Reflect. Ask yourself deeper questions about inclusion:
 - Is it possible an employee with a disability may also be in a minority group that's not well represented on my team?
 - Will a request for an accommodation trigger discrimination for the employee?
4. **Address the barriers:**
 - Send a Divisional email about workplace accommodations. Include links to relevant procedures, an overview of the process and how costs are handled.
 - Maintain confidentiality if an employee requests an accommodation.

⁶ Statistics Canada, [2022 Canadian Survey on Disability](#).

⁷ Gowan Consulting, [Invisible Disabilities in the Workplace, October 2023](#)

4.3 Economic Benefits of Accessibility

People with disabilities make up a large portion of the economic market share, considering the 2022 Canadian Survey on Disability shows 27% of the Canadian population aged 15 and older has at least one disability.

Successful businesses understand people are more likely to do business with an inclusive company. In fact, 62% of Canadians say they would be more likely to give their business to a company if they knew the company had specific policies to support people living with disabilities. Also, 92% of Canadians say that taxpayer-funded projects should be held to the highest accessibility standards.⁸

The economic benefits of accessibility are relevant to both the public sector and the private sector. In general, benefits include, but are not limited to:

- Increased consumer spending;
- Increased business profits;
- increased employee productivity;
- decreased employee lost time;
- increased innovation;
- increased ability to anticipate change;
- increased tourism; and
- increased access to an untapped; talent pool of employees with disabilities.

Diverse and inclusive workplaces have better business outcomes. They are twice as likely to meet or exceed financial targets, six times more likely to be innovative and six times more likely to effectively anticipate change.

⁸ Angus Reid Institute, [Canada's report card on disability and inclusion](#).

People with disabilities are great employees. In a recent business case study, they proved to have a 72% higher staff retention, 86% had equivalent or better attendance than their peers, and 90% performed equal or better than their coworkers without disabilities.⁹ The City understands implementing the 2024 to 2028 Accessibility Plan will help people with disabilities to participate in the labour force, increase the consumer spending power of people with disabilities and help support economic prosperity in Peterborough.

Examples

- City decisions on a transit service can increase access to a business by customers with disabilities who rely on transit. Increased access to a business can lead to more profits.
- City decisions on land use planning that supports multi-modal transportation can attract businesses to relocate to Peterborough and support their access to an untapped talent pool of employees with disabilities. The Peterborough region benefits from new employment opportunities and increased Gross Domestic Product (GDP), and the City benefits from an increased tax base.

It is common for major funding programs to require eligible projects to have a focus on accessibility and inclusion. They often give preference to projects that exceed minimum statutory requirements.

⁹ accessibleemployers.ca, [Why hiring people with disabilities is good for business in the new normal](#).

4.4 Accessibility Plan Public Consultation

The short-term road map (priorities) listed in the 2024 to 2028 Accessibility Plan reflect what we heard during public engagement around barriers that exist for people with disabilities. Participants highlighted categories in most need of attention are sidewalks, transit, streets/intersections, parks and employment opportunities for people with disabilities.

Public engagement tools also included questions about the pandemic. Participants highlighted the need to incorporate the needs of people with disabilities into emergency planning.

The City of Peterborough has made good progress by implementing previous accessibility plans, while recognizing that there is still work to do to achieve a more accessible and inclusive community. Thank you for helping us to better understand the experiences of people with disabilities.

Table 1: Examples of what we heard and what we’re doing to address barriers.

What we heard	What we’re going to do
Sidewalks: “There are many areas of the city where sidewalks do not exist.”	Continue to implement the Sidewalk Strategic Plan to add missing sidewalk links.
Transit: “Each bus stop should have access to a bus map.”	Add transit route maps in shelters. Add bus frequency and route information at all transit stops.
Streets/Intersections: “New intersections are good. There are many that need upgrading to make them accessible. All intersections should have voice activated crossing signals.”	Include accessible pedestrian signals at all new and retrofitted signalized intersections, as required by the AODA.
Parks: “City parks should have a trail around the grass, so the wheelchairs don’t need to go into the grass.”	Include walkways, benches and shade features into park rejuvenation projects.
Employment: “Ensure all people with disabilities know they are welcome to work for the City of Peterborough. This could be seen in an ad showing how people with disabilities could work in the field.”	Run a social media recruitment series using images of employees with disabilities.

5.0 Working Together

Key working groups, staff, committees and local organizations are helping to advance accessibility in our community. Some are performing their work with a goal of increasing accessibility, and some have other areas of focus that overlap with accessibility goals. Working together helps accessibility to advance more effectively and allows us to do more with the resources available.

5.1 Accessibility Advisory Committee (AAC)

The AODA requires municipalities with a population over 10,000 to establish a local AAC, with a majority of members represented by people with disabilities.

Peterborough's AAC gives Council, through staff, advice on how to make City projects, programs, services and facilities more accessible for everyone. The Committee also administers the City's Access Fund through a formal application and reporting process. The City strives to ensure committee members represent a broad range of disabilities, lived and living experience and expertise in understanding barriers to inclusion.

The AAC also fulfills a legislative duty to review development projects subject to the Site Plan Control Area under the Planning Act. They provide recommendations on how to make developments more accessible, with a strong focus on site walkway networks (ability to walk and roll), accessible parking spaces, building entrances and access to exterior amenity areas. Recommendations consider the needs of various types of disabilities, including those related to mobility, vision, hearing, neurodivergence and mental health.

5.2 Diversity, Equity and Inclusion (DEI)

Accessibility and DEI have closely related and overlapping objectives. The City's Accessibility Compliance Specialist and the Diversity, Equity and Inclusion Advisor work closely together to advise on how to make services, programs, projects and facilities as inclusive as possible. The City recognizes that society as a whole benefits from diverse perspectives and the strengths of people from all backgrounds.

People with disabilities are the largest minority group, and the only minority group that anyone can become a member of at any time. Ontario's Human Rights Code protects

people with disabilities from discrimination, with similar protections afforded under 16 other grounds including race, colour, age, sex, sexual orientation and religion.

The City acknowledges people with disabilities still consistently face barriers in their everyday experiences, from navigating streets, to applying for jobs, to accessing public transit and government services. The opening sentence in the AODA states, “Recognizing the history of discrimination against persons with disabilities in Ontario, the purpose of this Act is to benefit all Ontarians”. The City will strive to use the compliance + inclusion model, the accessibility lens and the inclusion lens on all City business to help prevent barriers.

5.3 Age-friendly Peterborough

Canada’s senior population is growing and it’s more important than ever to support the health and well-being of older Canadians so they can lead healthy and active lives and stay involved in their communities. Making communities "age-friendly" is believed to be one of the best ways to do this.¹⁰

Age-friendly Peterborough is working to ensure older adults have access to basic needs, can get around the community, are supported to build and maintain relationships, and have the opportunity to learn and contribute. Age-friendly Peterborough provides an age-friendly perspective on issues older adults face and collaborate to support solutions. Age-friendly Peterborough is a resource for older adults, their families and care providers.

The World Health Organization identified eight key domains to become more age-friendly, including transportation, housing and social participation. The eight domains significantly overlap with Ontario’s accessibility standards. When age-friendly initiatives are implemented in Peterborough, we are simultaneously working towards building a more accessible community for residents and visitors of all abilities.

The Age-friendly Peterborough Advisory Committee advises City Council and County Council (through the Joint Services Steering Committee), Curve Lake First Nation Council (through their Health and Family Services Committee), and Hiawatha First Nation Council. The Age-friendly Peterborough Advisory Committee is supported by four working groups which are comprised of local organizations, staff, and local volunteers.¹¹

¹⁰ Government of Canada, [Age-friendly Communities](#).

¹¹ City of Peterborough, [Committees](#).

5.4 Multi-modal Transportation Planning

With Peterborough's population projected to reach 125,000 people by 2051 through an average growth rate of 1,200 people each year, the City is taking action to create a low-emissions multi-modal transportation network where people of all ages and abilities can move safely and efficiently, no matter how they choose to travel.

Multi-modal transportation planning plays a key role to ensure Peterborough is a safe, livable community, especially for people with disabilities. Quality transportation planning improves travel choices for people and goods by providing an increased number of reliable, equitable, and accessible options that support the health and well-being of our growing community. It also improves safety of transportation systems for all users. Investments in transportation systems enhance equity and accessibility by expanding access to jobs, services and amenities regardless of age, ability or travel choice.

Many people with disabilities cannot rely on using a personal vehicle as a prime mode of transportation. They often have no choice but to rely on transit, taxicab, carpooling, carshares and active modes of transportation (i.e., walking, rolling, mobility scooter, wheelchair, cycling, electric bikes). The provision and maintenance of infrastructure that supports all season multi-modal transportation significantly helps people with disabilities to have the same quality of life as everyone else. Of important note, people who participated in the 2022 public engagement process for this accessibility plan identified sidewalks, transit and streets/intersections as the top three accessibility priority areas.

Accessibility staff liaise with key staff involved in transportation planning initiatives, stay informed on current best practices and use the compliance + inclusion model when conducting reviews of transportation projects.

5.5 Climate Action

Climate change poses a significant risk to Peterborough. Extreme weather events are becoming more frequent with severe rainfalls, intense summer heat and ice storms. Climate change is impacting human lives and health in a variety of ways. It threatens the essential ingredients of good health: clean air, safe drinking water, nutritious food supply and safe shelter.

Climate change amplifies the marginalization experienced by people with disabilities, who are two to four times more likely to be impacted during and after climate emergencies, compared to the general population. For example, emergency warnings and other important messages may not be designed with accessibility in mind. Also, people with disabilities are more likely to have social and economic risk factors, such as poverty and unemployment, that put them at greater risk.

Accessibility staff liaise with the City's Climate Change Coordinator and the City's Emergency and Risk Management team to apply a compliance + inclusion model to climate action projects and emergency planning.

5.6 Council for Persons with Disabilities

The City has a long history with Peterborough's Council for Persons with Disabilities (CPD). CPD was established in 1989, when a need was identified in Peterborough for an official platform to advocate for the rights of persons with disabilities. The Ontarians with Disabilities Act, introduced in 2001, required municipalities with a population over 10,000 to establish an AAC to advise Council about the City's accessibility plan, advise on new and renovated City facilities, and review site plans for private developments. CPD and its standing committees officially served as Peterborough's AAC from 2002 to 2011.

CPD has since evolved into an incorporated business and registered charity. CPD works to improve the quality of life for people with disabilities by promoting equality, opportunity and inclusion in the Peterborough region. CPD advocates on behalf of persons with disabilities, promotes public awareness, supports improvements and access to services, and monitors the work of all levels of government, including legislation and policies that impact persons with disabilities.

The City and CPD keep each other informed on celebration and education events, such as National AccessAbility Week and CPD's Time in My Shoes training program.

5.7 Local School Boards, Trent University, Fleming College

Educational institutions are leading the way in many areas of accessibility in the classroom and beyond. Inclusion work in the educational sector often surpasses minimum statutory requirements, as they find innovative ways to support students with disabilities through modern technology and applying best practices. It is common for students to have an individual education plan (IEP), special accommodations and services to succeed in school and have a positive and equitable learning experience.

The City continues to investigate opportunities with educational institutions to advance accessibility in the community. The City recently worked with Fleming College, Kawartha Pine Ridge District School Board and Peterborough Victoria Northumberland Clarington Catholic District School Board to develop universally designed sports field projects on school lands and explore park equity opportunities on elementary school sites within established neighbourhoods.

The City also provides a facility at the Peterborough Museum & Archives site for students in the Fleming College Museum Management and Curatorship program, where students attend lectures and complete practical training. All students complete City developed accessibility training as part of the curriculum.

5.8 Ontario Network of Accessibility Professionals

The Ontario Network of Accessibility Professionals (ONAP) is an unincorporated, voluntary network of accessibility professionals working to advance accessibility for persons with disabilities through the sharing of information, resources and best practices. ONAP currently has over 250 members represented by employees of public sector organizations who are responsible for making their communities more accessible, including representation by the City of Peterborough. ONAP members typically work for municipalities, educational institutions, hospitals, public transportation organizations, libraries and police services.

ONAP holds meetings approximately 2 to 4 times per year to collaborate on how to remove barriers and share information about challenging topics, such as website accessibility, service animals and employment opportunities for people with disabilities. Meetings typically include presentations and updates from a representative of the Government of Ontario, with opportunities to ask questions and influence changes to legislation and policies. ONAP has developed a relationship with Ontario's Ministry for Seniors and Accessibility and Accessibility Standards Canada, who both seek feedback from the members to advise on positive and negative experiences learned from the front lines of implementing the AODA.



Ontario

6.0 Compliance

6.1 Compliance Reporting

All public sector organizations with 20 or more employees, including municipalities, are legally required to report on compliance with the AODA every two years. Organizations that don't comply with the AODA could face enforcement measures which can include financial penalties.

Compliance reports have a simple format, requiring the City to answer basic yes or no questions that relate back to AODA and IASR requirements. The most recent accessibility compliance report filed with the Government of Ontario in December 2023 confirms the City of Peterborough is in full compliance.

6.2 Legislation

Ontario's Human Rights Code (HRC)

Ontario's HRC protects people from discrimination and harassment because of past, present, and perceived disabilities. It has primacy over other Ontario laws and sets out the legal duty to accommodate people with disabilities. Ontario's HRC also allows for the implementation of special programs to relieve hardship or economic disadvantage or to assist disadvantaged persons or groups to achieve or attempt to achieve equal opportunity.

The Integrated Accessibility Standards Regulation requires all City staff, volunteers and people we do business with to be trained on Ontario's HRC as it pertains to people with disabilities. Training can be completed at www.peterborough.ca/aodatraining.

Accessibility for Ontarians with Disabilities Act (AODA)

The AODA is intended to reduce and remove barriers for people with disabilities so that everyone in Ontario can fully participate in everyday life in our communities and the economy.

Ontario is the first province and one of the first jurisdictions in the world to enact specific legislation, establishing a goal and timeframe for accessibility. It is also the first jurisdiction to legislate accessibility reporting and to establish accessibility standards.

Integrated Accessibility Standards Regulation (IASR)

The IASR is a broad regulation enacted under the AODA that sets out accessibility standards in Ontario. The requirements of the standards range from limiting the amount of flashing on a website to requiring organizations to consult with people with disabilities on the design and placement of benches along walkways.

The IASR is having a major impact on removing and preventing barriers to information, employment, transportation, public spaces and customer service in Ontario. New standards are also being developed in the areas of health care and education.

The IASR requires all City staff, volunteers and people we do business with to complete accessibility training. Training can be completed at www.peterborough.ca/aodatraining.

Ontario's Municipal Act

The Municipal Act governs the powers and duties, internal organization and structure of municipalities in Ontario. It covers accessible parking permits, accessible parking offences, taxicab regulations related to transporting persons with disabilities, tax deferrals and relief of financial hardship for persons with disabilities, and annual levy (tax) on group living residences for persons with developmental disabilities.

Ontario's Planning Act

The Planning Act sets out the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them. The purpose of the Planning Act is to provide for planning processes that are fair by making them open, accessible, timely and efficient.

The Planning Act states accessibility for persons with disabilities to all facilities, services and matters to which the Planning Act applies, is a matter of provincial interest. The Planning Act requires any person undertaking development, in an area designated under site plan control, to show that their facilities are designed to have regard for accessibility for persons with disabilities.

Ontario's Building Code (OBC)

The OBC sets minimum accessibility standards for newly constructed buildings and existing buildings that are extensively renovated, maintaining Ontario's leadership role in barrier-free design.

City of Peterborough staff who manage building projects are responsible for consulting with Accessibility staff and the City's AAC for all new construction and renovation projects.

6.3 Ongoing Effort to Maintain AODA and IASR Compliance

The IASR enacted under the AODA includes standards on customer service, employment, information and communication, transportation and the design of public spaces. Ongoing effort is needed to maintain compliance with accessibility laws as the City formally transitions from a 'compliance model' to a 'compliance + inclusion model'.

The following IASR Requirements section provides a list of ongoing accessibility compliance work that City staff will implement as part of the 2024 to 2028 Accessibility Plan. The list is followed by a breakdown of three requirements in the IASR that are legislated to be part of the Accessibility Plan: Transit Accessibility Plan, Preventative and Emergency Maintenance, and Accessible Taxicabs.

IASR Requirements

- Upgrade accessibility policies and procedures as regulations change.
- Prepare annual status reports to document progress of the Accessibility Plan.
- Incorporate accessibility into the procurement process, including self-service kiosks.
- Continue accessibility training programs, including enhanced Transit training.
- Provide information in an accessible format, upon request.
- Provide emergency/public safety information in an accessible format, upon request.
- Ensure websites and web content is compliant with standards for web accessibility.
- Provide an accessible library collection and access to it, upon request.
- Incorporate accessibility into the employee recruitment process.
- Provide emergency response plans for employees with disabilities, when necessary.
- Provide individual accommodation plans for employees with disabilities.
- Apply a return-to-work process for employees who were absent due to a disability.
- Account for the needs of employees with disabilities at all stages of employment.
- Advise the public about accessible transit routes, vehicles and services.
- Apply various transit procedures to accommodate transit riders with disabilities.
- Maintain transit emergency preparedness and response policies.
- Apply transit fare equity (same fare structure/pay options for riders with disabilities).
- Maintain transit vehicle features, such as priority seating, stop announcements.
- Purchase transit vehicles with accessibility features that comply with the IASR.
- Maintain and apply a specialized transit service eligibility process.
- Apply same hours and days of service for conventional and specialized transit.
- Optimize specialized transit reservation process and address reservation issues.
- Determine proportion of on-demand accessible taxicabs required in Peterborough.
- Regulate accessible taxicab fares, fees and rules.
- Comply with technical requirements for recreational trail and beach access routes.
- Comply with technical requirements for outdoor public use eating areas/play spaces.
- Comply with technical requirements for sidewalks, walkways and multi-use trails.
- Comply with technical requirements for accessible parking spaces.
- Comply with technical requirements for service counters and waiting areas.
- Permit and apply rules related to service animals and support persons.
- Monitor and maintain an accessible customer service feedback process.
- Submit accessibility compliance reports to the Government of Ontario.

Transit Accessibility Plan

This plan includes a mini section on Transit accessibility to fulfil various requirements in the IASR that are legislated to be part of the Accessibility Plan. Refer to the [Peterborough Transit Study project page on Connect Peterborough](#) for the latest transit route review information, the City's long-term transit growth strategy and options to improve or relocate the downtown Transit Terminal.

[<https://www.connectptbo.ca/transit>]

Transit rider feedback

Peterborough Transit is taking action on feedback received from transit riders by improving customer service, wait times, and overall demand for public transit. The City consults with the public and people with disabilities for various transit related projects. The consultation survey for this Accessibility Plan included a Transportation section that asked people to describe their experience using transit. Many of the responses are built into the priorities listed in the Accessibility Plan.

Members of the public can submit feedback about transit through the City's [Report an Issue form](#). If the feedback about transit included contact information, any immediate action resulting from the feedback will be communicated back to the person who submitted the feedback. All transit related feedback will be captured in a central location for analysis and record keeping. Feedback will be used to help identify, prevent, and remove transit barriers in a timely manner and help prioritize service improvements.

A Transit Liaison Committee was formed in 2023 to connect transit riders and stakeholder groups directly to Transit staff. The committee includes two riders who use the specialized transit service and representatives from the AAC, Age-friendly Peterborough and the Council for Persons with Disabilities.

Transit annual public meeting

Peterborough Transit is required to hold at least one public meeting annually, involving people with disabilities. The meeting is intended to provide an opportunity to participate in a review of the Transit section of the Accessibility Plan and to provide feedback on transit accessibility. For efficiencies, Transit staff sometimes incorporate this engagement function as part of other public engagement work, such as the Transit Liaison Committee work held in 2023.

Specialized transit demand and wait times

Peterborough Transit is required to monitor the demand for specialized transit and develop steps to reduce wait times for the service. Refer to the Transit Priorities section for more information.

Accessibility equipment failures on vehicles

Peterborough Transit operators complete daily vehicle circle-checks prior to the start of service and any defects discovered are reported for repair. In the event a road call is required as a result of a vehicle malfunction or damage, vehicle operators notify the Transit Supervisor to arrange for a replacement vehicle as soon as possible. Transit will strive to minimize wait times and service disruption for transit riders, whenever possible.

Transit staff have a detailed 'Circle Check Reference Guide' and a 'Malfunctioning Accessibility Equipment Procedure' to assist vehicle operators with the vehicle inspection and vehicle malfunction reporting process.

Transit stops and shelters

The City continues to leverage funding opportunities such as the Investing in Canada Infrastructure Program (ICIP) to fund basic transit stop upgrades. Upgrade work includes new concrete pads to serve the front and rear doors of transit vehicles, walkway connections to the municipal sidewalk network and new transit shelters where appropriate. The upgrades will also consider other related safety and infrastructure needs, such as lighting, waste containers, signage and route information, where appropriate. The City is planning to upgrade 90 to 150 stops by 2028 and will continue to monitor and leverage funding opportunities.

The City consults with the AAC on how to make transit stops and shelters more accessible. The committee maintains a list of recommendations for accessible transit stop features. The Accessibility Compliance Specialist completes detailed reviews of all transit stop improvement projects to ensure technical compliance with relevant standards, such as walkway slope and adequate clear space for mobility aid users.



Preventative and Emergency Maintenance

Background

The Integrated Accessibility Standards Regulation (IASR) requires the City to have procedures for preventative and emergency maintenance of the accessible elements within the City's public spaces. Maintenance procedures are important to make sure people with disabilities can access public spaces. People with disabilities typically have fewer alternative routes when moving through and using public spaces, so procedures for maintenance will help support their continued mobility and independence.

Temporary service disruptions

The City applies a Temporary Service Disruptions procedure when dealing with temporary disruptions to accessible elements of public spaces. The procedure requires notices to be posted on the City's website or relevant facility website, and occasionally through media releases and social media platforms based on the nature or extent of the disruption. All notices include information on what and when the service is unavailable, the reason for disruption, alternative service options and a staff contact.

Minimum maintenance standards

The City applies minimum maintenance standards to public spaces, monitors preventative and emergency maintenance best practices and performs periodic evaluations, such as:

- annual inspections;
- seasonal-based maintenance;
- inspections after storms or events that may affect accessible elements; and
- inspections in response to reports of vandalism or complaints.

The City applies various policies, regulations, guides and minimum standards to direct maintenance activities in public spaces, such as:

- City of Peterborough Temporary Service Disruptions Procedure;
- City of Peterborough Winter Service Operations Policy;
- City of Peterborough Asset Management Policy;
- CSA Z614-14: Children's Playspaces and Equipment;
- Ontario Reg 239/02: Minimum Maintenance Standards for Municipal Highways;
- Ontario Reg 332/12: Building Code;
- R.R.O. 1990, Reg 581: Accessible Parking for Persons with Disabilities;
- TAC Guidelines for Understanding, Use and Implementation of Accessible Pedestrian Signals; and
- ISO 23599: Assistive products for blind and vision-impaired persons - tactile walking surface indicators

The following outlines basic maintenance activities of accessible elements within public spaces.

Exterior paths of travel (sidewalks, walkways, multi-use trails)

- Maintain surface: sweep, remove snow, de-ice.
- Maintain width/overhead clearance: trim bushes and branches, remove hazards.
- Maintain clear path of travel: relocate furnishings such as bike racks and benches.
- Ensure business sandwich boards are correctly located on sidewalks.
- Inspect and mark surface defects: apply markings at defects more than 2 cm high.
- Repair heaved surfaces: grind down, add sloped patches, replace bays.
- Maintain waste bins: empty regularly to avoid build-up around the containers.
- Maintain benches: inspect and replace parts, level, repaint, trim vegetation.
- Maintain lighting: replace lamps on a regular schedule with proper lamp wattage.
- Maintain access to transit stops, shelters, benches and parking payment machines.

Recreational Trails, Beach Access Routes

- Maintain access gates: regularly repaint, repair reflective tape and broken gates.
- Maintain trail bollards: regularly repaint, repair reflective tape and broken bollards.
- Maintain trail surface: sweep, remove snow, de-ice, repair holes and heaved areas.
- Maintain trail width/overhead clearance: trim bushes and branches, remove hazards.
- Maintain waste bins: empty regularly to avoid build-up around the containers.
- Maintain benches: inspect and replace parts, level, repaint, trim vegetation.
- Maintain beach access mats: sweep, remove and store seasonal components.

Outdoor public eating areas

- Maintain picnic tables: inspect and replace parts, level, repaint, trim vegetation.
- Maintain table pads: maintain clear space around table/access to mobility aid space.
- Maintain walkway surfaces, width and overhead clearance: sweep, trim vegetation.
- Maintain waste bins: empty regularly to avoid build-up around the containers.
- Maintain lighting: replace lamps on a regular schedule with proper lamp wattage.
- Prepare for winter: remove/ store seasonally, post service disruption notice.

Outdoor play spaces

- Inspect playgrounds for CSA compliance: i.e., fall height testing/ inspect parts.
- Maintain playground surfacing: loosen, till, rake, level, add, replace as required.
- Maintain standing/ponding water: drain, repair grading, barricade area as required.
- Maintain waste bins: empty regularly to avoid build-up around the containers.
- Maintain walkway surfaces: sweep material displaced from play zone, repair.
- Maintain landscaping: cut grass, trim vegetation, remove hazardous trees.
- Maintain lighting: replace lamps on a regular schedule with proper lamp wattage.
- Prepare for winter: remove/ store seasonal components, service disruption notice.

Accessible parking and payment machines (on-street parking and off-street parking lots)

- Maintain surface paint markings: repaint linework, access aisles, access symbol.
- Maintain surface: sweep, remove snow, de-ice, repair as needed.
- Maintain width/ overhead clearance: trim bushes and branches.
- Maintain signage: repair/replace accessible parking signs.
- Maintain lighting: replace lamps on a regular schedule with proper lamp wattage.
- Maintain payment machines: replace ticket paper, repair kiosks, adjust contrast settings for digital machines, post notice of temporary service disruptions as required.

Service areas (service counters, waiting areas, queuing lines)

- Maintain clear paths of travel: remove clutter such as boxes, carts, tables not in use.
- Maintain access to counter: keep floor space clear in front of and under the counter.
- Maintain device access: make point of sale devices, pens & speaking ports usable.
- Maintain access to all objects: make forms/ brochures, self-serve items reachable.
- Maintain accessibility signage: direct people to accessible seating/counter locations.
- Maintain width between queuing lines: min. 1100 mm wide, 1500 mm turning space.
- Maintain rails on queuing lines: make low rail cane detectable, max. 680 mm high.
- Maintain access to children's play areas: remove clutter as required.
- Maintain accessible seating:
 - Integrate accessible seating alongside the other seating.
 - Provide companion seating beside accessible seating.
 - Make area beside accessible seating free of clutter.
 - Offer choice of seating: with/without armrests, wider seat, higher weight capacity.
 - Make accessible fixed seating signage visible and replace as required.
 - Provide seating at regular intervals along lengthy queuing lines.

Accessible Taxicabs

There is currently one taxicab company operating in Peterborough, Capital Taxi. Accessibility staff corresponded with Capital Taxi in January 2024, who reported they have over 50 vehicles in their fleet with 18 vehicles operating as accessible taxicabs. The company noted accessible taxicab demand is high from early morning to midnight most days, and low from midnight to 6:00 a.m. Capital Taxi was also asked to report on industry barriers and provided the following relevant information:

- The cost of accessible vehicles is approximately double the cost of regular vehicles;
- Wear factor on accessible vehicles removes them from service 1.5 to 2 years sooner than regular vehicles;
- Accessible taxicab drivers are paid a premium;
- There is a higher driver turnover rate for accessible taxicab service;
- Accessible taxicab service is supplemented financially by regular taxi revenue; and
- Regular taxicab revenue is reduced due to growing ride share competition.

The City also obtained feedback from the public on accessible taxicab service, through the public consultation process for the Accessibility Plan.

As a private sector service, the City has limited authority to influence the taxicab industry to meet the need for accessible taxicabs. The City will continue to monitor numbers of accessible taxicabs serving the community and survey the public to help determine demand. The information will be used to update relevant by-laws as necessary.

Note, taxicab licensing administrative duties will be transferred from Police Services to the City in 2024. It is anticipated that the current Taxicab Licensing By-law will be repealed and replaced in 2024 with a new Driving Services Licensing By-law. In the interim, customers can file taxicab complaints to the Police Services Board per the instructions provided on the [licensed taxicab section of the Peterborough Police Service website](https://www.peterboroughpolice.com/en/police-services-board/licensed-taxi-limousine-and-towing-firms.aspx).

[<https://www.peterboroughpolice.com/en/police-services-board/licensed-taxi-limousine-and-towing-firms.aspx>]

As required by the IASR, the current Taxi By-law requires owners and operators of taxicabs to not charge a higher fare or an additional fee for a person with a disability, and not charge a fee for storing mobility aids or mobility assistive devices. The by-law also requires owners and operators of taxicabs to place vehicle registration and identification information on the rear bumper of the taxicab and make the information available to passengers in an accessible format.

7.0 Resources

7.1 Accessibility Training

As part of the City's commitment to demonstrate leadership for accessibility in the community, the City of Peterborough has an [online accessibility training portal](#) to help meet the training requirements of the IASR. Courses were developed for City staff, but everyone is welcome to use them.

[<https://www.peterborough.ca/aodatraining>]

7.2 Accessibility Funding Opportunities

The information in the following Government of Canada and Government of Ontario list of funding opportunities, is current as of June 2024. Funding name, details and links may be subject to change.

Enabling Accessibility Fund

The Government of Canada's [Enabling Accessibility Fund \(EAF\)](#) provides funding for projects that make Canadian communities and workplaces more accessible for persons with disabilities. The fund aims to create more opportunities for persons with disabilities to take part in community activities, programs and services, or access employment. The EAF is the main source of accessibility funding the City leverages to implement projects that specifically focus on making facilities, buildings and parks more accessible.

There are three different program components in the EAF: Youth Innovation Component (up to \$10,000), Small Projects Component (up to \$100,000) and the Mid-sized Projects Component (up to \$3 million). Each component holds separate calls for funding.

[<https://www.canada.ca/en/employment-social-development/programs/enabling-accessibility-fund.html>]

EnAbling Change Program

The Government of Ontario's [EnAbling Change Program](#) provides funding to not-for-profit organizations, industry organizations and professional associations to educate their stakeholders about the value and benefits of accessibility, help support compliance with accessibility laws and promote a culture of inclusion.

[<https://www.ontario.ca/page/enabling-change-program>]

Inclusive Community Grants

The Government of Ontario's [Inclusive Community Grants Program](#) helps ensure local governments and community organizations consider Ontarians of all ages and abilities at every stage of community planning and development. Inclusive communities respond to both the opportunities and challenges of an aging population by creating physical and social environments that support independent and active living and enabling older adults and people with disabilities to continue contributing to all aspects of community life.

Ontario's Inclusive Community Grants Program supports community projects that benefit local communities; promote accessibility, safety and active living for people of all ages and abilities; and meet the needs of seniors and people with disabilities.

[<https://www.ontario.ca/page/inclusive-community-grants>]

National Housing Strategy Funding Programs

Canada's National Housing Strategy offers funding through a variety of programs and initiatives administered by the Canadian Mortgage and Housing Corporation. The strategy is bringing together the public, private and non-profit sectors to ensure Canadians across the country have access to housing that meets their needs and is affordable. To achieve this, the strategy first focuses on the most vulnerable Canadians, including people with disabilities.

The [National Housing Strategy's funding programs](#) include the Affordable Housing Fund, which has separate streams for new affordable housing and the renovation and repair of existing affordable and community housing. Funds are provided as low-interest and/or forgivable loans and contributions. The Affordable Housing Fund streams focus on developing energy-efficient, accessible and socially inclusive housing that is mixed-income, mixed-tenure and mixed-use.

[<https://www.placetocallhome.ca/funding-programs>]



8.0 Report a Barrier

Anyone can report barriers to accessibility that prevents a person with a disability from accessing a City service, program, information or a facility. Use the City's [Report an Issue form](#) to report a barrier.

If the feedback included contact information, any immediate action resulting from the feedback will be communicated back to the person who submitted the feedback. All feedback related to accessibility will be captured in a central location for analysis and record keeping. Feedback will be used to help identify, prevent, and remove barriers in a timely manner and help prioritize accessibility improvements.

The City of Peterborough is committed to making the feedback process accessible for people of all languages and abilities. The City uses digital feedback forms wherever possible to allow residents who don't speak English to use translation software and to allow residents who use screen reading software to access information. Accessible formats and communication supports are available upon request.

[<https://www.peterborough.ca/reportanissue>]



9.0 Special Note on Accessible Housing

The City acknowledges it plays a key role to ensure there is an adequate supply and variety of housing in Peterborough, including accessible housing, through the land use planning processes.

The ‘complete community’ guiding principle of the Official Plan encourages and supports the provision of a full range and mix of housing options throughout the City to meet the needs of residents throughout their lives. New development and redevelopment should provide for accessible housing units and maximize the number of residential units which are in close proximity to active transportation and transit routes, shops and services, and public service facilities. Development proposals within Strategic Growth Areas will be planned to include a diverse mix of uses, including accessible housing, to support existing and planned transit service levels.

The City will encourage and assist the creation of accessible housing by applying guiding objectives, and by working with developers to add to the accessible housing supply. For example, the City will promote infill development with higher density housing forms that are subject to more stringent accessibility requirements of Ontario’s Building Code. These types of buildings will have barrier-free access and automatic door operators at main entrances, elevator access to all floors of the building, a barrier-free walkway network on the site and a minimum 15% of units with a barrier-free path of travel. The City will also explore opportunities to fast-track development applications that focus on accessible housing.

The City is playing a more proactive role in creating accessible housing units, such as the 6-storey, 53-unit affordable housing project currently under construction at **681 Monaghan Road**. The affordable housing project will be home to vulnerable populations in Peterborough, including people with disabilities.



Compliance + Inclusion