

May 6th 2025

Barrier-Free Cambridge respectfully submits the following correspondence for inclusion in the meeting minutes regarding the proposed new Comprehensive Zoning By-law and companion Official Plan Amendment.

### **Lack of Required Accessibility Advisory Committee Consultation**

Under the Accessibility for Ontarians with Disabilities Act (AODA) and O. Reg. 191/11, designated public sector organizations, including municipalities, are legally required to consult their Accessibility Advisory Committee (AAC) when developing policies and plans that affect accessibility, including those related to the built environment.

We are deeply concerned that the City of Cambridge has not consulted the Accessibility Advisory Committee during the development of the draft bylaw, which is a clear violation of these legislative obligations. The statutory meeting materials note that AAC consultation is “planned for May or June,” but by then, the draft has already been publicly presented, which undermines the AAC’s ability to shape key accessibility-related components of the zoning framework. The legislation states consultation when developing, not after the draft has been produced and publicly presented.

The City must pause this process and formally engage the AAC immediately, in accordance with provincial legislation.

## **Accessibility Gaps in the Draft Zoning By-law**

Upon review of the publicly released materials, we note the following accessibility concerns:

### **1. Accessible Parking Standards**

While the bylaw includes accessible parking requirements (a positive step forward), it fails to specify whether these align with the AODA Design of Public Spaces Standard, including:

- Required ratios based on total spaces
- Van-accessible space requirements
- Proximity to building entrances

### **2. Form-Based Residential Zoning**

- The shift to “form-based” residential zoning emphasizes building appearance and massing over land use, but it remains unclear how accessibility considerations (e.g., visitable units, universal design, or minimum accessible housing quotas) are integrated.
- There is a risk that form-based zoning could inadvertently exclude people with disabilities from new developments if accessibility is not an explicit regulatory component.

### **3. Commercial and Core Area Zones**

- While the draft bylaw proposes expanded mixed-use permissions, it does not clearly state how new or renovated commercial spaces must comply with AODA accessibility standards.
- Without clarity, this could result in continued barriers in storefront access and entrances.

### **4. Public Consultation and Engagement**

- The engagement process, though broad, did not explicitly include targeted outreach to disability communities or accessibility organizations.
- True accessibility must go beyond physical design and include barrier-free participation in decision-making processes.

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## **Requested Actions**

We urge Council and staff to:

- Immediately consult the Accessibility Advisory Committee on the draft zoning bylaw and Official Plan Amendment before proceeding further.
- Include clear, enforceable standards for accessible parking, housing, and commercial spaces aligned with FADS, AODA requirements and best practices in universal design.
- Commit to transparent public reporting on how accessibility feedback is incorporated into the final zoning framework.
- Ensure that the forthcoming Zoning By-law and official plan amendments updates actively remove existing barriers, rather than create new ones through regulatory ambiguity.

Accessibility is not a feature to be added after the fact, it must be embedded from the start. We remind Council that AODA compliance is not optional, and failure to follow required consultation and planning standards is not only a policy failure but a legal one.

Sincerely,  
Barrier-Free Cambridge