

June 10, 2025

**VICEREGAL PATRON**

Her Excellency the Right Honourable  
Mary Simon, Governor General of  
Canada

**PRÉSIDENTE D'HONNEUR  
VICE-ROYALE**

Son Excellence la très honorable  
Mary Simon, gouverneure générale  
du Canada

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Leonard Baker

The Honourable Rob Flack  
Minister of Municipal Affairs and Housing  
Submitted online

Dear Minister Flack,

We are pleased to provide you with feedback on proposed legislative changes to the Planning Act and City of Toronto Act, 2006 through *Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025* (Bill 17) and related regulatory changes.

In 2019, the Government of Canada enshrined housing as a human right in the National Housing Strategy Act (2019). Additionally, the United Nations Convention on the Rights of Persons with Disabilities (CRPD), to which Canada is a signatory, requires governments to recognize the equal right of all persons with disabilities to live independently and in the community, with choices equal to others, including by ensuring that persons with disabilities can choose their place of residence. Unfortunately, due to the lack of affordable, accessible housing in Canada, many people with disabilities are unable to access housing that meets their needs and enables them to remain independent in their own homes and communities.

We are hopeful that Bill 17 will increase the availability of homes for Ontarians and consequently make homes more affordable for all. However, without an amendment to the bill, Ontarians with disabilities will not benefit from this initiative, unless the new homes that are built are accessible or accessible ready and easily adaptable.

According to Statistics Canada's most recent *Canadian Survey on Disability* (2022), 27 percent of Canadians aged 15 and older identified with having at least one disability – an increase of 4.7 percent from 2017. This trend is likely to continue as Canada's population ages.<sup>i</sup> In 2017 at least 13 percent of those with physical disabilities were unable to obtain the accessibility features and aids that they needed in their homes<sup>ii</sup>.



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For over 20 years, MODC has administered the Home and Vehicle Modification Program in Ontario, first on behalf of the Ministry of Children, Community and Social Services, and now on behalf of the Ministry of Seniors and Accessibility. Our service users and staff have seen firsthand how important it is that homes be built in easily adaptable ways for people with disabilities and seniors to meet their needs change as they age. Too often, we have seen our service users lose the ability to make independent choices for adaptations that best meet their needs because of the need to pay for additional renovations that make the adaptation possible. By prioritizing adaptable, accessible home construction, we can ensure more people can remain independent in their homes and communities and out of long-term care and hospital when they do not need to be there.

There are existing solutions and guidance we can adopt to ensure newly built homes are either accessible, or accessible ready.

- The [CSA/ASC B652, Accessible dwellings standard](#) is an evidence based voluntary national standard developed to support peoples' accessibility needs. It outlines the requirements for the design, construction, and renovation of accessible homes. It was written to help people build homes that can meet a wide range of requirements and are easily adaptable over time.
- The [CAN/ASC 2.8, Accessible-Ready Housing Standard](#) outlines a "framework for accessible-ready housing, easily adaptable with minimal alterations. It incorporates legal, technical, and research sources, providing guidelines for various housing elements. The Standard emphasizes "Design for Accessible-Ready" (DAR), a proactive approach anticipating future accessibility needs, ensuring homes can be easily modified to meet emerging requirements."

Ensuring all new home builds comply with these standards (at minimum, CAN/ASC 2.8) means that more Ontarians will be able modify their homes to meet their needs, and remain in their communities. The additional costs of design features to make a newly constructed home accessible or adaptable are significantly lower than the cost of converting an existing dwelling to make it accessible<sup>iii</sup>. This is a critical opportunity to build inclusively from the start, increasing the supply of accessible housing and preventing future costs of modifications for governments and individuals.

Expanding the accessibility and adaptability requirements for all new and renovated buildings will bring Ontario a significant step closer to realizing the Accessible Canada Act's goal of a barrier-free Canada and meet our obligations under the CRPD, the National Housing Strategy Act, and the International Covenant on Economic, Social and Cultural Rights.

Most importantly, this change could enable people who need accessible housing to return home from costly institutional care, facilitate employment and full participation in family and community life, and reduce growing pressures on healthcare and long-term care systems. This is a significant opportunity to improve the quality of life for so many people with accessibility needs. We strongly believe that accessible housing through

adaptable and Universal Design is possible and within reach and we ask for your support to help make this happen.

We thank you for the opportunity to respond to this important consultation.

Sincerely,



Mary-Kathleen Dunn  
National Manager, Public Affairs  
March of Dimes Canada

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<sup>i</sup> Statistics Canada. New Data on Disability in Canada, 2022. [internet].  
<https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2023063-eng.htm>. Accessed February 28, 2024.

<sup>ii</sup> Statistics Canada. Housing Experiences in Canada: Persons with disabilities. [Internet].  
<https://www150.statcan.gc.ca/n1/pub/46-28-0001/2021001/article/00011-eng.htm>. Accessed February 28, 2024.

<sup>iii</sup> Canada Mortgage and Housing Corporation. "Cost of Accessibility Features in Newly-Constructed Modest Houses". CMHC Research Insight. November 2016, p. 2.