

Advisory Committee of Council Staff Report



To Accessibility Advisory Committee

Date Tuesday, May 21, 2024

Subject **Playground accessibility**

Recommended motions

1. That the AAC recommends that new playgrounds include a minimum of two wheelchair accessible play components. Where possible, this will be achieved by a ramp onto the play structure. Where a ramp is not feasible, this will be achieved by implementing inclusive play components in the playground area that are within 255 mm (10 inches) of an accessible pathway.
 2. That the AAC supports the geographic distribution of playgrounds with rubber surface within 2.5 km of residential areas.
 3. That the AAC recommends that economic need be a factor in determining the location of playgrounds with rubber surface.
 4. That the AAC supports using a geographic distribution metric rather than a ratio metric for implementing playgrounds with rubber surface.
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Executive Summary

Purpose of Report

To discuss playground accessibility with the Accessibility Advisory Committee (AAC) as directed by Council.

Key Findings

Parks staff presented the final Parks and Recreation Master Plan (PRMP) to City Council in October 2023. Council approved the PRMP but referred five items relating to playground accessibility back to staff to consult with the AAC and report back to Council if any new service levels are required. The referred items generally relate to wheelchair accessibility of playground components and the strategy for implementing rubber safety surfacing city-wide.

Through this report City staff note some of the challenges with the motions as presented at Council and make recommendations for revised motions that are achievable and sustainable within approved capital budgets and forecasts.

Strategic Plan Alignment

The topic of playground accessibility aligns with the Strategic Plan theme of Foundations, specifically by “fostering a culture of continuous improvement” and “removing barriers by integrating Guelph’s Equity Lens into everything we do.”

This topic also aligns with the Strategic Plan theme of City Building, specifically by “attracting more people to our parks and programs by making them easier to access and enjoy.”

Financial Implications

If the AAC votes in favour of the recommended motions as written, staff anticipate that the financial impact will be an increase of \$20,000 per playground project which can be reasonably accommodated within the capital budget forecast.

Report

The [Parks and Recreation Master Plan](#) (PRMP) is a strategic document that guides how the City plans, designs, funds, builds, and maintains the park and recreation network. The master plan and the accompanying [Needs Assessment](#) identify needs for current and future residents, establish future initiatives, and guide strategic investment for parks and recreation in the city.

The master plan was developed over four phases of work, and staff engaged with the AAC four times over the course of the project.

On October 24, 2023 staff presented a new iteration of the PRMP to City Council for approval. Council approved the PRMP but referred five items relating to playground accessibility back to staff to consult with the AAC, including:

1. That the final PRMP include a requirement that all new playgrounds in Guelph include a minimum of two wheelchair accessible play equipment, and that talk tubes are not considered one of those features.
2. That the final PRMP include a requirement that all new playgrounds in Guelph include at least one play structure that is wheelchair accessible to the lowest deck.
3. That recommendation 33 in the Parks and Recreation Master Plan be revised to read “Apply a service level target of one rubber surface playground within 2.5 km of residential areas until 2025, moving to a target of one rubber surface playground within 1.5 km of residential areas starting in 2026.
4. That the final PRMP include a recommendation that areas of economic need will be a factor in determining the location of playgrounds with rubber safety surface.
5. That the final PRMP include a recommendation to work with the Accessibility Advisory Committee to establish a target ratio of playgrounds that have rubber safety surface.

While Parks staff are supportive of playground accessibility, there are some challenges with implementing the above-noted recommendations. These challenges are further described below.

Item 1: Wheelchair accessible play components

Motion as presented at Council: That the final PRMP include a requirement that all new playgrounds in Guelph include a minimum of two wheelchair accessible play equipment, and that talk tubes are not considered one of those features.

It is staff's understanding that the AAC does not consider Engineered Wood Fibre to be wheelchair accessible. Therefore, for the purpose of this report, ground-play components over Engineered Wood Fibre do not meet the intention of the motion. With this in mind, there are three options to consider:

- A. Use rubber safety surface at all playgrounds;
- B. Include a ramp onto the play equipment at all playgrounds;
- C. Include play components that support inclusion and social interaction that are within 255 mm of the accessible pathway surrounding the playground.

With current approved and forecasted capital budgets it is not sustainable for the City to implement rubber safety surfacing at all playgrounds. Playgrounds with rubber surface are approximately three times the cost of playgrounds that use Engineered Wood Fibre. The life cycle of rubber is also approximately half the life cycle of Engineered Wood Fibre and it requires replacement two times in the life cycle of the play equipment. Therefore, staff do not recommend Option A.

While ramps onto play equipment may be possible at new playgrounds, they are difficult to implement as part of the Annual Play Equipment Life Cycle Project. This is because the scope of this project does not include replacement of existing playground curbs. The budget for this work accounts for replacement of the equipment only within the existing footprint of the play area. The length of ramping needed to achieve an accessible slope to the play equipment results in the equipment being pushed further into the centre of the play space, reducing the amount of play components that can be implemented and therefore a loss of play value. With current approved capital budgets and forecasts it not sustainable for the City to replace or expand the curbs as part of the playground life cycle project. Therefore, staff recommend implementing Option B (ramps onto play equipment) where possible. Staff note that this will not likely be achievable at many of the playground replacement sites.

Where ramps cannot be achieved, staff recommend implementing inclusive play components within the playground area that are within 255 mm of an accessible pathway. This is the maximum side reach distance identified in the City's Facility Accessibility Design Manual (FADM).

Staff estimate that the financial impact of adding ramps in new playgrounds, where feasible, will be approximately \$20,000 per project, and that this can be reasonably accommodated within the capital budget forecast.

Recommended motion: That the AAC recommends that new playgrounds include a minimum of two wheelchair accessible play components. Where possible, this will be achieved by a ramp onto the play structure. Where a ramp is not feasible, this will be achieved by implementing inclusive play components in the playground area that are within 255 mm of an accessible pathway.

Item 2: Wheelchair access onto play equipment

Motion as presented at Council: That the final PRMP include a requirement that all new playgrounds in Guelph include at least one play structure that is wheelchair accessible to the lowest deck.

As described above, staff recommend implementing ramps onto play equipment where possible.

Recommended motion: That the AAC recommends that new playgrounds include a minimum of two wheelchair accessible play components. Where possible, this will be achieved by a ramp onto the play structure. Where a ramp is not feasible, this will be achieved by implementing inclusive play components in the playground area that are within 255 mm of an accessible pathway.

Item 3: Distribution of playgrounds with rubber surface

Motion as presented at Council: That recommendation 33 in the Parks and Recreation Master Plan be revised to read "Apply a service level target of one rubber surface playground within 2.5 km of residential areas until 2025, moving to a target of one rubber surface playground within 1.5 km of residential areas starting in 2026.

Staff presented the Playground Rubber Surface Strategy to the AAC in April 2023. The AAC unanimously passed the following motion: "That the AAC supports the adoption of a geographic distribution of playgrounds with rubber surface within 2.5 km of residential areas. Further, the AAC supports the implementation of two new rubber surface playgrounds to fill distribution gaps in the central and north-west areas of the City."

In the past, Guelph has implemented playgrounds with rubber surface based on park type and on a case-by-case basis. This resulted in an uneven and inequitable distribution of playgrounds with rubber surface city-wide. The purpose of shifting to the geographic distribution model was to ensure that playgrounds with rubber surface are located within reasonable distance to residential areas (5-minute drive or 30-minute walk); and that they are more evenly distributed throughout the city. This is a balanced approach that recognizes that there is a need for rubber surfacing, while being fiscally responsible.

Adjusting the distribution target to 1.5 km will result in adding nine additional rubber surface playgrounds City-wide. This will require significant additional tax-funding or de-prioritization of other park projects. This may also result in slowing of the Annual Play Equipment Life Cycle Project, with more operational dollars spent on maintaining older infrastructure, or closure of playgrounds that are at the end of their service life before they are replaced.

Recommended motion: That the AAC supports the geographic distribution of playgrounds with rubber surface within 2.5 km of residential areas.

Item 4: Consideration of economic need when selecting location of playgrounds with rubber surface

Motion as presented at Council: That the final PRMP include a recommendation that areas of economic need will be a factor in determining the location of playgrounds with rubber safety surface.

Parks staff have no opposition to considering economic need when determining the location of playgrounds with rubber surface. However, staff note that the city-wide distribution gaps will be considered first, followed by areas of economic need being identified within these gaps.

Recommended motion: That the AAC recommends that economic need be a factor in determining the location of playgrounds with rubber surface.

Item 5: Target ratio for playgrounds with rubber surface

Motion as presented at Council: That the final PRMP include a recommendation to work with the Accessibility Advisory Committee to establish a target ratio of playgrounds that have rubber safety surface.

It is staff's understanding that the intention of this motion is to increase the amount of playgrounds with rubber surface in the city. Staff have concerns with introducing a ratio metric, as all playgrounds with rubber safety surface could be unevenly concentrated in certain areas of the city.

As described above in Item 3, the City has already adopted a geographic distribution target, with support from the AAC. The distribution target is intended to be a measurable and equitable way to establish the quantity and location of playgrounds with rubber surface, and therefore a ratio metric is not required.

Recommended motion: That the AAC supports using a geographic distribution metric rather than a ratio metric for implementing playgrounds with rubber surface.

Financial Implications

If the AAC votes in favour of the recommended motions as written, staff anticipate that the financial impact will be an increase of \$20,000 per playground project which can be reasonably accommodated within the capital budget forecast.

Consultations

- AAC, February 18, 2020 – Parks and Recreation Master Plan
- AAC, June 16, 2020 – Parks and Recreation Master Plan
- AAC, April 18, 2023 – Playground rubber surface strategy in the Parks and Recreation Master Plan
- AAC, June 20, 2023 – Parks and Recreation Master Plan

Attachments

Attachment-1 Minutes of Guelph City Council, October 24, 2023

Attachment-2 Playground Accessibility Presentation

Resources

[Creating Inclusive Playgrounds: A Playbook of Considerations and Strategies](#)

Departmental Approval

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