



Rialtas na hÉireann
Government of Ireland

Part M & TGD M

Provisions Relating to Changing Places

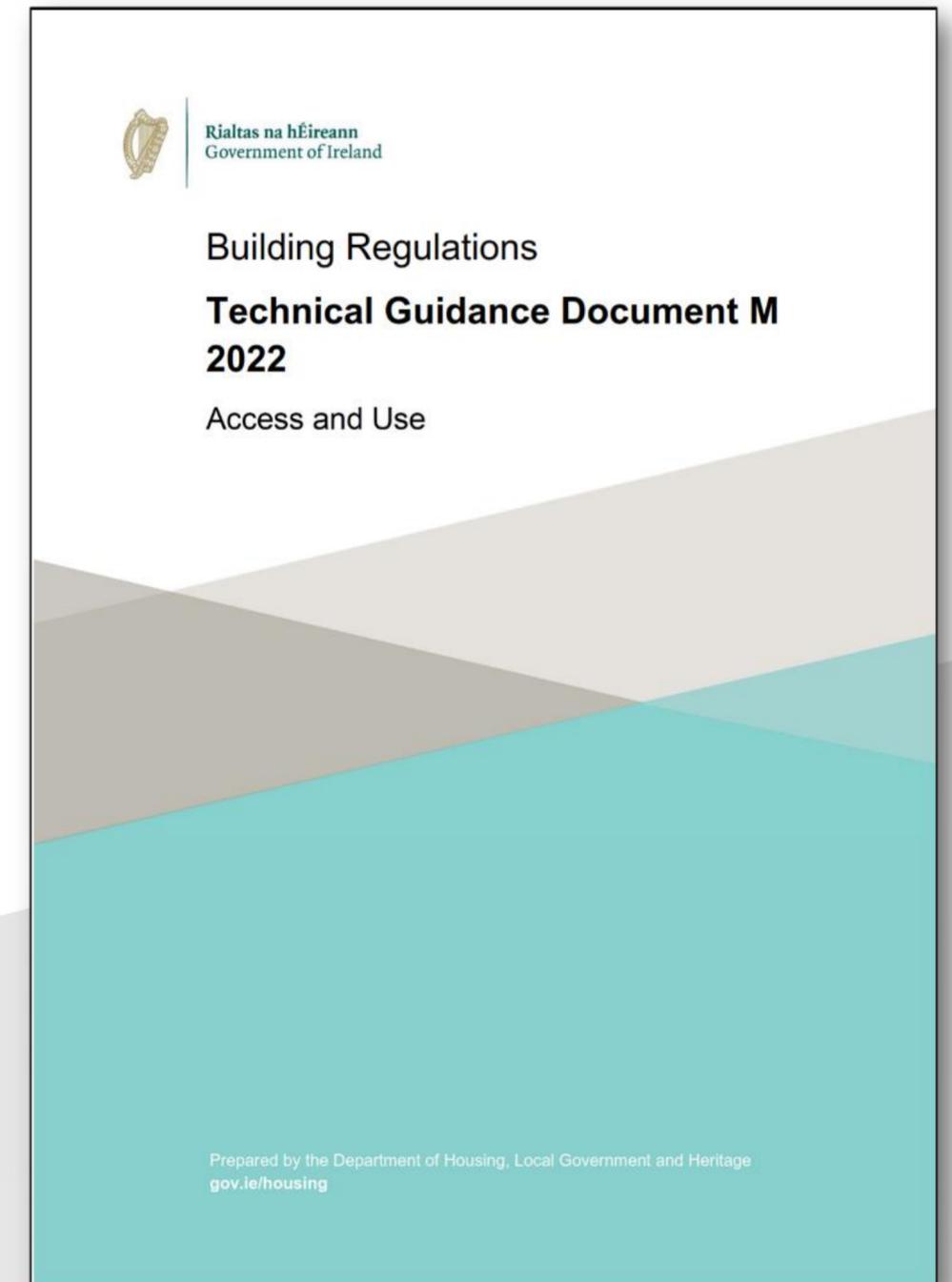
Toilets in Certain Buildings

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IBCI Conference March 2023

Overview



- What is a changing places toilet ?
- Overview of the amendment of Part M and TGD M to make provision for changing places toilets in certain buildings
- Relevant Building types
- Technical provisions
- Room layout and circulation spaces
- Transitional arrangements



What is a changing places toilet ?

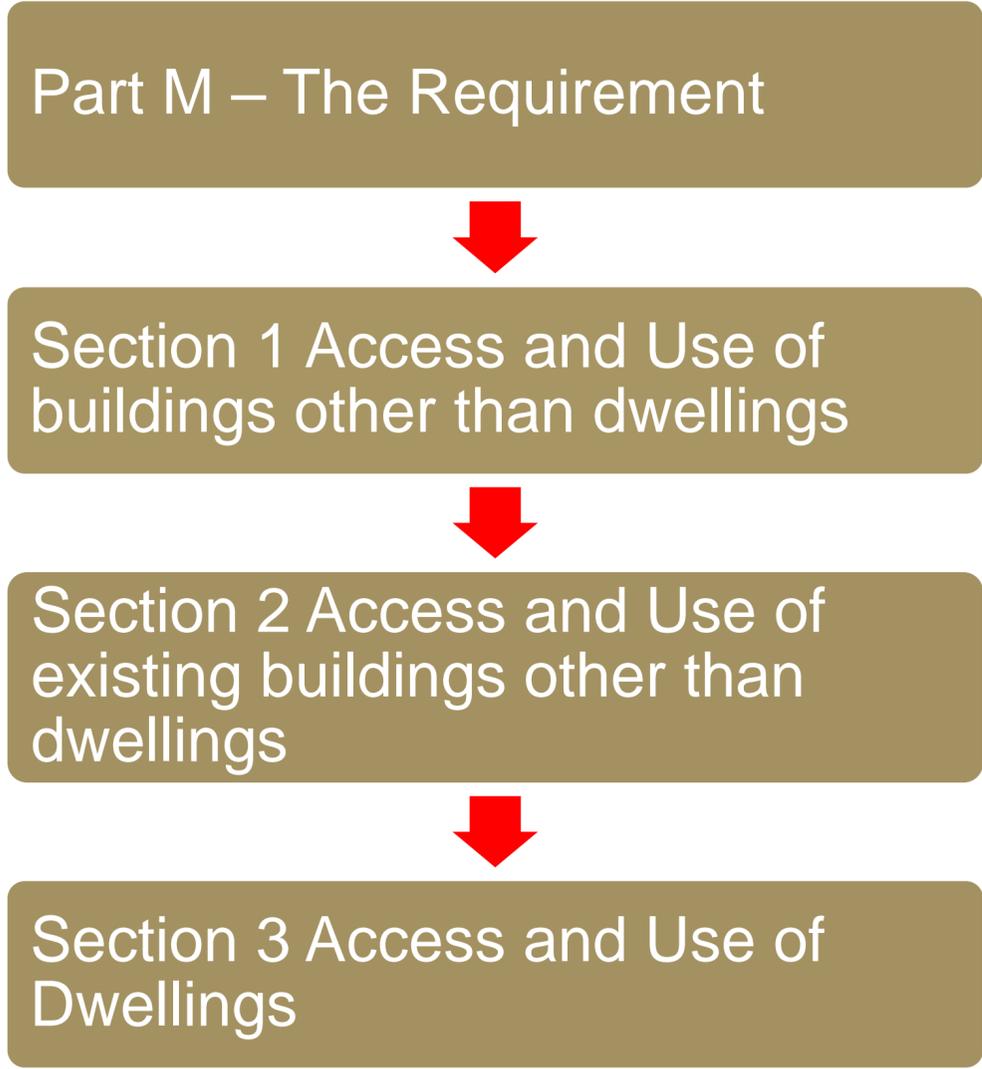


- A Changing Places toilet provides sanitary accommodation for people who cannot use a standard accessible toilet and who may have one or two assistants with them.
- They provide additional space and equipment and are provided in addition to any other accessible toilets.
- For the purposes of the Building Regulations a 'Changing Places Toilet' means *'an accessible sanitary facility with a toilet, hoist, basin, adult-sized changing bench and optional shower, with adequate space for use by persons with a range of abilities who may require assistance'*.



Courtesy: Inclusion Ireland

Part M and TGD M



<https://www.gov.ie/en/publication/78e67-technical-guidance-document-m-access-and-use/>

Part M – The requirement



The amended requirements of Part M - Access and Use

- The revised M4, requires that **where sanitary facilities are provided in a building**, or in a building that is to be extended, adequate provision shall be made for people to access and use a changing places toilet, having regard to the use and size of the building.

Access and Use	M1	Adequate provision shall be made for people to access and use a building, its facilities and its environs.
	M2	Adequate provision shall be made for people to approach and access an extension to a building.
Sanitary Facilities	M3	If sanitary facilities are provided in a building that is to be extended, adequate sanitary facilities shall be provided for people within the extension.
Changing Places Toilet	M4	Where sanitary facilities are provided in a building, or in a building that is to be extended, adequate provision shall be made for people to access and use a changing places toilet, having regard to the use and size of the building.
Non-Application of Part M	M5	Part M does not apply to works in connection with extensions to and material alterations of existing dwellings, provided that such works do not create a new dwelling.

1.4 Sanitary facilities – General provisions



The number and location of sanitary facilities required in a building will be dictated by the nature of the building, the size of the building, the number of people who will use the building, gender ratio, patterns of use and the ease of access;

- **Scale of provision** of sanitary conveniences (WCs & urinals) - Part G/ TGD G/ Safety, Health and Welfare at Work Regulations 2007;
- **Part M does not create** a requirement for the provision of sanitary facilities but ensures that when they are provided, accessible sanitary facilities are also provided;
- **Part M does not create** a requirement to provide sanitary facilities for different user groups e.g. for visitors where provision has only been made for staff.
- However, in the case of buildings where sanitary facilities **are being provided for use by people other than staff**, at least one changing places toilet should be provided in the buildings listed in Table 1 having regard to the use and size of the building.

1.4 Sanitary Facilities for Buildings Other than Dwellings

1.4.1 Objective

The objective is to provide independently accessible sanitary facilities that meet the needs of people with a wide range of abilities.

1.4.2 Introduction

For the purposes of this part, specific guidance on the provision of sanitary facilities is given in 1.4.3. Detailed guidance on the design of the sanitary facilities is given in 1.4.4 to 1.4.10.

1.4.3 General Provisions

The number and location of sanitary facilities required in a building will be dictated by the nature of the building, the size of the building, the number of people who will use the building, gender ratio, patterns of use and the ease of access. Refer to Part G/TGD G for the scale of provisions for sanitary facilities. In the case of places of work, designers should also have regard to the Safety, Health and Welfare at Work (General Application) Regulations, 2007 (S.I. No. 299 of 2007).

Section 1.4.3 requires the provision of accessible sanitary facilities where sanitary facilities are provided in a building, whether this is for customers, visitors, or staff working in the building. It does not create a requirement for the provision of sanitary facilities in a building or for different user groups e.g. for people other than staff where provision has only been made for staff.

However, in the case of buildings where sanitary facilities are being provided for use by people other than staff, at least one changing places toilet should be provided in the buildings listed in Table 1 having regard to the use and size of the building. The following guidance represents the minimum provisions to ensure that sanitary facilities where provided for a particular user group, are accessible to all in that group e.g. customers and/or staff.

The guidance is based on providing a minimum clear turning space of 1800 mm x 1800 mm for a wheelchair. This space provision will be adequate for many wheelchairs, however some powered wheelchairs and scooters may require larger turning spaces.

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Application of Part M



0.3 Buildings other than dwellings

0.3(b) **Where sanitary facilities are provided**, adequate sanitary facilities are available and accessible to people with a range of abilities.

In addition, where sanitary facilities are provided in a building, or in a building that is to be extended, adequate provision shall be made for people to access and use a changing places toilet, having regard to the use and size of the building;

Application of Part M

- 0.6(a) - New buildings
- 0.6(b)(iii) - Extensions
- 0.6(d) - Material Change of Use

where sanitary facilities are provided in a building, or part of a building, adequate provision shall be made for people to access and use a changing places toilet, having regard to the use and size of the building (refer to 0.6(g)).

However, those involved in the design and construction of buildings should also have regard to the design philosophy of Universal Design and consider making additional provisions where practicable and appropriate. For this purpose, a list of useful references is provided in the Annex to the Code of Practice for the Building Regulations. For more information, see the document 'Building for Excellence in Design'.

Section 2: The guidance in Section 2 should be read in conjunction with Section 1 and is intended to provide additional guidance for:

0.2 The Requirements

(a) Existing buildings

(b) The common parts of buildings

Section 2 provides additional guidance on the elements and features of buildings (0.7) to achieve the requirements of the Regulations. Where works (e.g. alterations, extensions, etc.) to buildings are carried out, and, where necessary, to meet Requirement M1, the provisions of Section 2 should be read in conjunction with the provisions of the Regulations and 0.7 'practicability'.

0.3 Buildings other than dwellings

In the case of buildings designed and constructed after the commencement of the Regulations:

(a) People with disabilities

(b) Where sanitary facilities are provided

In addition, where sanitary facilities are provided in a building, or in a building that is to be extended, adequate provision shall be made for people to access and use a changing places toilet, having regard to the use and size of the building;

(c) where relevant, the provisions of the Regulations shall apply to the common parts of buildings provided that the provisions of the Regulations are not inconsistent with the provisions of the Regulations.

Section 3: The provisions of Section 3 apply to the common parts of buildings provided that the provisions of the Regulations are not inconsistent with the provisions of the Regulations.

0.6 Application of Part M

The Building Regulations apply to any alterations subject to the requirements of Part A, B or M.

This means that alterations to features relevant to compliance with Part M e.g. entrances, circulation, etc., must comply with M1.

The building as a whole, including the approach from the site boundary and from on-site car parking where provided, must be no less compliant with M1 following a material alteration of a building.

However, this does not mean it is necessary to upgrade the existing access to the building entrance unless the entrance itself is subject to a material alteration;

Under M4, where sanitary facilities are provided in a building, or part of a building, that is to be extended, adequate provision shall be made for people to access and use a changing places toilet, having regard to the use and size of the building (refer to 0.6(g)).

¹ A 'changing places toilet' is a toilet basin, adult-sized, for use by persons with disabilities.

² Independent approach means a route of access that does not require the user to pass through any other part of the building.

0.6(g) - Application of Part M



- The provision of a changing places toilet is related to the use and size of the building.
- For the purposes of the provision of a changing places toilet, the various building use classifications are termed 'relevant building uses'.
- The relevant building use can apply to a building, or where a building has a number of different uses, to different parts of the same building.
- In some buildings there may be a number of relevant building uses that exceed the size criteria in Table 1. Where a changing places toilet is provided in such a building, it should be suitably located having regard to the operation and use patterns of all the relevant building uses.
- Table 1 sets out the relevant building uses and the size criteria relating to the provision of a changing places toilet.

Where such material change of use only applies to part of the building, that part must comply with M1 and M4. The approach and access to that part (through independent access or through another part of the building) where practicable (refer to 0.7) must comply with M1 and any sanitary facility provided in or in connection with it must comply with M1 and M4;

- (e) The Requirements of Part M do not apply to works in connection with extensions to and the material alterations of existing dwellings, provided that such works do not create a new dwelling.

However, an extension or a material alteration of a dwelling must not make the building, as a whole, less satisfactory in relation to Part M than it was before.

This means an extension or a material alteration of a dwelling need not itself comply with Part M, but it must not result in the dwelling being less compliant than it previously was;

- (f) The Requirements of Part M do not apply to the part(s) of a building used solely to enable inspection, repair or maintenance of the building.

- (g) The provision of a changing places toilet is related to the use and size of the building. For the purposes of the provision of a changing places toilet, the various building use classifications are termed 'relevant building uses'.

The relevant building use can apply to a building, or where a building has a number of different uses, to different parts of the same building.

In some buildings there may be a number of relevant building uses that exceed the size criteria in Table 1. Where a changing places toilet is provided in such a building, it should be suitably located having regard to the operation and use patterns of all the relevant building uses.

Table 1 sets out the relevant building uses and the size criteria relating to the provision of a changing places toilet.

Relevant floor area



The 'Relevant floor area' means the space bounded by the inner finished surfaces of the enclosing walls, or on any side where there is no enclosing wall by the outermost edge of the floor on that side, of the parts of the building to which people other than staff generally have access.

The calculation of relevant floor area shall:

- a) Include the space occupied by any walls, shafts, ducts or structure within the space being measured.
- b) Exclude staff-only areas or rooms to which people other than staff generally do not have access e.g. staff offices, storage rooms, food preparation areas, filing rooms, cleaner's closets etc.

Refer to the methodology in Technical Guidance Document B – Fire Safety for calculation of the occupant capacity of a building or part of a building.

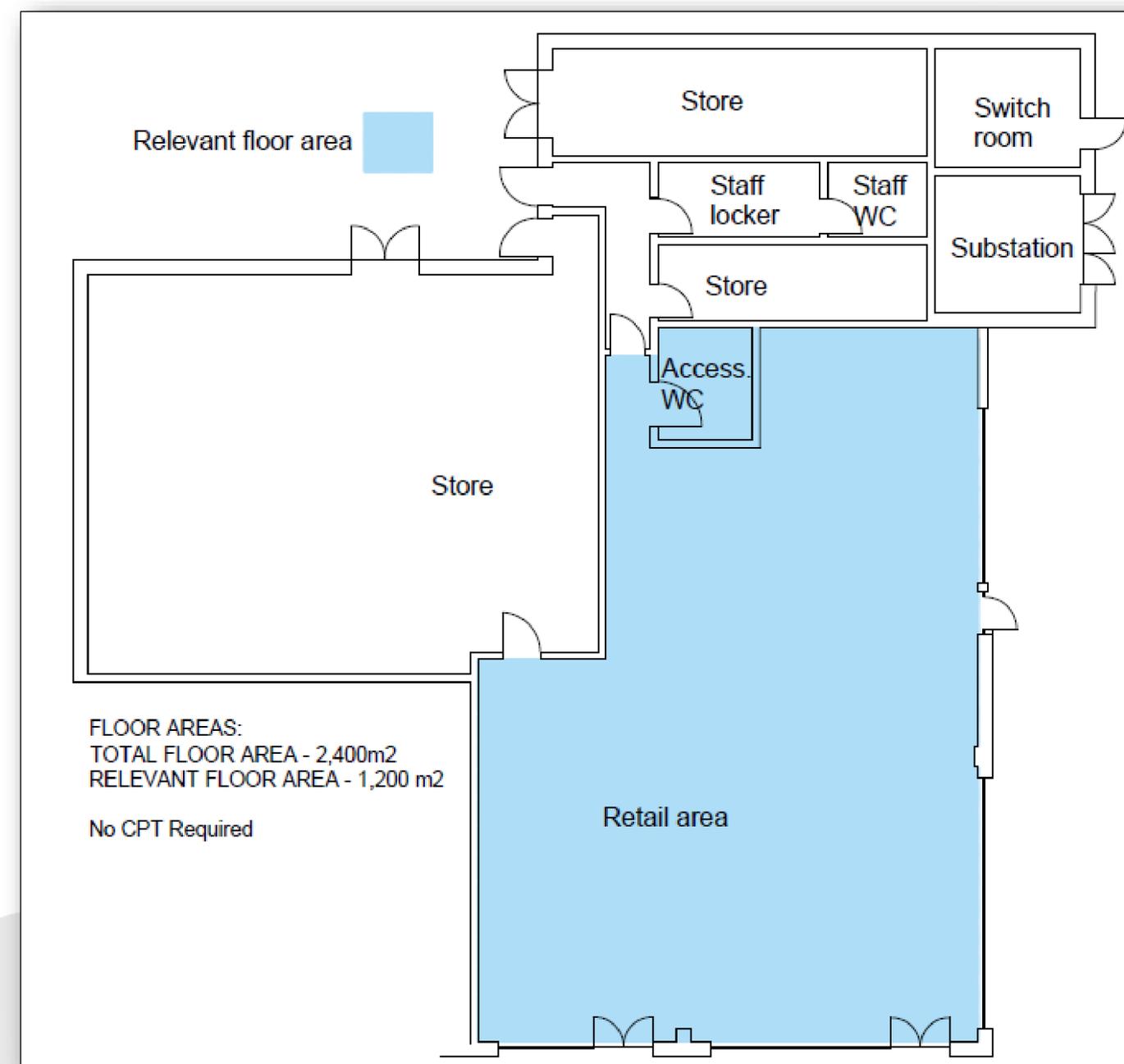


Table 1



The building types in Table 1 include:

- Hospital
- Day centre, other than a crèche, a pre-school or a day nursery, used for the provision of treatment or care to persons where such persons do not stay overnight and includes a day care centre
- Places of assembly used for social or recreational purposes
- Sports pavilion, stadium, grandstand buildings
- Roadside service facility that provides food hall / dining and sanitary facilities
- School (primary, secondary or special schools)
- Third level college, University, or other building for the provision of education
- Terminus, station or other facility for air, rail, road or sea travel
- Office
- Shop
- Shopping centre or retail park
- Hotel
- A public sanitary facilities building managed or controlled by a public body
- Building that provides sanitary facilities as part of a collection of smaller buildings associated with an outdoor amenity

Technical provisions – Section 1.4



The technical provisions relating to a Changing Places Toilet are generally included in:

- 1.4.3 General Provisions
- 1.4.3.6 Provisions for Changing Places Toilets
- 1.4.4 Sanitary Facilities – General
- 1.4.10 Changing Places Toilets (Items (a) to (s))
- Diagrams 26, 27(a), 27(b) and 27(c)

1.4 Sanitary Facilities for Buildings Other than Dwellings

1.4.1 Objective

The objective is to provide sanitary facilities that meet the needs of people with disabilities.

1.4.2 Introduction

For the purposes of this section, the term 'sanitary facilities' includes facilities for the use of people with disabilities. The provisions in this section apply to sanitary facilities in buildings other than dwellings.

1.4.3 General Provisions

The number and location of sanitary facilities shall be dictated by the nature and use of the building and the number of people who will use the facilities. Refer to Part 2 of the Building Regulations 2006 and the Health and Welfare Act 1983 for further information.

Section 1.4.3 requires that sanitary facilities are provided for people with disabilities, including people who are visually impaired, people who are hearing impaired, people who are physically disabled, and people who are cognitively disabled.

However, in the case of a building where the use is by people other than the general public, the provisions in this section do not apply. The following provisions ensure that sanitary facilities are accessible to all in the building.

The guidance is based on the assumption that a changing places toilet is 1800 mm wide for a wheelchair, however, larger turning spaces are required.

1.4.4 Sanitary Facilities

The space provided for sanitary facilities shall be accessible to people with disabilities, including people who are visually impaired, people who are hearing impaired, people who are physically disabled, and people who are cognitively disabled.

For further information, refer to the Building Regulations 2006, Part 2, Section 17210:2021.

Where accessible sanitary facilities are provided, they shall:

- Accessible sanitary facilities shall be accessible from a circulation route.
- Accessible sanitary facilities shall be accessible from the building.
- Any bath, shower or toilet shall be capable of being used by a person in a wheelchair.
- Any door handles shall be accessible to a person in a wheelchair.
- Doors to accessible sanitary facilities shall be capable of being opened by a person in a wheelchair.

1.4.10 Changing Places Toilets

In addition to the general guidance in 1.4.4 where a changing places toilet is provided:

- The minimum overall dimensions of the changing places toilet shall be as follows:
- An 1800 mm x 2000 mm clear space, should be provided for the changing places toilet.
- Unless the door is not be fitted with a door handle.
- The privacy door shall be fitted with a door handle.
- A peninsular WC shall be provided around the WC pan.

Rationale: This allows a person using the toilet to be able to turn around the WC pan.

- A distance of 700 mm shall be provided between the WC pan and the wall.
- Wall mounted toilet paper dispensers shall be provided on both sides of the WC pan.
- Vertical grab rails shall be provided on both sides of the WC pan.

At least one of the following shall be provided:

- Vertical grab rail

Diagram 26 Changing Places Toilet General Arrangement Layout

NOTE:
The overall dimensions should exclude such items as heat emitters, skirting boards, tiles and boxing in of pipework. Adjustments in room sizes will be needed to accommodate these items.
* Where high or low level cisterns are used, a rail with a padded back rest and a separate colostomy changing shelf 125 mm to 150 mm deep x 400 mm wide with its surface 950 mm above floor level should be provided. Where a flat topped close-coupled cistern is used, the cistern should be adequate to also act as a back rest. If the top of the cistern is flat it should be adequate to facilitate a colostomy changing surface for standing users without the extra requirement for a separate shelf.

Technical provisions – Section 1.4.3.6



1.4.3.6 - Provisions for Changing Places Toilets:

The provisions for changing places toilets are as follows:

- (a) At least one changing places toilet should be provided in the buildings listed in Table 1 having regard to the use and size of the building.
- (b) Where a changing places toilet is provided:
 - (i) It should be suitably located having regard to the use and operation of the building
 - (ii) It should be in addition to, and not instead of, the provision of standard and unisex accessible WCs, accessible bathrooms/shower rooms and other changing and/or showering facilities;
 - (iii) It should meet the minimum provisions set out in 1.4.10.

and/or changing facilities should be provided as per 1.4.9 in addition to communal separate-sex facilities. Where it is not practicable to provide both communal and individual facilities, an individual unisex and accessible showering and/or changing facility as per 1.4.9 should be provided. A choice of layouts suitable for left-hand and right-hand transfer should be provided when more than one changing and/or showering facility is provided.

1.4.3.6 Provisions for Changing Places Toilets

The provisions for changing places toilets are as follows:

- (a) At least one changing places toilet should be provided in the buildings listed in Table 1 having regard to the use and size of the building.
- (b) Where a changing places toilet is provided:
 - (i) It should be suitably located having regard to the use and operation of the building¹⁷

¹⁷ For further information see 'Universal Design Guidelines for Changing Places Toilets' (When published by the National Disability Authority).

- (ii) It should be in addition to, and not instead of, the provision of standard and unisex accessible WCs, accessible bathrooms/shower rooms and other changing and/or showering facilities;

- (iii) It should meet the minimum requirements set out in 1.4.10.

1.4.4 Sanitary Facilities – General

The space provided for manoeuvring and the relative positioning of WCs, wash basins and other accessories is critical to enable wheelchair users or people with mobility impairment to adopt various transfer techniques that allow independent or assisted use of sanitary facilities. The guidance given in the following sections

Technical provisions – 1.4.10



The technical provisions include guidance for the:

- Minimum clear turning space within a CPT (2000mm x 1800mm min)
- Minimum effective clear width for the entrance door to a CPT (1,000mm)
- Peninsula Toilet (Min. 900mm from edge of pan to wall)
- Height adjustable wash hand basin
- Height adjustable changing bench
- Circulation space around the WC, Basin and bench
- A continuous charging ceiling hoist providing full room coverage
- A wall mounted privacy screen
- Lighting (note the particular provisions for lighting over the bench)
- Grab rails and drop down support rails
- Wide paper roll
- Hand drying facilities
- Various shelves, mirrors, coat hooks
- Waste disposal bins
- Call alarm system
- Signage
- Shower unit (where required)

1.4.10 Changing Places Toilets

In addition to the general guidance in 1.4.4 where a changing places toilet is provided:

- (a) The minimum overall dimensions and arrangement of equipment, circulation spaces, grab rails and other fittings within a changing places toilet should be provided in accordance with Diagrams 26, 27(a), 27(b) and 27(c)¹⁸;
- (b) An 1800 mm x 2000 mm wheelchair turning space, that is free from obstruction, should be provided directly inside the door to the changing places toilet;
- (c) Unless the door is an accessible power-operated door or a fire door it should not be fitted with a self-closing device;
- (d) The privacy door bolt should incorporate a visual indicator to display when the changing places toilet is occupied or vacant;
- (e) A peninsular WC layout should be provided with a clear circulation space around the WC pan in accordance with Diagram 27(a).

Rationale: This allows for assistance to be provided from both sides of the WC.

- (i) A distance of 750 mm should be provided from the back wall to the front of the WC pan.

Rationale: This allows the wheelchair seat to be parallel with the toilet seat, so that the wheelchair can be reversed against the wall and the person using the toilet does not have to manoeuvre both sideways and also backwards to transfer to and from the WC pan;

- (ii) Wall mounted drop down support rails and vertical grab rails should be provided on both sides of the WC pan in accordance with Diagram 27(a).

At least one of the drop-down support rails should incorporate a toilet roll dispenser;

Vertical grab rails should be a minimum of 600 mm in length.

¹⁸ A changing places toilet is not suitable for Bariatric use where the turning space and load-bearing capabilities are required to be considerably more onerous. It is necessary to obtain specialist advice for such use.

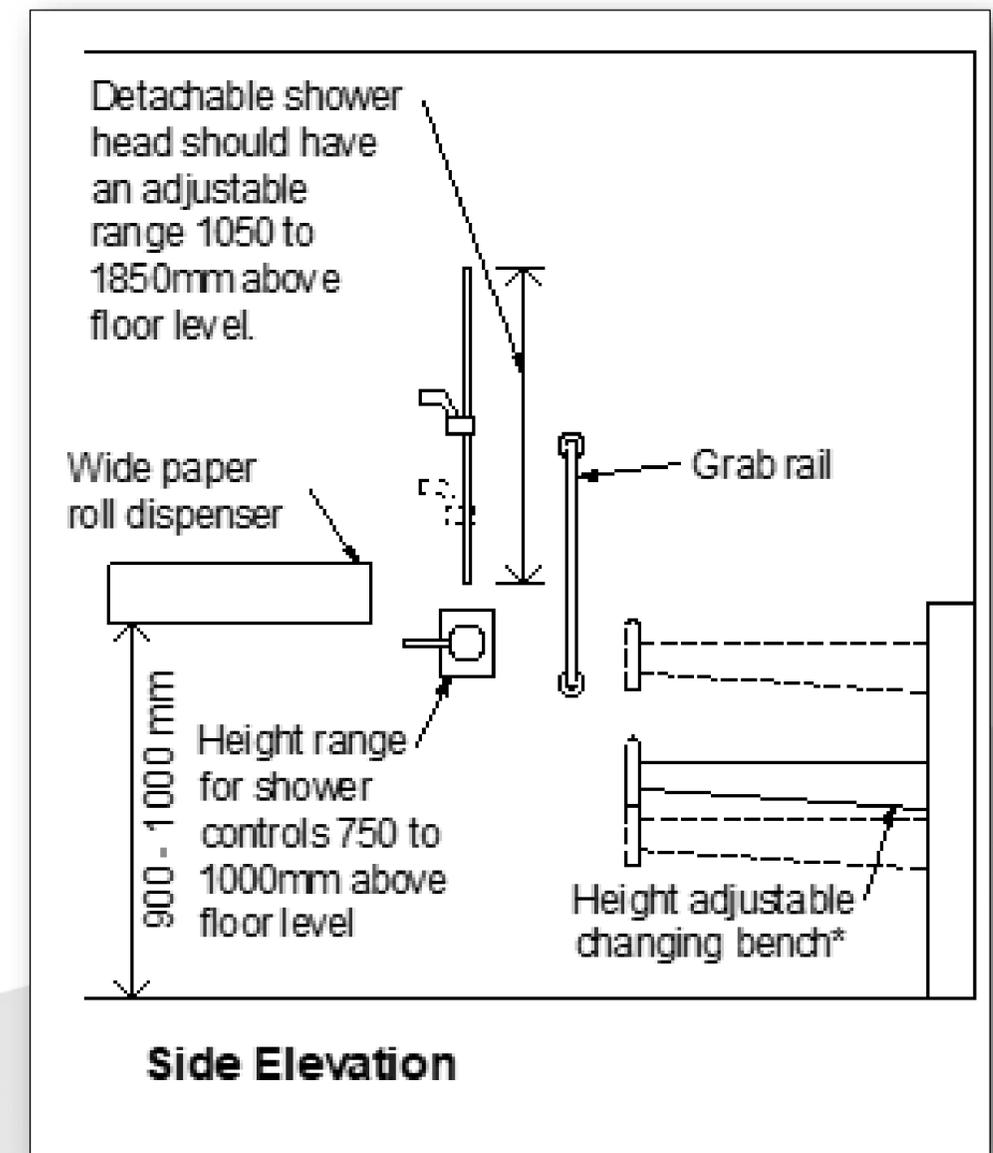
Showers in a CPT (1.4.10(s))



A shower unit should be provided within the changing places toilet in buildings where sanitary facilities combining showers and WCs for use by people other than staff is provided.

The provisions relating to the positioning of the shower, controls etc. are in:

- 1.4.3 General Provisions
- 1.4.4 Sanitary Facilities – General
- 1.4.10(s) Changing Places Toilets
- Diagrams 26, 27(a), 27(b) and 27(c)

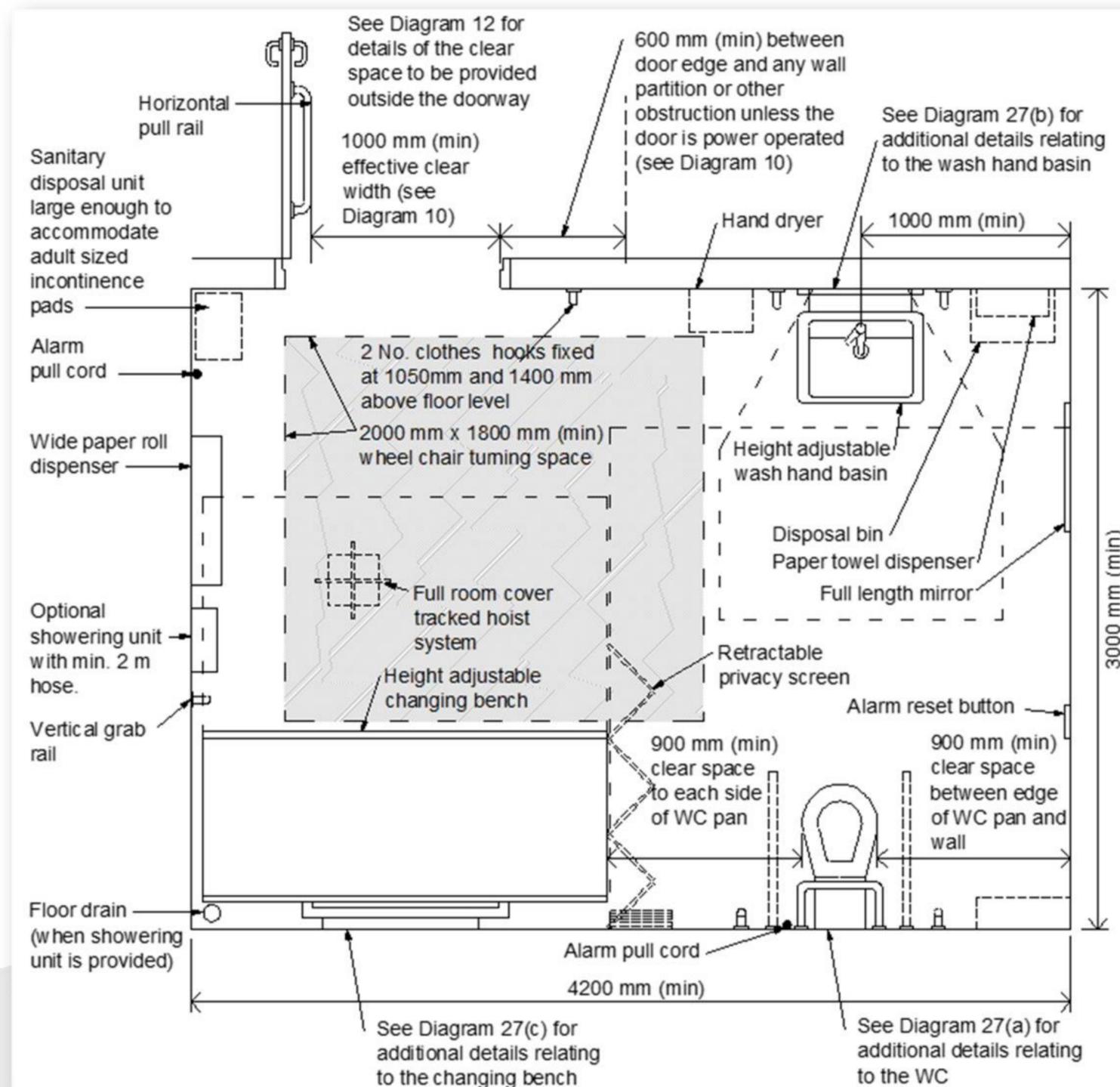


Room size and layout



TGD M makes provision for a minimum room size of 4.2m x 3.0m, with a minimum ceiling height of 2.4m.

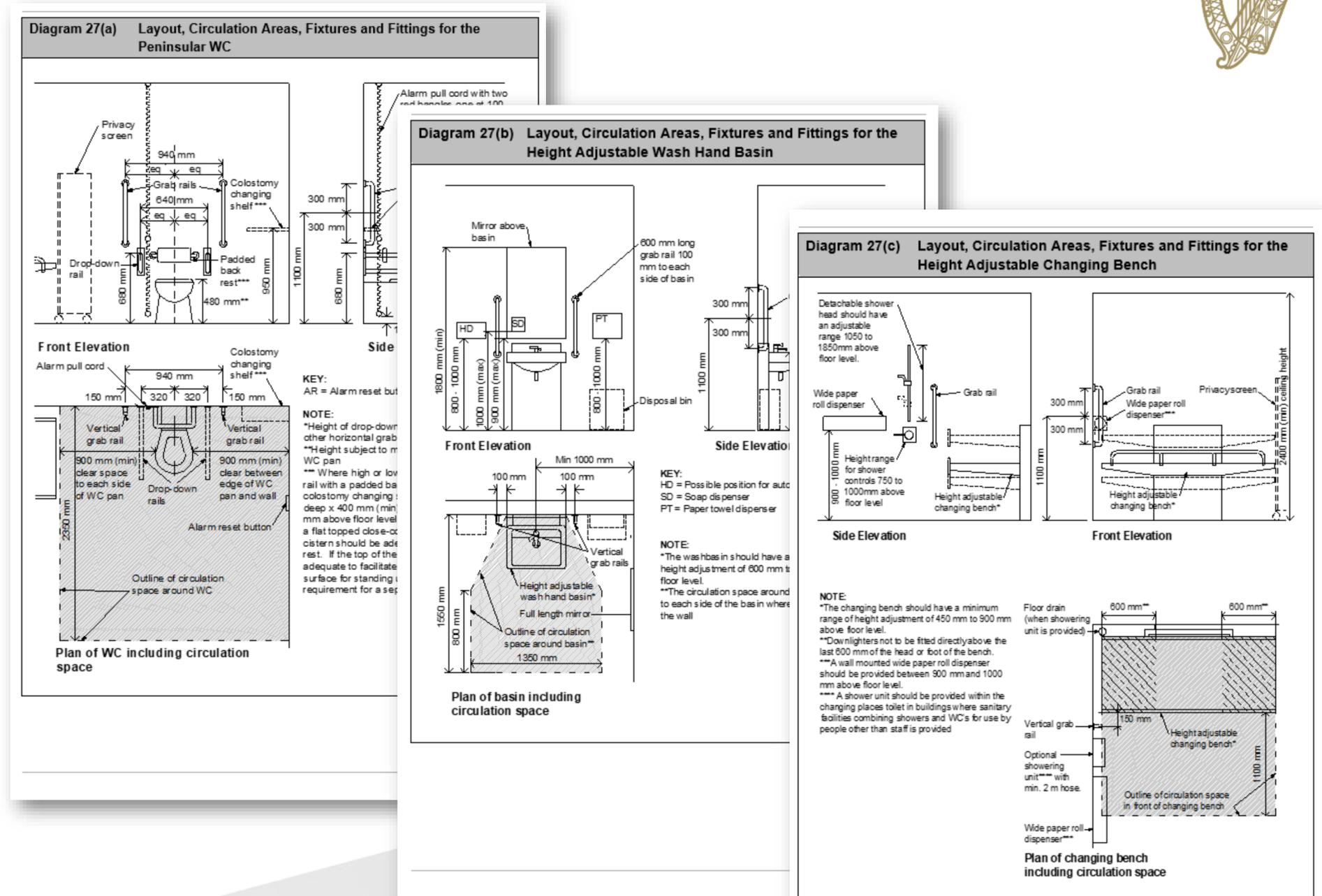
Diagram 26 shows the general arrangement layout.



Room size and layout



Diagrams 27(a), 27(b) and 27(c) show the layout, circulation areas, fixtures and fittings arrangements around the WC, basin and changing bench.



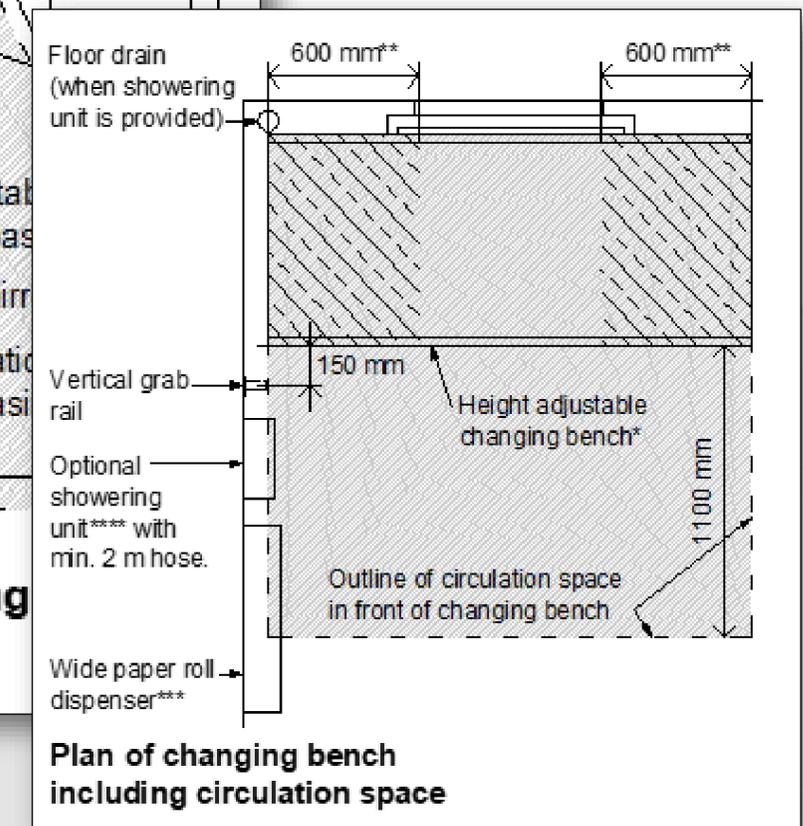
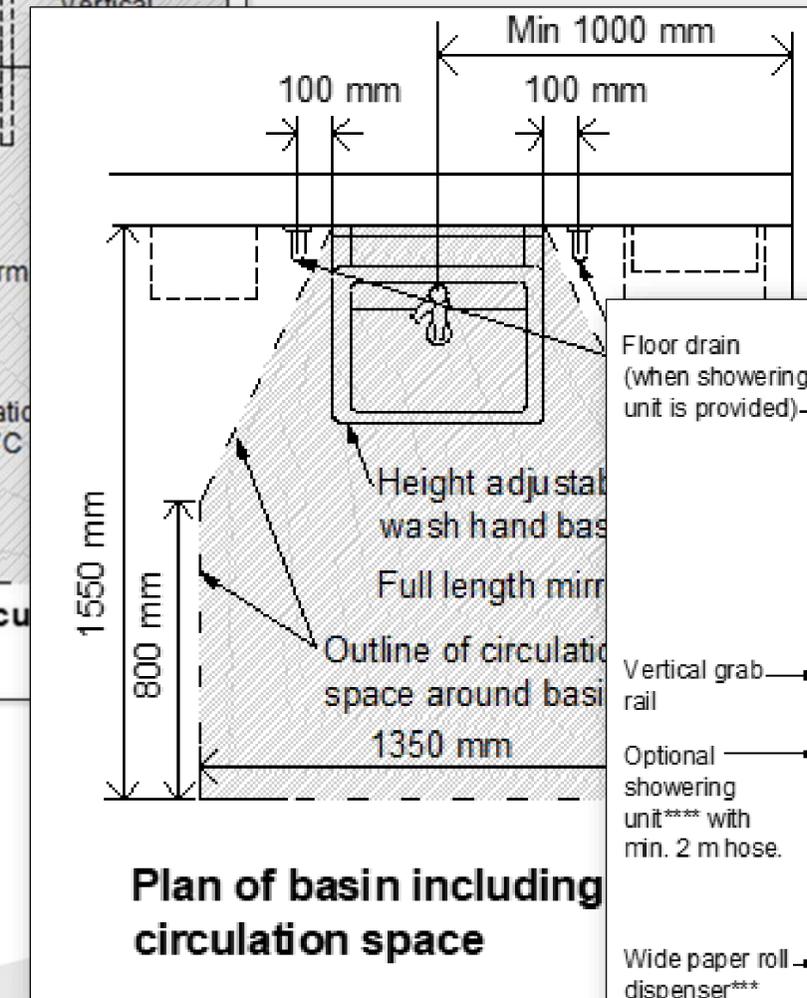
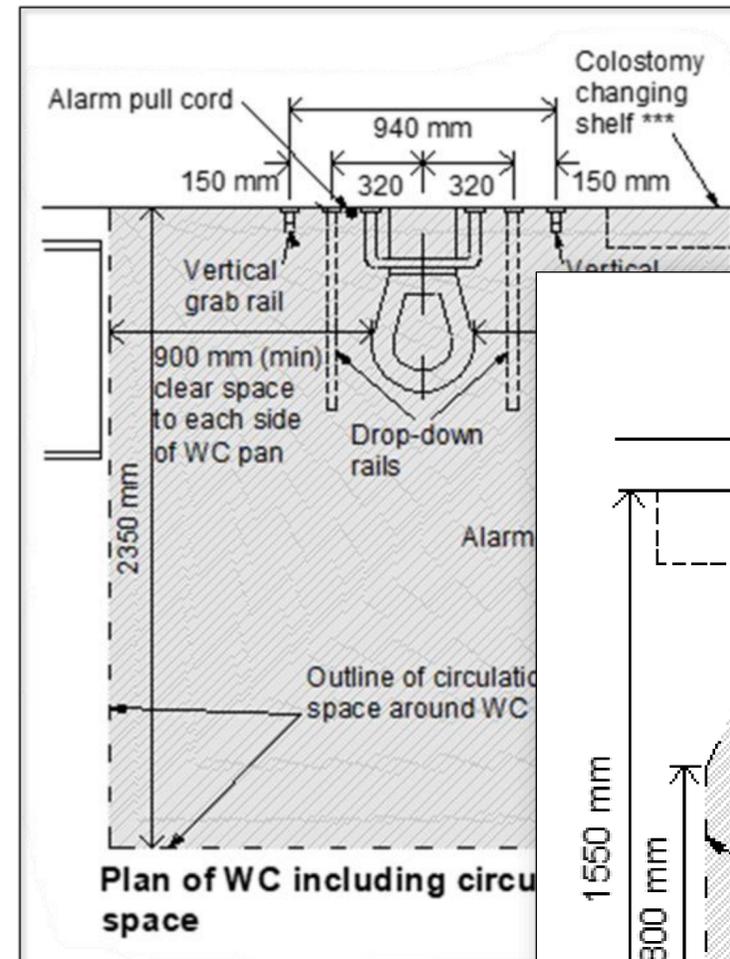
Circulation space



The provision of adequate circulation space around the key pieces of equipment is really important for the use and operation of the CPT.

Dimensioned individual layouts, showing the minimum required circulation spaces have been provided for the:

- WC (Diagram 27(a))
- Height adjustable basin (Diagram 27(b))
- Height adjustable changing bench (Diagram 27(c))



Existing Buildings – Section 2 (2.4.3)



2.4.3 General Provisions

Guidance on the provision of accessible sanitary facilities in 1.4.3 should be followed except:

(e) Where it is not practicable to provide a changing places toilet with a room size and layout as per Diagram 26, an alternative room size and layout may be used. In such an alternative room, the wheelchair turning space described in 1.4.10(b) must be provided.

In addition, the minimum circulation spaces around each piece of equipment should be provided in accordance with Diagrams 27(a), 27(b) and 27(c).

This provides greater flexibility when incorporating a changing places toilet into existing buildings.

2.4 Sanitary Facilities in Existing Buildings Other than Dwellings

2.4.1 Objective

The objective is to provide independently accessible sanitary facilities that meet the needs of people with a wide range of abilities.

2.4.2 Introduction

Specific guidance on the provision of sanitary facilities is given in 1.4.3 and where necessary 2.4.3. Detailed guidance on the design of the sanitary facilities is given in 1.4.4 to 1.4.10

2.4.3 General Provisions

Guidance on the provision of accessible sanitary facilities in 1.4.3 should be followed except:

- (a) Where there is more than one WC facility provided at different locations within an existing building, at least one accessible unisex WC should be provided on each accessible floor which has a WC facility;
- (b) Where it is not practicable to provide doors to accessible sanitary facilities with a clear effective width in accordance with 1.3.3.2, the doors should be as wide as possible but not less than 750 mm, except where such doors provide access to a changing places toilet;
- (c) Where it is not practicable to provide a wheelchair accessible unisex WC with a minimum turning space of 1800 mm x 1800 mm, a minimum turning space of 1500 mm x 1500 mm may be provided (refer to Diagram 15b);
- (d) Where it is not practicable to provide a WC cubicle(s) for ambulant disabled people and/or enlarged cubicles in accordance with 1.4.6.2 and 1.4.6.3 respectively, ambulant disabled WC cubicle(s) in accordance with Diagram 33 may be provided.
- (e) Where it is not practicable to provide a changing places toilet with a room size and layout as per Diagram 26, an alternative room size and layout may be used. In such an alternative room, the wheelchair turning space described in 1.4.10(b) must be provided.

Transitional Arrangements



The amended regulations, and TGD M 2022 apply to works, or to a building in which a material change of use takes place, where the works commence, or change of use takes place, on or after 1 January 2024.

Except where the works, or buildings, are the subject of –

- a planning application made on or before 31 December 2023 for planning permission or approval under the Planning and Development Act 2000 (No. 30 of 2000),
- a notice of a proposed development under Part 8 of the Planning and Development Regulations 2001 (S.I. No. 600 of 2001) has been given by a local authority under article 81 of those Regulations on or before 31 December 2023, or
- a fire safety certificate or a disability access certificate under the Building Control Regulations (S.I. No. 496 of 1997), in respect of the works or buildings, has been granted on or before 31 December 2023,

and where the structure of the external walls of the building has been erected by 31 December 2025.



Thank you

<https://www.gov.ie/en/publication/78e67-technical-guidance-document-m-access-and-use/>