



Irish Wheelchair Association

Part M Submission to:
Department of the Environment Heritage and
Local Government

September 2009



Irish Wheelchair Association Part M Submission

Parts 1 and 2

Introduction

The Irish Wheelchair Association (IWA) represents and advocates on behalf of people with limited mobility; currently with a membership of over 20,000 members. IWA, in full consultation with its members, has identified issues that are a priority for people with disabilities in Ireland today. The review of Part M of the Building Regulations brings the issue of access to the fore in an opportunity to inform the overall strategy for how the built environment is planned. The efficacy of Part M promotes the social and economic inclusion of people with disabilities in Irish society.

Background

It is now acknowledged and well documented that people with disabilities face a range of social, environmental, economic and attitudinal barriers which hinder their social inclusion. It can be said with confidence that the existence of these barriers leads to people with disabilities experiencing discrimination within the community in some form. Equally it is recognised that the participation of people with disabilities as citizens, students, customers and employees benefits society as a whole.

IWA's direct aim in contributing to this consultation process is to advance the vision and realisation of an all inclusive and accessible society.

Part M Consultation

IWA welcomes the opportunity to comment in this final round consultation on the draft Part M text which considerably develops on the present Part M in expanded content and increased guidance. IWA welcomes the inclusion of guidance on the approach route to a building and onsite parking, the increased and expanded guidance in relation to the use of facilities within a building and the extension of the application of Part M to material alterations to a building and to material change of use.

It is clear that many recommendations made in the first round consultation have been taken on board in this present draft Part M text. A major disappointment however would be that the draft guidance in relation to dwellings has not changed to any real extent and that as a whole the guidance document continues to give minimum design guidance.

Development of a Design Brief

While the draft Part M text does allow for and even suggest that designers use higher design specifications, the reality is that the majority of designers will use Part M as their main reference document without consulting or perhaps understanding the need to consult other referred reading. A Part M Access and Use design brief based on minimum design guidance, unlike other Technical Guidance Documents, has the end result of specifically excluding some wheelchair users from using a building and the facilities therein, in particular WC facilities.

IWA welcomes the recognition in the draft Part M guidance text that larger public WCs are required by some wheelchair users, particularly users of large powered wheelchairs. However

IWA considers that the space provisions required by users of large powered wheelchairs and which implies a *design for all brief*, should underpin the complete guidance document and not be confined to certain named WC locations.

The draft Part M guidance document falls significantly short of moving the *Part M Access and Use Building Regulation Guidance*, from being minimum design guidance, to a more complete and comprehensive accessibility design guidance document. The IWA recommended next step would see the Part M Guidance Document being based throughout on an 1800mm turning circle to give best practice design guidance intended to respond to all accessibility requirements in all situations. The use of an 1800mm turning circle as the space requirement for a powered wheelchair user to manoeuvre and turn his/her chair within a built environment is well documented in various pieces of UK and international research.¹

IWA urges the Department of the Environment to go beyond a minimum design requirement approach by requiring and giving guidance on a full and complete provision to accommodate all accessibility requirements of all wheelchair users in all situations.

IWA Part M Submission

This IWA Submission on the draft Part M text is in three parts:

- **Part 1** - lists six IWA key recommendations for alteration or addition to the draft Part M text. IWA advises that these key recommendations are critical to ensuring that Part M will have the greatest impact on creating a more universally accessible environment for all. The detail of these six key recommendations is expanded in Part 3 of the IWA Submission at the beginning of the document sections within which they are located.
- **Part 2** - lists ancillary IWA recommendations which expand and support those key recommendations made in Part 1.
- **Part 3** - is a detailed tabular review and commentary on the draft text in all sections of draft Part M.

Since the original IWA Part M Submission was made in March '07, the IWA has undertaken a major review of IWA members' accessibility requirements. In line with increased expectations IWA has revised many of the recommendations made in the original IWA Part M submission; consequently there will be some disparity between this document and the original IWA submission.

In May '09 based on consultation with IWA members, the IWA produced the IWA "*Best Practice Access Guidelines*" book which is attached and proposed as an additional reference to be included in the recommended reading appendix to the new Part M. See also <http://www.iwa.ie/Docs/IWA-Access-Guidelines-Edition-1.pdf>

¹ Wheelchair User Housing study Housing Executive <http://www.nihe.gov.uk/publications/reports/wheelchairreport.pdf>
<http://www.cot.co.uk/specialist/housing/intro/pdf/wheelchairreport.pdf>
Department for Transport UK
<http://www.dft.gov.uk/transportforyou/access/tipws/cmspt/carriageofmobilityscooterson6163?page=4>
Inclusive mobility
<http://www.lancashire.gov.uk/environment/documents/mobility.pdf>
Code of Practice on Access and Mobility UK
http://www.accesscode.info/general/4_1m.htm and ISO 7176-5

Part 1: IWA Key Recommendations in order of priority

1. That the Department of the Environment move the Part M Guidance Document from being a minimum design guidance to a best practice design guidance document.
2. Increase the WC cubicle size of all public WCs to accommodate an 1800mm turning circle i.e. 1800 x 2500mm (1.4.2 pg 36 last three lines of the third paragraph). This increased cubicle size is required not just by users of powered wheelchairs but also by people who have legs extended or are reclining in their chair. It makes no sense to recommend this larger provision in some circumstances (again 1.4.2) and not others. People with more significant access requirements and users of large powered chairs cannot limit their use of public WCs to shopping centres, cinemas and hotels. The provision of genuinely usable WCs is such a basic and personal requirement and one upon which participation in community life depends, that Part M must go beyond the minimum guidance in this most basic of all facility.
3. In addition to a unisex WC, require the provision of a WC cubicle with a changing bench and hoist facility in large public buildings where people congregate for prolonged periods such as shopping centres, airports, stadia, leisure centres and swimming pools, to accommodate people who require full assistance. The draft text in the last paragraph on page 37 acknowledges that some people have a need for assistance within a WC cubicle but fails to develop this point. With recent Health and Safety legislation, the need for personal assistance implies the provision of a peninsular style WC with onsite hoist provision. IWA recommends the inclusion of a changing bench within this facility and in leisure and swim facilities the addition of a level access shower as outlined in the *IWA Best Practice Access Guidelines* (pgs 62 and 83) and in the BS:8300:09 (pg 154 figure 58).
4. Include guidance on parking spaces for multi purpose/high top vehicles. These vehicles are increasingly used by disabled drivers/passengers. The draft guidance recommends a car park height of 2.6m to allow entry/exit to these vehicles but gives no guidance on the relevant space size required.
5. Require that all lifts are evacuation lifts which is the most realistic egress provision that can support a truly viable evacuation plan for all users of a building, particularly people who are wheelchair users.
6. Change the requirement for dwellings to be visitable to require dwellings to be LifeTime Adaptable Homes with an additional % of Wheelchair Accessible Homes.

Part 2: IWA Ancillary Recommendations

1) Definitions. In The Requirement - Part M re Access and Use develop the definitions of:

- i. “all people”, which informs the design brief of the document, to include people with significant mobility impairment who use powered wheelchairs and who may require assistance in some circumstances.
- ii. “environs” to include smoking areas and on street café.
- iii. “habitable” rooms to include living/dining room/s and ground/entrance level WC.

2) The Requirements and Application:

- i. the explanation of the Requirements and Application of Part M is complex and requires a clearer explanation in simple language that is easily understandable by people who have no technical background or expertise.
- ii. the Application of Part M to the material change of use of a building must include office and industrial premises.
- iii. include a guidance section on the application of Part M to existing buildings and incentivise the upgrading of accessibility within existing buildings.
- iv. in the Requirement of Part M state that all people be able to use the facilities in an extension to a building. In addition state that Part M applies to new dwellings.
- v. develop the section on management of a building which is critical in maintaining high levels of access.

3) Parking Spaces: the guidance on the number of accessible parking spaces to:

- i. include a % of spaces for multi purpose/high top vehicles and a separate allocation of spaces for employees who are disabled drivers/passengers.
- ii. recommend the use of white markings on blue with yellow cross hatching of the adjacent access zone to highlight the presence of the space and to discourage abuse in the use of the space.

4) Approach to the Building and Circulation within to include:

- i. an 1800mm turning circle at the top and bottom of a ramp that is clear of door swing, a wider corridor width and an 1800mm turning circle throughout the document.
- ii. create a narrative throughout the text that identifies and gives guidance in relation to structural evacuation provisions including refuges.

5) Audience and Spectator Facilities to:

- i. include guidance on sight lines to ensure that standing spectators do not block the view of people who are wheelchair users.
- ii. require that spaces for spectators/audience members who are wheelchair

- users are dispersed throughout the stadium/cinema/theatre on different levels and with a choice of vantage points.
- iii. include a section on the use of facilities in leisure centres i.e. gym equipment, swim pool etc.

6) Dwellings:

- i. should the Department decide not to move to guidance on LifeTime Homes (see Key Recommendation 6) then the guidance on Visitable Housing to require larger internal door and hallway widths alongside a larger WC size with all habitable rooms located at entry level and with no allowance for duplex dwellings.

7) In the use of references and terms throughout the document:

- i. give the salient point/s from reference documents such as British Standards and other Technical Guidance Documents (TGD) as well as referencing the publication. Constant reference to publications which must be purchased without giving the critical information is unhelpful and frustrates the reader.
- ii. ensure consistency between TGDs B, K and M with the relevant guidance merged and repeated in each document.
- iii. in referencing other documents on specific points give the page and paragraph number in the referenced publication for ease of access.
- iv. give increased reference to and explanation of related legislation e.g. Equal Status legislation and the Building Control Act '07 which gives the basis for Disability Access Certification.
- v. create a glossary of terms in the appendices to Part M and clarity and consistency in the use of terms e.g. there are several different combinations of words relating to “clear width” with no explanation as to any difference in meaning.

8) Diagrams:

- i. the diagrams in the draft document require further work and additional diagrams to achieve clarity. Additional diagrams would be useful particularly in providing guidance in relation to parallel parking spaces, spaces for multi purpose/high top vehicles, slope with recommended gradient, WC with 1800mm turning circle and WC with changing bench facility.

Part 3: Review and Commentary

The following pages detail a tabular review and commentary on the text in all sections of draft Part M with accompanying recommendation. Key and ancillary recommendations as outlined above are identified throughout.

**Part 3 IWA Part M Submission
IWA Comment Template for Recommended additions and amendments to Draft Part M October 2009**

Access and Use Building Regulations - The Requirement Pages 6 to 9

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
6	Overall Recommendation	Key Recommendation	Move the Part M guidance document as a whole to best practice access provisions guidance. Technical Guidance Document M to go beyond minimum standards. Minimum guidance has the end result of excluding some wheelchair users from the built environment, particularly WCs.
6	Application of the Part – M2	Adequate provision should be made for the use of facilities in an extension	Include, <i>and use the facilities therein</i>
6	Building Regulation – the requirement	In the application of the Part M, it should apply to new dwellings and the common areas of apartment buildings	After M3 add a new M4 which states <i>Part M applies to new dwellings and to the common areas of apartment buildings.</i> The existing M4 becomes the new M5.
6	0.1	Dwellings to go beyond visitable to be LifeTime Adaptable homes	Amend bullet point two to say <i>dwellings to be LifeTime Adaptable with a % of Wheelchair Accessible Housing</i> - see IWA Best Practice Access Guidelines (IWA AG) page 106
6	0.2	Include environs and facilities and give definitions of both.	Text to read, in bullet point two, <i>All buildings, their environs and facilities should be designed and constructed so that.....people of all ages, size or ability can safely.....</i>

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
7	0.4 (i)	Remove the text that allows for duplex dwellings	
7	0.4 (ii)	If guidance document does not move to LifeTime homes then improve guidance on visitability, define habitable rooms to include living/dining room/s and WC Require visitable rooms to be always on ground/entry level. Remove text that allows habitable rooms on other than entry level.	Habitable rooms <i>to be understood as the entrance/ living/dining rooms and WC</i>
7	0.4 (iii)	WC only to be allowed on entry level, remove text that allows WC to be on other than entry level	Remove text
8	0.5 (d)	Part M must also apply to Material Change of Use when a building becomes an office building or industrial premises	Include office building/industrial premises
8	0.6	It is insufficient to just give reference to Part B and NDA publication re egress. The critical information re evacuation and people with disabilities needs to be included within Part M. As there is a lack of information on this topic elsewhere it would be useful to have this information in the Part M document.	Create a new section on evacuation or develop text on evacuation throughout the document

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
9	0.8	Give additional information re legislation	Include <i>Equal Status</i> legislation and the <i>Building Control Act '07</i> with explanation as to the connections to Part M
9	0.9	Additional information is required re Management issues eg maintenance of good access	Within the main document include a section on Management and maintenance of the built environment

Section 1 Approach to Buildings pages 10 to 20

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
12	1.1.3.1 (c)	No minimum bollard width given	Should be minimum of 250mm in width
12	1.1.3.1 (e)	No minimum distance between bollards given	Adjacent Bollards should be a minimum of 1200mm apart.
13	1.1.3.1 (e)	Access route should have higher than minimum 100 Lux.	Minimum illumination of 150 Lux recommended
13	1.1.3.2 (a)	The preferred minimum width of an access route should be 1800mm along the whole route to allow two wheelchair users going in opposite directions to pass.	The preferred minimum clear width should be 1800mm. If it is less than 1800mm passing places for wheelchair users should be provided. Width to be maintained if street furniture is present

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
13	Before 1.1.3.3	Where slope is provided also provide steps as on page 35, addition to text.	Provide both ramp and steps where the rise is greater than 300mm, single steps are dangerous and to be avoided
13	1.1.3.2 (f)	Unfilled gap should be no wider than 5mm (10mm with 5mm depth stated.)	Unfilled gap should be no wider than 5mm.
13	1.1.3.3 (c)	Landing at top and bottom of ramp needs to accommodate, give space for user of powered wheelchair to turn	Landing at the top and bottom of the ramp should provide a turning circle of 1800mm clear of door swing
14	1.1.3.3 (d)	Intermediate landings are specified at 1500mm long. Minimum length should be 1800mm.	Intermediate landings should have a minimum length of 1800mm.
14	1.1.3.3 (f)	A maximum 1:20 gradient is preferred and should not exceed 1:12	A maximum 1:20 gradient is preferred and if necessary, in exceptional circumstances, should not exceed 1:12.
14	1.1.3.3 (f)	Circular Handrail Design is specified at 40-50mm in diameter.	Circular handrail should be 32-45mm in diameter
16	1.1.3.4 (b)	Staircase landing length is specified at 1200mm	Staircase landings top and bottom should have an unobstructed landing length of 1500mm.
18	1.1.3.5 (a)	Handrail vertical height range should be the same for both stairs and landing.	The vertical height to the top of the upper handrail from the pitch line of the surface of a flight of stairs should be between 900mm and 1000mm and similarly for the surface of a landing.

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
20	1.1.4	Dropped kerbs that have an upstand are difficult for a wheelchair user to negotiate, say that that the dropped kerb be level with the road	Kerb to be level with the road, if this is not possible the maximum sloped upstand should not be more than 5mm

Section 1.1 Approach to Buildings and circulation within buildings pages 21 to 27

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
21	Section 1.1 1.1.5 Additional opening paragraph	Key Recommendation	A number of larger spaces should be designated for larger vehicles ie vans which have hoist/ramps/lifts etc. Of the designated accessible spaces 1 in 4 should be designated to accommodate these larger multipurpose vehicles.

21	<p>Section 1.1 1.1.5 First paragraph</p>	<p>Increase provision of accessible spaces to accommodate increased use of adapted vehicles, both cars and high top multi purpose vehicles. IWA's Access Guidelines (AG) recommend a minimum of 1 in 15 (7%) accessible spaces, where as the revised Part M states that the figure should be 5% (1 in 20). BSI British Standards recommend between 5% & 6% excluding spaces provided for employees who require access to accessible parking due to their disability.</p>	<p>Where public parking is provided, e.g. on street, shopping areas, recreation and leisure facilities, hospitals, public transport parking facilities etc. 1 in 15 spaces or 7% should be designated for drivers and passengers with parking permits.</p> <p>Designated parking spaces should be additional to spaces provided for employees who require accessible parking spaces due to their disabilities. Spaces designated for disabled employees who are motorists (driver or passenger) should be differentiated from spaces designated for other users.</p>
21	<p>Section 1.1 1.1.5 (a) and (h)</p>	<p>Give guidance on the location of bays as well as their need to be easily recognisable. The documents does not specify what colours should be used in relation to the design criteria for accessible parking spaces. This is similar to the approach recommended by the BSI British Standards but IWA's AG recommends white markings for the international symbol on a slip resistant blue surface for ease of recognition and to discourage abuse.</p>	<p>a) designated parking bay/s should preferably be located beside or adjacent to the main entrance and never more than 40m from the main entrance. At hospitals/health care facilities a number of designated parking bays should always be "at" the main entrance.</p> <p>h) The bay itself should be clearly marked with the international symbol of access. The international symbol of access should be white on a slip resistant blue surface. The adjacent accessibility zone should be crosshatched in yellow. A vertical sign beside the bay should be provided displaying the same image in the same format.</p>

		<p>There is no mention in the text of lift access to/from the car park when located underground</p>	<p>Include an additional point m) <i>lift access to be provided to/from the car parking area when it is located underground</i>. Refer to section on Lifts page 32 paragraph 1.3.4.1</p>
22	Section 1.1 Diagram 7	<p>General comment: there are a lot of very useful diagrams and additional information in relation to accessible parking bays in both IWA's AG and BSI British Standards which could significantly enhance this section of the document. There is no diagram to show the measurements for a larger vehicle e.g. van etc space. Space needs to accommodate hoist/ramp exit and space for individual and assistant.</p>	<p>Insert additional diagrams:</p> <ul style="list-style-type: none"> i) IWA recommends space size of 5400x7800mm (incorporating 3,000mm access zone for hoist/ramp and space for person exiting vehicle) for large multi purpose vehicles. ii) Suggest additional diagram showing parallel parking to be included
22	Section 1.1 1.1.6	<p>Additional information should be included under "where a setting down area is provided". Saying setting down area should be "close to" the accessible entrance is too vague.</p>	<p>The setting down point should include both side and rear access zones including provision for the use of passenger lift/hoist/ramp at the rear and to the side of all vehicles. The setting down point should be beside or adjacent to the main entrance. At hospitals/health care facilities the setting down point should always be "at" the main entrance.</p>
23	Section 1.2.2. Accessible entrances	<p>(b) a level landing of at least 1.5x1.5m is not sufficiently large to accommodate all wheelchair users.</p>	<p>Recommend level landing of 1800x1800mm</p>

23	Section 1.2.2. Accessible entrances	Re thresholds, new guidelines recommend a maximum height of 15mm and with any upstands higher than 5mm cambered or rounded. Upstands are always difficult for wheelchair users to negotiate.	Recommend level entry, and only where site constraints make level entry impossible to allow for thresholds upstands. In this situation the best practice would be to provide a level interior and 6mm exterior threshold height. If threshold heights over 5mm are necessary then thresholds should be bevelled to a maximum slope of 1:8 and be no higher than 10mm.
26	Section 1.2.3	(a) Table 2 The external doorways width has increased to 1000mm in-line with IWA's AG. Internal door width is now 800mm, this is insufficient for all wheelchair users to gain clear access through a door frame.	Replace 800mm in Table 2: minimum effective clear widths for internal door to be always 900mm. See <i>IWA AG pg 33</i>
25 & 26	Section 1.2.3.1	(b) "an unobstructed space of at least 300mm on the side next to the leading edge of a single leaf door". This is insufficient space to allow wheelchair users easy access to open the door.	In 1.2.3.1 (b) page 25 change 300mm to 500mm and change in the diagram 8 on page 26. See <i>IWA AG pg 33</i>

27	Section 1.3	Formula used to calculate lobby space is complicated and it does not allow adequate space for another person to be present with the wheelchair user, within the lobby.	<p>Maintain minimum clear space of 900 x1700mm free of door swing within lobby area, to accommodate wheelchair user with accompanying person.</p> <p>If present formula must be maintained the internal space needs to increase from 1570mm to 1700mm to allow adequate space for wheelchair user and one other person to be present.</p> <p>Amend diagram - a) the length in Diagram 9 needs to be modified, for single swing doors and at least DP1+DP2+1700MM with double swing doors</p> <p><i>IWA's AG pg 35 and 36</i></p>
6 & 27	Section 1.3 1.2.3.1	There is no mention in this section of Pull Handles. Add in additional point.	(e) Doors that do not have self-closing devices should have a 300mm pull handle located on the push side. This pull handle will assist a wheelchair user in pulling the door closed behind them. The upper end of the pull handle should be centred on the door at 900mm from floor level with the lower end sloped towards the hinged side of the door at 800mm from floor level. – <i>IWA's AG 5.1.2.3 page 28</i>
26	Section 1.3 1.2.3.1	There is no mention in this section of Kick Plates. Add in additional point.	(f) Kick plates to protect the door service should be provided on the base of the door. They kick plates should extend across the full width of the base of the door to a height of 400mm. Typically a kick plate should be made of steel aluminium. – See <i>IWA's AG Section 5, page 27 & 28</i>

Section 1.3 Circulation within a Building - entrance hall, doors, corridors, lifts, slopes, steps, pages 28 to 35

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
33	1.3.4.1	Key Recommendation	The installation of internal lifts which meet evacuation standards are recommended, i.e. with fire resistant properties and suitable for use in emergency evacuation. These lifts reduce reliance on assisted evacuation for people with disabilities, particularly people with a mobility impairment, in the event of an emergency.
28	1.3.2 Intro	Need to give instruction on lighting levels at entrance and reception areas	Lighting level at main entrance should be 150 lux
29	1.3.3.1	Additional to above point	Lighting level between entrance & reception should be evenly dispersed with min recommended illumination of 150 lux. Lighting level at reception counter top should be 250 lux.
29	1.3.3.1 (d)	To allow a wheelchair user to approach and turn to move away from a reception area adequate space provision is required	Clear manoeuvring space of 1800x1800mm in front of any reception desk.....
29	1.3.3.1 (e)	Additional information suggested	This provision for a counter height of 760mm should be in addition to the conventional counter section at a height of 1050mm to suit standing users
29	1.3.3.1	Need for information on signage and directional information	In lobbies & reception areas facilities & location signage should be clearly displayed at a height of 900mm to 1200mm above floor level

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
29	1.3.3.1	Additional information required re queuing systems, information provision and the availability of seating for people unable to stand for any prolonged period	Propose to include from <i>IWA AG page 44</i> 6.1.2.1 information re: queuing systems, seating and information provision
29	1.3.3.2	This section should apply to internal and external doors	
29	1.3.3.2 (b)	In previous section IWA recommends a larger internal door width to give wheelchair users easy access through the door frame	Effective clear opening width of internal single or double leaf door must be 900mm
29	1.3.3.2 (c)	In previous section IWA recommends a larger dimension of 500mm unobstructed space on the door side next to the leading edge of the door, a very common recommendation to give adequate swing space to a wheelchair user to reach the door handle	There should be an unobstructed space of at least 500mm on the side next to the leading edge. Minimum acceptable edge is 300mm.
30	1.3.3.2 (h)	Addition information from IWA AG doc suggested to protect hand and knuckles and to avoid compromised use of the door handle	Glazed vision panels should be flush so as not to compromise use of door handle.

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
30	1.3.3.3 (a)	Increased recommendation widths of corridors to ideally allow two wheelchair users to pass going in opposite directions	The unobstructed clear width should be 1800mm along its length. Minimum acceptable clear unobstructed width is 1500mm, with a width of 1200mm acceptable only were no other alternative is possible. Designated escape routes should always have minimum corridor widths of 1800mm.
30	1.3.3.3 (b)	Increased information required re passing places and guidance re the need to provide a turning space at the end of a corridor so a wheelchair user will not get blocked in.	Corridors less than 1800mm in width & more than 5000mm in length should have a turning space of 1800mm x 1800mm at end of corridor, at junctions and at intervals. The turning space should be repeated at intervals of 25m as length of corridor increases. Corridor corners should be rounded.
31	1.3.3.3 (m)	Additional information required re lighting levels	The lighting level along the length of the corridor should be 150 lux.
34	1.3.4.2 (a) & 1.1.3.4 (f)	Increase recommended width on stairs to allow for contraflow, particularly where stair is part of evacuation route, the same recommendation applies to external stairs.	Clear unobstructed width should be 1500mm.
35	1.3.4.3	Guidance is required on the recommended gradient of a slope, the guidance in section 1.1 on slopes is difficult for a non technical person to understand.	Clearly state as in section 1.1 that the preferred gradient of a slope is 1:20 or gentler. Give 1:12 as the limit but only acceptable when no other solution is possible.

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
33	1.3.4.1 (d)	Space in front of lift doors is inadequate to accommodate users of powered wheelchairs	Clear unobstructed space of 1800x 1800mm in front of lift entrance
33	1.3.4.1 (f)	Door width is inadequate to accommodate users of powered wheelchair/scooters	Doors should have a clear opening width of at least 900mm
33	1.3.4.1 (g)	No guidance given for people with vision or hearing impairment	Both visual & auditory warning should be given before the lift doors open & close
33	1.3.4.1 (h)	The lift size given in the guidance document is too small to comfortably accommodate a wheelchair user and another person.	Single door lifts should ideally provide sufficient internal cabin space to accommodate a turning circle of 1800mm x 1800mm. In lifts where an alternative exit door is located directly opposite the entry a clear space of 1700mm depth & 1200mm width within the car is required. Minimum Lift size to be 2000mm in depth and 1400mm in width, a Class 3 lift. Where a lift car is not square it is always preferable that it be deeper rather than wider to facilitate entrance & exit of mobility scooters.
33	1.3.4.1 (i)	400mm is too tight to the wall for siting of lift controls	Controls to be sited at least 500mm from any return wall
33	1.3.4.1 (r)	The section on lifts needs to address emergency and evacuation issues. The requirement to provide an effective two way communication system for all people is required within the lift	Suitable emergency communication system including a visual & auditory response indicator to be installed. The function of this response indicator is to confirm receipt of an emergency call, to detail expected response time & to allow ongoing communication. <i>IWA AG pg 40</i>

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
33	1.3	In the last paragraph on page 33 reference is made to the use of platform stair lifts. These lifts can be used only in exceptional circumstances when no other solution is possible. Their use is very, very limited and their safety is questionable. Referring to these lifts in the technical guidance gives them unwarranted validity.	Suggest omitting reference to wheelchair platform stair lifts

Section 1.4 Sanitary Conveniences in Buildings pages 36 to 49

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
36	1.4.2 Third paragraph	Key Recommendation	Every toilet should be big enough for 1800mm turning circle irrespective of floor area in any building. The space requirement for a WC to be an adequate size for a wheelchair user has no co- relation with the size of the building. The WC with 1800mm turning circle is required by many wheelchair users and should be required in all WC locations.

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
37	Changing facilities	Key Recommendation	Adult Changing facilities within toilets are required in locations where people spend prolonged periods such as; transport terminals, stadia, large shopping centres. People requiring full assistance should be accommodated in these locations. See section 6.5.2.1 in IWA AG, also see BS:8300:09 pg 154 and http://www.changing-places.org/
38	1.4.3	Last part of the section (d) and section (g) are repetition	Section (g) should be deleted.
38	1.4.3 Section (h)	Minimum door opening 800 mm will be too tight if approached obliquely.	IWA recommendation 900 mm.
38	1.4.3 (l)	Upper range (300 lux) may be too high illumination.	NCBI might advise on this.
38	1.4.3(m)	43 degree C,	Use Celsius not C
38- 39	1.4.3 (p) & (s)	Both the sections are conveying more or less same point	Could be merged into one point.
39	1.4.3 (y)	'... support grab rail should be capable of....' Not very specific	IWA recommends 1.3 kN
39	1.4.4 (a)	'... a greater distance may be acceptable...' no specification on how much.	Say 50 meters maximum.

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
39	1.4.4 (c)	‘where a wash basin is provided..’ Does not mention in which case wash basin should be provided. Should be provided in all WCs. Finger basins are totally inadequate to any required use. Bigger wash basins are required to clean toilet equipments (urinals etc.) after use.	bigger wash basins are required in every accessible toilet, see IWA AG page 64, 6.5.6 Basins can be a compromise size between full and finger sized basin, with emphasis on the internal space provision not the surround.
40	1.4.4 (h)		Add grab rail diameter (35mm)
40	1.4.4	Diagrams are too small to read	Diagrams based on 1.8 m turning space should be shown Scaling up is needed.
42	1.4.5.3	Outward door swing is not mentioned in text. ‘Vertical grab rail on rear wall...’ not very clear.	Diagram showing the plan and elevation view should be shown. A wider door width in this cubicle would be better considering guide dogs, parents carrying double buggy etc.
43	1.4.5	Toilet height subject to manufacturing tolerance of WC pan- Not clear what this means.	Clarify please

Page No.	Paragraph No. and text description	Justification for Change	Proposed Amendment to text
44	1.4.6 (a)	‘Clear area of 900 x 1350...’	IWA recommends 900 x 1400 mm, so does BS8300:2009
44	1.4.6 (c)	Diagram shows 600 mm grab rail even for lower urinal. Horizontal grab rail is not mentioned in the text Also it is not shown in elevation view of the diagram	Longer grab rails (900 mm) to be shown in the diagram Mention specs of horizontal grab rail in the text Show it in the elevation view
46	1.4.7	Top diagram does not show the correct elevation view of the plan view shown in the bottom.	Rotate the bottom diagram clockwise 90 degree.

Section 1.5 Facilities within a Building pages 50 to 56

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
50	1.5.2 (Introduction)	No reference to public access terminals or to the use of leisure facilities. Suggest additional sections on both which can be accessible with a good design emphasis rather than any major additional space provisions.	Insert additional bullet points <ul style="list-style-type: none"> • Public terminals i.e. ATM's and phones (refer to IWA AG page 50 and 53) • Gym and sports equipment (refer to IWA AG page 87).
50	1.5.2 Third paragraph. Second sentence. And 1.5.3	2 nd sentence needs to inform of the preference to provide integrated accessible seating on several levels.	Add into sentence three '.....sufficient wheelchair spaces in selected areas, on several levels and at different vantage points, which afford good viewing conditions at all times during a performance/event'.
50	1.5.2 Third paragraph. Third sentence. And 1.5.3	Current comment is too vague regarding viewing conditions.	Insert after 'which afford good viewing facilities' the following text..... <i>Any wheelchair seating area should be designed so that spectators in wheelchairs can still see the event when located behind standing accommodation or where people in front might stand up.</i>
51	Table 3 And 1.5.3	Provision of wheelchair space in audience seating Recommended; Up to 1000 – minimum – 10 spaces	Increase to minimum 10 spaces in line with IWA access guide and BS.
		The Department should be providing this information out as opposed to redirecting to it. The Accessible Stadia Guidelines referenced have to be purchased	Add guideline number for 10000 or greater capacity

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
51	Create additional section	Recommend additional section on leisure facilities. In the earlier part of the document there is guidance re shower facilities/changing rooms, develop these points by extending the guidance to access to and from swimming pools and the layout of equipment in gyms and the use of dual purpose equipment.	See IWA AG Section 7.5 page 81.
51	Create additional section	Give guidance information on public phones and other public access terminals	See IWA AG Section page 50
52	Diagram 24	Too often cinemas locate wheelchair spaces only at the front, the least comfortable position from which to view a film. Need to show different levels and different vantage points here as well as in lecture theatre.	Amend cinema/theatre diagram to show spaces to the front and to the rear and not always with two wheelchair users beside each other

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
Page 53 and 54	1.5.5	<p>Considerably more details need to be given and shown in relation to the room layout and space provisions within.</p> <p>Provisions for people with more significant disability and requiring full assistance must also be included.</p>	<p>Show turning circles of 1800mm within the bedroom and beside the bed – show access zone around the bed and access zone at the wardrobe. Require a 300mm unobstructed space under a firm bed, Preferred bed height of 460 to 480mm with a firm mattress. Explain that while these are not structural issues it can make the difference in a wheelchair user being able to use the room or not.</p> <p>Diagram also needs to show positioning of bathroom door in relation to bed area, preferably adjacent. The width of lobby area is nb particularly when bathroom door is located within lobby area. Room/s designed for assisted use ought to be also provided, and these with a hoist facility. See IWA AG section 7 page 67.</p>

Section 1.6 Aids to Communication Pages 57 to 59

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
57	16.2 Aids to communication	<p>In the paragraph relating to lighting it does not mention the minimum acceptable level of lighting i.e. 150 lux</p> <p>Increased guidance required re lighting levels, communication enhancements and signage/way finding</p>	<p>Additional text. Approaches to buildings should be well-lit with non-glare minimum illumination of 150 lux. Lighting between entrance and reception areas in buildings must be evenly dispersed with a minimum recommended illumination of 150 lux. The lighting at reception counter top level should be 250 lux.</p> <p>Even lighting levels should be present throughout a building, with task lighting available where it is likely to be needed – for instance, at desks where people may wish to read or write. Task area lighting should be 250 lux. General lighting should be 150 lux, with and increase to 200 lux on stairs and ramps.</p> <p><i>cont'd next page...</i></p>

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
			<p>Good balance lighting, combined with the use of matt finishes on surfaces, will prevent glare and shadows occurring. Where there are large areas of glass, care should be taken with the positioning of mirrors and in how lighting is provided, this prevents confusing and disorienting reflections for people with vision impairment.</p>
16.3	Signage	Refers the reader to BS document for recommendations as opposed to actually advising ranges	<p>IWA Guidelines suggests</p> <p>Directional signage should only be placed on fixed parts of the building such as walls, posts and floors. In spaces where signs would not be visible, as in, large crowds, they should be projected or suspended from the ceiling. Signs that are projected or being suspended from the ceiling must be positioned at a height to allow for a 2200mm clearance from floor level.</p> <p>Directional signage should have characters of not less than 37mm in height and informational signage to have characters of not less than 25mm in height. Emergency signage should be larger. Characters on all signs should be raised by 1.5mm. Text and symbols should be consistent in design and use conventional colours and symbols. Legibility should be ensured by using a contrasting coloured background.</p> <p>The use of easily recognised symbols, pictograms and directional arrows can simplify the interpretation of signage and also aid wayfinding.</p> <p>Information signs to be read at a close distance by a wheelchair user should be situated between 1000–1100mm above floor level. For a person standing they should be situated between 1400–1700mm above floor level. A recommended compromise height to accommodate both wheelchair users and people who are standing is when the centre line of the sign is situated at 1400mm above the floor level.</p> <p>It is desirable that safety instruction signage be duplicated at both high and low levels, i.e. 1000–1100mm and 1400–1700mm</p> <p>For further information refer to “The Sign Design Guide”, JMU Access Partnership/The Sign Design Society.</p>

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
	16.3	Insertion of a diagram from BS:83900 page 66	The inclusion of the Standard public information symbols is a good idea.

Section 2 Access and Use of Dwellings pages 60 to 68

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
General All in this section	All	Key recommendation	The Irish Wheelchair Association recommends that The Department moves from providing for visitable housing to providing for Lifetime Adaptable Housing with a % of Wheelchair Accessible Housing. Both of these design types are detailed in the attached IWA “Best Practice Access Guidelines”; Section 10 pages 106 to 121. If the Department decides not to move from the visitable requirement, the following recommendations are made to ensure that real visitability to a dwelling is delivered to all potential visitors, including wheelchair users, by the Part M Building Regulation
Page 61	Section 2.1 Approach to Dwelling Create an introduction to section 2.1	It would be useful at the start of section 2.1 to set the context by again stating what Part M requires in relation to dwellings and to redefine visitability and habitable rooms	i)At the start of section 2.1 include text from paragraph 0.4 page 7, which defines visitable, incorporating changes to paragraph 0.4 as recommended by IWA ii) define habitable rooms – room/rooms to include both living and dining areas iii) state that the common areas of apartment buildings must comply with the Regulation and that the main body of Part M gives guidance in this regard.

Page No.	Paragraph No. and text description	Comment and/or Justification for Change	Proposed Amendment to text
Page 61	2.1.2 first paragraph	It should be acknowledged at this point that level access is not always possible	The second sentence of this paragraph should state that: <i>both steps and sloped approach should be provided where the rise is greater than 300mm.</i>
Page 61	2.1.2 second paragraph	A 900mm access route is particularly narrow for a wheelchair user to negotiate.	The access route to have a clear width of 1200mm
Page 61	2.1.2 at the beginning of the first sentence of the fourth paragraph	Need to give the specific information on the recommended flattest slope gradient that can easily be negotiated by a wheelchair user	First sentence of 4 th paragraph will read: <i>Where site gradients require a sloped approach route, the recommended gradient is 1:20 or gentler... landing should be 10 metres.</i> Refer back to 1.1.3.3 on page 13 and Table 1 on page 15 with proposed additional diagram.
Page 61	2.1.2 last two paragraphs on page 61 and bullets on page 62	A stepped approach without an accompanying slope will not provide visitable housing. There should be no allowance made for only a stepped approach.	Remove text that allows for a stepped approach without accompanying sloped approach
Page 62	2.1.2 bullet point f) re stepped approach	Handrails required on all steps to assist people with mobility impairment to ascend/descend	Remove last sentence in bullet point f)
Page 63	Section 2.2 Access to Dwellings 2.2.1 Objective	Require that the main entrance only be accessible, provide no allowance for alternate entrance	<p>i) The first sentence should read: <i>The main entrance is the entrance accessed from ground level or by lift which a visitor not familiar with the dwelling would normally expect to approach.</i></p> <p>ii) Remove second paragraph which allows for an accessible entrance other than the main entrance</p> <p>iii) also in the last line of this paragraph use term, “wheelchair user” not people with wheelchairs</p>

Page 63	2.2.2 Accessible entrance	Provide for a greater clear level area in front of the entrance and level access to the dwelling, i.e. the minimum space and level requirements, to allow easy independent access/egress for wheelchair users. No allowances to be made for a stepped approach which will be impossible for a wheelchair user. Increased door width is required to allow entry without the scratching of knuckles of a wheelchair user or damage to door frame by wheelchair	Change clear level area in front of the entrance to 1.5m wide x 1.5m deep. State that level entry is required with no threshold height – only allow for a threshold height where unusual site constraints make a threshold provision necessary. In this situation the best practice would be to provide a level interior and 6mm exterior threshold height. If threshold heights over 6mm are necessary then thresholds should be bevelled to a maximum slope of 1:8 and be no higher than 10mm. Remove the final paragraph which allows for a stepped approach without adjacent sloped access. Increase the main entrance door width to 900mm with 300mm clear space to the side of the leading edge of the door.
Page 64	Section 2.3 Circulation within a dwelling 2.3.1 Objective	In order for a dwelling to be genuinely visitable by all people the habitable rooms must be on entrance level with no exception	The objective is then: <i>To facilitate circulation of all visitors within visitable rooms and WC located on entrance level.</i>
Page 64	2.3.2 Circulation within a dwelling	Allowing a width of 900mm and down to 800mm where there are radiators, alongside door widths of 775 and 800mm, will result in scratched knuckles, damaged walls/door frames and scratched radiators. Need to create an easy, even, seamless and level access route between rooms.	Increase corridor/passageway width to 1200mm. Increase door widths to 850mm where the door is approached head on and 900mm where the door is approached side on, with 300mm clear space to the side of the leading edge of the door. Remove the requirement for saddle boards. In the last paragraph on page 64, remove the sentence which makes reference to the main living room being located other than on the entrance level, also remove similar text under diagram 28 i.e. “where there is no habitable room at the entry level” the text then becomes ---the stair way providing access to the upstairs of the dwelling.
Page 65	Diagram 28		Amend diagram to show above dimensions as recommended by IWA

Page 65	2.3.2	<p>Allow for a range within the going and risers of a stairway and also the rise of the stairway – a handrail should be required at all steps to assist people with varying degrees of mobility impairment to ascend/descend</p> <p>A new section needs to be added giving direction on a space requirement in habitable room/s so that a wheelchair user can enter, be present within a room, turn and leave the room.</p>	<p>The following points should state: <i>d) rise of each step to be uniform and between 150 to 175mm</i> <i>e) going of each step to be uniform and between 280 to 425mm</i> <i>f) a handrail should be required for all steps, remove the last few words which allow for steps with no handrail. Total rise of stairway to be between 1.8m to 2.1m.</i></p>
Page 65			<p>The following section should be added: Require a space allocation within habitable room/s i.e. living/dining room/s, of 800 x 1300mm to accommodate a single stationary manual wheelchair and occupant, also a 1500mm turning circle to be identified within the habitable room/s.</p>
Page 66	<p>Section 2.4 Sanitary Conveniences The Objective</p>	<p>To ensure true visitability and compliance with the intent of the Regulation, both habitable room/s and WC provisions to be allowed on entry level only.</p>	<p>Remove text from the Objective statement which allows for no habitable room being present at entry level.</p>
Page 66	2.4.2 Accessible WC	<p>The present dimensions and configuration of possible WC cubicles within a dwelling make no allowance for activity space or for a wheelchair user to manoeuvre their chair within the cubicle. The minimum size for a single stationary manual wheelchair is 900 x 1300mm (larger than in the draft text), in addition the cubicle size given allows no space for an individual to move from the wheelchair to</p>	<p>WC cubicle size to increase to 1500 x 2200mm which is the minimum size cubicle for use by a person using a manual wheelchair and provides for activity space and a 1500mm turning circle to allow a person enter/leave and access the facilities within the cubicle. By incorporating the requirement for an external space beside the WC cubicle that could be later incorporated into the cubicle to create a shower room, then this most critical of Lifetime Design standards with the increased corridor and door widths advised above, would add significantly to the potential use of the dwelling in the event of an occupier acquiring a mobility impairment, even without incorporating all Lifetime design standards.</p>

		<p>the WC pan or to move the wheelchair within the cubicle at all to better position for a transfer or to access the washbasin. This is not a viable WC provision for a wheelchair user. The required size of a WC cubicle to be usable by a wheelchair user cannot be compromised; a wheelchair user cannot reduce his/her space WC requirement by virtue of being in a dwelling rather than a public building.</p>	
Page 67	2.4.3. WC in smaller dwellings	There should be no allowance for a smaller WC to be provided within certain dwellings	Remove this section. Recommend increasing dwellings size to accommodate WC of 1500 x 2200mm.
Page 68	Section 2.5 2.5.2 Switches and sockets		At the end of the sentence in paragraph 3 add, “ frequently used switches and sockets to be positioned between 750 to 1000mm from finished floor level. Reduce upper limit to 1000mm.