



**Rialtas na hÉireann**  
Government of Ireland

# **Final Regulatory Impact Analysis**

## **Provision of a Changing Places Toilet in Certain Buildings**

**December 2022**



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## 1.0 Summary and Recommended Option

<b>Department / Office:</b>  Department of Housing, Local Government and Heritage	<b>Title of Legislation:</b> <ul style="list-style-type: none"> <li>• Building Regulations (Part M – Amendment) Regulations 2022 (S.I. No. 608 of 2022), and</li> <li>• Technical Guidance Document M – Access and Use 2022</li> </ul>
<b>Stage:</b> Amending Regulations enacted	<b>Date:</b> December 2022
<b>Related Publications:</b> <ol style="list-style-type: none"> <li>1. <a href="#">Building Regulations, 1997 (S.I. No. 497 of 1997)</a></li> <li>2. <a href="#">Technical Guidance Document M – Access and Use 2010</a></li> </ol>	
<b>Contact for enquiries:</b>  Building Standards Advisory	<b>Contact details:</b>  Tel: (01) 888 2000  Email: <a href="mailto:Buildingstandards@housing.gov.ie">Buildingstandards@housing.gov.ie</a>
<b>Introduction</b> <p>This Final Regulatory Impact Analysis (RIA) updates a Preliminary RIA that evaluated the proposal to amend the Building Regulations by making provisions for a changing places toilet in certain buildings. The preliminary RIA was presented along with the public consultation material.</p> <p>A changing places toilet is 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.</p> <p><b>What are the policy objectives?</b></p> <p>The promotion of community participation and social inclusion of people by :</p> <ul style="list-style-type: none"> <li>• increasing the provision of changing places toilets in certain buildings and</li> <li>• further enhancing the health and safety of people in and around buildings.</li> </ul> <p><b>What policy options were considered?</b></p> <p>A. Do nothing;</p> <p>B. Introduce amendments to the <a href="#">Building Regulations</a> and associated minimum standards in Technical Guidance Document M – Access and Use (TGD M);</p>	

C. Promote provision of changing places toilets by means of voluntary guidance, hoping that those involved in design and construction of buildings adopt it.

### What is the recommended option?

The option being implemented is 'B' - Introduce amendments to the Building Regulations and associated minimum standards in Technical Guidance Document M – Access and Use (TGD M).

Benefits	Estimated costs	Impacts
<ul style="list-style-type: none"> <li>The needs of a proportion of the population will be met by the new regulatory provision of this sanitary facility in large publically accessible buildings and spaces where standard accessible WCs do not meet their needs.</li> <li><a href="#">National Disability Authority research</a> indicates that between 17,100 to 37,700 people (or between 1 in 132 to 1 in 291 people), excluding their assistants, may benefit from the provision of a changing places toilet.</li> <li>Regulating for the provision of a changing places toilet in certain buildings such as hospitals, schools, museums, galleries etc. as listed in Table 1 (pages 14 – 17) may provide as many as 80 changing places toilets per annum.</li> <li>Regulating for the provision of a changing places toilet will encourage adoption of the principle in other developments. This may assist current broader action to deliver changing places toilets on a voluntary basis.</li> </ul>	<ul style="list-style-type: none"> <li>The cost of a changing places toilet (the combined construction and additional equipment costs i.e. hoist, adjustable basin, adjustable adult-sized changing bench) is estimated to range between € 35,400 and € 77,650 depending on the building type and size (average cost of €54,115).</li> <li>Based on the installation of 82 changing places toilets it is estimated that construction costs will be in the region of € 4.46 million per annum.</li> <li>For new buildings, the cost increases range from 0.02 % to 1.49 % with an average construction cost increase of 0.11% (average cost of €54,115).</li> <li>The annual operation costs, including maintenance, servicing and cleaning, of a changing places toilet are expected to be about € 3,500 per annum (excluding VAT).</li> </ul>	<ul style="list-style-type: none"> <li>Regulating for the provision of a changing places toilet will improve community participation and social inclusion.</li> <li>It will increase the nationwide provision of such facilities in a proportionate manner and contribute to a more equitable society.</li> <li>It will allow users to attend to their hygiene needs with dignity.</li> <li>Buildings in which a changing places toilet may be required represent an average of 3% of all buildings, other than dwellings, commenced per annum.</li> <li>Provision of a changing places toilet may result in increased trade<sup>1</sup> for businesses by allowing them to cater for a wider range of customers.</li> <li>Irish Building Regulations relating to access and use of buildings will be favourably comparable with international good practice.</li> </ul>

<sup>1</sup> Unquantified

## 2.0 Introduction

A changing places toilet is an accessible sanitary facility with a toilet, hoist, basin, adult-sized changing bench and optional shower. It offers larger supported facilities that address the needs of people for whom current accessible sanitary accommodation is inadequate.

Adequate provision of these facilities enables people with complex care needs to take part in everyday activities such as travel, shopping, family days out or attending a sporting event allowing people to plan activities with confidence around where such facilities are located and when they are open (see Figure 1 for a photograph of a typical changing places toilet).

**Figure 1**      **Changing Places Toilet**



Courtesy: Inclusion Ireland

[National Disability Authority research](#) indicates that between 17,100 to 37,700 people (or between 1 in 132 to 1 in 291 people), excluding their assistants, may benefit from the provision of a changing places toilet.

Since 2014, an advocacy, carers and end-user group called Changing Places Ireland<sup>2</sup> has campaigned to seek the introduction of changing places toilets in buildings frequented by the public in response to the lack of adequate accessible sanitary facilities. Despite their efforts, there are approximately nineteen publically accessible changing places toilets in Ireland<sup>3</sup>. Prior to this amendment to the Building Regulations there was no other legislation requiring the provision for a changing places toilet in publically accessible buildings in Ireland.

In support of Government policy on advancing the rights and inclusion of people with disabilities, in December 2020, the Department of Housing, Local Government and Heritage established a Working Group to examine the provision of a changing places toilet in certain buildings.

The following organisations are represented on the Working Group:

- 1) Changing Places Ireland;<sup>4,5</sup>
- 2) National Disability Authority;
- 3) Royal Institute of the Architects of Ireland;
- 4) Society of Chartered Surveyors of Ireland;
- 5) Office of Public Works;
- 6) Health Service Executive – Estates;
- 7) Construction Industry Federation; and
- 8) Department of Education;

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<sup>2</sup> Changing Places Ireland (<https://changingplaces.ie/>) is supported by the following organisations:

- Enable Ireland
- Central Remedial Clinic
- Inclusion Ireland
- Disability Federation Ireland
- InterAcT (Accomplish and Thrive)
- Spina bifida hydrocephalus Ireland (SBHI)
- Irish Wheelchair Association (IWA)

<sup>3</sup> <https://changingplaces.ie/find-changing-places/>

<sup>4</sup> The UNCRPD requires State parties to actively involve people with disabilities in policy development. It is vital that Government hears the voices of people with lived experience of disability. The experiences and perspectives of people with disabilities are essential to the development of policies and programmes that meet their needs effectively.

<sup>5</sup> The Working Group included three people from Changing Places Ireland, two of whom are users of Changing Places Toilets (one user of changing places toilets and one parent).



## 9) Building Control Authorities<sup>6</sup>.

Draft documentation, that included DRAFT Building Regulations (Part M Amendment) Regulations 2022, DRAFT Technical Guidance Document M – Access and Use 2022, a Preliminary Regulatory Impact Analysis, and an easy read consultation document with audio visual transcription, was published for public consultation between 09 February 2022 to 12 May 2022.

Approximately 650 submissions were received, with almost 95% originating from individuals with a lived experience of the matter under consideration. These individuals overwhelmingly expressed their support in favour of the proposal on behalf of themselves as service users, their families, carers and friends.

A submission was also received from Independent Living Movement Ireland (ILMI) who voiced their positive support for the proposal. ILMI are a cross-impairment DPO (disabled persons organisation) formed to ensure that the voice of disabled people will be heard in campaigns, research and policy development.

In addition to the large number of individual submissions received, approximately 28 stakeholders representing sectoral interest groups, public bodies and agencies, non-governmental or charity organisations made submissions, all of whom were supportive of the proposal.

The Working Group Members reviewed all submissions made during the Public Consultation process and met twice as a group to discuss the issues raised. Following their evaluation of the submissions, the Working Group finalised their recommendation on the types and sizes of buildings where a changing places toilet should be required, along with the technical requirements (equipment, room size and layout) of a changing places toilet. They are satisfied that the needs of a proportion of the population will be met by the provision of this sanitary facility in large publically accessible buildings and spaces.

The implementation of the recommendations of the Working Group necessitated changes to the Building Regulations 1997 to 2022 and to Technical Guidance Document M – Access and Use.

Post consultation changes made to the documentation (Building Regulations and associated Technical Guidance Document) that were informed by the public consultation submissions are not expected to have a significant impact on the potential provision of changing places toilets.

The estimated costs of providing a changing places toilet in each building type listed in the preliminary RIA have been updated to reflect the *Buildcost Second half 2022 Construction Cost Guide* and the *Linesight Ireland Handbook 2022*.

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<sup>6</sup> Represented by Cork County Fire and Building Control Department.

## **3.0 Context**

### **3.1 Policy Context**

Government policy on advancing the rights and inclusion of people with disabilities is co-ordinated through two whole-of-government strategies: the National Disability Inclusion Strategy (NDIS) 2017-2021 (extended to 2022), and the Comprehensive Employment Strategy for People with Disabilities 2015-2024. In 2018, Ireland ratified the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

#### **3.1.1 National Disability Inclusion Strategy (NDIS) 2017-2021**

The NDIS (recently extended to 2022), takes a whole of Government approach to improving the lives of people with disabilities, their families and carers and creating the best possible opportunities for people them to fulfil their potential. The NDIS Steering Group chaired by the Minister of State with Responsibility for Disability, oversees the implementation of the Strategy.

#### **3.1.2 Comprehensive Employment Strategy for People with Disabilities**

The Comprehensive Employment Strategy for People with Disabilities (CES) 2021-2024 is the primary disability employment policy framework in Ireland. It is a cross-government approach, bringing together actions by Government Departments and Agencies to address the barriers and challenges to employment of people with disabilities. The CES's strategic priorities are to build skills, capacity and independence, to provide bridges and supports into work, to make work pay, to promote job retention and re-entry to work, to provide coordinated and seamless supports and to engage employers.

Implementation of the Strategy is undertaken through agreed action plans and is monitored by an Implementation Group.

#### **3.1.3 UN Convention on the Rights of Persons with Disabilities**

The purpose of the UN Convention on the Rights of Persons with Disabilities [UNCRPD](#) is to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity. The Government is committed to the principles of the UNCRPD, including Article 9 Accessibility and Article 19 Living independently and being included in the community. Meeting the obligations of the UNCRPD is one of progressive realisation, each year moving forward on key reforms.<sup>7</sup> Advancing the implementation of the UNCRPD is an ongoing priority.

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<sup>7</sup> [CRPD Ireland Initial Report](#)

### **3.1.4 What are the policy objectives?**

The policy objectives are the promotion of community participation and social inclusion of people by:

- increasing the provision of changing places toilets in certain buildings and
- further enhancing the health and safety of people in and around buildings.

### **3.1.5 What policy options were considered?**

The following options were considered when preparing the Regulatory Impact Analysis:

- A. Do nothing; or
- B. Introduce amendments to the Building Regulations and associated minimum standards in Technical Guidance Document M – Access and Use; or
- C. Promote provision of changing places toilets by means of voluntary guidance, with the hope that those involved in design and construction of buildings adopt it.

## **3.2 Regulatory Context**

### **3.2.1 Building Control Act 1990 to 2020**

The design and construction of buildings in Ireland is regulated under the Building Control Acts 1990 to 2020, in order to ensure the safety of people within the built environment. The Acts set out the statutory framework for the regulation and oversight of building activity based on:

- a)** the minimum requirements for the design and construction of buildings as set out in the Building Regulations;
- b)** detailed Technical Guidance Documents to outline how these requirements can be achieved in practice;
- c)** clear administrative procedures for demonstrating compliance in respect of an individual building or works as set out in Building Control Regulations;
- d)** the responsibility for compliance with the Building Regulations resting, first and foremost, with building owners, builders and designers; and
- e)** the responsibility for enforcing compliance with the building regulations resting with the 31 local building control authorities.

### **3.2.2 Building Regulations 1997 to 2022**

The Building Regulations 1997 to 2022 set out minimum standards for the design and construction of buildings and works to ensure the health and safety of people in and around such buildings. They are subject to ongoing review in the interests of safety and the well-being of persons in the built environment, and to ensure that due regard is taken of changes in construction techniques, technological progress and innovation.

Part M of the Building Regulations deals with Access and Use. The associated Technical Guidance Document M provides guidance indicating how the requirements of Part M can be achieved in practice. Where works are in accordance with TGD M, this will, *prima facie*, indicate compliance with Part M of the Second Schedule of the Building Regulations.

Part M of the Building Regulations aims to foster an inclusive approach to the design and construction of the built environment.

While the Part M requirements may be regarded as a statutory minimum level of provision, the accompanying technical guidance encourages building owners and designers to have regard to the design philosophy of Universal Design<sup>8</sup> and to consider making additional provisions where practicable and appropriate.

### **3.2.3 Building Control Regulations 1997 to 2021**

Separate to requirements under the Building Regulations, the Building Control Regulations 1997 to 2021 require that, in the case of commercial buildings and apartment blocks, a Disability Access Certificate is obtained from the local building control authority.

A Disability Access Certificate is a certificate, which specifies that the works or building to which the application relates will, if carried out in accordance with the plans and specifications submitted, comply with the requirements of Part M of the Second Schedule to the Building Regulations. It is an offence to occupy or use a building without having a valid Disability Access Certificate in place as required.

### **3.2.4 Equal Status Acts**

The Equal Status Acts prohibit discrimination in the provision of goods and services, accommodation and education. The Acts require those selling goods or providing services to provide reasonable accommodation, or special treatment or facilities where, without these, it would be impossible or unduly difficult for a person with disabilities to avail of the goods and services, unless this would cost more than a nominal cost.

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<sup>8</sup> Universal Design is defined in the Disability Act 2005 as “the design and composition of an environment so that it may be accessed, understood and used to the greatest practicable extent, in the most independent and natural manner possible, in the widest possible range of situations and without the need for adaptation, modification, assistive devices or specialised solutions, by persons of any age or size or having any particular physical, sensory, mental health or intellectual ability or disability.”

### 3.2.5 Disability Act 2005

PART 3 of the Disability Act 2005 places an obligation on public bodies to make their buildings and services accessible. Section 25 states that '*a public body shall ensure that its public buildings<sup>9</sup>, are as far as practicable, accessible to persons with disabilities*' and requires public bodies to apply Part M retrospectively to the public areas of public buildings. Section 25 states that where Part M is amended, public buildings shall be brought into compliance with any amendments not later than ten years after the commencement of that amendment.<sup>10</sup>

For the purposes of giving guidance to public bodies on the matter, the National Disability Authority has recently initiated the development of a Code of Practice for Accessible Public Buildings under Section 25 of the Disability Act.<sup>11</sup>

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<sup>9</sup> Public building means 'a building, or that part of a building, to which members of the public generally have access and which is occupied, managed or controlled by a public body'.

<sup>10</sup> [An operational review of the effectiveness of Section 25 of the Disability Act](#) was carried out under Action 26 of the National Disability Inclusion Strategy 2017-2021, by the National Disability Authority (NDA) and the Office of Public Works (OPW).

<sup>11</sup> The development of the Code is a commitment under action 105 of the National Disability Inclusion Strategy, which states that 'we will develop a code of practice for accessible public areas of public sector buildings'.

## 4.0 Statement of Objectives

The amendment regulation aims to secure adequate standards of health, safety and welfare for persons in and about buildings without imposing disproportionate bureaucracy and costs.

The key objectives of the amendments are as follows:

- a) To increase the provision of changing places toilets in certain new buildings, subject to their size and use,
- b) To ensure adequate standards of accessibility and usability in changing places toilets,
- c) To improve the accessibility and usability of existing building stock by making provision for a changing places toilet, where there is a significant extension or material change of use, subject to the building size and use,
- d) To support and complement the aims of the Equality Act 2004, the Disability Act 2005, and the UN Convention on the Rights of Persons with Disabilities.
- e) To further the achievement of [UN Sustainable Development Goals](#) by reducing inequality and promoting an inclusive society.
- f) To support and underpin the philosophy of Universal Design.

## **5.0 Changes to Regulations and Technical Guidance Documents**

The introduction of the requirement to provide a changing places toilet in certain buildings has necessitated changes to the Building Regulations 1997 to 2022 and to Technical Guidance Document M – Access and Use.

The requirement to provide a changing places toilet does not apply to residential buildings or dwellings.

### **5.1 Summary of Amendments to the Building Regulations 1997 to 2022**

The new provision of a changing places toilet in certain buildings includes:

- Amendment to Part M of the Building Regulations to require the provision of a changing places toilet in buildings, having regard to the buildings use and size;
- Amendment to Article 5(4) of the Principal Regulations to include a definition of a ‘changing places toilet’, and to amend the definition of an ‘institutional building’;
- Amendment to Article 13 of the Principal Regulations to require Part M4 to apply to an existing building or part of a building which undergoes a material change of use having regard to the use and size of the building;
- Revocation of Building Regulations (Part M Amendment) Regulations 2010 (S. I. No. 513 of 2010);
- Identifying an operative date of the Regulations of 01 January 2023, subject to the transitional periods cited.



## **5.2 Summary of Amendments to Technical Guidance Document M**

The provision of a changing places toilet in certain buildings includes the following amendments:

- Update of Section 0 (Application of Part M), to provide guidance on the application of the Regulations to works and buildings subject to their size and use.
- Update to Section 1.4 (Sanitary facilities) to provide minimum standards for changing places toilet in new buildings (including consequential changes throughout the technical guidance document).
- Update to Section 2.4 (Sanitary facilities) to provide minimum standards for changing places toilet in existing buildings.
- The opportunity has also been taken to make other minor editorial corrections, where appropriate.

## 6.0 Buildings Where a Changing Places Toilet Should Be Provided

The Working Group considered a wide range of relevant building uses and sizes to ensure that the requirement to provide a changing places toilet will be appropriate and achieve the policy objectives.

The new amendments generally apply to large new buildings, existing buildings undergoing significant extensions and buildings undergoing a material change of use, where the provision of a changing places toilet will increase community participation and advance social inclusion.

A changing places toilet is required where sanitary facilities are provided for people other than staff, and the relevant building use exceeds the size criteria identified in Table 1.

<b>Table 1 Provision of At Least One Changing Places Toilet in New Buildings</b>		
<b>Item No.</b>	<b>Relevant Building Use</b>  <b>Note: the relevant building use refers to the building or part of the building in which a changing places toilet may be required</b>	<b>Size Criteria</b>  <b>Applies where sanitary facilities are being provided for use by people other than staff.</b>
<b>1.</b>	Hospital	All new Hospital buildings, with a relevant floor area <sup>1</sup> greater than 500 m <sup>2</sup>  The changing places toilet should be in a suitable accessible location, preferably close to the main reception or waiting area
<b>2.</b>	Day centre, other than a creche, 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	Relevant floor area <sup>1</sup> greater than 500 m <sup>2</sup>
<b>3.</b>	Places of assembly used for social or recreational purposes such as: <ul style="list-style-type: none"> <li>an amusement arcade, concert hall, theatre, public library, hall, cinema, gallery, museum, conference centre, leisure or sports centre, place of public worship, crematorium</li> <li>public house, restaurant, or similar premises used for the sale to</li> </ul>	<b>(i)</b> Relevant floor area <sup>1</sup> greater than 1,000 m <sup>2</sup> , or  <b>(ii)</b> includes leisure facilities with a relevant floor area <sup>1</sup> of more than 500 m <sup>2</sup> that includes a swimming pool of greater than 10 m in length

	<p>members of the public of food or drink for consumption on the premises</p> <ul style="list-style-type: none"> <li>• or other building of public resort.</li> </ul>	
<b>4.</b>	Sports pavilion, stadium, grandstand buildings	Relevant floor area <sup>1</sup> greater than 5,000 m <sup>2</sup>
<b>5.</b>	Roadside service facility that provides food hall / dining and sanitary facilities	Relevant floor area <sup>1</sup> greater than 800 m <sup>2</sup> of which the relevant floor area <sup>1</sup> of the food hall / dining area is greater than 200 m <sup>2</sup>
<b>6.</b>	School (primary, secondary or special schools)	All new school buildings with a relevant floor area <sup>1</sup> greater than 1,000 m <sup>2</sup>
<b>7.</b>	Third level college, University, or other building for the provision of education	All new buildings with a relevant floor area <sup>1</sup> greater than 1,000 m <sup>2</sup>
<b>8.</b>	Terminus, station or other facility for air, rail, road or sea travel	Relevant floor area <sup>1</sup> greater than 800 m <sup>2</sup>
<b>9.</b>	Office	<p>(i) Gross floor area greater than 20,000 m<sup>2</sup>, and where sanitary facilities, for use by people other than staff, i.e. visitors to the building, are provided to serve the main entrance reception area, or</p> <p>(ii) Relevant floor area<sup>1</sup> greater than 250 m<sup>2</sup> where the office is occupied, managed or controlled by a public body to which members of the public generally have access and where sanitary facilities are provided for the public</p>
<b>10.</b>	Shop	Relevant floor area <sup>1</sup> greater than 2,500 m <sup>2</sup>
<b>11.</b>	Shopping centre or retail park	Relevant floor area <sup>1</sup> greater than 5,000 m <sup>2</sup> .
<b>12.</b>	Hotel	<p>(i) Gross floor area of greater than 8,000 m<sup>2</sup>, or</p> <p>(ii) includes leisure facilities with a relevant floor area<sup>1</sup> of more than 500 m<sup>2</sup> that include a swimming</p>

		pool of greater than 10 m in length, or  <b>(iii)</b> includes conference or function facilities for more than 350 <sup>2</sup> people (other than staff).
<b>13.</b>	A public sanitary facilities building managed or controlled by a public body e.g. public toilets in public parks, urban areas, cemeteries, heritage sites or adjacent to a beach etc.	All buildings (or part thereof) providing two or more WCs.
<b>14.</b>	Building that provides sanitary facilities as part of a collection of smaller buildings associated with an outdoor amenity primarily used for assembly, recreation or entertainment such as zoos, amusement parks and theme parks	A building (or part thereof) providing sanitary facilities where the capacity of the outdoor amenity is more than 2,000 people (excluding staff) unless there is another building containing a changing places toilet within 250 metres
<p><sup>(1)</sup> 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.</p> <p>The calculation shall:</p> <ul style="list-style-type: none"> <li><b>a)</b> Include the space occupied by any walls, shafts, ducts or structure within the area being measured.</li> <li><b>b)</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.</li> </ul> <p><sup>(2)</sup> 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.</p>		
<p><b>Extensions to Existing Buildings</b></p> <p>Subject to Part M4, at least one changing places toilet should be provided when:</p> <ul style="list-style-type: none"> <li><b>a)</b> An existing building, or part of a building, with a relevant building use is extended by more than 25% of the floor area of a new building with the same relevant building use as described in Items 1 to 12 of the table above, and  the combined floor area of the existing building, or part of a building, with a relevant building use and the extension is greater than the floor area of a new building with the same relevant building use as described in Items 1 to 12 of the table above.</li> </ul>		

- b)** In the case of Item 13 - the floor area of the sanitary facilities is being extended by more than 25% of its existing floor area, or when two or more WCs are being added.
- c)** In the case of Item 14 - the capacity of the outdoor amenity is more than 2,000 people (excluding staff) and the relevant floor area of a building (or part thereof) providing sanitary facilities for use by people other than staff, is being extended by the lesser of 25% of its existing floor area or 250 m<sup>2</sup>, unless there is another building containing a changing places toilet within 250 metres.

**Examples:**

- A.** A shop (where sanitary facilities are provided for use by people other than staff) having a relevant floor area of 2,000 m<sup>2</sup> is extended by 700 m<sup>2</sup>. The floor area of the extension is greater than 25% of the new building floor area criteria and the combined floor area of the extended building is greater than 2,500 m<sup>2</sup>. With reference to Item 10, at least one changing places toilet should be provided.
- B.** A shop (where sanitary facilities are provided for use by people other than staff) having a relevant floor area of 1,000 m<sup>2</sup> is extended by 1,200 m<sup>2</sup>. The relevant floor area of the extension is greater than 25% of the new building floor area criteria and the combined floor area of the extended building is 2,200 m<sup>2</sup>. With reference to Item 10, as the combined relevant floor area of the extended building is less than 2,500 m<sup>2</sup>, the provision of a changing places toilet is not required.

**Material Change of Use**

Subject to Part M4, at least one changing places toilet should be provided when:

- a)** An existing building (or part of an existing building) undergoes a material change of use, and the floor area (either relevant or gross as may be applicable) is greater than the area of a new building with the same proposed use, as described in Items 1, 2, 3, 4, 5, 6, 7, 8, 10, 11 and 12 and sanitary facilities for use by people other than staff will be provided in the building (or part thereof).
- b)** In the case of Item 14 - the capacity of the outdoor amenity is more than 2,000 people (excluding staff) and sanitary facilities for use by people other than staff will be provided in the building (or part thereof) unless there is another building containing a changing places toilet within 250 metres.

**Examples**

- C.** A building (gross floor area 9,000 m<sup>2</sup>) changes use to become a hotel. With reference to Item 12, at least one changing places toilet should be provided.
- D.** A building (gross floor area 3,000 m<sup>2</sup>) changes use to become a hotel and incorporates conference facilities for ≥ 350 people. With reference to Item 12, at least one changing places toilet should be provided.

## 6.1 Impact of the Size Criteria

The Working Group carefully considered the building use and size criteria outlined in Table 1, which set the trigger level (building use and size criteria) for the provision of changing places toilets.

Commencement Notice data<sup>12</sup> for 6,667 valid commencement notices submitted from January 2018 to December 2020 was analysed to determine the potential number of buildings affected by the amendments.

From the analysis it was concluded that if the those three years of construction activity were to continue, roughly 80 buildings/works per annum (56 New, 21 Extensions and 5 Material Changes of Use) may exceed the trigger levels in Table 1 and may be required to provide a changing places toilet. This represents an average of 2.8% of all of the building uses identified in Table 1 for which a valid commencement notice was submitted (January 2018 to December 2020).

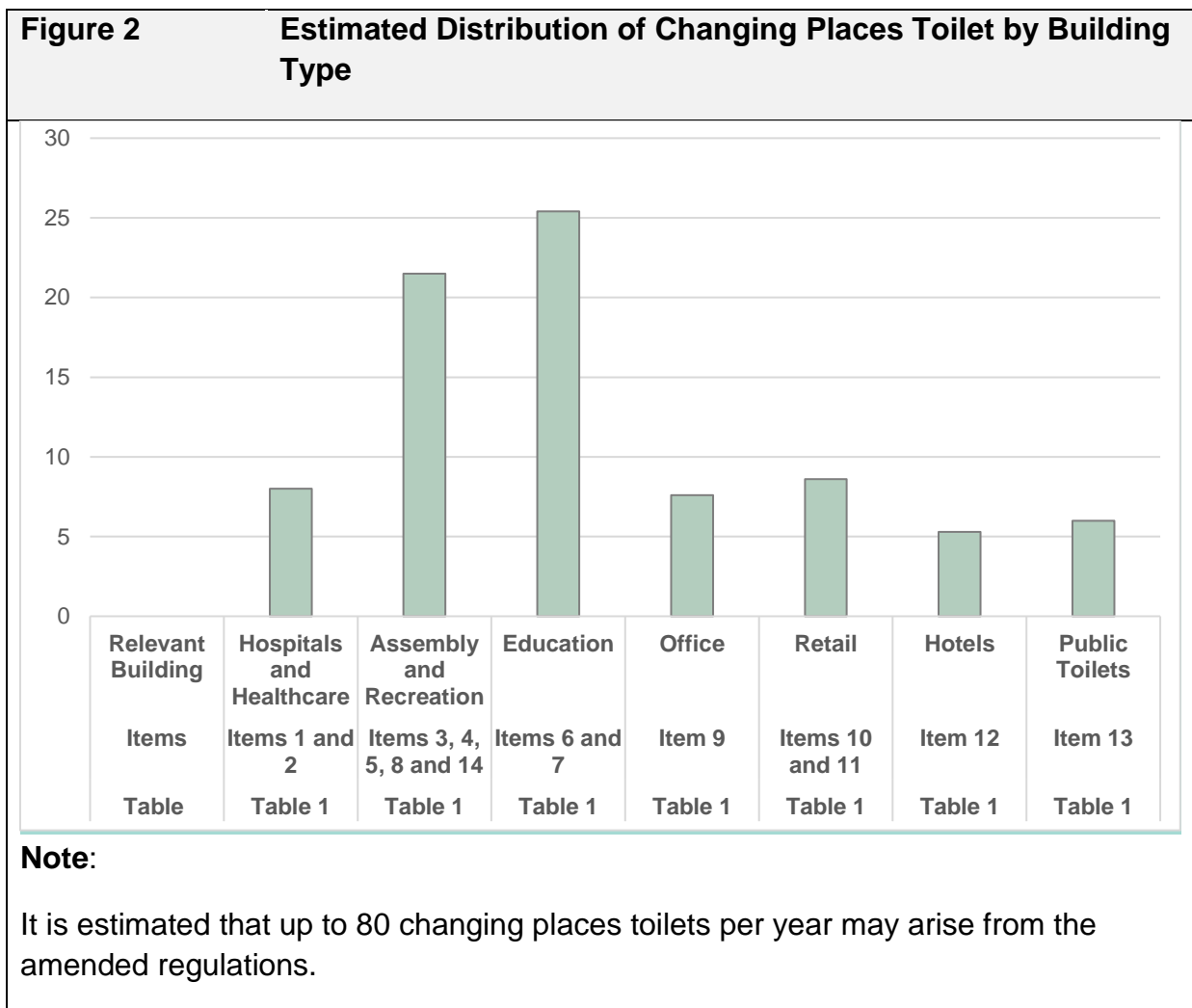
A summary of the analysis is included in Table 2, with a detailed breakdown of each building type provided in Table A.1 of Appendix 1.

Figure 2 illustrates the expected distribution of changing places toilets across the various types of buildings.

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<sup>12</sup> [See Open Data Portal for building control activity data.](#)

Table 2      Summary of Average Number of Buildings/ Works Estimated to Require the Provision of a Changing Places Toilet			
Type of Building or Works for Which a Commencement Notice Was Submitted (2018-2020)	Average Number of Buildings/Works per year In Accordance With Building and Size Criteria Outlined In Table 1	Average Number of Buildings/Works per year In Accordance With Building and Size Criteria Outlined In Table 1	Average % of Buildings/Works per year in Accordance With Building and Size Criteria Outlined in Table 1
New	1,333	56	4.2%
Extension	655	22.2	3.4%
Material Alteration	713	N/A*	N/A*
Material Change of Use	235	4.2	1.8%
	<b>2936</b>	<b>82.4</b>	<b>2.8%</b>
<b>Notes:</b>  *Material alterations were not included within the criteria to activate the provision of a changing places toilet.			





## 7.0 Cost Benefit Analysis

### 7.1 Estimated Costs

#### A. Do nothing

There were no cost associated with this option.

#### B. Introduce amendments to the Building Regulations and associated minimum standards in Technical Guidance Document M – Access and Use

There are additional costs associated with this option. The assumptions and methodology adopted by the Working Group, and the outcome of the analysis of the estimated costs are as follows:

- a) The Working Group recommended adopting the room size layout from **I.S. EN 17210:2021 Accessibility and Usability of the Built Environment - Functional requirements**<sup>13</sup> that indicates a minimum room size of 4.2 m x 3 m (12.6 m<sup>2</sup> floor area).
- b) The typical average costs per square metre of floor area for new buildings<sup>13</sup>, dependent on building type, were based on the averages of the ranges given in the **Buildcost Second half 2022 Construction Cost Guide**<sup>14</sup>, **The Linesight Ireland Handbook 2022**<sup>15</sup> and cost data supplied directly by the Department of Education<sup>16</sup>, with the following costs being used:
  - Retail (unit)<sup>15</sup> - € 1,700 per m<sup>2</sup>
  - Retail (shopping centre mall areas)<sup>14</sup> - € 3,500 per m<sup>2</sup>
  - Hotel<sup>14</sup> - € 4,000 per m<sup>2</sup>
  - Education (primary and second level)<sup>16</sup> - € 1,990 per m<sup>2</sup>
  - Education (third level)<sup>14</sup> - € 3,600 per m<sup>2</sup>
  - Healthcare (hospital)<sup>14</sup> - € 5,050 per m<sup>2</sup>
  - Healthcare (Primary care)<sup>14</sup> - € 3,000 per m<sup>2</sup>
  - Offices<sup>14</sup> - € 3,200 per m<sup>2</sup>
  - Restaurants<sup>15</sup> - € 3,200 per m<sup>2</sup>
  - Cinemas<sup>15</sup> - € 2,750 per m<sup>2</sup>

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<sup>13</sup> Based on average construction build cost only and excludes fixtures furniture & equipment, site works, VAT, professional fees, future inflation and other developer costs etc. Refer to Buildcost or Linesight reports for all cost assumptions made.

<sup>14</sup> Refer to <https://buildcost.ie/wp-content/uploads/2022/08/Buildcost-Construction-Cost-Guide-2022-2nd-Half.pdf>

<sup>15</sup> Refer to <https://www.linesight.com/en-us/insights/regional-report/europe-2022/> for average Irish construction costs 2022

<sup>16</sup> Provided directly by the Department of Education

A figure of € 3,190 per m<sup>2</sup> was used when typical average construction costs were not available for a particular building use. This was the average of the construction costs across all the building types that construction costs data was available for.

Due to the individual nature of each building extension, average construction costs are not available for this category of work.

- c) The cost of additional equipment over and above a typical unisex accessible WC i.e. hoist, adjustable basin, adjustable adult-sized changing bench was established by a market tender to be on average € 14,000 per installation (excluding VAT).
- d) Using the above costs, the following estimated costs have been identified:
  - (i) The cost of a changing places toilet (the combined construction and additional equipment costs i.e. hoist, adjustable basin, adjustable adult-sized changing bench) will range from € 35,420 to € 77,630 depending on the building type and size (average cost of € 54,115) <sup>17</sup>.
  - (ii) Based on the installation of 82 changing places toilets (56 New, 22 Extensions and 4 Material Changes of Use) it is estimated that construction costs will be in the region of € 4.460 million per annum.
  - (iii) For new buildings, the cost increases range from 0.02 % to 1.49 % with an average construction cost increase of 0.11% (average cost of € 54,115).
  - (iv) Whilst the provisions of the Building Regulations do not relate to management, it should be noted that the annual operation costs, including maintenance, servicing and cleaning of a changing places toilet is estimated at approximately € 3,500 per annum (excluding VAT).

A summary of the estimated costs are included in Table 3, with a detailed breakdown per building type provided in Table A.1 of Appendix 1.

**C. Promote provision of changing places toilets by means of voluntary guidance, with the hope that those involved in design and construction of buildings adopt it.**

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<sup>17</sup> In all cases the costs of equipment is constant, but the average construction costs for the type of building vary as per 7.1.B.b).

There were no implementation costs associated with this option. However, where a person chooses to follow any advice on non-mandatory provision, the costs are likely to be as indicated under option B above (where an equivalent specification is provided).

Table 3 Summary of Average Cost Impact of the Provision of Changing Places Toilets									
Building Description (Item 1 to 14 as listed in Table 1)	Type of Building or Works	Average Number of Buildings/ Works per year (Other Than Dwellings) That Were Analysed	Average Number of Buildings/ Works per year In Accordance With Table 1	Average % of Buildings/ Works per year In Accordance With Table 1	Average Construction Cost <sup>(a)</sup> per m <sup>2</sup> for Buildings in Table 1	Average Construction Cost <sup>(a)</sup> of Buildings in Accordance with Table 1 € (Millions)	Average Cost <sup>(a)</sup> of Provision of a Changing Places Toilet (€)	Average % Increase in the Cost <sup>(a)</sup> of Buildings in Accordance with Table 1	Avg. % Increase in the Cost <sup>(a)</sup> of All Buildings of the Same Use
Total (Averages per year)	New	1,333	56	4.2%	€ 3,185	€ 49.262	€ 54,115	0.11%	0.11%
	Extension	655	22.2	3.39%	(b)	-	-	-	-
	Material Alteration	713	N/A	N/A	(c)	N/A	N/A	N/A	
	Material Change of Use	235	4.2	1.8 %	(d)	-	-	-	-
		2936	82.4	2.8%		-			
<b>NOTES:</b> <p>(a) Based on average construction build cost only, and excludes fixtures furniture and equipment (except for those associated with a changing places toilet), site works, VAT, professional fees, future inflation and other developer costs etc. Refer to Buildcost or Linesight reports for all cost assumptions made.</p> <p>(b) Due to the individual nature of each building extension, average construction costs are not available for this category of work.</p> <p>(c) Material alterations were not included within the criteria to activate the provision of a changing places toilet.</p> <p>(d) Constructions costs are not available for changes of use, as the building subject to the change of use have already been constructed.</p>									

## 7.2 Benefits

### A. Do nothing

No benefit was expected from this option.

### B. Introduce amendments to the Building Regulations and associated minimum standards in Technical Guidance Document M – Access and Use

The benefits from the provision of changing places toilets are as follows:

- a) Up until now there was no provision for a changing places toilet in publically accessible buildings. The needs of a proportion of the population will be met by the new regulatory provision of this sanitary facility in large publically accessible buildings and spaces, where standard accessible WCs do not meet their needs.
- b) [National Disability Authority research](#) indicates that between 17,100 to 37,700 people (or between 1 in 132 to 1 in 291 people), excluding their assistants, will benefit from the provision of a changing places toilet.
- c) The provision of enhanced sanitary facilities in the form of a changing places toilet will enable people with complex care needs to take part in everyday activities such as travel, shopping, family days out or attending a sporting event. People will be able to plan activities with confidence around where such facilities are located and when they are open.
- d) Regulating for the provision of a changing places toilet in certain buildings such as hospitals, schools, shops, shopping centres, offices, museums, galleries, roadside service stations and so on may provide as approximately 80 changing places toilets per annum<sup>18</sup> where they are currently not provided.
- e) Regulating for the provision of a changing places toilet will encourage the adoption of the principle in other developments. This will assist current broader action to deliver changing places toilets on a voluntary basis.
- f) From the analysis of the Commencement Notice data, it is estimated that over a three-year period the amended regulations may result in the provision of at least one changing places toilet in most local authority areas.

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<sup>18</sup> Refer to Table 2

**C. Promote provision of changing places toilets by means of voluntary guidance, with the hope that those involved in design and construction of buildings adopt it.**

The benefits from the provision of voluntary guidance was that:

- a)** It would have reduced the uncertainty of what constitutes best practice. However, any benefits gained by the introduction of voluntary guidance would have been unlikely to deliver significant additional numbers of changing places toilets throughout the country.
- b)** Technical Guidance Document M 2010 already encourages building owners and designers to have regard to the design philosophy of Universal Design and to consider making additional provisions where practicable and appropriate. Despite this, and the efforts of Changing Places Ireland to promote voluntary installation of changing places toilets there are a limited amount of such facilities in Ireland.

## 7.3 Impact

### A. Do nothing

No positive impact was expected. The minimum standards of TGD M will not reflect current advances in international standards or help to promote a more inclusive society.

### B. Introduce amendments to the Building Regulations and associated minimum standards in Technical Guidance Document M – Access and Use

The impact from regulating for the provision of changing places toilets in certain buildings are:

- a) Regulating for the provision of a changing places toilet will improve community participation and social inclusion.
- b) It will increase the nationwide provision of such facilities in a proportionate manner and contribute to a more equitable society.
- c) It will allow users to attend to their hygiene needs with dignity.
- d) Buildings in which a changing places toilet may be required in accordance with Table 1 represent an average of 3% of all buildings, other than dwellings, commenced per annum.
- e) Provision of a changing places toilet may result in increased trade for businesses able to cater for a wider range of customers.
- f) Irish Building Regulations relating to access and use of buildings will be more favourably comparable with international good practice and provisions in Northern Ireland, England, Scotland and Australia.

### C. Promote provision of changing places toilets by means of voluntary guidance, with the hope that those involved in design and construction of buildings adopt it.

The impact from the provision of voluntary guidance was that:

- a) It would have reduced the uncertainty of what constitutes best practice. However implementation of this option would have only been on a voluntary basis.

- b)** Continual education would have been the driving force for this option's implementation and success.
- c)** The voluntary uptake of the provision of a changing places toilet is not apparent, as there are fewer than nineteen changing places toilets in Ireland.
- d)** Other jurisdictions e.g. Northern Ireland, England, Scotland and Australia have mandated the provision of changing places toilets in recent years due to low uptake from voluntary guidance, while the Welsh Government have recently held a public consultation relating to the provision of changing places toilets.



## 8.0 Other Impacts

### 8.1 Competition Assessment

There are no significant areas where issues of competition, restriction or imbalance have been identified. The Department of Housing, Local Government and Heritage considers that the amendments will have no significant effect on competition in any markets. The Department also considers that the amendments apply in a proportional and equitable way.

### 8.2 Consultation

#### 8.2.1 Working Group

In December 2020, the Department of Housing, Local Government and Heritage established a Working Group to examine the provision for a changing places toilet in certain buildings. The following organisations are represented on the Working Group:

- 1) Changing Places Ireland <sup>19, 20, 21</sup>
- 2) National Disability Authority;
- 3) Royal Institute of the Architects of Ireland;
- 4) Society of Chartered Surveyors of Ireland;
- 5) Office of Public Works;
- 6) Health Service Executive – Estates;
- 7) Construction Industry Federation; and
- 8) Department of Education;
- 9) Building Control Authorities<sup>22</sup>.

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<sup>19</sup> The UNCRPD requires State parties to actively involve people with disabilities in policy development. It is vital that Government hears the voices of people with lived experience of disability. The experiences and perspectives of people with disabilities are essential to the development of policies and programmes that meet their needs effectively.

<sup>20</sup> The Working Group included three people from Changing Places Ireland, two of whom are users of Changing Places Toilets (one user and one parent).

<sup>21</sup> Changing Places Ireland (<https://changingplaces.ie/>) is supported by the following organisations:

- Enable Ireland
- Central Remedial Clinic
- Inclusion Ireland
- Disability Federation Ireland
- InterAcT (Accomplish and Thrive)
- Spina bifida hydrocephalus Ireland (SBHI)
- Irish Wheelchair Association (IWA)

<sup>22</sup> Represented by Cork County Fire and Building Control Department.

The plenary Working Group met eight times, in addition to a number of sub-group meetings.

In addition, the Working Group obtained a valuable insight into the implementation of similar provisions in other jurisdictions from meetings with Regulators from Scotland and Northern Ireland, a review of the regulations in Scotland, England, and Australia and consideration of the public consultations in Wales and Northern Ireland.

Following the public consultation, and a review of the 650 submissions received, the Working Group made a final recommendation of the types and sizes of buildings where they consider a changing places toilet should be required. They also finalised the technical requirements (equipment, room size and layout) of a changing places toilet.

The Department of Housing, Local Government and Heritage sincerely thank the Working Group for their huge personal effort and contribution to the process.

### **8.2.2 Public Consultation**

The draft documentation including DRAFT Building Regulations (Part M Amendment) Regulations 2022, DRAFT Technical Guidance Document M – Access and Use 2022, a DRAFT Preliminary Regulatory Impact Analysis, an easy to read consultation document and an information video to support the easy to read consultation document were published to support a public consultation on the matter.

The outcome of the public consultation is described in Section 9.0.

### **8.2.3 Consultation with the European Commission**

In accordance with the notification requirements of [Directive \(EU\) 2015/1535](#)<sup>23</sup>, the European Commission were notified of the DRAFT regulations/Technical Guidance Document and the Preliminary Regulatory Impact Analysis. The notification allowed the European Commission and the Member States of the EU to examine the technical regulations before their adoption.

No observations were received from the European Commission or Member States during this consultation.

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<sup>23</sup> Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services.

### **8.3 Regulatory Burden**

There will be a requirement for additional training of Building Control Officers. This will be included as part of ongoing training delivered by the National Building Control Office.

As a transitional lead in period is being allowed, building designers have a period of time to adapt to the new revisions. The regulations will come into effect approximately 12 months from the date of signing, subject to transitional periods. It is generally accepted in the industry that Building Standards and Codes of Practice evolve over time. This should not have any major impact on design and supervision fees.

Section 25 of the Disability Act 2005 requires public bodies to apply Part M retrospectively to the public areas of public buildings. Section 25 states that where Part M is amended, public buildings shall be brought into compliance with any amendments not later than ten years after the commencement of that amendment. This change will have implications for public bodies that own, manage or control qualifying public buildings, as they will need to bring them into compliance within ten years.

For the purposes of giving guidance to public bodies on the matter, the National Disability Authority has recently initiated the development of the Code of Practice for Accessible Public Buildings under Section 25 of the Disability Act.

## 8.4 Enforcement and Compliance

The primary responsibility for compliance with the requirements of the Building Regulations rests with the designers, builders and owners of buildings.

Enforcement of the Building Regulations is delegated under the Building Control Act 1990 to 2020 to the local building control authorities (i.e. the 31 local authorities) who are independent in the exercise of their statutory powers. Building Control Authorities who have a broad range of powers under the Act to investigate and, where appropriate, take action in the event that non-compliances are identified in buildings.

The **Building Control Regulations 1997 to 2021** set out the system of administrative controls to support compliance with the Building Regulations by requiring, inter alia, the submission of Commencement Notices, Fire Safety Certificates, Disability Access Certificates and Certificates of Compliance on Completion.

## **8.5 Sectors and Groups Affected**

Sectors and groups that will be affected include:

- (a)** Building users who will benefit from the provision of a changing places toilet along with their families, friends, and other people providing assistance.
- (b)** Building owners/developers who need to consider the additional cost of a changing places toilet into the planning of a building or works that exceed the criteria in Table 1.
- (c)** Public bodies, who occupy, manage or control a building, or that part of a building, to which members of the public generally have access.
- (d)** Building operators of certain buildings that may be required to maintain a changing places toilet.
- (e)** Building designers/constructors involved with building design, construction and compliance certification will need to familiarise themselves with the new regulations and technical guidance.
- (f)** Building Control Authorities responsible for, inter alia, approvals of Disability Access Certificates and enforcement for compliance with Parts M of the Building Regulations will need to familiarise themselves with the new regulations and technical guidance.

## 9.0 Public consultation

Documentation including the DRAFT Building Regulations (Part M Amendment) Regulations 2022, DRAFT Technical Guidance Document M – Access and Use 2022, a DRAFT Preliminary Regulatory Impact Analysis, an easy to read consultation document and an information video to support the easy to read consultation document was published for public consultation from 09 February 2022 to 12 May 2022.

Approximately 650 submissions were received, almost 95% of which originated from individuals with lived experience on the matter under consideration. These individuals overwhelmingly expressed their support in favour of the proposal on behalf of themselves as service users, their families, carers and friends.

A submission was received from Independent Living Movement Ireland (ILMI) who voiced their positive support for the proposal. ILMI are a cross-impairment DPO (disabled persons organisation) formed to ensure that the voice of disabled people will be heard in campaigns, research and policy development.

In addition to the large number of individual submissions received, approximately 28 stakeholders representing sectoral interest groups, public bodies and agencies, non-governmental or charity organisations responded to the consultation.

The Working Group Members reviewed all submissions made during the Public Consultation process and met twice as a group to discuss the issues raised. Following their evaluation of the submissions, the Working Group finalised their recommendation on the types and sizes of buildings where a changing places toilet should be required, along with the technical requirements (equipment, room size and layout) of a changing places toilet.

Post consultation changes made to the documentation (Building Regulations and associated Technical Guidance Document) that were informed by the public consultation submissions are not expected to have a significant impact on the potential provision of changing places toilets.

The estimated costs of providing a changing places toilet in each of the various building types used in the preliminary RIA have been updated to reflect the Buildcost Second half 2022 Construction Cost Guide and the Linesight Ireland Handbook 2022.

The implementation of the recommendations of the Working Group necessitated changes to the Building Regulations 1997 to 2022 and to Technical Guidance Document M – Access and Use.

## 10.0 Recommendations

There were three options for consideration, options A, B, or C described below.

### **A. Do nothing**

This option imposed no additional costs, it did not provide any additional benefits either. It is likely that Part M would have been regarded as being outdated in comparison with best practice.

### **B. Introduce amendments to the Building Regulations and associated minimum standards in Technical Guidance Document M – Access and Use**

This is the option that has been selected for implementation as it complements Government policy and additionally:

- It will increase the provision of changing places toilets nationally (estimated at 82 changing places toilets per annum), in a proportionate manner and contribute to a more equitable society.
- It will improve community participation and social inclusion and will endeavour to improve the lives of between 17,100 and 37,700 potential end users.
- The estimated benefits to society balance the extra costs.
- Irish Building Regulations regarding access and use of buildings will be more comparable with international good practice.

### **C. Promote provision of changing places toilets by means of voluntary guidance, with the hope that those involved in design and construction of buildings adopt it.**

This option would have helped reduce the uncertainty of what constitutes good practice. However, any benefits gained by the introduction of voluntary guidance would have been unlikely to deliver significant additional numbers of changing places toilets throughout the country.

## 11.0 Appendix 1

Table A.1 Cost Impact for Buildings or Works in Accordance with Table 1									
Building Description \ Use	Type of Building or Works	Average Number of Buildings/ Works per year with a Valid CN	Average Number of Buildings/ Works per year in Accordance with Table 1	Average % of Buildings/ Works per year in Accordance with Table 1	Average Construction Cost <sup>(A)</sup> per M <sup>2</sup> for Buildings in Table 1	Average Construction Cost of Buildings in Accordance with Table 1 €(Millions)	Cost of Provision of a Changing Places Toilet (€)	Average % Increase in the Cost of Buildings in Accordance with Table 1	Avg. % Increase in the Cost of All Buildings of the Same Use
1. Hospital	New <sup>24</sup>	3.7	3.7	100 %	€ 5,050	€ 28.020	€ 77,630	0.28 %	0.28%
	Ext <sup>25</sup>	8.0	4	50 %	(b)	-	-	-	-
	MCoU <sup>26</sup>	0	0	0	(c)	-	-	-	-
2. Day centre, other than a crèche, a pre-school or a day nursery, where such persons do not stay overnight and includes a day care centre	New	3.5	1.7	47.62 %	€ 5,050	€ 12.955	€ 77,630	0.60 %	0.40 %
	Ext	0	0	0	(b)	-	-	-	-
	MCoU	0.5	0.3	66.67 %	(c)	-	-	-	-
<b>NOTES:</b> (a) Based on average construction build cost only and excludes fixtures furniture and equipment (except for those associated with a changing places toilet), site works, VAT, professional fees, future inflation and other developer costs etc. Refer to Buildcost or Linesight reports for all cost assumptions made. (b) Due to the individual nature of each building extension, average construction costs are not available for this category of work. (c) Constructions costs are not available for changes of use, as the building subject to the change of use have already been constructed.									

<sup>24</sup> New buildings

<sup>25</sup> Extensions to existing buildings

<sup>26</sup> Material change of use



Building Description \ Use	Type of Building or Works	Average Number of buildings/ Works per year with a valid CN	Average Number of Buildings/ Works per year in Accordance with Table 1	Average % of Buildings/ Works per year in Accordance with Table 1	Average Construction Cost(a) per m2 for Buildings in Table 1	Average Construction Cost(a) of Buildings in Accordance with Table 1 €(Millions)	Cost(a) of Provision of a Changing Places Toilet (€)	Average % Increase in the Cost(a) of Buildings in Accordance with Table 1	Avg. % Increase in the Cost(a) of All Buildings of the Same Use
3.Places of assembly used for social or recreational purposes such as: <ul style="list-style-type: none"> <li>• an amusement arcade, concert hall, theatre, public library, hall, cinema, gallery, museum, conference centre, leisure or sports centre, place of public worship, crematorium</li> <li>• public house, restaurant, or similar premises used for the sale to members of the public of food or drink for consumption on the premises or</li> <li>• other building of public resort</li> </ul>	<b>New</b>	63.5	12	18.90 %	€ 2,600	€ 6.162	€ 46,760	0.76 %	0.50 %
	<b>Ext</b>	80.3	3.6	4.48 %	(b)	-	-	-	-
	<b>MCoU</b>	42	2.3	5.48 %	(c)	-	-	-	-
<b>NOTES:</b> <p>(a) Based on average construction build cost only and excludes fixtures furniture and equipment (except for those associated with a changing places toilet), site works, VAT, professional fees, future inflation and other developer costs etc. Refer to Buildcost or Linesight reports for all cost assumptions made.</p> <p>(b) Due to the individual nature of each building extension, average construction costs are not available for this category of work.</p> <p>(c) Constructions costs are not available for changes of use, as the building subject to the change of use have already been constructed.</p>									

Building Description \ Use	Type of Building or Works	Average Number of Buildings/ Works per year with a valid CN	Average Number of Buildings/ Works per year in Accordance with Table 1	Average % of Buildings/ Works per year in Accordance with Table 1	Average Construction Cost(a) per m2 for Buildings in Table 1	Average Construction Cost(a) of Buildings in Accordance with Table 1 €(Millions)	Cost(a) of Provision of a Changing Places Toilet (€)	Average % Increase in the Cost(a) of Buildings in Accordance with Table 1	Avg. % Increase in the Cost(a) of all Buildings of the Same Use
4. Sports pavilion, stadium, grandstand	New	No buildings within study period							
	Ext	No buildings within study period							
	MCoU	No buildings within study period							
5. Roadside service facility that provides food hall / dining and sanitary facilities	New	8.3	1.3	15.66 %	€ 3,190	€ 3.642	€ 54,194	1.49 %	0.55 %
	Ext	7.3	0.3	4.11 %	(b)	-	-	-	-
	MCoU	0	0	0	(c)	-	-	-	-
6. School (primary, secondary or special schools)	New	135.3	14	10.35 %	€ 1,990	€ 7,855	€ 39,074	0.50 %	0.35 %
	Ext	114.7	7	6.10 %	(b)	-	-	-	-
	MCoU	14.3	0.7	4.90 %	(c)	-	-	-	-
7. Third level college, University, or other building for the provision of education	New	2.0	1.7	85.00 %	€ 3,600	€ 69.450	€ 59,360	0.09 %	0.08 %
	Ext	2.7	1.7	63.0 %	(b)	-	-	-	-
	MCoU	0.7	0.3	42.9 %	(c)	-	-	-	-
<b>NOTES:</b> <b>(a)</b> Based on average construction build cost only and excludes fixtures furniture and equipment (except for those associated with a changing places toilet), site works, VAT, professional fees, future inflation and other developer costs etc. Refer to Buildcost or Linesight reports for all cost assumptions made. <b>(b)</b> Due to the individual nature of each building extension, average construction costs are not available for this category of work. <b>(c)</b> Constructions costs are not available for changes of use, as the building subject to the change of use have already been constructed.									

Building Description \ Use	Type of Building or Works	Average Number of Buildings/ Works per year with a valid CN	Average Number of Buildings/ Works per year in Accordance with Table 1	Average % of Buildings/ Works per year in Accordance with Table 1	Average Construction Cost(a) per m2 for Buildings in Table 1	Average Construction Cost(a) of Buildings in Accordance with Table 1 €(Millions)	Cost(a) of Provision of a Changing Places Toilet (€)	Average % Increase in the Cost(a) of Buildings in Accordance with Table 1	Avg. % Increase in the Cost(a) of all Buildings of the Same Use
8. Terminus, station or other facility for air, rail, road or sea travel	New	1.0	0.3	33.33 %	€ 3,190	€ 7.018	€54,194	0.77 %	0.23 %
	Ext	0	0	0	(b)	-	-	-	-
	MCoU	0	0	0	(c)	-	-	-	-
9. Office	New	79.0	6.3	7.97 %	€ 3,200	€ 105.414	€ 54,320	0.050 %	0.030 %
	Ext	63.0	1.0	1.59 %	(b)	-	-	-	-
	MCoU	40.0	0.3	0.75 %	(c)	-	-	-	-
10. Shop.	New	43.3	6.0	14.89 %	€ 1,700	€ 7.229	€ 35,420	0.49 %	0.22 %
	Ext	56.7	1.0	1.76 %	(b)	-	-	-	-
	MCoU	26.7	0.3	1.12 %	(c)	-	-	-	-
11. Shopping centre or retail park	New	3.0	0.3	10.0 %	€ 3,500	€ 233.335	€ 58,100	0.02 %	0.01 %
	Ext	6.0	1.0	16.67 %	(b)	-	-	-	-
	MCoU	0	0	0	(c)	-	-	-	-
<b>NOTES:</b> <b>(a)</b> Based on average construction build cost only and excludes fixtures furniture and equipment (except for those associated with a changing places toilet), site works, VAT, professional fees, future inflation and other developer costs etc. Refer to Buildcost or Linesight reports for all cost assumptions made. <b>(b)</b> Due to the individual nature of each building extension, average construction costs are not available for this category of work. <b>(c)</b> Constructions costs are not available for changes of use, as the building subject to the change of use have already been constructed.									

Building Description \ Use	Type of Building or Works	Average Number of Buildings/ Works per year with a valid CN	Average Number of Buildings/ Works per year in Accordance with Table 1	Average % of Buildings/ Works per year in Accordance with Table 1	Average Construction Cost(a) per m2 for Buildings in Table 1	Average Construction Cost(a) of Buildings in Accordance with Table 1 €(Millions)	Cost(a) of Provision of a Changing Places Toilet (€)	Average % Increase in the Cost(a) of Buildings in Accordance with Table 1	Avg. % Increase in the Cost(a) of all Buildings of the Same Use
12. Hotel	New	19.0	4.0	21.05 %	€ 4,000	€ 66.068	€ 64,400	0.10 %	0.06 %
	Ext	20.3	1.3	6.40 %	(b)	-	-	-	-
	MCoU	0	0	0	(c)	-	-	-	-
13. A public sanitary facilities building managed or controlled by a public body e.g. public toilets in public parks, urban areas, cemeteries, heritage sites or adjacent to a beach etc.	New	4.7	4.7	100 %	-	-	-	-	-
	Ext	1.3	1.3	100 %	(b)	-	-	-	-
	MCoU	0	0	0	(c)	-	-	-	-
14. Building that provides sanitary facilities as part of a collection of smaller buildings associated with an outdoor amenity primarily used for assembly, recreation or entertainment such as zoos, amusement parks and theme parks	New	Accounted for within assembly and recreation buildings							
	Ext								
	MCoU								
NOTES:									
(a) Based on average construction build cost only and excludes fixtures furniture and equipment (except for those associated with a changing places toilet), site works, VAT, professional fees, future inflation and other developer costs etc. Refer to Buildcost or Linesight reports for all cost assumptions made.									
(b) Due to the individual nature of each building extension, average construction costs are not available for this category of work.									
(c) Constructions costs are not available for changes of use, as the building subject to the change of use have already been constructed.									

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