



**Comments from Imtac about Consultation  
Proposals for amendment of Technical  
Booklet Guidance to Part R (Access to and  
use of buildings) – Changing Places Toilets  
Provision**

**(October 2021)**

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## **About Imtac**

Imtac is a committee of disabled people and older people as well as others including carers and key transport professionals. The role of the Committee is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

Imtac's aim is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (hereafter referred to as the Department).

## **Comments on the proposals**

Imtac fully supports the proposal to introduce criteria for Changing Places Toilets (CPTs) that will require provision in certain buildings through building regulations statutory guidance.

The Committee welcomes and commends both the Minister and officials at the Department of Finance for responding positively to the concerns raised by disabled people and carers. We believe the current proposals demonstrate both a clear commitment to equality and inclusion whilst recognising and addressing the disparity in regulation around CPTs between Northern Ireland and Great Britain.

Access to suitable toilet facilities is an essential prerequisite for an inclusive society where Deaf people, disabled people and older people can participate and exercise their rights on an equal basis to others. The Committee welcomes the acknowledgement in the current consultation that current requirements under Building Regulations to provide unisex wheelchair accessible toilets do not meet the needs of some Deaf people, disabled people, and older people.

Imtac does believe that discussions around CPT provision often underestimate the number of people in our society who will benefit from more inclusive toilet facilities. It is our experience that most standard unisex accessible toilets are limiting for many disabled people who need assistance when toileting. This type of toilet is designed predominantly around the requirements of (mainly right-handed) wheelchair users who can transfer independently. The space restrictions in these toilets makes their use difficult or impossible for anybody who requires assistance.

This includes not only other wheelchair users but also ambulant disabled people who require assistance. By way of example, we have been told of the experiences of people with dementia who need assistance having to use toilet facilities with the door of the toilet open because of the space restrictions. Whilst the consultation recognises the benefits of CPT provision for certain groups of disabled people, we do believe the wider benefits to a significantly greater number of disabled people who may not need all the facilities of a CPT but do need the additional space they offer, should also be recognised.

The Committee recognises the rationale for defining the scope and criteria of the types of buildings where a CPT should be provided. We acknowledge there are difficulties if regulations in Northern Ireland diverge significantly from those in place in Great Britain. We also fully recognise that the applying scope and criteria to the buildings listed in the consultation will, over time, make a significant contribution to making our built environment more accessible and inclusive. We would, however, recommend the Department considers two issues around scope and criteria before final decisions are taken.

Firstly, Imtac wants all Deaf people, disabled people and older people living in Northern Ireland to have equitable access to inclusive toilet facilities, regardless of where they live. Given the rural nature of our society we have some concerns that the criteria will result in the concentration of CPTs in urban areas with the greatest populations and low numbers, if any, in less populated areas. The Committee would ask that the Department consider lowering some of the size and capacity triggers (such as those relating to shopping centres) to recognise the geography and demography of Northern Ireland.

Secondly, the Committee disagrees with the omission of transport facilities and the justification for this from the scope of the regulations. Imtac challenges the assumption that the beneficiaries of CPTs cannot use public and other transport modes. We acknowledge that current accessibility regulations do place restrictions on the size of wheelchair that can be accommodated on transport but many people who currently need CPTs can and do travel on buses, trains and other transport. Furthermore, a review is currently being undertaken by the Department for Transport into public transport accessibility regulations which is likely to see changes which will make vehicles accessible to more wheelchair users. As travel and transport is essential to any fully inclusive society, the Committee recommends transport termini and interchanges are included in the scope of the regulations.

Imtac recognises that building regulations are not the only lever for increasing the provision of CPTs across Northern Ireland. Whilst we have raised the inclusion of transport termini in the scope of the regulation, Imtac fully recognises that through discussion with the Department for Infrastructure and Translink there is a policy commitment in place to ensure all new or refurbished mainline stations will have a CPT facility. There are examples of other Government Departments such as Department for Communities as well as local councils proactively including the provision of CPT in new developments and redevelopments. Given the central role the Department of Finance plays in procurement, the Committee recommends it proactively encourages other Departments and local councils to adopt policy commitments around the provision of CPTs where public money is being spent. We believe this approach will go some way to mitigating the potential disparity between provision in urban and rural areas highlighted above.

In addition to changes to regulation and promoting provision through public procurement Imtac also supports the approach taken in England<sup>1</sup> where Government has allocated dedicated funding stream to encourage the provision of more CPTs. The Committee recommends that similar dedicated funding be introduced in Northern Ireland.

In conclusion, while there are actions which could widen the beneficial impact of introducing requirements for Changing Place Toilets, Imtac welcomes and supports the current proposals as a significant step forward in making society more inclusive and accessible. The Committee strongly believes the proposals will bring positive changes to the lives of Deaf people, disabled people, older people and carers and will deliver wider benefits to both Government and providers of services, through reducing social exclusion and its associated costs and making services and facilities more accessible to a significant proportion of the population.

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<sup>1</sup> <https://www.gov.uk/government/news/share-of-30m-changing-places-toilets-fund-now-open-for-applications>