



Ministry of Housing,  
Communities &  
Local Government

## The Government's response to the consultation on changing places toilets

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# **Section One**

## Introduction

1. Changing places toilets meet the needs of people with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These toilets provide the right equipment including a height adjustable adult-sized changing table, a tracking hoist system, adequate space for a disabled person and carer, a peninsular WC with room either side and a safe and clean environment including tear off paper to cover the bench, a large waste bin and a non-slip floor.
2. The Government announced its intention to consult on how it can increase the provision of changing places toilets in December 2018. The consultation took place during the summer of 2019 and we are publishing the outcome now.
3. The restrictions on movement that most people have experienced during the COVID-19 pandemic, along with the frustrations that many have felt as a result, are a taste of what many people with these complex conditions, their carers and families experience most of the time.
4. As the country emerges from the crisis, we need to ensure that this experience is not wasted and that it drives empathetic change for the people who will benefit most from the increased provision of changing places toilets. We will align this with other initiatives such as the Tourism Sector Deal and the National Strategy for Disabled People promised in the Government's manifesto.
5. Therefore in England, we will require 4m x 3m changing places toilets in most of the types of property on which we consulted where those venues are either new or subject to a material change of use. We will require this through changes to Approved Document M, the statutory guidance for Part M of the building regulations, which covers access to and use of buildings. We will conduct ergonomic research to establish whether 3m x 3m is viable for existing buildings, when they are subject to extension of gross floor area of 25% or more or for buildings undergoing a material alteration. We plan to update Approved Document M further, pending the outcome of that research.
6. The changes to Approved Document Part M, Volume 2, non-domestic buildings will mandate the provision of changing places toilets in the following buildings:

- a. Assembly, recreation and entertainment buildings (see note) with a capacity for 350 or more people. Or a collection of smaller buildings associated with a site used for assembly, recreation or entertainment such as zoos, theme parks and venues for sport and exhibitions with a capacity of 2000 people or more;
- b. Shopping centres/malls or retail parks with a gross floor area of 30,000 m<sup>2</sup> or more;
- c. Retail premises with a gross floor area of 2500m<sup>2</sup> or more;
- d. Sport and leisure buildings with a gross floor area over 5000m<sup>2</sup>;
- e. Hospitals and primary care centres;
- f. Crematoria and cemetery buildings.

Note: Places of assembly, recreation and entertainment can be defined as buildings such as:

- Amusement arcades;
- Art galleries;
- Cinemas;
- Concert halls;
- Conference centres;
- Further education colleges;
- Hotels that provide function, sport or leisure facilities;
- Libraries open to the public;
- Motorway service areas;
- Museums;
- Places of worship;
- Theatres;
- University buildings open to the public.

Or any other buildings or sites as defined by these thresholds, which are open to the public and used for the purpose of assembly, recreation or entertainment.

7. We are grateful for the quality and breadth of the responses received, particularly from individuals and carers whose lives are enriched by the provision of changing places toilets and to those who have shared their very personal and painful experiences of inadequate provision. We have carefully considered all responses and set out our changes to the guidance in detail below.

## **Section Two**

### The Consultation

#### Timeline

8. The Government has been working with the Changing Places Consortium's campaign for a number of years to increase provision of toilets, including co-funding an on-line map with the devolved governments, and match funding new facilities in hospitals and motorway service areas.
9. The Government also accepted the recommendation made by the House of Commons Women and Equalities Committee report on Disability and the Built Environment which stated, 'Greater provision of changing places toilets should be a specific priority: such facilities should be required in all large building developments that are open to the public.'
10. The Government's response to the Women and Equalities Committee also stated that it had asked the Building Regulations Advisory Committee (BRAC) to review its processes for further involving disabled people in the development of any new Part M guidance, which covers access to and use of buildings. This included consideration of requirements in relation to the provision of changing places toilets for certain types of building.
11. On 24 December 2018, the Local Government Minister at that time, Rishi Sunak MP, announced that the Government would consult on expanding the provision of changing places toilets in 2019.
12. A workshop with changing places toilet users and carers was held on 26 February 2019, which confirmed support for a consultation on expanding provision. Discussions were also held with other stakeholders and officials from across other Government departments around this time to establish the types of property that could be in scope.
13. This consultation was published on 12 May 2019 and ran for a period of 10 weeks, ending on 22 July 2019. It was reopened for targeted consultation of sectors most likely to be affected in February 2020 using the same questions. These sought views on a range of questions which looked at the sizing of the facilities, the equipment in them, and in which publicly accessible buildings they should be provided.

14. The Government's proposals were discussed with BRAC at its 6 June 2019 meeting and BRAC provided its response to the Government on 17 June 2019, which was broadly supportive of most aspects of the proposals.
15. The Budget of 11 March 2020 announced the Government's intention to take forward the proposals in this consultation through building regulations guidance. It also announced that the government will launch a £30 million changing places fund, working with the Changing Places Consortium and others to identify those sectors where we most need to accelerate the provision of such facilities in existing buildings.
16. As of March 2020, there had been 1460 changing places toilets registered and accredited with the Changing Places Consortium; this is a tenfold increase from the 140 that were available in 2007. This growth can be attributed to a combination of campaigning, trade association guidance and requirements in different sectors' accreditation or funding criteria.

## Summary of Questions

17. The consultation consisted of fifteen questions in total which can be broken down into four parts:
  - a. Questions on options for increasing the provision of changing places toilets;
  - b. Questions on the size and equipment in changing place toilets;
  - c. Other commentary and observations about the proposals for changing places toilets;
  - d. Questions on cost and equality impacts.
18. On the questions regarding the provision of changing places toilets, the respondents were asked about:
  - a. The provision of changing places toilets and their mandatory requirement in the Building Regulations;
  - b. Alternative approaches;
  - c. The mandatory requirements, size, capacity and other triggers for the building types suggested in the consultation.

19. On the questions regarding the size and equipment in of changing places toilets, the respondents were asked about:
- a. 12m<sup>2</sup> changing places toilets in new buildings which fall under the suggested triggers;
  - b. 9m<sup>2</sup> changing places toilets in a building which undergoes material alteration, an extension or a change of use;
  - c. What equipment 12m<sup>2</sup> and 9m<sup>2</sup> sized facilities should include and if they did not agree, what they felt needed omitting or adding to the equipment list.
20. On the questions regarding the cost and equality impacts of changing places toilets, the respondents were asked about:
- a. The cost and build rate estimates;
  - b. Further evidence they could provide on ongoing maintenance costs;
  - c. For comments on the initial equality impact assessment.

## **Section Three**

### Summary of responses

21. There were 1542 responses to the changing places toilets consultation paper. Not all respondents addressed every part or answered every question.
22. The table below provides a breakdown of responses to the consultation by type of respondent, please note some respondents have selected more than one type of organisation or profession, or none-at-all

Type of Respondent	Individuals	Organisations
<b>Total:</b>	<b>1337</b>	<b>188</b>
Builder/developer	1	1
Manufacturer	3	5
Designer/engineer/surveyor	9	2
Local Authority	12	17
Building control approved inspector	2	1
Architect	9	2
Access consultant	18	9
Occupational therapist	25	2

Facilities manager	3	12
Construction professional	8	4
Retailer	3	2
Changing places user/carer	663	27
Property manager	1	5
Landlord representative organisation	0	1
Charity	21	47
Campaigner or lobby group	80	22
Tour guides and operators	42	9
Other	518	69

23. This document provides a summary of consultation responses received. We have carefully reviewed and analysed the responses.

## Section Four

Questions on options for increasing the provision of changing places toilets

24. This section sets out the main findings from the responses regarding the provision of changing places toilets.

Questions 3, 4 & 5

25. 99.6% of respondents agreed with the increased provision of changing places toilets and 96% agreed that the Government should introduce a mandatory requirement as proposed.
26. The respondents suggested the benefits of the increased provision of changing places toilets would:

- a. Give individuals with multiple or complex disabilities, as well as their carers and families, greater ability to leave their home and visit different places;
- b. Provide the necessary equipment for the safe transfer of users onto toilets or changing facilities, removing the risk of unsafe lifting from carers;
- c. Offer a dignified space for users to address their toileting needs;
- d. Be more suitable for use than wheelchair-accessible unisex toilets

27. Those with objections to the increased provision of changing places toilets were concerned with:

- a. The costs that would fall on the private sector;
- b. Impacts on historic buildings;
- c. Whether the Government could provide funding or more practical incentives to increase the provision of changing places toilets rather than making it mandatory through the means set out in the consultation.

28. The alternative approaches suggested were:

- a. Require changing places toilets through the planning system.
- b. Rely on the discretion of building owners and managers to decide whether their properties need to conform to reasonable adjustments requirements under the Equality Act 2010

## Question 6

29. 82% of respondents who answered agreed with the building types listed in Box A. Of the 18% of respondents who disagreed, 16% felt the list should be wider.

30. Of the respondents who disagreed with the building types listed in Box A, those who felt they should be wider said:

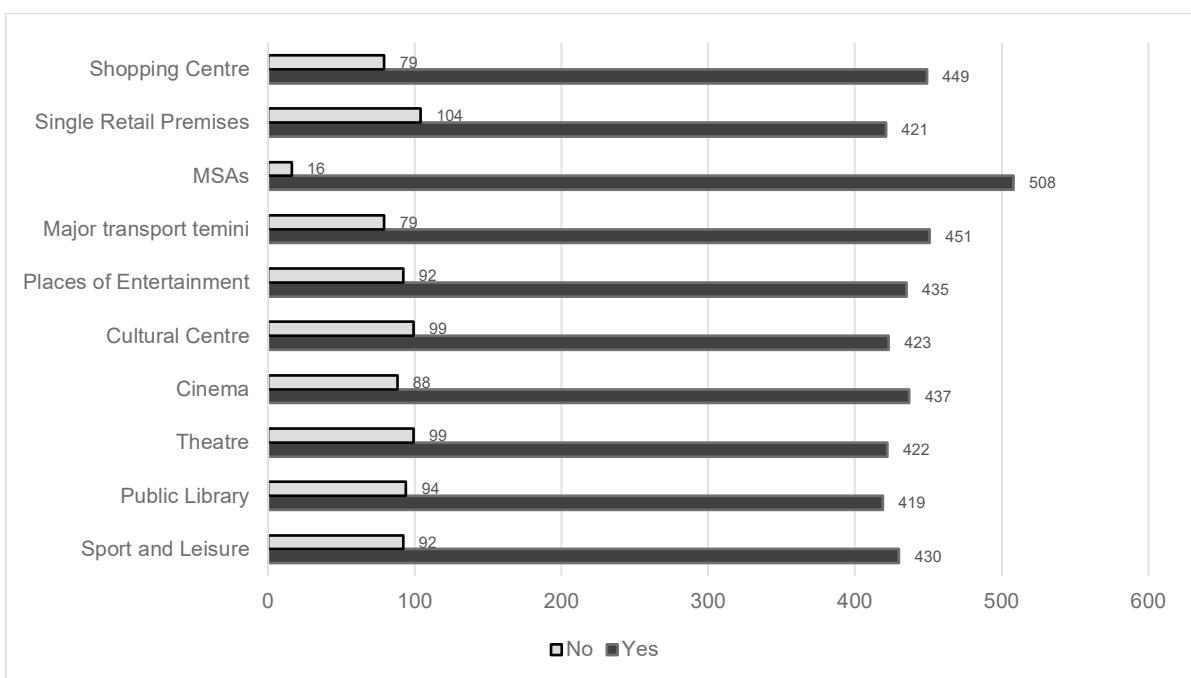
- a. That for museums, cultural centres, concert halls and art galleries, the figure of 300,000 annual visitors seemed like too high a threshold;
- b. The room trigger for hotels felt inappropriate and should focus on hotels' other public facilities like conference or catering provision;
- c. Changing places toilets would not be provided in smaller towns and villages;
- d. Provision in public buildings such as crematoria and other civic buildings should be included;
- e. Provision should also be in other public spaces such as beaches and parks;
- f. That some of the thresholds felt arbitrary.

31. The respondents that stated they should be narrower said:

- a. It should not necessarily include all education buildings;
  - b. That public libraries should be omitted;
  - c. Some triggers should be increased such as theatres and cinemas;
32. Some respondents, who both agreed and disagreed with the building types suggested that the triggers were too varied and lacked cohesion and that some triggers made no sense for the buildings they were applied to. Some, while supportive generally, opposed provision being mandated in their sectors.

### Question 7

33. The chart below displays the respondents yes or no answers asking whether they agree with the triggers in relation to each building type:



34. Of the respondents who stated 'no' against a building type suggested the following would be more appropriate triggers:

- a. For shopping centres, respondents requested that they be based on different criteria, such as people capacity or the number of shops. Commonly, people requested that the trigger be brought down to 10,000m<sup>2</sup> or 15,000m<sup>2</sup>;

- b. For single retail premises, responses asked for consideration to be taken so that small businesses are not heavily impacted by these triggers and to ensure supermarkets are in scope;
  - c. For major transport termini, some respondents stated that the footfall trigger was too high and not nuanced enough. Further issues about the placement of Changing places toilets in termini, such as being on both sides of ticket barriers or passport controls, were also highlighted;
  - d. For places of entertainment respondents mentioned theme parks were not necessarily in scope;
  - e. For cultural centres there were concerns about the ability to install changing places toilets in faith centres and historical buildings;
  - f. For cinemas, questions were asked about the clarity of asking for them to be five screens in addition to capacity triggers and about whether 350 seats referred to a cinema's total capacity;
  - g. For theatres respondents wondered why triggers were different from cinemas;
  - h. For libraries respondents who wondered whether libraries within community centres or are mixed-use would be covered by this trigger;
  - i. For sport, leisure and hotels respondents wondered why these had been grouped together.
35. Other and general comments from respondents from those who stated 'no' against a building type were:
- a. That the triggers were unnecessary as it should be decided by planning or done one a case by case basis to assess appropriateness and even geographical spread;
  - b. Generally, many correspondents wanted to see triggers lowered;
  - c. Some respondents stated that an increased threshold would help in safeguarding rural or isolated businesses from being burdened with a new cost.

## **Section Five**

Questions on the size and equipment in changing places toilets

36. This section sets out the main findings from the responses regarding the sizing of and equipment in changing places toilets.

## Questions 8 & 9

37. 95% of respondents who answered agreed that standard-sized changing places toilets of 12m<sup>2</sup> should be provided in new buildings listed in Box A.
38. Respondents who stated 'no' about the 12m<sup>2</sup> sizing suggested:
  - a. There could be geographical clustering of toilets in a small area, like in town centres for example;
  - b. That 12m<sup>2</sup> might not be big enough;
  - c. That 12m<sup>2</sup> is too big for small businesses, older buildings or buildings undergoing refurbishments;
  - d. A different approach should be taken to mandating the size and should be done through other means, such as local building control or planning.
39. Some respondents who answered yes to whether 12m<sup>2</sup> facilities should be provided in new buildings also commented in the free text section stating:
  - a. 7m<sup>2</sup> was previously seen as functional but in reality it was not practical as it did not allow turning space for individuals in wheelchairs and, for some, rendered the toilet unusable. There were also safety risks involved with the 7m<sup>2</sup> space such as having to reverse into a public corridor out of the facility and allowing more than one individual into the facility to safeguard the user;
  - b. The facility needs to be big enough to facilitate the easy, hygienic and safe use of the equipment within it. A smaller facility would potentially have to omit some equipment.
40. 59% of respondents who answered agreed that a 9m<sup>2</sup> should be provided in a building which undergoes material alterations, an extension or a change of use.
41. The respondents who agreed with the 9m<sup>2</sup> sizing suggested:
  - a. That it was adequate space for a powered wheelchair to have a full turning circle;
  - b. A building undergoing material alteration, extension or a change of use which is near a 12m<sup>2</sup> facility could install a 9m<sup>2</sup> facility to reduce costs;
  - c. That a 9m<sup>2</sup> facility would be far preferable to no facility at all;
  - d. Where a 9m<sup>2</sup> facility is installed, it should be able to meet the requirements for a changing places facility as set out in BS 8300-2:2018

and should be clearly stated either on site or via the Changing Places Consortium's website that the facility is of a smaller size.

42. Of the respondents who disagreed with the 9m<sup>2</sup> sizing, their concerns were:

- a. That the 9m<sup>2</sup> could be a potential loophole for developers to exploit;
- b. If a 9m<sup>2</sup> was used that it may have to sacrifice some of the features of a larger 12m<sup>2</sup> facility;
- c. About the suitability of the evidence base for the 9m<sup>2</sup> facility being ergonomically functional as the 12m<sup>2</sup> facility.

#### Question 10

43. 90% of respondents who answered agreed that the equipment listed in boxes B & C should be included in both a 12m<sup>2</sup> and 9m<sup>2</sup> changing places toilet.

44. Of the respondents who answered no, 61% believed there should be more equipment and 39% believed there should be less.

45. Of those who stated less these are the percentages of what they thought should not be included from boxes C & D:

Equipment	% who stated less
Peninsular WC with space either side for carers	6%
Height adjustable wash hand basin	23%
Ceiling-mounted tracking hoist;	31%
Height adjustable adult sized changing bench (min. length 1.8m)	10%
Retractable privacy screen or curtain;	46%
Wide tear off paper roll to cover the bench	21%
Large waste bin	6%
Within a building that includes other changing facilities for users, such as swimming pools/leisure centres, the provision of a wall-mounted shower.	27%

46. Respondents who stated 'more' regarding the provision of equipment in a changing places toilet suggested:

- a. That noisy hand dryers can cause distress to people and therefore paper hand towels should be included in addition to the hand dryers. In some comments, respondents stated that hand dryers should be removed altogether;
  - b. That showers are not always appropriate for some venues, because they require further maintenance and cleaning;
  - c. Toilets with seats that can be raised electronically would be valuable for people whose arms do not have sufficient strength to lift themselves using grab rails;
  - d. Shelves should be provided for placing colostomy bags while the facility is being used.
47. Some respondents who answered 'yes' in response to the suggested equipment in boxes B & C should be provided commented in the free text:
- a. That there should be emphasis on the installation quality of the equipment and that the current standards of installation in some facilities are not at the required level;
  - b. There need to be mechanisms to ensure the regular servicing of equipment to ensure it is safe to use;
  - c. The bins in changing places toilets should have both a foot pedal and a lever or handle so that the bin can be operated by arm or foot use;
  - d. That the equipment standards needed to go further and mandate for weight limits on equipment like the hoist.
  - e. The hoist should be ceiling tracked and not a mobile hoist.

## **Section Six**

Other commentary and observations about the proposals for changing places toilets

48. This section will investigate the substantive additional points raised in Question 11 through three scopes:
- a. Comments relating to the financial impact of changing places toilets;
  - b. Current issues with changing places toilets;
  - c. The impact of the mandatory provision.

### Question 11

49. 37% of respondents replied to question 11 with commentary and observations on changing places toilets.

50. Comments on the impact of the mandatory provision of changing places toilets:

- a. That the mandatory provision will help enforce equality of access and help to develop a greater awareness of the existence of such facilities;
- b. It will allow users to attend to their hygiene needs with dignity and without the current risks to health and safety;
- c. Carers will be able to lift users safely without endangering their own health;
- d. It will improve the standard of the accessible built environment;
- e. The mandatory provision of equipment will provide consistency for users between locations;
- f. That the recommended changes do not address the provision of changing places toilets in remote locations such as national parks, beaches and other public spaces.

51. Comments on the financial impact:

- a. That the private sector needed assistance with the economic burden so that they are not disproportionately impacted;
- b. Cultural institutions rely upon significant public investment in order to implement any redevelopment so adding Changing Places toilets as a part of these will increase the cost;

52. Comments on the current issues with changing places toilets:

- a. That the fixtures and fittings of changing places toilets, even those which are registered under the changing places consortium, are of a poor quality and have in some instances led to the closure of changing places toilets for extended periods;
- b. The capacity to install changing places toilets to the required quality standard is not currently available;
- c. Access to facilities is hugely restricted to within the working hours of the building they are situated in;
- d. The travel distance to changing places toilets in very large buildings, such as shopping centres, can be excessive;

- e. Whether there is scope for the Government to require access to changing places toilets via RADAR keys;
  - f. That consistency, or at the very least some continuity should be kept with the BS 8300-2:2018 which many people currently use as guidance for building changing places currently;
  - g. Clear signposting and signage are required to make users aware of the presence and location of changing places toilets;
  - h. There are concerns about the mismanagement of changing places toilets and how they could be poorly maintained or that businesses begin to use them as storage facilities.
53. Many people asked for a website or app which would signpost individuals to the location of changing places facilities. This service exists already and can be found on <https://www.uktoiletmap.org/> which is run by the Changing Places Consortium.

## **Section Seven**

Questions on cost and equality impacts

54. This section sets out the main findings from the responses regarding the costs and equality impact of changing places toilets.
55. The costs estimates discussed in this section referred to an estimate between £28,700 to £43,500. This range was based on the physical provision of facilities being installed in new or existing buildings. They were derived from research undertaken for previous Building Regulations reviews and the consultation recently undertaken by the Scottish Government. We now estimate that the cost of design, equipment and installation is less than £25,000 for a new building or one undergoing a material change of use. Cleaning and maintenance costs (Lifting Operations and Lifting Equipment Regulations and Provision and Use of Work Equipment Regulations) are estimated to be lower than £1900 per year.

### Question 12

56. 88% of respondents who answered question 12 agreed with the cost estimates for changing places toilets.
57. Of the respondents who answered no, 97% explained what they believed was an appropriate cost range and provided evidence to show why.

58. The respondents who answered 'no' suggested what they believed to be an appropriate cost range:
- a. That in their experience of installing changing places toilet, that the equipment cost approximately £15,000;
  - b. A changing places toilet can be installed with minimal structural disturbance for £20,000 - £25,000;
  - c. If a changing places toilet is considered in the early planning stage of a building, then the costs can be reduced;
  - d. In a building that undergoes a material alteration, an extension or a change of use costs can be higher, especially if they end up as a modular attachment or external building from the main building;
  - e. That these predictions do not account for the true cost for these facilities, as it does not consider the land and site expenses associated with the installation of a changing places toilet.

### Question 13

59. 85% of respondents who answered question 13 agreed with the build rate estimates of 156 additional changing places toilets per annum and the associated cost.
60. Of the respondents who answered 'no', 93% provided evidence what build rate and cost estimates they considered appropriate:
- a. The build rates seemed too low;
  - b. 156 is not the correct figure and that 100 per year in new and existing buildings is a more accurate figure and that, while 156 would be a welcome increase that the ability for the Changing Places Consortium to accredit, these would potentially be beyond their capacity;
  - c. Making changing places toilets mandatory will significantly change the number of facilities being built therefore this figure may be lower than the potential build rate.

## Question 14

61. 3% of the respondents who answered this question were able to provide evidence of ongoing maintenance costs in changing places toilets:

- a. The hoist ceiling tracked hoist will require two Lifting Operations & Lifting Equipment Regulation (LOLER) tests per annum, the changing table and adjustable basin require one Provision and Use of Work Equipment Regulation (PUWER) test per annum;
- b. Service agreements from the manufacturers can be taken out for one, three or five years at an average of £360 per piece of equipment;
- c. Estimates ranged between £300 - £1500 per annum, with the average cost sitting around £375, these estimated costs only discuss the service and maintenance costs of a facility and do not incorporate soft service costs, utility or staff training costs. The costs will vary depending on location.

## Question 15

62. 9% of the respondents who answered this question had comments on the initial equality impact assessments:

- a. One respondent, queried the relevance of the Mencap figures stated in the equality impact assessment, saying they were from 2016 and that more up to date figures should be sourced, it does not represent the growth in figures;
- b. The figures quoted only represent the direct users of changing places toilets and does not account for the number of carers and families that will benefit from this provision;
- c. That this would also allow greater access to sport and leisure facilities for disabled people to take part in active recreation;
- d. It should be noted how this also increases equality for carers and families and users;
- e. That the greater levels of social mobility will improve mental health significantly for the users, families and carers of changing places;
- f. The equality impact assessment does not consider the impact this will have on independent users of changing places toilet;
- g. Carers are more likely to be women (58%) than men (42%); providing more facilities would result in a positive equality impact for women.

63. Many respondents stated their overall agreement with the equality impact assessment and the areas it would cover.

## Section Nine

Government response

### Provision of changing places toilets

64. The Government is committed to increasing the provision of changing places toilet facilities across England within the built environment as a part of its wider strategy for increasing the quality of accessibility.
65. This commitment from the government has already resulted in funding being allocated to increasing the provision of changing places toilet facilities in English hospitals as well as motorway and trunk road service stations.
66. The increase in facilities has been welcomed by changing places users, carers and campaigners as a positive step forwards in widening the accessible built environment.
67. The Government will seek to increase the provision of changing places toilets and introduce a mandatory requirement for changing places toilets using *Approved Document M, volume 2, non-domestic buildings*. The requirement will take effect, as set out in the accompanying circular, from yet to be confirmed date for buildings in scope that are new or those undergoing a material change of use.
68. This will occur in the form of an amendment to paragraphs 5.5 and 5.6 in this document, with reference to BS 8300-2:2018, paragraph 18.6 and diagram 48 for guidance on equipment and other technical information. The following Annexes will also be referenced for further guidance on:
  - E. Reach ranges;
  - F. Hoists, associated slings and showering/changing benches;
  - G. Space allowances for wheelchair manoeuvre.

### Size and equipment in changing places toilets

69. After reviewing the consultation responses and engaging stakeholders the Government has decided to adjust the building types that were originally listed in Box A in the consultation. Efforts have been made to consolidate the list and create a more cohesive list which is easier for Building Control Bodies and Building Inspectors to use.
70. The Government has changed the criteria for the following new building types:
- a. For single retail premises, the Government has removed the exclusion for single retail premises within shopping centre or retail park where a facility is already required. They will now be required in all single retail premises with a gross floor area of 2500m<sup>2</sup>;
  - b. Motorway service areas (MSAs), with under 350 people will no longer be included in the mandatory provision of changing places toilets;
  - c. A place of entertainment including stadia and auditoria, theme parks or places of assembly with a capacity of 2000 people or more has been adjusted in the following manner:
    - i. Stadia and theme parks will remain at 2000 people capacity;
    - ii. Auditoria have been removed as the definition falls within other criteria;
    - iii. Places of entertainment have been amalgamated in to places of assembly, so buildings of this type, which are not stadia, theme parks, exhibition centres or zoos, will trigger the mandatory provision of changing places toilets if their capacity exceeds 350 people or more.
  - d. The following new buildings will now fall under the mandatory provision for places of assembly with a capacity for over 350 people:
    - i. Cultural centres, including museums, concert halls, art galleries and faith centres. This has been changed from 300,000 visitors per year;
    - ii. Cinema complexes, the trigger for 5 or more screens has been removed;
    - iii. Theatres, this has been lowered from 500;
    - iv. Public libraries, have changed from 3000m<sup>2</sup>;
    - v. Educational buildings providing community facilities, this will now only apply to universities and further education with community facilities;
    - vi. Hotels have changed from 100 room capacity to 350 capacity, this capacity will derived from the hotels function, sport or leisure facilities combined.
71. The mandatory provision for the following new buildings, as suggested in the consultation, will remain unchanged:
- a. Hospitals and primary care centres;

- b. Sport and leisure facilities over 5000m<sup>2</sup>.
72. The following new buildings have been added to the mandatory provision in response to consultation responses and stakeholder engagement:
- a. Crematoria;
  - b. Cemetery buildings.
73. The Government will undertake ergonomic research to investigate whether a smaller 9m<sup>2</sup> facility is suitable for the whole spectrum of changing places users with up to two additional carers.
74. The research will establish whether the facility is appropriate by assessing:
- a. Whether there is adequate turning and manoeuvring space for a user in a wheelchair with additional equipment and up to two carers;
  - b. That the wheelchair user and up to two carers can manoeuvre without impediment and easily access the equipment in the facility without obstruction.
75. The equipment listed in BS 8300-2:2018, figure 48 - example of fittings and accessories in a changing places toilet, excluding the floor drain and optional shower unit, will be referred to as the guide for what equipment should be the mandatory minimum for changing places toilets.
76. While the Government will not be mandating a shower in changing places toilets, it will advise the inclusion of one in relevant leisure facilities.

## Equality Impact Assessment

77. The responses confirmed our original analysis, bringing out that women represent 58% of carers. Measures we put into place will be of particular benefit to them and users, including better mental and physical health outcomes for all affected through increased opportunity for social, sport and leisure activities.

## **Section Ten**

Other Government Departments & BRAC's responses and suggestions

### Schools

78. The Department for Education intends to adopt this inclusive approach as part of a review of its design specification and guidance for new school buildings, which has a planned completion date of May 2021.

### Transport infrastructure buildings

79. As stated in the consultation document, most transport buildings are covered by different requirements than Building Regulations.
80. Good progress is already being made by some sectors, such as airports and Category A stations. Additionally, a number of bus and coach stations have installed changing places toilets over the past year or are planning to do so.
81. Having considered the responses to the consultation, we will expect, where appropriate to do so, at least one changing places toilet to be installed in transport termini with an estimated or actual footfall of at least 10 million per typical year, where the building is either new or subject to a change of use. This includes airports, ferry ports, bus and coach stations, and any building that serves as an interchange. For railway stations, the Design Standards for Accessible Railway Stations already require a changing places toilet to be provided in all large Category A railway stations when toilet facilities are installed, replaced or renewed. (Category A, with at least a 2 million footfall each year).

### Changing Places Fund

82. At the Budget 2020, the Government announced a Changing Places Fund for the 2020/21 financial year, to assist in the provision of changing places toilets in existing buildings. Work has started to establish how this fund could be targeted to help facilitate economic recovery from the impacts of the COVID 19 virus and details will be announced in due course.

## **Section Eleven**

Amendments to Paragraphs 5.5 and 5.6 in Part M Volume Two

Original text of paragraphs 5.5, 5.6 and 5.7 in Part M, Volume Two

### **Design considerations**

- 5.5 Toilet accommodation needs to be suitable, not only for disabled people, but for all people who use the building. For disabled people, suitable toilet accommodation may take the form of a specially designed cubicle in separate sex washrooms, or a self-contained unisex toilet. For wheelchair users in particular, a self-contained unisex toilet is always the preferred option since, if necessary, a partner or carer of a different sex can enter to give assistance. Wheelchair-accessible unisex toilets should always be provided in addition to any wheelchair-accessible accommodation in separate sex-toilet washrooms. Wheelchair-accessible unisex toilets should not be used for baby changing.
- 5.6 The provision of an enlarged cubicle in a separate-sex toilet washroom can be of benefit to ambulant disabled people, as well as parents with children and people (e.g. those with luggage) who need an enlarged space. In large building developments, separate facilities for baby changing and an enlarged unisex toilet incorporating an adult changing table are desirable. Facilities incorporating adult changing tables are more commonly known as changing places toilets and further guidance is available from the changing places Campaign website ([www.changing-places.org](http://www.changing-places.org)) or by reference to guidance in section 12.7 and Annex G of BS 8300.

**Note:** For specific guidance on the provision of sanitary accommodation in sports buildings, refer to 'accessible sports facilities'

### **Provision of toilet accommodation**

- 5.7 The provision of toilet accommodation will satisfy Requirement M1 or M3 if:

- a. Where there is space for only one toilet in a building, it is of a wheelchair-accessible unisex type, but of greater width to accommodate a standing height wash basin;
- b. At least one wheelchair-accessible unisex toilet is provided at each location in a building where sanitary facilities are provided for use by customers and visitors to a building, or by people working in the building;
- c. At least one WC cubicle is provided in separate-sex toilet accommodation for use by ambulant disabled people;
- d. Where there are four or more WC cubicles in separate-sex toilet accommodation, one of these is an enlarged cubicle for use by people who need extra space, in addition to any provision under 5.7[c]

Revised text for paragraphs 5.6 and 5.7 in Approved Document M, Volume 2

### **Design considerations**

- 5.5 Toilet accommodation needs to be suitable, not only for disabled people, but for all people who use the building. For disabled people, suitable toilet accommodation may take the form of a specially designed cubicle in separate sex washrooms, or a self-contained unisex toilet. For wheelchair users in particular, a self-contained unisex toilet is always the preferred option since, if necessary, a partner or carer of a different sex can enter to give assistance. Wheelchair-accessible unisex toilets should always be provided in addition to any wheelchair-accessible accommodation in separate sex-toilet washrooms. Wheelchair-accessible unisex toilets should not be used for baby changing.
- 5.6 The provision of an enlarged cubicle in a separate-sex toilet washroom can be of benefit to ambulant disabled people, as well as parents with children and people (e.g. those with luggage) who need an enlarged space. In large building developments, separate facilities for baby changing and an enlarged unisex toilet incorporating an adult changing table are desirable. Changing places toilets, facilities designed for individuals with complex and multiple impairments who may require the assistance of up to two assistants, should be provided in addition to any wheelchair-accessible accommodation in separate-sex toilet washrooms, wheelchair-accessible unisex toileting facilities and baby changing facilities. Further guidance on layout and equipment is available from the

Changing Places Consortium campaign website ([www.changing-places.org](http://www.changing-places.org)) and by reference to guidance in section 18.6, diagram 48 and Annexes F and G of BS 8300-2:2018.

**Note:** For specific guidance on the provision of sanitary accommodation in sports buildings, refer to 'accessible sports facilities'.

### **Provision of toilet accommodation**

5.7 The provision of toilet accommodation will satisfy Requirement M1 or M3 if:

- a. Where there is space for only one toilet in a building, it is of a wheelchair-accessible unisex type, but of greater width to accommodate a standing height wash basin;
- b. At least one wheelchair-accessible unisex toilet is provided at each location in a building where sanitary facilities are provided for use by customers and visitors to a building, or by people working in the building;
- c. At least one WC cubicle is provided in separate-sex toilet accommodation for use by ambulant disabled people;
- d. Where there are four or more WC cubicles in separate-sex toilet accommodation, one of these is an enlarged cubicle for use by people who need extra space, in addition to any provision under 5.7[c]
- e. At least one changing places toilet is provided in the following types of building:
  - i. assembly, recreation and entertainment buildings (see note) with a capacity for 350 or more people; or a collection of smaller buildings associated with a site used for assembly, recreation or entertainment, such as zoos, theme parks and venues for sport and exhibitions, with a capacity of 2000 people or more;
  - ii. shopping centres/malls or retail parks with a gross floor area of 30,000m<sup>2</sup> or more;
  - iii. retail premises with a gross floor area of 2500m<sup>2</sup> or more;
  - iv. sport and leisure buildings with a gross floor area more than 5000m<sup>2</sup>;

- v. hospitals and primary care centres;
- vi. crematoria and cemetery buildings.

**Note:** Places of assembly, recreation and entertainment can be defined as buildings such as:

- amusement arcades;
- art galleries;
- cinemas;
- concert halls;
- conference centres;
- further education colleges;
- hotels that provide function, sport or leisure facilities;
- libraries open to the public;
- motorway service areas;
- museums;
- places of worship;
- theatres;
- university buildings open to the public;

or any other buildings or sites as defined by these thresholds, which are open to the public and used for the purpose of assembly, recreation or entertainment. Capacities should be derived from the combined total of a building's publicly accessible facilities. Alternatively, the capacity number may be taken as the number of fixed seats provided, if the occupants of the building will normally be seated. Approved Document B volume 2 provides a method for estimating the capacity of a building where this is not known.

The Department for Education will publish separate guidance regarding changing places toilets in schools providing community facilities in 2021.