

Inspectors Report

Appeal against the refusal of a RDAC application for proposed fit out of a Wow Burger Outlet at Unit 1 & 2 Parnell Centre, Dublin 1.

A DAC application has been previously granted for the subdivision of the original Parnell Street Cinema Foyer into Units 1 & 2 at the Parnell Centre. This DAC application included the change of use from Retail to Restaurant of Unit 1 (Wow Burger Outlet) whilst Unit 2 was indicated as shell and core only as there was no tenant for this unit.

Board appeal ref no:	ABP-300571-18
Building Control Authority DAC application, no:	RDAC/2017/0732
Appellant/Agent:	Svetac Ltd.
Building Control Authority:	Dublin City Council
Date of site inspection:	N/A
Inspector:	Eoin O'Herlihy
Appendices Attached:	Yes

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1. Introduction

1.1. Site description

The proposed works relates to the fit out of a Wow Burger Outlet at Unit 1 & 2 Parnell Centre, Dublin 1.

1.2. Subject matter of application

The proposed works include fit out of a Wow Burger Outlet at Unit 1 & 2 Parnell Centre, Dublin 1 (RDAC/2017/0732).

A DAC application had been previously granted (DAC/2016/0681) for the subdivision of the original Parnell Street Cinema Foyer into Units 1 & 2 at the Parnell Centre. This DAC application included the '**Change of Use**' from Retail to Restaurant of Unit 1 (Wow Burger Outlet) whilst Unit 2 was indicated as shell and core only as there was no tenant for this unit.

It is noted that in the DAC/2016/0681 the proposed Wow Burger Restaurant was located in Unit 1. In the RDAC application this restaurant is now shown in Unit 2.

1.3. Documents lodged as part of Revised Disability Access Certificate (RDAC) application

The application made by Maurice Johnson & Partners (on behalf of the appellant) was received by the Building Control Authority (BCA) on the 11th November 2017 and included:

1. An application form.
2. 2 No copies of RDAC drawings including:
 - Site location map/site layout plan.
 - Proposed Floor Plan and Section AA.
 - Previously Approved Floor Plan.
 - Proposed Elevation (Parnell Street).
3. 2 No. copies of the RDAC compliance report (17285 DAC R01).
4. The required fee of €800.

Dublin City Council (DCC) wrote to Maurice Johnson & Partners on the 12th December 2017, seeking additional information in relation to the RDAC application.

Maurice Johnson & Partners (on behalf of the appellant) issued additional information cover letter and an updated accessibility strategy drawing on 12th December 2017.

Subsequently, Maurice Johnson & Partners (on behalf of the appellant) issued additional information cover letter on the 19th December 2017 responding to the 7 No. items in the additional information request sent by DCC on 12th December 2017.

1.4. Building Control Authority decision

The BCA refused the RDAC for the above works on the 20th December 2017. There were seven reasons attached to the refusal. Refer to Appendix 1 below for outline of reasons.

2. Relevant history/cases

The following previous DAC application is relevant to the case:

1. DAC/2016/0681 – for the subdivision of the original Parnell Street Cinema Foyer into Units 1 & 2 at the Parnell Centre. This DAC application included the 'Change of Use' from Retail to Restaurant of Unit 1 (Wow Burger Outlet) whilst Unit 2 was indicated as shell and core only as there was no tenant for this unit. The DAC was granted on 31st March 2017.

3. Information considered

The following information was considered as part of the appeals process:

3.1. Application for a DAC which was granted on 4th December 2016

DAC/2016/0681 – “Division of the original unoccupied cinema foyer within the confines of the Parnell Centre into 2 no. equal retail units for letting. The total floor area is 240sqm, the units has a pre-existing stepped floor plate. The proposed works are to shell and core only to unit 02. The proposed change of use to unit 01 consists of the change from retail purpose group 4 (a) to licensed restaurant purpose group 5 (iv). The development will consist of 2 no. dining areas, kitchen, store and WC facilities. Level universal access is achieved via the upper entrance off the main mall”.

3.2. Application for Revised DAC application (11th November 2017)

Maurice Johnson & Partners applied to DCC for a Revised DAC application on the previously granted DAC with a reference number of DAC/2016/0681. The main reason given for the RDAC application was “material alterations to the previously approved DAC”. Refer to section 1.3 for list of documents lodged as part of Revised Disability Access Certificate (RDAC) application.

The following are some of the key points in the RDAC report:

- The description of the works provided in the report state the works relate to the proposed fit-out works within the vacant shell of Unit 02¹ of the Parnell Centre, Dublin 1 comprising of kitchen fit out, erection of partitions, installation of services and installation of sanitary accommodation.
- Section 1.2 of the report indicates that wheelchair access will be provided within the Mall at the rear of the unit. Accordingly, the rear entrance will be wheelchair accessible.

¹ The inspector notes that the previous granted DAC was for the change of use of Unit 1 and not Unit 2. This is not referenced in the RDAC application.

- No mention is made to why a new ramp or platform lift cannot be provided within the unit. The report indicates that these are not applicable to this application.
- A new stepped access route will be provided within the Unit.
- Reference is made to existing structural restrictions on site and implications on provision of a right-hand transfer accessible WC.
- No mention is provided in the RDAC in relation to the proposed change of use.

Note: The Wow Burger Unit was intended to be located in Unit 1 in original DAC application and Unit 2 was shell and Core only. In the RDAC application the Restaurant is shown in Unit 2 and Unit 1 is vacant.

3.3. Additional information request from DCC in relation to the RDAC application (12th December 2017).

DCC wrote to Maurice Johnson & Partners on the 12th December 2017, seeking additional information in relation to the RDAC application made on 13th November 2017. The Building Control Authority requested 7 No. clarifications/Additional information requests:

1. Scales used on the drawings.
2. Clarification on which entrance is the main entrance (i.e. Parnell Street or the Mall).
3. Clarification on access at the rear entrance to avoid discrimination and to ensure the accessible entrance is not a secondary entrance but designed as a main entrance.
4. Provision of a leading edge leading to the accessible WC.
5. Provision of 1800mm by 1800mm turning areas within corridors.
6. Additional information on internal door design (e.g. widths of doors).
7. Clarification on the provision of audible aids.

3.4. Additional information submitted to DCC following additional information request.

Doyle and Partners on Behalf of PC Management Ltd responded to the additional information request made by DCC (no date on the response letter). The response addressed the 7 no. clarifications/additional information request. The following is a summary of the response:

1. Scales used on the drawings – **New floor plans were attached.**
2. Clarification on which entrance is the main entrance (i.e. Parnell Street or the Mall) – **Information was provided indicating that the entrance doors would meet the guidance in section 1.2.3 & 1.2.4 of TGD M 2010 but no information was provided on which door was intended to be the main entrance.**
3. Clarification on access at the rear entrance to avoid discrimination and to ensure accessible entrance is not a secondary entrance but designed as a main entrance - **Not addressed in the response.**
4. Provision of a leading edge leading to the accessible WC – **Amendments were proposed to make the WC more accessible and usable.**
5. Provision of 1800mm by 1800mm turning areas within corridors - **Not addressed in the response.**

6. Additional information on internal door design (e.g. Widths) – Addressed in point 4 of additional information response letter and it states all new internal doors will be designed in accordance with guidance in section 1.3.3.2 of TGD M 2010.
7. Clarification on the provision of audible aids – Information is provided regarding lighting levels, escape lighting, visual contrast and the provision of loop systems as outlined in the RDAC application report. It is noted by the inspector that there is no information provided in the RDAC report or DAC Report on the provision of hearing induction loops.

It is noted that information is provided in the response highlighting that the design of the server counter will be in accordance with section 1.1.5 of TGD M 2010.

3.5. Additional information submitted to DCC following additional information request (12th & 19th December 2017).

Maurice Johnson & Partners (on behalf of the appellant) submitted additional information to the BCA on 12th & 19th December 2017. The following is a summary of the responses:

12th December response:

- MJP were not the original access consultants on the project and have based their access strategy on the previously granted DAC application.
- Access is restricted to the Unit due to 600mm change of level owing to existing structural limitations. Therefore wheelchair access is provided through the Mall.
- They continue to state that new Part M steps are to be provided as part of the RDAC. The inspector notes that as a result of the provision of new steps the structural limitations seems to have changed and been overcome by new stepped access route only.
- The proposed access strategy posed no new or greater contravention to the requirements of Part M.

19th December response:

The response on the 19th December 2017 aims to address the additional information request made by DCC. The response addressed the 7 no. clarifications/additional information request. The following is a summary of the response:

1. Scales used on the drawings – Revised drawings were submitted.
2. Clarification on which entrance is the main entrance (i.e. Parnell Street or the Mall) – Entrances as previous granted DAC. MJP noted they were not the original access consultants on this project and are of the opinion that no new or greater contravention of Part M has taken place.
3. Clarification on access at the rear entrance to avoid discrimination and to ensure accessible entrance is not a secondary entrance but designed as a main entrance – Updated access strategy drawing provided omitting the secondary door where one enters the unit they have full line of sight of the offering.

4. Provision of a leading edge leading to the accessible WC – Reference is made that a leading edge of 300mm is only required on pull side of a door when it is opening towards you and a sliding door is now proposed. MJP note that door will be revised to allow ease of access to door handles and door locks.
5. Provision of 1800mm by 1800mm turning areas within corridors – MJP outline how a turning circle is now provided at the Mall entrance and that adequate circulation space is provided within the unit where wheelchair access is provided.
6. Additional information on internal door design (e.g. widths of doors) – Information is provided on how the 3 No. internal doors will meet the guidance in TGD M 2010.
7. Clarification on the provision of audible aids – MJP note that audible aids will be as outlined in original DAC application.

3.6. RDAC Refusal by DCC (20th December 2017)

Following a review by the BCA, the RDAC (RDAC/2017/0732) was refused on the 20th December 2017 subject to 7 reasons. The reasons are attached to Appendix 1 below.

3.7. Appeal to An Bord Pleanála (2nd January 2018)

Maurice Johnson & Partners (on behalf of the appellant) made an appeal to An Bord Pleanála on the 2nd January 2018. The appeal was against the refusal to grant the RDAC application. The following is a summary of the appeal:

- “The basis of our appeal of the decision being that the proposed fit out works are in accordance with the principles established in the landlord DAC application approved by Dublin City Council where the design was granted on the basis of stepped access off Parnell Street and level access off the shopping centre mall”.
- “The agreed stepped access approved in the previously approved DAC off Parnell Street addressed a significant existing level difference between the shopping centre mall and Parnell Street; a challenge which is common to all the Parnell Centre units which now communicate with the mall and Parnell Street”.
- The submitted particulars does not seek to materially alter this approved design approach and accordingly the appellant does not consider the proposed RDAC application design to pose a new or greater contravention of the previously approved DAC.

The appeal also addressed the 7 No. reasons for refusal:

- **Reason 1:** The applicant failed to provide adequate information showing compliance with the requirements of Part M of the Second Schedule of the Building Regulations 2010 – **No comment.**
- **Reason 2:** This application seems to discriminate against people with disabilities by providing segregated entrances to the restaurant. A new contravention is proposed by the construction of a single leaf doorway accessing a service corridor at the rear of the premises as the only

wheelchair accessible entrance to the unit – The appellant states “The proposed fit out design is in accordance with the design approved by DCC. The intermediate lobby door was omitted in response to queries raised by DCC to ensure that there is no inference of a service route. There is no technical impediment or reduction in accessibility associated with a single leaf door. The proposed door is of the requisite width and provided with a 300mm leading edge. Accordingly, we do not consider this to pose a new or greater contravention. The Parnell Street shopping centre mall is not a service route. The mall is 7.5m wide and serves as an entrance to the cinema, provides a direct route from the multi-storey car park, accesses comparable commercial offerings and has public entrances available at either end. Conspicuous shop front signage is provided off the mall to the unit. MJP have proffered an inclusive design which honours the previously approved design and affords access for all to all services and facilities within an existing building that has very significant structural impediments”.

- **Reason 3:** The applicant failed to provide adequate provision for wheelchair circulation through the restaurant. No facilities for wheelchair users have been provided inside the entrance to the restaurant from Parnell Street – The proposed fit out design is in accordance with the design approved by DCC (referring to previously granted DAC application).
- **Reason 4:** Incorrect guidance has been referenced for the sanitary facilities within the restaurant. The appellant is unsure what is being referred to here as the accessible WC is designed as 1500mm by 2,200mm (in accordance with Diagram 15b of TGD M 2010 for works less than 200sq.m).
- **Reason 5:** The applicant failed to provide adequate information for the proposed internal doors within the restaurant. No indication of the required clear space at the doors leading edges has been provided. The appellant notes that they have indicated in the RDAC report that the information provided in the previous DAC application will be met and therefore are of the opinion that this reason is invalid.
- **Reason 6:** The required clear manoeuvring space in front of the proposed accessible counter has not been provided. Again, the appellant notes that they have indicated in the RDAC report that the information provided in the previous DAC application will be met and therefore are of the opinion that this reason is invalid. An extract from the DAC report is provided in the appeal indicating same.
- **Reason 7:** Adequate information has not been provided for the proposed stepped route within the restaurant. Reference is made to the RDAC report where the report states that the stepped access route will be designed in accordance with section 1.3.4.1.2 of TGD M 2010.

3.8. Observations from the BCA in relation to the appeal (31st January 2018)

Observations from the BCA were received by the Board on the 31st January 2018. The following is a brief summary of their response:

- An overview of the case was provided relating to the RDAC application (RDAC/2017/0732) and the DAC application (DAC/2016/0681).
- DCC noted that “Both units were intended for restaurant use. These are located on the ground floor level of the Parnell Centre and are accessed off the public footpath along Parnell Street. Additional access is provided at the rear of these units through the existing mall within the Parnell Centre. Both units have a split floor level with a short stepped route intended inside the main entrance. Neither unit has proposed a ramp or platform lift for this change in level”.
- The existing Unit 02 was vacant with a double leaf doorway at the front and rear of this unit. The proposed works will reduce the rear door to a single leaf doorway and will create a service corridor within the unit accessing its sanitary facilities, staff rooms and kitchen at the rear of this restaurant. It was the opinion of the case officer that this reduces this entrance to a secondary entrance point and segregates wheelchair users from the Parnell Street entrance to the restaurant. No wheelchair accessible facilities are intended inside the main entrance. No servery counter or reception is intended on the lower level to assist wheelchair users or direct wheelchair users to the rear of the unit. It is unclear if a platform lift or ramped route was ever considered for this change in level.
- “The applicant was provided with an opportunity to redesign the layout of the unit to reduce the negative impact on the accessibility by the Mall entrance, but this opportunity was not taken and no significant change was made”.
- A clear 300mm space at the leading edge of the door accessing the wheelchair accessible WC was requested to be compliant with Diagram 10 of TGD Part M 2010, this was declined by the applicant.
- DCC noted that adequate information in relation to the stepped access routes and internal doors was not provided to show compliance with Part M of the Second Schedule of the Building Regulations.
- Prior to refusing this application additional information was requested however DCC are of the opinion that much of this information was not provided or failed to adequately illustrate how wheelchair users could access and use this new restaurant independently or without being segregated from able bodied customers.
- DCC Building Control formed the opinion that the proposed fit-out of this unit differed significantly from the works to the adjoining Unit 01 and the application was refused.

4. Relevant history/cases

The following previous DAC application is relevant to the case:

- DAC/2016/0681 – for the subdivision of the original Parnell Street Cinema Foyer into Units 1 & 2 at the Parnell Centre. This DAC application included the 'Change of Use' from Retail to Restaurant of Unit 1 (Wow Burger Outlet) whilst Unit 2 was indicated as shell and core only as there was no tenant for this unit. The DAC was granted on 31st March 2017.

5. Considerations

The following is an overview of my observations in relation to the appeal:

5.1. Location of the Restaurant – Unit 2

The Restaurant was intended to be located in Unit 1 in original DAC application and Unit 2 was shell and Core only. In the RDAC application the Restaurant is shown in Unit 2 and Unit 1 is vacant. This should have been clarified in the RDAC application and a Change of Use should have been applied for Unit 2 from retail to Restaurant use. However there is no reference made to the Material Change of Use in the RDAC application.

5.2. Meeting the requirements of Part M 2010 when carrying out a Material Change of Use

The requirements of M1 of the Second Schedule of the Building Regulations apply when a material change of use takes place. M1 of the Second Schedule of the Building Regulations states 'Adequate provision shall be made for people to access and use a building, its facilities and its environs'.

In order to meet the requirements of M1 when a Change of Use takes place section 0.6(d) of TGD M 2010 recommends:

“An existing building or part of an existing building, which undergoes a material change of use to a day centre(i), hotel, hostel or guest building(ii), institutional building(iii), place of assembly(iv), shop(v) (which is not ancillary to the primary use of the building) or shopping centre(vi).

S.I. No. 513 of 2010 amends Article 13 of the Building Regulations dealing with material changes of use to require Part M to apply to certain material changes of use. Where such material change of use applies to the whole building (including approach and access, where practicable), the building must comply with M1. Where such material change of use only applies to part of the building, that part must comply with M1, the approach and access to that part (through independent access or through another part of the building) where practicable (refer to 0.7) must comply with M1 and any sanitary facility provided in or in connection with it must comply with M1”.

5.3. Determination of Practicability

Section 0.7 of TGD M 2010 (Determination of Practicability) has been introduced in TGD M 2010 for existing buildings as the scope of Part M was broadened in S.I. 531 of 2010 relating to its application to existing buildings (i.e. material alteration, certain material changes of use).

The concept of practicability recognises that certain existing buildings (e.g. historic, terraced, urban or restricted sites, etc.) may not be able to comply with the guidance for new buildings in Section 1 of TGD M 2010.

It also recognizes that the rigid application of guidance for new buildings could seriously limit the potential use of existing buildings as it may not in some cases be possible to comply;

It allows an applicant to adopt concept where the particular circumstances (set out in section 0.7 of TGD M 2010) apply for existing buildings.

The main purpose of section 0.7 of TGD M 2010 is to provide a less onerous set of guidance (section 2 of TGD M 2010) in certain circumstances where it may not be practicable to meet the guidance provided in Section 1 of TGD M 2010 for an existing building.

5.4. Technical Guidance Document Part M (2010) - Flowchart

The Department of Housing Planning and Local Government have published a "Technical Guidance Document Part M (2010) - Flowchart" as part of their guidance² on Part M of the Second Schedule of the Building Regulations. The flow chart is attached to Appendix 2 below.

The flow chart indicates that where a 'Material Change of Use' applies to Part of a building that:

- That Part of the Building must comply with Part M.
- Sanitary facilities provided in, or in connection with that part of the building must comply with Part M.

A note is provided asking 'Is it practicable to modify or provide an approach and access to that part of the building that complies with Part M'?

Achieving compliance with Part M 2010 is recommended by applying Section 1 of TGD M 2010 where practicable. If it is not practicable to achieve the guidance in Section 1, then the guidance in Section 2 should be followed and an explanation should be given in the DAC application of why it is not practicable to achieve the guidance in Section 1.

² [http://www.housing.gov.ie/housing/building-standards/tgd-part-m-access-and-use/part-m-documents#Technical%20Guidance%20Document%20Part%20M%20\(2010\)%20-%20Flowchart](http://www.housing.gov.ie/housing/building-standards/tgd-part-m-access-and-use/part-m-documents#Technical%20Guidance%20Document%20Part%20M%20(2010)%20-%20Flowchart)

If the guidance in Section 2 cannot be achieved, a dispensation or relaxation (or partial dispensation or relaxation from Part M will be required by the Building Control Authority). Refer to Appendix 2 for further details.

6. Assessment

The following is an overview of my assessment of this case.

6.1. Proposed works and Material Change of Use

The proposed works was for the provision of 2 No. new retail units within the existing original Parnell Street Cinema Foyer and the change of use of 1 no. new retail unit to Restaurant use. As the use of the area is changing to Restaurant Use that part must comply with M1, the approach and access to that part (through independent access or through another part of the building) where practicable (refer to 0.7) must comply with M1 and any sanitary facility provided in or in connection with it must comply with M1". The layout of the restaurant must also be designed in accordance with Section 1 of TGD M 2010 where practicable.

6.2. Existing change of level within the proposed restaurant

The main issue affecting compliance with the requirements of Part M 2010 is that the original Cinema Foyer Area had a change of level of 4 No. steps (600mm) to access the main mall. It is clear from the existing drawings submitted with the DAC application that that the original Cinema Foyer Area had a change of level of 4 No. steps (600mm) to access the main mall from street level. This change of level is also shown within the proposed units.

In the original DAC application, it was proposed to use existing steps and in the RDAC application a new set of Part M compliant ambulant steps were proposed (but no internal ramp or platform lift was proposed).

No information was provided to indicate why it was not practicable to install a lift or a ramp in the DAC/RDAC application. Based on the information provided in section 5.2 and 5.4 above, when a material change of use is taking place, then the guidance in Section 1 of TGD M 2010 should be followed where practicable.

If it was not practicable to meet the guidance in Section 1 an explanation should be provided in the DAC application. Therefore an assessment should have taken place on whether or not a platform lift or ramp could have been installed to overcome the internal level change. This information should have been clearly provided in the DAC/RDAC applications to allow the Building Control Officer to determine if the requirements of Part M 2010 have been met within the existing building.

6.3. Provision of wheelchair access via the Mall only

As there is an existing internal level change within the proposed restaurant unit, the appellant has argued that access for wheelchair users will be via the Mall entrance and not the Parnell Street entrance. The main concern here is that insufficient details are provided in the report/Drawings to indicate how accessible the access routes from the main building entrances on Parnell Street are to the Mall entrance of the proposed restaurant (e.g. level access,

travel distances, signage). The other concern is that the Parnell Street entrance is a main entrance to the restaurant.

6.4. Conclusion on Considerations/assessment

In my opinion, in order to demonstrate meeting the requirements of Part M of the Second Schedule of the Building Regulations when carrying out a material change of use, the guidance in Section 1 of TGD M 2010 should have been followed where practicable and wheelchair access should have been provided to overcome the internal level change (where practicable).

Where this was not possible the appellant should have provided sufficient information to the Building Control Authority in their DAC/RDAC application to allow the BCA determine whether the requirements of Part M of the Second Schedule of the Regulations have been met and if a relaxation or dispensation application was also required.

Alternatively, the Building Control Authority should have requested additional information in the original DAC application to clarify if it was practicable to provide alternative access to overcome the change of level within the Unit.

Taking on board the information provided above and noting that the basis of compliance for the RDAC application, to meet the requirements of Part M 2010 was Technical Guidance Document M 2010, it is my opinion that insufficient information was provided throughout the application process to determine if the requirements of Part M of the Second Schedule of the Building Regulations was insufficient (e.g. information on approach routes to the Mall entrance and determination of practicability regarding provision of lift or internal ramp).

Therefore I recommend that the Board reject the appeal against the BCA's decision. I recommend that the Board **Refuse** to issue a RDAC Relaxation of Part M of the Second Schedule of the Building Regulations.

7. Recommendation

I recommend that the Board reject the appeal against the BCA's decision.
I recommend that the Board Refuse to Issue a Disability Access Certificate for the following reasons:

7.1. Reasons and Considerations

Having regard to the provisions of the Building Regulations 1997 to 2017, Second Schedule, Part M, to the nature and layout of the proposed works and to the submission made in connection with the application and appeal, it is considered that the works or building to which the application relates, if constructed in accordance with the plans, calculations, specifications and particulars submitted, **fail/s** to comply with the requirements of Part M of the Second Schedule to the Building Regulations 1997 to 2017.

Reason 1:

The applicant should have applied for a Material Change of Use from Retail use to Restaurant use but failed to address this in their application.

Reason 2:

The applicant failed to provide adequate information showing compliance with Part M of the Second Schedule of the Building Regulations and failed to demonstrate in their RDAC application that adequate provision shall be made for people to access and use the building, its facilities and its environs.

Reason 3:

Inadequate information has been provided. The proposal fails to demonstrate whether it was practicable to provide access throughout the Restaurant and insufficient information was provided on approach routes to access the Mall to demonstrate how all people regardless of age, size or disability can adequately, safely and independently access and use the entrance/s and the necessary provisions to comply with the relevant Technical Requirements of Part M of the Second Schedule to the Building Regulations.



Eoin O'Herlihy

Inspector

29th May 2018

Appendix 1 – Reasons for Refusal of RDAC application

Reason 1

The applicant failed to provide adequate information showing compliance with the requirements of Part M of the Second Schedule of the Building Regulations 2010.

Reason 2

This application seems to discriminate against people with disabilities by providing segregated entrances to the restaurant. A new contravention is proposed by the construction of a single leaf doorway accessing a service corridor at the rear of the premises as the only wheelchair accessible entrance to the unit.

Reason 3

The applicant failed to provide adequate provision for wheelchair circulation through the restaurant. No facilities for wheelchair users have been provided inside the entrance to the restaurant from Parnell Street.

Reason 4

Incorrect guidance has been referenced for the sanitary facilities within the restaurant.

Reason 5

The applicant failed to provide adequate information for the proposed internal doors within the restaurant. No indication of the required clear space at the doors leading edges has been provided.

Reason 6

The required clear manoeuvring space in front of the proposed accessible counter has not been provided.

Reason 7

Adequate information has not been provided for the proposed stepped route within the restaurant.

Appendix 2 – Technical Guidance Document Part M (2010) - Flowchart

