



# Universal Access Statement

## Residential-led Mixed-Use Development at Milltown Park, Sandford Road, Dublin 6.

### UNIVERSAL ACCESS STATEMENT

Prepared for:  
**Sandford Living Limited**

12 December 2025

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## **UNIVERSAL ACCESS STATEMENT** (Revision No.1)

Prepared for:  
**Sandford Living Limited**

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## 1 Project Description

Sandford Living Limited intend to apply for permission for a Large-Scale Residential Development at a c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, D06 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The development will principally consist of: the demolition of c. 4,847.5 sq m of existing structures on site including Milltown Park House (880 sq m), Milltown Park House Rear Extension (2,031 sq m), the Finlay Wing (622 sq m), the Archive (1,240 sq m) and the Link Building between Tabor House and Milltown Park House Rear Extension to the front of the Chapel (74.5 sq m); the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m) and the provision of a single storey glass entrance lobby to the front and side of the Chapel (52 sq m); and the provision of 562 No. residential units comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units).

Block A1 will range in height from 5 No. storeys to 8 No. storeys and will comprise 81 No. apartment units; Block A2 will range in height from 6 No. storeys to 8 No. storeys and will comprise 139 No. apartment units; Block B will range in height from 3 No. to 7 No. storeys and will comprise 74 No. apartment units; Block C will range in height from 4 No. storeys to 7 No. storeys and will comprise 151 No. apartment units; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 30 No. apartment units; Block E will be 2 No. storeys in height and will comprise 6 No. courtyard type houses; and Block F will range in height from 5 No. storeys to 7 No. storeys and will comprise 81 No. apartment units.

The development also includes the provision of: cultural/community space within Tabor House (4 No. storeys including lower ground floor level) and the Chapel (2 No. storeys including lower ground floor level and mezzanine level) (1,698 sq m) with associated outdoor space (248 sq m); a café/restaurant (179 sq m) and a creche (375 sq m) within Block F with associated outdoor creche play area; ancillary residents' amenities and facilities (324 sq m) within Blocks B & C; and a single storey bin store and substation adjacent to Block F (101 sq m).

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 319 No. car parking spaces (288 No. at basement level and 31 No. at surface level); set down area for deliveries; bicycle parking; 22 No. motorcycle spaces; bin storage; boundary treatments; private balconies and

terraces facing all directions; hard and soft landscaping including public open space and communal open space; green/blue roofs; PV panels; substations; lighting; plant; lift cores and overruns; and all other associated site works above and below ground.

The proposed development has a gross floor space of c.50,196 sq m above ground level over a partial basement (under part of Blocks A1 and A2 and under Blocks B and C) measuring c. 10,550 sq m, which includes parking spaces, bin storage, bike storage and plant.

## 2 Application of Part M of the Second Schedule of the Building Regulations for the Proposed Works

The proposed development scheme must meet the requirements of Part M of the Building Regulations. Part M 2022 came into operation on the 1st January 2024 and the requirements of Part M 2022 must be followed subject to certain transitional arrangements. The requirements of Part M 2022 are as follows:

<b>Access and Use</b>	<b>M1</b>	Adequate provision shall be made for people to access and use a building, its facilities and its environs.
<b>Sanitary Facilities</b>	<b>M2</b>	Adequate provision shall be made for people to approach and access an extension to a building.
	<b>M3</b>	If sanitary facilities are provided in a building that is to be extended, adequate sanitary facilities shall be provided for people within the extension.
<b>Changing Places Toilet</b>	<b>M4</b>	Where sanitary facilities are provided in a building, or in a building that is to be extended, adequate provision shall be made for people to access and use a changing places toilet, having regard to the use and size of the building.
<b>Non-Application of Part M</b>	<b>M5</b>	Part M does not apply to works in connection with extensions to and material alterations of existing dwellings, provided that such works do not create a new dwelling.

Figure 1 – The requirements of Part M (2022) of the Building Regulations

The Design Team recognises that since the introduction of the Disability Act in 2005, Irish Building Regulations (See Figure 1 above) have been revised with Universal Design in mind and a more comprehensive technical guidance document is now in place. This document is known as the Building Regulations 2022 Technical Guidance Document M – Access and Use, or alternatively TGD M 2022.

TGD M 2022 provides guidance in relation to meeting the requirements of Part M of the Second Schedule to the Building Regulations and focuses on Access and Use. It is important to note that the introduction of TGD M 2022 states:

“The materials, methods of construction, standards and other specifications (including technical specifications) which are referred to in this document are those which are likely to be suitable for the purposes of the Regulations. Where works are carried out in accordance with the guidance in this document, this will, prima facie, indicate compliance with Part M of the Second Schedule to the Building Regulations (as amended). However, the adoption of an approach other than that outlined in the guidance is not precluded provided that the relevant requirements of the Regulations are complied with. Those involved in the design and construction of a building may be required by the relevant building control authority to provide such evidence as is necessary to establish that the requirements of the Building Regulations are being complied with”.

O'Herlihy Access Consultancy have been liaising with the design team during the planning stages of this project and are satisfied that the proposed works will meet the requirements of Part M of the Second Schedule of the Building Regulations. For example:

- A minimum 5% of the total amount of car parking spaces provided will be accessible car parking spaces in line with Section 1.1.5 of TGD M 2022, where development plan is silent. These bays are designed to meet the guidance in Section 1.1.5 of TGD M 2022;
- Setting down area will be provided within the development. The setting down areas will be designed to meet the guidance in Section 1.1.6 of TGD M 2022;
- Various accessible landscaped areas are provided throughout the site will be designed to meet the guidance in Section 1.1 of TGD M 2022;
- Adequate approach and access routes will be provided from all designated car parking facilities, setting down areas, and from the site boundary to all accessible entrances of the buildings and facilities, and will be designed in accordance with Section 1.1 of TGD M 2022, including level, gently sloped, ramped and stepped access routes;
- All entrances to the buildings are designed in accordance with the guidance in Section 1.2 and Table 3 of TGD M 2022, with 1,800mm by 1,800mm level landings provided at all accessible entrances;
- In existing buildings, the approach routes and accessible entrances will be in accordance with the guidance in Section 1.1.2, 1.1.3 & 1.2 of TGD M 2022 and, where necessary, in accordance with Section 2.1.2, 2.1.3 & 2.2 of TGD M 2022;
- All entrance and internal lobbies will be designed in accordance with Section 1.2.5, 1.3.3.4 and Diagram 11 of TGD M 2022;
- Internal corridors, floor finishes and doors within accessible internal areas will be designed in accordance with Section 1.3 of TGD M 2022, with 1,800mm turning spaces provided in all accessible corridors within the building;
- Reception areas will be designed in line with Section 1.3.3.1 of TGD M 2022;
- At least 1 No. passenger lift and 1 No stairs suitable for ambulant disabled people will be provided serving all floors within the buildings. The lifts will be designed in accordance with the guidance in Section 1.3.4.2 of TGD M 2022 and stairs in accordance with Section 1.3.4.3 of TGD M 2022;

- Sanitary facilities (e.g. unisex accessible WC etc.), where provided will be adequately provisioned within the buildings in accordance with Section 1.4 of TD M 2022;
- Refreshment facilities, where provided, will meet the guidance in Section 1.5.5 and Diagram 30 of TGD M 2022;
- All communal facilities within or surrounding apartment blocks will be provisioned as accessible to meet the needs of all users in accordance with the guidance in TGD M 2022;
- Apartments will be designed to meet the guidance in Section 3 of TGD M 2022 (e.g. 1200mm by 1200mm level landing at apartment entrances and 800mm wide doors at entrances to the apartments);
- An accessible WC, suitable for visitors, is provided at entry level within each apartment unit. Each will be designed in accordance with Section 3.4 of TGD M 2022, providing adequate space for sideways transfer from a wheelchair.

### **3 Application of Universal Design for the Proposed Works**

The proposed development scheme has regard to the provisions of the principles of Universal Design and the application of lifelong design thinking as set out in Section 5.5.5 of the Dublin City Development Plan 2022 – 2028. A number of individual apartment units (1-bed and 2-bed) have been designed in accordance with the guidance in Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019 as far as practicable.

O'Herlihy Access Consultancy have been liaising with the design team during the planning stages of this project and are satisfied that the identified individual Universal Design apartment units will meet the minimum requirements of Universal Design Guidelines for Homes in Ireland 2015 as far as practicable. For example:

- Entrance doors into the apartments will meet the guidance in Section 2 of Guidelines for Homes in Ireland 2015 (e.g., clear width of between 800mm and 850mm, 300mm clear space provided on the leading edge side of the door externally and internally, etc.);
- Entrance hallways will meet the guidance in Section 2 of Guidelines for Homes in Ireland 2015 (e.g., a space of between 1500mm × 1500mm and 1800mm × 1800mm provided adjacent to the entrance door);
- Corridors and doors will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015 (e.g., corridor widths between 1050mm and 1200mm, 300mm clear space provided on the leading edge side of the door, etc.);
- Living rooms will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015 (e.g., minimum room widths achieved, clear space of 1500mm–1800mm turning circle or 1700mm × 1400mm ellipse provided);
- Dining rooms will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015 (e.g., 1200mm clear space on at least two consecutive sides of a table, located directly adjacent to the kitchen);
- Kitchens will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015 (e.g., between 1200mm – 1500mm provided between opposing work surfaces, 'U' or 'L'-shaped design, etc.);

- Bedrooms will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015 (e.g., minimal area requirements for single and double bedrooms achieved, located directly adjacent to a bathroom, etc.);
- Bathrooms will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015 (e.g., minimum size 2100mm x 2400mm, clear space requirements in front of bath, shower, sink and WC, etc.);
- Storage and utility spaces will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015;
- Balconies and terraces will meet the guidance in Section 3 of Guidelines for Homes in Ireland 2015 (e.g., level access provided, minimum area requirements, etc.).

The Design Team notes that TGD M 2022 is the minimum guidance to show compliance with the requirements of the Part M of the Building Regulations. In addition, the requirement of providing a number of Universal Design apartment units as set out in the Dublin City Development Plan 2022 – 2028 is noted. The Design Team is also firmly committed to achieving universal access in the building and are committed to ensuring that:

Independently accessible means of approach to the accessible entrances and circulation around the proposed development will be provided in accordance with Section 1.1 of TGD M 2022. (e.g. level access routes, gently sloped access routes, ramped access routes, stepped access routes, pedestrian crossings, etc.)

Entrances to the proposed buildings will be independently accessible and avoid segregation based on a person's level of ability in accordance with Section 1.2 of TGD M 2022. (e.g. accessible entrance doors - glazed, manual, power-operated - entrance lobbies, etc.)

People will be able to travel horizontally and vertically within buildings, conveniently and without discomfort in order to make use of all relevant facilities in accordance with Section 1.3 of TGD M 2022. (e.g. reception areas, internal doors, corridors, internal lobbies, passenger lifts, stairs, etc.)

Independently accessible sanitary facilities, where provisioned, that meet the needs of people with a wide range of abilities, will be provided within the proposed works in accordance with Section 1.4 of TGD M 2022. (e.g. wheelchair accessible unisex WCs, etc.)

Other facilities within the proposed communal areas will be accessible and useable, designed and constructed to facilitate active participation where appropriate in accordance with Section 1.5 of TGD M 2022. (e.g. refreshment facilities, switches, outlets and controls, etc.)

Adequate aids to communication will be provided within the common areas to ensure people can independently access and use the buildings and their facilities in accordance with Section 1.6 of TGD M 2022. (e.g. signage, visual contrast, lighting, audible aids, etc.)

Apartments within the development will be designed in accordance with Section 3 of TGD M 2022, ensuring that they provide adequate access for visitors, including; accessible entrances with clear level landings, adequate circulation within the entrance storey, accessible WCs suitable for visitors, etc.

Universal Design apartment units within the development will be designed in accordance with Universal Design Guidelines for Homes in Ireland 2015 and incorporate lifelong design principles as far as practicable.

Figure 2 – Universal Access Strategy

## 4 References

1. DEHLG (2000) Building Regulation, 2000 Technical Guidance Document M. Access for people with disabilities. Department of Environment, Heritage and Local Government, Dublin.
2. DEHLG (2022) Building Regulation, 2022 Technical Guidance Document M. Access and Use. Department of Environment, Heritage and Local Government, Dublin.
3. Access – improving the accessibility of Historic Buildings and Places published by the Department of Arts, Heritage and Gaeltacht.
4. Architectural Heritage Protection - Guidelines for Planning Authorities (2004) – Chapter 18 – Improving Access;
5. BSI (2018), BS8300-1: Design of an accessible and inclusive built environment, Part 1: External environment – Code of practice.
6. BSI (2018), BS8300-2: Design of an accessible and inclusive built environment, Part 2: Buildings – Code of practice.
7. NDA (2002), Building for Everyone. The National Disability Authority, Dublin.
8. DCC (2022), Dublin City Council Development Plan 2022 – 2028, Chapter 5: Quality Housing and Sustainable Neighbourhoods.
9. CEUD, (2015) Universal Design Guidelines for Homes in Ireland 2015. Centre for Excellence in Universal Design at the National Disability Authority.