**Carmarthenshire County Council** 

### **Local Toilets Strategy**

In accordance with the Public Health (Wales) Act 2017 - Part 8

#### DRAFT – March 2019

Prepared in partnership with the British Toilet Association





# CARMARTHENSHIRE LOCAL TOILETS STRATEGY

#### Contents

Introduction	3
Local Toilets Strategy – Statutory Guidance	4
Aims of the Strategy	5
Current Provision	8
Carmarthenshire Public Toilet Consultation –	
Analysis and results	11
Strategic Outlines & Considerations	22
Summary Recommendations & Action Plan	31
APPENDIX A - Carmarthenshire Public Toilet Data	34
Standards & Provisions – legal references	41
Acknowledgements & Miscellaneous	43

#### Introduction

Carmarthenshire has a rich and diverse environment, holding a shared vision of corporate priorities within strategic planning and delivery of its current and future statutory obligations. The Council is however facing a period of significant and continued budget reductions and it is therefore more important than ever to ensure we are making best use of resources. We continue to face a number of challenges, most of which are driven by factors outside of the Council's control and over recent years, the level of resources available for public services has seen significant reductions whilst at the same time the pressures in terms of demand and expectations have been increasing. This therefore requires that we change the way we provide certain services as we seek to utilise more creative ways of providing some services such as public toilet facilities.

With the current population around 185,000 and the whole county attracting some 3 million visitors each year; investment in the county's infrastructure and legacy has been significantly demonstrated. This strategy highlights the role that both public and private sector toilets operating within the Council's realm will play; and how their positioning will enhance and boost that visitor experience. The recommendations from this strategy support the vision of a healthy Carmarthenshire which values diversity, equality and social inclusion, as well as giving support to the people, businesses and the communities within the county.

Toilet provision has a significant impact on social inclusion and basic equality, as well as public health and hygiene issues. Some members of the community could remain trapped at home or potentially avoid travelling completely rather than run the risk of needing and not being able to find a suitable "away from home" toilet that meets their needs or those of their family.

# There is no statutory requirement for local authorities to provide public toilets, however, this strategy aims to mitigate potential impacts where there may be a loss of toilet provision.

The adequate provision of safe, clean, hygienic, publicly available toilets in any major town has a significant impact on the life and well-being of its residents, visitors and tourist trade. However, probably one of the most critical infrastructure factors is purely commercial. Toilet provision greatly affects the commercial business activity and in particular the shopper's experience. Not enough toilets and the shopper will become uncomfortable and leaves the area taking their spending budget with them. Worse still if the problem is known then they might simply choose not to visit at all and local businesses will suffer falling revenue streams. The lack of toilets within the public realm can reflect on the area's reputation, cleanliness and well-being across the whole commercial spectrum. Consideration should also be shown to commercial travellers, delivery drivers, emergency services and transient workers who rely on clean toilet facilities being accessible whilst they are passing through or visiting local shops/stores each day.

Within the strategy a number of opportunities could be investigated and/or developed with business partners to counteract the loss of provision during this economic malaise. The

opportunities to be realised could increase the number of toilets becoming open and available to everyone, yet at a minimal cost to the council directly.

#### Why do we need a Toilet Strategy? - Statutory Guidance

The Public Health (Wales) Act 2017 ('the Act') received Royal Assent on the 3 July 2017. The Act brings together a range of practical actions for improving and protecting health. Part 8 of the Act introduces provision of toilets and specifically local toilets strategies.

The aim of Part 8 is to ensure each local authority (LA) in Wales assesses the needs of its community in relation to toilets, and then takes a strategic and transparent approach to best meet that need. This process will enable a broader consideration of options available for providing toilets for use by the public, ranging from traditional stand-alone public toilets through to toilets in private ownership. This is intended to help address the current challenges regarding the provision of public toilet facilities within communities, which have often relied upon traditional stand-alone facilities that have been in decline in recent years due to LA financial pressures.

The intended effect of Part 8 is not to prevent local authorities from taking decisions which they need to take during the course of their activities, which may include decisions to close a traditional public toilet or building when appropriate to do so. Instead, the intended effect is to improve the planning of provision so that any such decisions are taken within the overall context of meeting their communities' identified needs. A strategic approach will also help to mitigate any negative impacts of changes to provision.

To achieve this, the Act places a duty on each LA in Wales to prepare and publish a local toilets strategy for its area. The duty to prepare a strategy does not in itself require LAs to provide and maintain public toilets themselves, but they are required to take a strategic view across their area on how these facilities can be provided and accessed by their local population. In doing so it is envisaged that LAs will consider a full range of options for making facilities available to the public.

In order to provide LAs with the flexibility to respond to changing circumstances, LAs are able to review the strategies at any time in addition to a mandatory review period. Upon review of this strategy, Carmarthenshire County Council is required to publish a progress statement. The importance of ongoing engagement with local communities is upheld within these provisions, through a requirement for any revised strategy to be published.

#### The Aims of the Strategy

The Public Health (Wales) Act 2017 was conceived and delivered on the Ministers mandate to make Wales a more attractable country to live, work and visit. It set out goals for the health & well-being of our populous and future generations and in doing so called for a total review of publicly accessible toilets across the country. Each local authority has been tasked with devising a toilet strategy for the availability of publicly accessible toilets within their county borders. Furthermore, developing this into a working programme that can be reviewed & accessed periodically to monitor improvements and opportunities.

#### The main outline goals for Section 8 of the Act are as follows:

- 1. To devise/develop a public toilet strategy for each region across Wales
- 2. To identify opportunities for continued provision
- 3. To identify potential partnerships with local businesses & communities
- 4. To increase awareness of current provision
- 5. To investigate/promote participation in a community toilet scheme
- 6. To identify future opportunities for the provision of Changing Places toilets
- 7. Promote public awareness of these facilities to visitors and tourists
- 8. By inception make Wales a healthier place to Live, Work and Visit
- 9. Relieve the burden on the Health Service for problems related to the potential effects of negative provision or reduced services

#### From these goals Carmarthenshire County Council will develop the following agenda:

- (a) To establish a Toilet Strategy Study Group (TSSG) from within its departmental structures and for the management and senior staff to share knowledge, experiences and current working practices developing this strategy.
- (b) To develop a holistic approach to the current and future toilet provision strategy for both the town centres and the wider county area, gaining knowledge through consultations and utilizing this interdepartmental group to deliver an efficient and affordable service.
- (c) To regularly engage with key stakeholders from owners/operators, public buildings, businesses and other representative bodies working and living within the area, investigating

and considering potential partnerships with interested parties.

- (d) To discuss and determine future investment, strategies and working practices within the council, town and community councils and the wider county area to comply with all perceived objectives of the PHWA 2017 – helping to develop Carmarthenshire into an inclusive and vibrant county.
- (e) To identify opportunities for the council to work positively with its local communities, social groups and to more readily serve the needs of both residents and visitors.
- (f) Where appropriate, matters around the incorporation and provision of toilet facilities within development will be considered in accordance with planning policy and national planning guidance.

The Authority believes it may be prudent to set some short, medium and long-term goals for the terms shown above. Once the terms have been agreed and approved by the Toilet Strategy Study Group, the members should have a much clearer definition of the overall scope of the project. Consequently, we will then be ready to progress with the creation of the remaining project deliverables.

#### WAYS OF WORKING DIFFERENTLY

The Well-being of Future Generations (Wales) Act 2015 puts in place a 'sustainable development principle' which tells public bodies how to go about meeting their duty under that Act. The principle is made up of five ways of working which public bodies should follow when carrying out sustainable development. These are:

• looking to the long term so we do not compromise the ability of future generations to meet their own needs;

- taking an integrated approach;
- working with others in a collaborative way to find shared sustainable solutions;
- involving a diversity of the population in the decisions affecting them; and
- acting to prevent problems from occurring or getting worse.

The key prevention aims of this local toilets strategy are to:

- identify key toilet facilities in a location;
- identify facilities at risk of being lost to a location, and ways to preserve their use;
- identify alternative provisions if facilities must close;
- identify additional facilities that can be brought into wider use to supplement existing facilities or as a replacement for those that have been lost; and

• identify opportunities for incorporating new facilities to modern, inclusive specifications in future developments.

We are mindful of developing these goals in keeping with the "Five ways of working" ethos laid out in the Carmarthenshire Well-being Plan 2018-2023.

#### **Reviewing the Strategy**

Carmarthenshire County Council will prepare an interim progress report setting out the steps taken in line with their strategy every two years commencing from the date of the last published strategy. The interim progress report will be published within six months of the end date of the two year period. Therefore, following publication in May 2019, the review will take place before the end of May 2021 and be published before the end of November 2021.

Carmarthenshire County Council will also review the local toilet strategy within a year of each ordinary election for its area. The next election date in Wales is Thursday 5 May 2022 so the latest date for review is 4 May 2023. If no changes are made to the strategy following the post-election review then Carmarthenshire County Council will publish an interim progress statement covering a two year period commencing from the date of the last election.

Carmarthenshire County Council may review its strategy at any time following which it must publish a statement of the steps which it has taken in accordance with the strategy. If following a review, Carmarthenshire County Council decides to revise the strategy it will publish the revised strategy and then prepare an interim progress report covering the two year period commencing from the date of publication.

#### **Current Provision**

#### Map of available toilets in Carmarthenshire

(Traditional stand-alone facilities provided by the County Council and Town & Community Councils)



Carmarthenshire County Council currently oversees the running and servicing of 19 publicly accessible traditional stand-alone toilet blocks throughout the county. Operational responsibility for these varies across the Authority. Individual responsibilities for each facility is outlined in the table below. The list also includes a further 21 facilities which are operated by town & community councils and other community groups.

A detailed facilities breakdown of these is shown separately in Appendix A

Information on opening times is displayed by clicking on the individual pins via our electronic map which is available on the Carmarthenshire County Council website:

https://www.carmarthenshire.gov.wales/home/council-services/travel-roadsparking/toilets/#.XIe8XsSYTIU

Location	Charge	Responsibility					
Abergorlech - Village Centre	Free	Community Council					
Alltwalis - Village Centre	Free	CCC Waste & Environmental Services					
Ammanford - Carregamman Car Park	20p	Danfo / CCC Waste & Environmental Services					
Ammanford Central Park	Free	Town Council					
Ammanford Coop Car Park	Free	Town Council					
Brechfa - Village Centre	Free	Village Trust					
Burry Port - Railway Station Car Park	Free	CCC Waste & Environmental Services / Town Council					
Carmarthen - John Street Car Park	20p	Danfo / CCC Waste & Environmental Services					
Carmarthen - Market	Free	CCC Regeneration & Policy					
Cenarth Car Park	Free	CCC Waste & Environmental Services					
Cynwyl Elfed – adjacent to Park	Free	Community Council					
Ferryside - Beach Entrance	Free	CCC Waste & Environmenta Services					
Ffaldybrenin – near Heol Timothy	Free	Community Council					
Ffarmers – adjacent to Village Hall	Free	Community Council					
Glanamman - Cwmamman Square	Free	Town Council					
Gorslas - adjacent to Park	Free	Community Council					
Kidwelly - Town Centre Square	Free	Town Council					
Laugharne - adjacent to Castle	20p	Danfo / CCC Waste & Environmental Services					
Llanboidy - Village Centre	Free	Community Council					
Llanddowror - Tenby Road	Free	Community Council					
Llandeilo Car Park (Crescent Road)	20p	Danfo / CCC Waste & Environmental Services					
Llandovery Car Park	20p	Danfo / CCC Waste & Environmental Services					
Llandybie Heol Gwilym	Free	Community Council					
Llanelli - East Gate Bus Station	20p	Danfo / CCC Waste & Environmental Services					

Llanelli - Market	Free	CCC Regeneration & Policy
Llanelli - Park Howard	Free	CCC Waste & Environmental Services
Llanelli - adjacent to Town Hall	20p	Danfo / CCC Waste & Environmental Services
Llansawel - adjacent to Village Hall	Free	Community Council
Llanstephan - Beach Car Park	Free	CCC Waste & Environmental Services
Llanybydder - The Square	Free	Community Council
Meidrim Car Park	Free	Community Council
Meinciau - adjacent to Community Hall	Free	Community Council
Newcastle Emlyn – adjacent to Mart	Free	CCC Waste & Environmental Services
Newcastle Emlyn - Market Hall	Free	Town Council
Pendine - Parry Thomas Centre	Free	CCC Regeneration & Policy
Penygroes – opposite Surgery	Free	Community Council
St. Clears Car Park	20p	Danfo / CCC Waste & Environmental Services
St. Peter's Car Park - Carmarthen	20p	Danfo / CCC Waste & Environmental Services
Whitland - Cross Street	Free	Town Council
A48 Bristol House Lay-by	Free	South Wales Trunk Road Agent

#### **Carmarthenshire Public Toilets Consultation**

A public toilets consultation and assessment of needs was undertaken during October/November 2018.

#### **Purpose of Consultation**

The aim of this consultation was to gather information from the public on their opinions and ideas for improvement of public toilet provision in Carmarthenshire.

#### **Consultation Process**

A questionnaire was produced to gather public opinion on:

Safety and cleanliness of facilities

Location of facilities

Quality of the service currently provided

Baby changing facilities

**Disability access** 

Changing places facilities

This questionnaire was available on Carmarthenshire County Council's website during October / November 2018. The questionnaire was also sent to relevant representative groups for people who may be more reliant on the use of public toilets. The consultation received 507 responses. The results are summarised below:

#### Summary of Results

Public toilet provision is an important issue to the residents of Carmarthenshire, with 88% of consultation participants responding that they worry about whether they will be able to access a public toilet while out and about. Feedback from the consultation showed that there were some areas where respondents felt that further provision was needed, with 51% of respondents saying that a lack of toilet provision has stopped them from visiting a public place such as a shopping centre or beach in the past.

The main areas where increased provision was requested were Newcastle Emlyn, Pensarn (Carmarthen) and Llanelli Town Centre. When considering future provision, a number of factors will be taken into consideration. The majority of respondents (59%) said that they would be happy to pay a small charge to be able to use a public toilet. Additionally, approximately 25% of respondents said that they use or would use unisex toilets.

Of the 507 respondents to the questionnaire, 9% said that they use or assist someone else in using Changing Places Facilities. The questionnaire showed demand for more of these facilities to be provided countywide, in town centres, country parks, beaches and other attractions.

The consultation also considered other factors that prevented members of the public from being able to access public toilet facilities (Figure 1).



Figure 1 Barriers to accessibility in public toilets

Location was the most common barrier to being able to use a public toilet. Cleanliness also prevented some respondents from using facilities. Survey results appeared to show that this issue disproportionately affected women, with 27% of women and 16% of men stating that cleanliness had prevented them from using a public toilet. Location and cleanliness were barriers to some people in being able to make use of public toilet facilities and 84% of respondents said that it wasn't easy to find a toilet while out and about in Carmarthenshire. The questionnaire results also showed that 79% of respondents rated the safety and cleanliness of public toilets in Carmarthenshire as 'Fair' to 'Excellent'.

#### **PUBLISHED RESULTS – as received**



- Newcastle Emlyn (Clock) que, facilities for young children very poor, closed, location is not suitable as it's at the opposite side of the town to the main car park, only 1 x female and 1 x male toilet, not well signposted, closed, dirty, uninviting, shouldn't have to pay, too many waiting, dirty, smelly, vandalised, no hand wash facility, no baby changing, radar key doesn't open when closed on weekends.
- Newcastle Emlyn (Mart) locked
- St Clears Water leak, urine on floor
- Laugharne very unkempt
- Llandeilo issue finding change to use
- Abergorlech closed
- Talley closed
- Llansteffan not clean.

#### (1c) Please explain any issues you encountered.

- Llanelli (Town Centre) no baby changing facilities, no room for wheelchair, no changing space for disabled, dirty, full of toilet waste
- Llanelli (Beach) No toilet roll and smelly
- · Llanelli (Market) not suitable for disabled teenager, too small, disgusting
- Llanelli (Library) closed
- Llanelli (Bus Station) pay to use why?
- Pembrey County Park disabled child, no changing tables suitable as too big for baby unit.
- Burry Port unpleasant, dirty, unpleasant experience, dirty, full of toilet waste, not very clean, no bins, not clean
- Kidwelly filthy, not very clean
- Gorslas (Park) locked
- Ammanford (Co-op Car Park) Very dirty, mould, cold
- Ammanford no room for wheelchair, no baby changing facilities, needle disposal, no money,
- Ammanford (Park) dirty
- Carmarthen locked, no changing space for disabled, facilities for young children very poor, closed, too far from town centre
- Carmarthen (St John CP) paid 20p x 2 and no door opened
- Carmarthen (Park) closed
- Llansteffan Dirty, water not working

(2) Please tell us: (In your experience do you think it is easy to find a toilet when out and about in Carmarthenshire?)



(2) Please tell us: (Has the lack of public toilet provision ever stopped you from visiting a shopping area or other location?)



#### Comments:

Location and number of people who provided the same location, highest at the top.

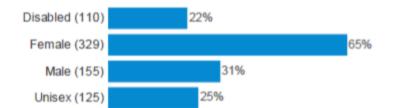
- Newcastle Emlyn 93
- Pensarn 27
- Llanelli 21
- Carmarthen 20
- Carmarthen 9
- Talley 6
- Coastal path and beach locations 5
- Ammanford 4
- Trostre 4
- Cross Hands 4
- Llandeilo 3
- Town Centres 3
- Llanelli Library 3
- Burry Port 3
- Llanelli Beach 2
- St Catherine's Walk 2
- Llandysul 2
- Laugharne 2
- Tumble 2
- Merlins Walk Carmarthen 2
- Cynwyl to Carmarthen Road 1
- Llanybydder 1
- Rural Carmarthen 1
- Lammas Street Carmarthen 1
- St Clears 1
- Pembrey 1
- Pontyberem 1
- Kidwelly 1
- Carmarthen to Llaneli Road 1
- Carreg Cennen 1

- Pendine 1
- Cross Hands Library 1
- Cenarth 1
- Drefach Felindre 1
- Llangadog 1
- Hendy 1

#### Abergwili 1

- Cynnwyl elfed 1
- Clunderwen 1
- Pemberton 1

#### (3) Please tell us which toilets do you or would you use?



# (4) Do you know about Changing Places Facilities and what they offer people with a disability?



# (4a) Are you someone who would use, or assist someone else in a Changing Places facility?



(4b) Please tell us if there are any locations within the County where you think a Changing Places Facility should be provided.

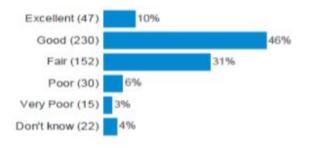
- Everywhere (town centres/villages county wide) 13
- Llanelli Town Centre 9
- Carmarthen 7
- Trostre 4
- Pembrey County Park 4
- Ammanford 3
- Hospitals 3
- Ammanford 2
- Newcaslt eEmlyn 2
- Llandeilo 2
- Laugharne 1
- St Catherine's Walk 1
- Theatres 1
- Lesuire Centres 1
- Talley 1
- Parc Y Scarlets 1
- Playground/Parks 1
- Pensarn 1
- Llyn Llech Owain 1

(4c) Do you have any other comments regarding Changing Places?

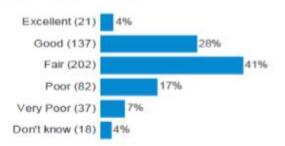
- · Should be at least 1 hoist available in every town centre
- · Bed needed also to change older children/adults, not acceptable to change on a dirty floor
- Adult changing area
- Every village/town needs these facilities
- 1 in each town
- 1 at every historic site, attractions, beach and country park
- Needle disposal same place as baby changing
- Not enough
- No charge
- Baby changing facilities must be with no sex stipulated and free for male or female to use baby changing with their child

These facilities must be considered at planning stages of developments

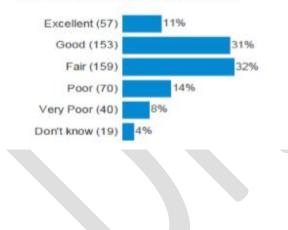
 (5) Please tell how you would rate the standard of the facilities that you have used for the following. (Safety)



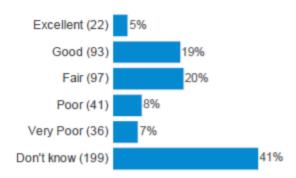
(5) Please tell how you would rate the standard of the facilities that you have used for the following. (Cleanliness)



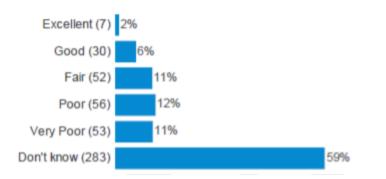
(5) Please tell how you would rate the standard of the facilities that you have used for the following. (Convenient location)



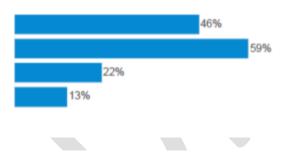
(5) Please tell how you would rate the standard of the facilities that you have used for the following. (Disabled access)



# (5) Please tell how you would rate the standard of the facilities that you have used for the following. (Baby changing facilities)



#### (6) Please tick any of the following that apply to you.



- a) I only use toilets that are free
- b) I would be happy to pay small charge to use a toilet
- c) I only use customer toilets in shops & restaurants
- I try to avoid using public toilets (inc those in shops/restaurants) when I am out

#### (7) If you do not use public toilets please state the reason for this.



#### (7) comments:

- No change 4
- Cost 4
- Not suitable for SEN or Disabled 4
- Too messy/dirty 4
- Non-existent 3
- Use shop toilets 1
- Lack of soap, water and paper 1
- Refuse to use 1
- Closed 1

(8) Please tell us: (Have you ever been refused the use of a toilet by a private business in Carmarthenshire (e.g. shop)



(8) Please tell us: (Do you worry about whether you will be able to access a toilet when you are out and about?)

Yes (440)	8	88%
No (58)	12%	

#### (8a) Please tell us why:

- Always
- Struggle to find somewhere clean and suitable
- Disabled, wheelchair doesn't fit
- Staff only toilets
- None available
- Staff only toilets
- Pregnant sickness no toilets
- Matalan area is an issue
- Not a paying customer cant use
- · Drink less as driving instructor to avoid toilet stop
- Don't know where they are, need a list of disabled toilets such a bus timetable

(9) Please tell us if there are any locations within the County where you think additional public conveniences should be provided.

- Newcastle Emlyn 38
- Everywhere 7
- Pensarn 7
- Pensarn 6
- Carmarthen 5
- MCP 4
- Cross Hands Library 3
- Open all year round 3
- Town Centres 3
- Country Park Pembrey 2
- Llanwrda 2
- Trostre 2
- Talley 2
- Llandovery CP 1
- Nantgaredig 1
- Llandeilo 1
- Gorslas 1
- Merlin hill 1
- Coastal path 1

#### (10) Do you have any other comments regarding public conveniences?

- Open all year round
- Cleanliness
- Sanitary disposal bins
- Closing too early
- Baby changing should be any sex
- Disabilities are currently restricted
- Not convenient
- Upgrade needed
- No toilets on bus route
- Too much reliance on business to provide toilets
- Carmarthen bus station closes toilets too early
- All year toilets should be open not just for tourists
- Expensive, charge too much
- Standard fee for all
- Removing toilets from towns/villages is destroying them
- Should be free
- Basic necessity
- Medical needs means must have access to toilet/changing room
- Need a list of disabled toilets
- Disabled toilets need to accommodate wheelchairs
- Ramps are in poor condition

#### **British Toilet Association (BTA) – Strategic Recommendations**

The BTA identified the following core issues which could potentially be considered:

(a) Town/Community Councils – explore further opportunities to devolve management and running costs.

- (b) Community Toilet Scheme the inclusion of & use of toilets in local retail outlets.
- (c) Portable toilet provision control of provision for events and festivals.
- (d) Signage effective communication & information to identify/promote facilities.
- (e) 24-hour access the Night Time Economy consider 24 hour access where practical.
- (f) Web design toilet mapping the increasing use of hard copy and electronic media.
- (g) Health & Safety controlling safety, security, vandalism and anti-social behaviour.
- (h) Changing Places the identification of potential sites within future developments.

The formation of a Toilet Strategy Study Group (TSSG) is being recommended as the initial driver to assimilate all relevant information gathered and held on public provision across the council. The group can then set down goals and timetables to help officers and partners understand the strategy development and to create an amenable working environment for its delivery.

Once the Study group has been assembled then the next phase would be to liaise with local commercial/business representatives and other representative groups to have an input on future opportunities.

#### **Strategic Outlines & Considerations**

Whilst there are no statutory requirements upon any council to provide public toilets, it is generally accepted that all councils have a role in the provision of public toilets to support local communities, older persons, families with children and promote active participation in life and enjoyment of the public realm.

Consequently, within this section of the strategy we are attempting to highlight a few specific areas that need additional thought and consideration. Subsequently, amongst the first set of actions suggested would be the formation of a Carmarthenshire Toilet Strategy Study Group. Representatives from departments who have a role in the provision of the Council's toilet facilities will be invited to participate and help guide this development. Primarily, to analyse the overall toilet provision and to reach agreement or put forward workable suggestions on adding to or removing from the current stock of public facilities.

As a further important step, we will liaise with local business and representative groups to have a say and participate in how the overall policies are progressing.

Public access to toilets is important for local shops and businesses too. Businesses operate to turn a profit, and customer footfall is the lifeblood of the retail and leisure sectors but people need first to feel drawn into the area. Family businesses and independents, for instance, may have connections with their local area going back generations. National chains, on the other hand, often have a strong social or community support ethos as part of their corporate policy. Businesses operate as part of communities and hold as much of a stake in supporting local community amenities and promoting civic pride as local authorities themselves.

Public toilet provision is an important issue for areas relying on tourism income or seeking to develop their profile as a visitor destination. The Wales visitor economy accounted for around 10 million overnight stays which were worth £1.9 billion in the last twelve months, approximately 80 per cent of which was from domestic tourism. Carmarthenshire is a growing visitor destination with around 3 x million tourists in 2016/17. A 2005 survey by Changing Lives N-Vision (Future Foundation) showed that people aged over 55 and families with children are most inclined to take holidays and short breaks at home. At the same time, these groups are more likely to place a higher value on being able to access a toilet.

Being able to access a toilet is a fundamental need for any visitor. Tourists need more local information, more signboards, signposts or local notice boards. They cannot simply go home, into work, or their local pub to use the toilet. Tourists choose their destinations carefully, drawing on their previous impressions, talking to friends and family, looking up feedback on the internet. Sense of destination – the extent to which it has met a visitor's needs and made a strong and positive impression – is therefore vital to secure repeat trade and plays a significant role and indicator towards sustainable economic development.

Transport operators – like any commercial business – need to respond to feedback from surveys on levels of customer satisfaction. They will only make the most of their commercial opportunities if they provide the facilities that their passengers demand. Most stations and interchanges are the first real point of contact when visitors arrive. Often at the end of a

substantial journey and immediately upon arrival the most pressing need is for toilet relief and perhaps even an opportunity to freshen up prior to embarking into the town.

While this strategy focuses on the provision of council owned public toilets, it is clear that the public regard all publicly accessible toilets as public toilets. Toilets provided by department stores within shopping centres, within major fast food outlets, within public buildings and transport hubs need to be regarded as part of the overall public toilet provision. Cafes, restaurants, hotels and pubs which all must provide toilets for patrons, could also be considered to be part of the potential overall provision.

The priority focus will naturally fall on villages, town centres, main arterial routes, historical sites and their car parks and immediate adjoining areas. This is where we draw the greatest number of visitors and subsequently these areas will be under the most direct pressure to satisfy the visitor's needs. Many local authorities are turning to local businesses to enter into partnerships to develop the feeling of welcome, social inclusion and support for the local economy. This unique partnership agreement is entitled "Community Toilet Scheme" or "Comfort Toilet Scheme" which we will further outline within this strategy. The simple ethos is to encourage many of the local retailers and business community that currently have toilet provision within their shop/store/workplace to become encouraging to the general public by openly inviting all visitors and residents to use these facilities without the need for any initial purchase.

#### Health and Well-being

The extent to which people have access to good quality toilets affects their general health and well-being - as well as that of the whole community. By enabling a wide range of users and user groups; with very different specific requirements, to make use of public toilets at different times of the day and night we could have a significant impact on issues like public health, equality, exercise, behaviour and well-being. For these reasons, this strategy is important across a range of council policy areas.

**Social Equity and Inclusion:** a lack of clean, accessible and safe toilets impacts on some individuals more than others. Some people may feel unable or reluctant to leave their homes and visit areas where they fear they will not be able to find a public toilet. Older people (a growing section of the population in our ageing society), mothers, fathers and carers with young children, disabled people and people with chronic health problems – all need easy access to suitably equipped public toilet facilities.

In considering our "Healthy Communities", a lack of toilet facilities at the right time in the right place contributes to dirty streets that are unsanitary, unpleasant and can spread infection.

Special user groups such as the IBS Network, Disability Action, sufferers with Crohn's disease or chronic incontinence, shy-bladder syndrome (Paruresis) and many others can be afraid to venture out for any length of time or at all if they cannot find or locate any clean, hygienic public facilities. Many older persons may even reduce or stop taking medicines in order to travel greater distances when visiting friends or family. Grand-parents caring for young children and families with elderly family members are also displaced by the lack of these vital facilities. They all have spending power and they all have an effect on the economy within the county. Single parents and families with young children can be particularly vulnerable to the lack of hygienically clean public facilities.

The provision and maintenance of toilets in public places is at the discretion of local authorities who have a power, under section 87 of the Public Health Act 1936 ("PHA 1936"), to provide public conveniences, but no duty to do so. Whether or not they choose to provide these facilities is at their discretion, and any expenditure has to be weighed in the balance against other local service demands. Under section 87(3)(c) of the PHA 1936, local authorities were allowed to charge for use of all public conveniences. The new Public Health (Wales) Act 2017 seeks to place a duty on all councils to develop a strategy for the provision of publicly accessible toilets and Changing Places to make Wales a more attractive place to work, live, visit and to increase the feelings of public well-being for all.

Whilst it is fully understood that councils across the country are struggling significantly during this severe economic downturn; budgets have been severely depleted and one of the major casualties is public toilet provision which has always been a discretionary service. The implementation of the Public Health (Wales) Act 2017 is expected to be a catalyst for councils throughout Wales to find and investigate new solutions for toilet provision.

#### Community or Comfort Toilet Schemes (CTS)

In consultation with the BTA we have seen a significant drive from the larger town and city councils to entice major retailers and business holders to enter into a range of managed schemes, known as the local Community or Comfort Toilet Scheme (CTS). The challenge is to tap into this additional, already available provision on a more formal basis. Understandably, the scheme is not appropriate everywhere and struggles with large groups of visitors arriving at the same time, as well as servicing the night time economy, when most businesses are shut. However, if this type of scheme was embraced within the Carmarthenshire area then the potential range and supply of publicly accessible toilets could significantly increase the total availability across the county. Consideration also needs to be given to any financial assistance that might/could be granted to participants. These initial schemes set out to support the members by giving a payment to help off-set cost of additional consumables and cleaning products. This supplement was variable from council to council but traditionally ranged from £300 - £1,000pa.

The Welsh Government (WG) previously offered a Community Toilet Scheme Grant which was administered by local government. Businesses were offered an annual recompense payment of up to £500. In 2014/15 this funding was transferred to WG Revenue Support Grant and the Council therefore ceased to support a Community Toilet Scheme.

Consideration could be given to the reallocation of the funding set aside in the Revenue Support Grant for the Community Toilet Scheme. Subject to this funding, then as an initial first drive over the coming months we will be striving to approach some potential CTS participants and thereby compile a properties list of potential partners from around the county, and this will be presented to the Strategy Group for discussion and further action. International research and surveys consistently show that, while the vast majority of the community regard public toilet provision as vital or at least extremely important - using a public toilet is often a matter of last resort, especially for women. Many negative perceptions prevail, that public toilets are unhygienic, unclean and constantly attract anti-social behaviour and vandalism. Some of this misconception stems from the not too distant past when toilets were intentionally placed to be out of public view and therefore often were poorly serviced or attended and attracted undesirable behaviours. Many publicly accessible toilets are now generally sited in locations where they can be easily seen and accessed and are therefore safer and more likely to provide a more welcoming and positive experience.

Transfer of assets to town & community councils has had a beneficial effect on retaining some facilities and promoting local management. This allows local councils to run their own facilities and also permits local people to make local decisions regarding opening times and flexibility of use.

#### Social Inclusion and Accessibility

A lack of public toilets means that certain groups feel anxious about leaving their home. Age Cymru and AgeUK has research findings citing the impact on older people's health – physical, social and mental – when they are unable to leave the house because they are fearful about not finding a public toilet. The Help the Aged paper "Nowhere to Go: Public provision in the UK" (2007), based on a survey of 1,000 older people to get their views on public toilet provision, noted that 12% of older people (1.2m) felt trapped in their own home; 13% (1.26m) do not go out more than once a week and 100,000 had never gone out. Their evidence is that lack of public toilets is a significant contributory factor in the isolation of older people. As people age, chronic health conditions emerge which often lead to increased urinary frequency. The draft Age UK report notes that the number of people aged over 60 will increase significantly over the next 25 years.

Carmarthenshire has an ageing population with over 40's accounting for 56% of the population and over 65's for 23%. This trend is set to continue with projections suggesting that increases in overall Carmarthenshire population to 2021 will be primarily in the 65+ age group.

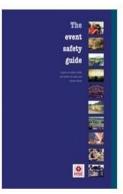
With an aging population we should carefully consider the large numbers of elderly citizens who find themselves locked out of our towns because of the lack of freely available public facilities. This social group has considerable spending power and has the time to choose their preferred location to visit. If provision is lacking in the County, then these individuals will travel to other destinations and spend their monies elsewhere. We must also consider that many will have medical conditions that might restrict their movements or can be a severe cause of distress if they are unable to relieve themselves within a limited timeframe.

#### **Portable Toilet Provision**



The HSE's event safety guide (Purple Guide) is a guide to health, safety and welfare at most outdoor events. This guide will enable our event organisers to understand the needs of others concerned with the event. Event organisers must ensure that adequate sanitary provision is made for the number of people expected to attend the event, and that consideration is given to location, access, construction, type of temporary facilities, lighting and signage. The floors, ramps and steps of

the units should be stable and offer a non-slip surface. Connecting pipe



work should be protected to avoid potential tripping hazards & physical damage. Portable toilets should be readily visible, well-lit internally; and clearly signed from all parts of the venue. The areas, and where appropriate, the individual units, should be adequately lit at all times of day. The Chartered Institute of Building Services recommends a minimum lighting level of 100 lux for general toilet areas (200 lux for wheelchair-accessible toilets). Regular maintenance and correct location/positioning are vital for these types of toilets.

Carmarthenshire has an active calendar of events and activities scheduled every year. Most events that need to be catered for are booked annually and often repeated annually. These types of events attract many visitors and tourists to the area. Most remain for several hours and will therefore require some level of toilet provision to be provided. It must be the event organiser that carries the responsibility for evaluating, ordering and siting all portable or fixed toilet provision on site. This must also include accessible units for any disabled visitors as well as additional facilities to cover any performers, security and ancillary staff.

The table below provides guidance on sanitation provision at a variety of event types and is based on practical experience. Consideration should also be given to the legal and safe disposal of effluent.

	Female Toilets	Male Toilets					
For events with a gate time of less than	1 per 100	1 per 500,					
6-hours duration opening		plus 1 urinal per 150					
For events with a gate opening time of 6 hours or		1 per 425,					
more, but with little or no alcohol or food served	1 per 85	plus 1 urinal per 125					
For events with a gate opening time of 6 hours or		1 per 400,					
more, with alcohol and food served in quantity	1 per 75	plus 1 urinal per 100					
For campsites at major events, swapping the	1 per 75	1 per 150,					

emphasis from urinal to	plus 1 urinal per 250
WCs for males	

#### Signage, Visitor Information and Communication

Promoting public access to toilets is not simply about increasing provision, it could also be about improving the signage and other information about what is available. This is important for local people and visitors alike.

A number of visitor information boards are currently provided by Carmarthenshire County Council in addition to other similar apparatus provided by some town and community councils. Consideration could therefore be given to review these existing information boards with a view to incorporate more detailed information on toilet locations.

Signage could potentially include information on direction, distance, address and type of facilities located at each point. Signage should also be used to indicate essential information or other points of interest to visitors.

#### THE WALES MAP – LLE GeoPortal



One of the commitments made during the passage of the Public Health (Wales) Act 2017 through the National Assembly for Wales in respect of local toilets strategies was to work to produce a national map of toilets. This map will be produced within existing Welsh Government mapping infrastructure via the Lle website. This provides a geo-portal which was developed in partnership between Welsh Government and Natural Resources Wales. Lle

serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment. Examples of data displayed on the online maps include Active Travel designated routes; air quality management areas; environment noise mapping; National Park and local authority boundaries; flood alert areas; habitat survey data and a range of other environmental information.

The website will generate all-Wales maps based on the datasets provided by local authorities which can be configured to focus on either the national picture, or on more local areas. The data included in the Lle map will be available as an open data service accessible to everyone.

The Welsh Government has not developed an app, as many people are unable to use a smartphone for a number of reasons. It is more appropriate to focus on ensuring the information is available online through a wide range of websites and via traditional offline methods. We believe that app development is best done by professional developers who will be able to access the data from the Lle website.

Requirements: Once local authorities have identified the toilets that will be publicised as available for use by the general public, local authorities are required to prepare a dataset to a given specification and make it available as open data on their website. The dataset will

consist of the location and specified characteristics of the identified toilets, and this data will be consumed by the Welsh Government system and joined to other LA datasets to produce the national dataset for the Lle map.

For data to be classed as open data it needs to be made available under an open licence. Within the Public Sector this can be achieved by publishing data under the Open Government Licence (OGL). As the data provided by local authorities is to be made available as open data, it will be available for reuse by third parties, either directly from the local authority's own website, or via the joined dataset behind the Lle map. This might include other online map services, app developers or commercial interests, as well as being available for reuse by other public sector organisations.

Carmarthenshire County Council has supplied full details of the location, facilities breakdown and postcodes of our publicly accessible toilet units to the Welsh Government and these locations will be uploaded and displayed on the GeoPortal. Both residents of and visitors to Wales should be able access this national mapping software to locate public toilets across the country.

The link to this site will also be available on our corporate website along with a complete map of our publicly available toilets <u>http://lle.gov.wales/home</u>.

#### NOTE:

All owners of toilets should be made aware the data gathered under this strategy will be made openly available. This is in line with the Welsh Government's commitment to open data which is outlined within the Welsh Government Open Data Plan.

#### Entry Control and Locking

Charging for toilets is, of course, a vexing issue being faced by many councils at the moment. With budget cuts coming in year on year, it has become even more important to consider raising revenue from all potential sources.

Most people questioned will confirm that they are happy to pay for clean and safe public toilets, and the generally accepted rate is currently between 20-50p. Charging is so commonplace now across the UK that visitors to most towns or cities will be generally happy to pay as long as the facilities are clean and well maintained. We currently have nine units that are controlled by a 20p pay to enter system and this could potentially be extended to some other units in future. These units can be accessed by those needing to use a RADAR key and this entry is FREE of charge.

**Contactless payment:** We are detecting a substantial interest and potentially significant uptake in this emerging technology. The future installation of card readers and the appropriate systems will probably be a natural progression for public toilets where charges apply.

#### **Entry Control**

The individual cubicle set up in the majority of our toilets means the only entry control point is the main door. Open - and anybody can walk in, shut - and nobody gains entry. In most instances a member of staff has to go around unlocking the toilets in the morning and then returning to repeat locking them up again in the evening.

There are a number of problems associated with this:

- Toilet opening/closing is subject to staff attendance and vulnerable to illness and holidays
- Often a time expensive process with the routine taking up to two hours morning/evening
- Environmental impact associated with the travelling between the toilets.

The Study Group could seek to rationalise this process where appropriate so that wherever possible, this is either managed locally or through possibly automating the opening/shutting process.

#### Changing Places Facility

The Changing Places campaign aims to increase the provision for people with individual and/or multiple disabilities who need special equipment and support from carers. The campaign is promoted by a consortium of organisations working to support the rights of disabled people. Thousands of people with profound and multiple learning disabilities

cannot use standard accessible toilets. They need support from one or two carers to use a toilet. Standard accessible toilets do not provide changing benches or hoists. Most are too small to accommodate more than one person. Providing these toilets in public places would make a dramatic difference to the lives of many people who desperately need these facilities.

Each Changing Places toilet provides:

- height adjustable adult-sized changing bench
- tracking hoist system, or mobile hoist if this is not possible.
- enough space to allow full accessibility
- adequate space for the disabled person and up to two carers
- centrally placed toilet with room either side for the carers
- screen/curtain to allow the disabled person and carer privacy.
- a safe and clean environment





- wide tear off paper roll to cover the bench
- large waste bin for disposable pads
- non-slip floor.

Carmarthenshire County Council will strive to ensure that proper consideration is given to incorporate Changing Places facilities within any appropriate future developments.

#### Mapping and Website upgrading

The toilet map shown below is taken directly from our corporate website and gives a broad indication of where public toilets can be located across the county. However, this mapping only shows those sites currently promoted as public toilets. The map does not specify the type of toilet or the facilities available. An upgraded version of this information would be helpful for residents and visitors to the county.



We should also consider the addition of new pins to show the locations of all participating members of the proposed Community Toilet Scheme, once recruited, verified and recorded. Additionally, some controls will need to be addressed as new developments and participating buildings appear across the county.

## Summary of Recommendations & Action Plan

Below we are attempting to set a series of initial steps and recommendations for progressing this strategy and developing Carmarthenshire's future toilet provision.

(1) Review of all current toilet facilities – position/mapping and opening times Carmarthenshire County Council has identified all currently available council owned and managed facilities in addition to town and community council ones and will include these sites in all future toilet mapping and website publicity. Officers will be using a data collection system to gather a wider range of information on these units. This information will feed into the national dataset for the Welsh Government's Lle mapping system. The public will be able to see and search the data as it appears on the Lle website, to see the whole of Wales or to look at particular areas such as Carmarthenshire.

(2) Identify and encourage other council facilities to become more publicly available Research / identify and approach all in-house facilities with the aim to include relevant and appropriate sites in future toilet mapping and website publicity. These sites could include any publicly accessible building where the individual location, access and circumstances allow such as libraries, information centres, sport & leisure centres and some council offices where appropriate. Community centres and other community buildings would need to be carefully considered and perhaps treated as a special case study. Many are used for children's activities and would therefore be subject to privacy and safety requirements to protect those at risk from any unwanted intrusion.

(3) Establish partnership links with public/private companies and organisations Actively encourage other significant organisations who are traditionally keen to achieve a higher foot-fall. Visitor numbers could be increased when these public buildings promote their in-house toilet facilities.

#### (4) A Community/Comfort/Partnership Toilet Scheme (CTS)

Investigate the opportunity to engage with local shop owners and other businesses trading across the county to develop a formal basis for the inception of a Community Toilet Scheme. This additional provision, as it grows, will undoubtedly be seen as a major step forward in addressing additional provision. Further information to be sought and accumulated for the purpose of assessing the viability of this step including allocation of funding to operate such a scheme.

#### (5) Portable Toilet provision

Where event organizers currently do not provide adequate toilet facilities they should be advised to do so in line with HSE guidelines. A link to the purple guide which contains suggested standards can be found at:

https://www.carmarthenshire.gov.wales/home/business/organising-events/eventorganisers-toolkit/licensing-for-events/#.XGQvmGa7Lcs The adequate provision of sanitary facilities at events may be reviewed by the Events Safety Advisory Group for Carmarthenshire which comprises members from the emergency services along with key Council departments.

#### (6) Changing Places toilets

Carmarthenshire currently has two Changing Places toilets, both privately run, to cope with any person with an extreme disability or who may require multiple carers. Over 1250 Changing Places facilities have been installed across the UK & Ireland with over forty units already installed in Wales. A socially inclusive and equal Wales needs to provide accessibility for all visitors and residents. Carmarthenshire County Council will strive to ensure that consideration is given to incorporate Changing Places facilities within appropriate future developments.

#### (7) Charging – helping to eradicate social misuse and vandalism

Paddle gates, turnstiles and single user units with coin operated locks are standard in many areas across the UK. Charges in many councils vary from 20p to 50p depending on the location & the volume of traffic visiting the toilet block. The majority of installations using any of these types of charging mechanisms are reporting considerable drops in congregation, loitering and misuse within these toilet areas. Incidents of anti-social behaviour also appear to be considerably reduced and the toilets are reported easier to keep clean and in a serviceable condition. Carmarthenshire County Council currently provides nine facilities which require a 20p entry charge. The majority of respondents to our public convenience consultation exercise said they would be happy to pay a small charge to be able to use a public toilet. Consideration could therefore be made for exploring the viability of introducing charges at some other facilities where appropriate.

#### (8) Improve Communication and Information on available Toilet Facilities

Feedback from the public convenience consultation suggests that current levels of signage could be improved. On investigation we have ascertained that some local authorities, particularly those with an active partnership toilet scheme, have installed street boards containing more information on the location of key sites, addresses and more significantly postcodes for the mobile, SatNav or computer user. The installation of multi-use information boards giving tourism and event information alongside public notices and potential advertising should heighten public visitor awareness. Consideration could therefore be given to the future development and installation of street boards at appropriate locations within the county.

#### (9) Welsh Government Mapping Application (LLE)

Updated information will be collated and passed on to the Welsh Government - as per the Wales Visitor map. Considerable care and attention will be required to make sure that all available sites are entered and recorded for use by visitors and tourists on both electronic mobile hand-held devices; as well as SatNav units, to easily locate toilets within the country. As our proposed Community Toilet Scheme and business partnership projects expand then we should consider the possibility of broadening this mapping service out to include these additional partners.

#### (10) Use of Planning

We will as part of the preparation of the Revised Local Development Plan 2018 -2033 consider the opportunities for integrating guidance and policy requirements in respect of the provision of public facilities. The content of guidance will inform the preparation of the LDP and the outcomes of its preparatory process will be reflected in future versions of this strategy. Where appropriate, matters around the incorporation and provision of toilet provision within development will be considered in accordance with planning policy and national planning guidance. It is noted that the Revised LDP is scheduled for adoption in November/December 2021.

#### Appendix (A) attached below

These sheets give a full facilities breakdown of the current provision across the county. They give clear guidance on male, female and unisex provision as well as details on accessible units & baby-changing facilities.

#### APPENDIX A Carmarthenshire current public toilet provision

		Facilit	ies avai	lable												
Name of	Postcode				Baby	change				Disab	ed					Changing place
Location										Open	access		Locke	d (RADA	AR)	(incorporating
Ammanford,	CA10.25	Male only	Female only	Unisex toilet	male toilet	female toilet	unisex toilet	Separate to toilets	Separate to toilets disabled toilet	male only	female only	unisex	male only	female only	unisex	adult changing facilities, hoists etc. for people with profound disabilities and their carers)
Ammanford, Carregamman Car Park	SA18 3EL	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No
Carmarthen, John Street Car Park	SA31 1QT	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No
Carmarthen, St. Peter's Car Park	SA31 1LN	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No
Laugharne adjacent to Castle	SA33 4SP	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No
Llandeilo Car Park	SA19 6HL	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No

		Facilit	ies avai	lable												
Name of	Postcode				Baby	change				Disabl	ed		-			Changing places
Location										Open	access	1	Locke	d (RADA	R)	(incorporating
	doverv	Male only	Female only	Unisex toilet	male toilet	female toilet	unisex toilet	Separate to toilets	Separate to toilets disabled toilet	male only	female only	unisex	male only	female only	unisex	adult changing facilities, hoists etc. for people with profound disabilities and their carers)
Llandovery Car Park	SA20 0AB	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No
Llanelli adjacent to Town Hall	SA15 3AH	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No
Llanelli East Gate Bus Station	SA15 1SG	No	No	Yes	Yes	No	No	No	Yes	No	No	No	No	No	Yes	No
St. Clears Car Park	SA33 4AG	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No
Abergorlech Village Centre	SA32 7SN	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No
Alltwalis Village Centre	SA32 7EB	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	No	Yes	No
Ammanford Central Park	SA18 3BE	Yes	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No

		Facilit	ies avai	lable												
Name of	Postcode				Baby	change				Disab			Changing places			
Location										Open	access	1	Locke	d (RADA	AR)	(incorporating
		Male only	Female only	Unisex toilet	male toilet	female toilet	unisex toilet	Separate to toilets	disabled toilet	male only	female only	unisex	male only	female only	unisex	adult changing facilities, hoists etc. for people with profound disabilities and their carers)
Ammanford Coop Car Park	SA18 1DL	Yes	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No
Brechfa Village Centre	SA32 7RA	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	No	Yes	No
Burry Port Railway Station	SA16 0EP	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No
Cenarth	SA38 9JL	Yes	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No
Cynwyl Elfed	SA33 6TU	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	No	Yes	No
Ferryside Beach Entrance	SA17 5TD	Yes	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No
Glanamman Cwmamman Square	SA18 1DZ	No	No	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No
Gorslas adjacent to Park	SA14 7HP	Yes	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No

		Facilit	ies avai	lable														
Name of	Postcode				Baby	change		1	1	Disabl						Changing places		
Location										Open	access	1	Locke	d (RADA	AR)	(incorporating		
	SA17 4UU		SA17 4UU	Male only	Female only	Unisex toilet	male toilet	female toilet	female toilet unisex toilet	Separate to toilets	disabled toilet	male only	female only	unisex	male only	female only	unisex	adult changing facilities, hoists etc. for people with profound disabilities and their carers)
Kidwelly Town Centre	SA17 4UU	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No		
Llanboidy Village Centre	SA34 OEL	Yes	Yes	No	Yes	Yes	No	No	Yes	No	No	No	No	No	Yes	No		
Llanddowror Tenby Road	SA33 4HJ	No	No	Yes	No	No	No	No	Yes	No	No	No	No	No	Yes	No		
Llanstephan Beach Car Park	SA33 5JX	Yes	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No		
Llanybydder Square	SA40 9TX	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	No	Yes	No		
Meinciau adjacent to Community Hall	SA17 5LE	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	No	Yes	No		
Newcastle Emlyn near Mart	SA38 9AD	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	No	Yes	No		

		Facilit	ies avai	lable												
Name of	Postcode				Baby	change	1	1	1	Disab	ed		1			Changing places
Location										Open	access	1	Locke	d (RADA	AR)	(incorporating
		Aale only       Male only       Male only       Imale toilet       Male only	unisex toilet	Separate to toilets	a c	male only	female only	unisex	male only	female only	unisex	adult changing facilities, hoists etc. for people with profound disabilities and their carers)				
Newcastle Emlyn Market Hall	SA38 9AS	No	No	Yes	No	No	No	No	No	No	No	Yes	No	No	No	No
Parry Thomas Centre Pendine Beach	SA33 4NY	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No
Whitland West Street	SA34 OAB	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	No	Yes	No
Park Howard Llanelli	SA15 3JQ	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No
Llanelli Market	SA15 1YH	Yes	Yes	No	No	No	No	Yes	No	No	No	No	No	No	Yes	No
Carmarthen Market	SA31 1QY	Yes	Yes	No	No	No	No	No	Yes	No	No	Yes	No	No	No	No
Bristol House A48	SA4 OFS	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No
Meidrim Car Park	SA33 5QL	Yes	Yes	No	Yes	Yes	No	No	Yes	No	No	No	No	No	Yes	No

		Facilit	ies avai	lable														
Name of	Postcode				Baby o	change				Disabl	ed					Changing places		
Location										Open	access		Locke	ocked (RADAR)		ocked (RADAR)		(incorporating
		Male only	Female only	Unisex toilet	male toilet	female toilet	unisex toilet	Separate to toilets	disabled toilet	male only	female only	unisex	male only	female only	unisex	adult changing facilities, hoists etc. for people with profound disabilities and their carers)		
Llandybie	SA18 3HY	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No		
Penygroes	SA14 7RP	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	Yes	No		
Ffarmers	SA19 8LQ	Yes	Yes	No	No	No	No	No	No	No	No	Yes	No	No	No	No		
Ffaldybrenin	SA19 8QR	Yes	Yes	No	No	No	No	No	No	No	No	Yes	No	No	No	No		
Llansawel	SA19 7JF	Yes	Yes	No	No	No	No	No	Yes	No	No	Yes	No	No	No	No		

#### **Public Toilets – Standards and Provision**

This section provides a selective commentary on the main regulations and policies relating to public toilet provision and standards.

#### Public Health Act 1936

The provision and maintenance of toilets in public places is at the discretion of local authorities who have a power, under section 87 of the Public Health Act 1936 ("PHA 1936"), to provide public conveniences, but no duty to do so. It is therefore for local authorities to decide whether they should provide public toilets and, if so, how many. In doing this, each local authority must balance competing local demands for a broad range of public services against the need to avoid excessive burdens on local taxpayers.

#### BS 6465 - Parts 1-4: Sanitary installations

#### Code of practice for the provision of public toilets

Building regulations set mandatory scales for toilet provision in dwellings only; workplaces are covered by the Health and Safety (Workplace) Regulations. The updated British Standard is a Code of Practice for the design of sanitary installations and scales of provision of sanitary and associated appliances. It gives recommendations on the design of sanitary facilities and the recommended scale of provision of sanitary and associated appliances in new buildings and those undergoing major refurbishment. This standard applies to private dwellings, residential and nursing homes for older people, workplaces, shops and shopping malls, petrol stations, schools, theatres, cinemas, exhibition centres, libraries, museums, hotels, restaurants, licensed pubs, nightclubs, sports facilities, public toilets and temporary toilets.

#### Disability Discrimination Act (DDA) 2005 The Equality Act 2010

# From 1 October 2010, the Equality Act replaced most of the Disability Discrimination Act (DDA). However, the Disability Equality Duty in the DDA continues to apply. Part 3 of the Disability Discrimination Act 1995, as amended, includes provisions covering access to services and facilities. It requires service providers (including public authorities) to make reasonable adjustments to allow disabled people to access those services which it would otherwise be impossible or unreasonably difficult to access. This might mean, for example, changing a policy or procedure (such as amending a "no animals" policy to allow an assistance dog to accompany a disabled person onto the premises), providing an auxiliary aid (such as information on opening times or charges in large print or Braille), or making adjustments to abuilding where steps exist, wider doorways and larger cubicles for access by wheelchair users).

**British Standard: BS8300** 

However, the DDA only requires service providers to do what is "reasonable" in all the circumstances, including the cost of the adjustment and its practicability. No public service should have to close down just because it is not "reasonable" to make adjustments so that it is accessible to disabled people. The extension of the DDA 1995 by the Disability Discrimination Act 2005 gave all public authorities duties to promote equality of opportunity for disabled people. The Disability Duty, which came into force on 4 December 2006, requires public authorities to consider the needs of all sectors of the society they serve, and how they make sure they are delivering services, and carrying out functions, in a way that promotes greater equality for disabled people. In addition, the preparation of Disability

Equality Schemes enables local authorities to consider what action they may have to take to improve access to toilet facilities for disabled people.

#### The Highways Act 1961

Enables Highway Authorities to consent to the siting of public conveniences on the highway. However, there are no regulations requiring train, or other transport, operators to provide toilets for their passengers.

#### The Public Lavatories (Turnstiles) Act 1963

This Act prohibited the use of turnstiles in any part of a public lavatory controlled or managed by a local authority (this does not apply to other providers of toilet facilities). This provision responded to public concern about the safety of turnstiles and the access problems they cause for disabled people, people with luggage or pushchairs, pregnant women etc. The Sexual Discrimination Act 1975 was replaced by the Equality Act 2010 and thus repealed the (Turnstiles) Act 1963. Local authorities will now be allowed to fix or install paddle gates or turnstiles to council premises.

#### Anti-Social Behaviour Act 2003

Powers contained in the Anti-Social Behaviour Act 2003 allow the Police, Local Authority Officers, and Community Support Officers to issue a Fixed Penalty Notice (FPN) to anyone caught graffiting or vandalising property such as public toilets.

#### The Health and Safety Executive's Purple Guide

Covers health, safety and welfare at music, festivals and similar larger events. This includes a complete section giving advice on the provision of sanitary facilities.

#### The Rail Vehicle Accessibility Regulations 1998 (as amended)

Sets out minimum access standards for toilets when they are installed on trains and require, where they are fitted, that cubicles closest to the wheelchair space(s) be accessible to a wheelchair user. Of twenty different train designs introduced since the regulations came into force, all but one included on-board toilets.

#### Acknowledgements

The following represent a selection of the resources that have proved useful in compiling this strategy. There is a large array of material available via the internet, and that material is expanding all the time, particularly as local authorities highlight the positive steps that they are taking to improve public access to toilets.

#### Legislation, general and technical guidance on public toilets

Public Health Act 1936 www.legislation.gov.uk British Standards – Sanitary Installations (BS6465-Part 1-4) Public Conveniences: Policy, Planning, Provision, April 2001 Inclusive Mobility – access to pedestrian and transport infrastructure Department for Transport Knowledge Bank on Toilets ENCAMS

#### **General Studies and Reviews**

An urgent need – London's public toilets - London Assembly Health & Public Services Committee. Who Put the P in Policy? design of the accessible toilet Bichard J, Hanson J and Greed C Taking stock: an overview of toilet provision and standards, 2005 Clara Greed Improving Public Access to Better Quality Toilets A Strategic Guide Department of Communities and Local Government Inclusive Urban Design: Public Toilets, 2003 Dr Clara Greed The Accessible Toilet Resource, 2007 Hanson J, Bichard J and Greed C Independence & healthy living – the need for accessible loos Prof J Hanson LA Reports Draft Strategy for the provision of public conveniences in Cambridge Public Conveniences – Review of charging policy and modernisation of the facilities at Chesterton Road and Cherry Hinton Hall Cambridge City Council A Public Toilet Strategy for Doncaster, July 2003 Doncaster Metropolitan Borough Council

#### **Other Reports and Reviews**

Public Toilet Survey, Sept 2006 Bristol Women's Forum Health impact assessment – Draft Older People's Strategy, Taking control of incontinence, 2007 Nowhere to go – public toilet provision in the UK, 2007 Improving Public Access to Better Quality Toilets www.bccforums.org.uk Clara Fletcher April 2007 Help the Aged Help the Aged Westminster

Council outlines improvement programme for public toilet facilities, July 2006 New city centre facility officially opened, June 2008 Wolverhampton City Council

**Useful Web Gateways** 

National Consumer Council:	www.ncc.org.uk
British Toilet Association:	www.btaloos.co.uk
Loo of the Year awards:	www.loo.co.uk
Changing Places:	www.changing-places.org
ENCAMS:	www.encams.org
Chartered Institution of Wastes Management:	www.ciwm.co.uk
Age Cymru:	www.ageuk.org.uk/cymru
Department for Transport:	www.dft.gov.uk/transportforyou/access
World Toilet Organisation:	www.worldtoilet.org

Grateful thanks are also extended to all the officers and management of the council and private organisations who helped in the comparative council study and gave freely of their time, knowledge and expertise to assist in its completion. Special thanks also to the members of the British Cleaning Council whose invaluable input and debate helped to shape and create this document.

Raymond Boyd Martin Managing Director, The British Toilet Association Enterprise House, 2-4 Balloo Avenue, Bangor, Co.Down Northern Ireland BT19 7QT Tel/Fax: 02891 477397 Mobile No: 07739 950784 E-Mail: raymond@britloos.co.uk