



Cardiff Council
Public Convenience
Strategy

2016

Background

In March 2016 Welsh Government failed to agree the adoption of the Public Health (Wales) Bill. Notwithstanding, the Council has a continued ethical and operational commitment towards public convenience provision in the City.

As such the Council, in line with the recommendations of the aforementioned un-adopted Bill, intends to set out a Strategy to address the toileting needs of the community; improving both the standards and availability of public conveniences under the Local Authority's control. This strategy also includes details of partnership approaches, best practice adoption and use of new technologies and communications that it is envisaged will lead to an increased awareness of the locations of Public Conveniences within the city.

This Strategy is the first step to delivering this commitment. It sets out recommendations that should be considered before a timetable for plans can be established, in order to ensure that the City of Cardiff's aspirations provide good quality public convenience facilities for all residents and visitors.

Introduction

Historically, the management of public conveniences has been spilt across four service areas within the Authority:

- i) Street Cleansing, managing the city centre facilities,
- ii) Parks managing the facilities in Parks
- iii) Bereavement Services managing toilets in cemeteries, and
- iv) The Harbour Authority manages for toilets in the Bay.

This strategy provides an overarching directional strategy for all Council in order to ensure consistent service delivery.

The provision of public conveniences provides infrastructure necessary to facilitate the enjoyment of the city by visitors and residents. They can make a significant impact upon the comfort of individuals and families who visit public spaces in the city and their perception of the city as a desirable place to visit.

Although the proposed Welsh Government, Public Health (Wales) Bill, Part 6 focuses on 'Provision of Toilets', currently a local authority provision of public conveniences is not a statutory duty. Increasingly Council faces challenges to maintain standards of toilet provision, maintenance and cleaning due to limited funding and pressure on resources and varying approaches across the service areas.

The 2007, Public Conveniences survey found 75% of respondents found public conveniences poor or very poor across Cardiff and in the city centre 48% thought the facilities were poor or very poor.

Changing demographics, human activity in the city and the regulatory provision of these facilities in private businesses (i.e. hotels and shopping precincts, St Davids Shopping Centre) has impacted on the demand for public conveniences. As such many modern toilet facilities are demanded by patrons of the private sector; who in meeting customers' needs, expectations and related legislation now provide high toileting that is of a high standards of cleanliness, accessibility and safety, ensuring within their licensing that hygiene and maintenance are achieved.

As such; the historic role of Local Authorities providing Toileting has become less of an imperative. Local authorities now mainly provide Toileting facilities where they create demand as service providers themselves e.g. libraries, Community hubs and supported facilities.

This reduction in specific dedicated Council Toilet provision has over the last ten to fifteen years been further impacted in Cardiff by major infrastructure development and investment and the regeneration of many locations. By way of example many private retailers now provide public conveniences as part of their developments under building regulations Part M e.g. St David's shopping centre provides high quality separate toilet facilities, incorporating WCs, Baby and adult changing facilities and fully accessible toileting available over extended opening hours in excess of 18 hours a day and capable of satisfying increased footfall. This type of quality provision is designed to satisfy the demands of wide ranging demographic of customers including those with a range of disabilities, parents with children and the older community.

Understandably Cardiff is not alone in the growing pressure on public toilet provision, and in an attempt to address this the government produced in 2008 a document 'Improving Public Access to Better Quality Toilets – A Strategic Guide' providing a blueprint for local public toilet provision. Furthermore, the proposed Welsh Government; Public Health (Wales) Bill, expresses under Part 6 'Provision of Toilets' a number of duties that Local authorities must account for regarding WC provision. (Appendix 3: Relevant Legislation).

However, as said increasing pressures on local authorities and the greater potential of improved diversity and quality of services held in the private sector delivery of Toileting, must raise the question; is local authority best placed to provide all local public conveniences? Is there a shared benefit to a greater partnership working approach?

2. Aims & Objectives

The aim of this strategy is to meet the needs of residents and visitors to the city by reviewing and accounting for the quality and quantity of public conveniences in Cardiff, their usage, maintenance, and opening hours.

Broadly the strategy seeks to achieve;

- A unified holistic council approach to a strategy for all the councils Public Conveniences; Implemented and supported corporately.

- Unified approach to high quality WC and sanitary provision across Council.
- Generation of guide lines for the integration of public accessible facilities into any new council building development where practicable; using Part M Building regs as a minimum requirement / standard.
- Provide a selection of clean, safe, accessible and high standard WCs, with a 'home from home' experience when using the Council and partners facilities.
- Provision of public conveniences by Council and partners to support activities where people are encouraged to stay for long periods in excess of three hours.
- Provision of public conveniences to support events including the consumption of food and beverages: ideally supported in partnership by the private sector and retailers that benefit from customers comfort.

Considerations and Recommendations		
Consideration	Issue / opportunity	Recommendation
Provision	<p>All of the below Options have been evaluated in accordance with best practice. However Option 4 - Expand the offering - working in partnership; has been identified as the preferred option.</p> <p>Option 1 - Close all public conveniences Although the provision of a public convenience service is not currently statutory, this Council recognises the importance and essential need to provide this service. Cardiff Council is committed to provide a high quality public convenience service council-wide; closure of all public conveniences is a not an option as the remaining toilet facilities provide valuable provision and many have integrated uses e.g. with changing facilities.</p> <p>Option 2 Status Quo - Retention of the existing service The retention of public conveniences currently available, focusing on consistent standards of quality that can be sustained.</p> <p>Option 3 – Community Tax Levi Improve standards and availability by securing community tax levy to provide new facilities.</p> <p>Option 4 - Expand the offering - working in partnership In accordance with the Public Health (wales) Bill. The Council will focus on providing better, high quality, uniform standards for the existing facilities, but also expanding and adding to provision, through the use of new developments of council buildings / incorporating new offerings within a unified strategy to provision</p> <p>In accordance with the Equalities Act 2010 the Council will also aim to cater for elderly users and those with special medical conditions, paying attention to the distribution of public conveniences and the frequency, distance between them.</p>	<p>Currently Option 4 as outlined in the previous column and below is recommended.</p> <p><i>Option 4 - Expand the offering - working in partnership In accordance with the Public Health (wales) Bill. The Council will focus on providing better, high quality, uniform standards for the existing facilities, but also expanding and adding to provision, through the use of new developments of council buildings / incorporating new offerings within a unified strategy to provision</i></p> <p>The following points briefly outline how this will broadly be implemented.</p> <ol style="list-style-type: none"> 1. Offering and Quality Improvements. Within this document a raft of recommendations will suggest towards the implementation of Option 4 - Expand the offering - working in partnership In accordance with the Public Health (wales) Bill. The Council will focus on providing better, high quality, uniform standards for the existing facilities, but also expanding and adding to provision, through the use of new developments of council buildings / incorporating new offerings within a unified strategy to provision 2. Low use Retention. It is unlikely that public conveniences with low levels of usage will be retained by council. 3. Strategy integration. Use of strategic and spatial plans to ensure a better mix of provision, adopting a range of approaches to meet needs at different times of the day, and to improve poor quality facilities that attract criminal activity and bring down the reputation of neighbourhoods. 4. Improved communications to the public via new media will be a key driver for change and information relay regarding provision and quality. By way of example in the high footfall areas of Cardiff (bay & city centre) there are 100's of toilets. Council will work with retailers and food outlets to signpost their facilities better in partnership. 5. Community Toilet scheme evolution. The Community Toilet Scheme funding will support initiatives as well as possible corporate sponsorship and promotion to encourage the private sector to open up their facilities to more of the public.
Legal Position	<p>Whilst the Council does not currently have a statutory duty to provide public conveniences independently; the upcoming Welsh Government; Public Health (Wales) Bill, expresses under Part 6 'Provision of Toilets' a number of duties that Local authorities must account for regarding WC provision. (Please see Appendix 3: Relevant Legislation).</p> <p>Councils Vision the 7 shared outcomes established as a requirement for Cardiff to become a liveable capital city also prescribe towards the provision of Wcs within the City; a level of expectation based on Cardiff's growing requirements, both in population and demand as an ever expanding Capital City; naturally creates demand for a high level of expectation.</p>	<ol style="list-style-type: none"> 1. In March 2016 Welsh Government failed to agree the adoption of the Public Health (Wales) Bill. Notwithstanding, Under the Public Health (Wales) Bill council is required to develop a strategy for Toilet provision, independently and or in partnership with the public sector. It is recommended that all elements of the Bill be adopted regardless of its adoption / statute. 2. Statutory planning. Council to improve its statutory opportunity, through planning and Building Control to ensure that planning applications comply with Part M building regulations. Providing high quality accessible WCs, Baby changing and adult changing opportunities as services may demand. 3. Illustration of compliancy with the Equalities Act 2010 regarding the availability of WCs and the removal of barriers to access, in order to improve social opportunities.

	<p>The Equalities Act 2010 would consider the provision of Toileting in the community as the removal of barriers to access and inclusion. As such a full equality impact assessment and accompanying engagement will be conducted in order to establish the best options for WC provision in Cardiff.</p>	<p>4. In accordance with the duties as expressed within the Equalities Act 2010; a full equality impact assessment will be conducted using community engagement as a vehicle for identifying need and gaps.</p>
Council Position	<p>Currently the Councils public conveniences are controlled through in-house resources and funding under the City Operations Directorate. Although there is now 1 directorate an inconsistent approach in provision, maintenance and standards is evident given that each of the now combined section brings their own approach.</p> <p>Upon the completion of the planned closures of the APC; Council will have no standalone facilities; with the remaining stock of public conveniences being predominately linked to facilities with joint purpose or within existing buildings.</p> <p>It is unlikely that Council will commit to providing any newly construction dedicated standalone WC facilities on an independent basis. The capital investment costs to secure and build new facilities can prove to be a barrier if the council were to consider new facilities, by example the completed Roath Park project cost excess of £100,000 in 2013.</p> <p>It is proposed that by bringing the conveniences for the whole of council under one approach, it will be possible to make efficiencies by one service area overseeing all public conveniences and the adoption of set standards, resources and budgets can be maximised.</p> <p>From 1st April 2015 all standalone toilet facilities provided by the Council fall under the directorate of City Operations.</p> <p>Therefore, this directorate is best placed to take forwards the actions from this strategy to ensure standard approaches and economies of scale.</p>	<ol style="list-style-type: none"> 1. Unified Approach. Led by City Operation, a unified approach to high quality WC and Toileting provision across the city should be implemented in partnership with other directorates e.g. communities. Using existing and growing provision (e.g. community hubs, libraries) based within community facilities would satisfy upcoming Bills and gaps in service provision / availability, augmenting services based within City Operations responsibility. 2. Targeting provision. Locations affected by the Closures should be targeted to identify alternative facilities or provision within a close distance. The Community Toilet Scheme funding will support initiatives as well as possible corporate sponsorship and promotion to encourage the private sector to open up their facilities to more of the public to replace the gap created through closure / removal. 3. Marketing. Review of community toilet scheme responsibilities and current provision needs to be conducted. City Operations through a newly established strategy to initiate corporate marketing of WC provision for residents, tourism, and visitors 2015/16, via new media and communications. 4. Working with partners, the council would propose greater partnership working and sharing of resources in order to publicise, operate and utilise all available facilities; this providing an economic benefit to all parties.
Revised opening hours	<p>Antisocial behaviour and operational management of closing times.</p> <p>On a location by location basis seasonal opening and closing hours for public conveniences can be introduced for all facilities, this can be remotely conducted through automatic time locks being installed.</p> <p>Regulation of closing hours and automated locking should mitigate against misuse and abuse of the facilities and thereby improve quality standards, in addition to matching the demands of the public.</p> <p>Many of the parks facilities already have seasonal hours to match the sporting activities and parks usage.</p> <p>The hours the facilities are accessible can have an impact on mis-use and anti-</p>	<ol style="list-style-type: none"> 1. Assessment of opening times. Continue standard opening times – further to assessment. Review on a facility by facility and customer usage basis to find the optimum opening periods.

	social behaviour. Be reviewing the time incidents occur a pattern of opening hours could be improved.	
Seasonal opening hours	<p>Seasonal opening and closing hours for public conveniences can be introduced for all standalone facilities.</p> <p>Regulation of closing hours and automated locking should mitigate against misuse and abuse of the facilities and thereby improve quality standards, in addition to matching the demands of the public.</p> <p>Many of the parks facilities already have seasonal hours to match the sporting activities and parks usage.</p> <p>The hours the facilities are accessible can have an impact on mis-use and anti-social behaviour..</p>	<ol style="list-style-type: none"> 1. Fitment of automatic time locks to all standalone facilities to be installed. 2. Review incident rates so establish appropriate closure times to reduce anti social behaviour / occurrence. 3. Promote and communicate closure times to communities using such locations. Promote changes through new media.
Improve the offer / availability / use of existing Council facilities	<p>One way to increase public convenience facilities is to make Council buildings toilet facilities accessible to the public. It is recognised that toilets provided in certain Council offices can be made accessible to public use. Subject to consultation being carried out and accessibility being improved at certain sites, additional toilet facilities Council-wide will become accessible.</p>	<ol style="list-style-type: none"> 1. Mapping of existing provision. Conduct a mapping exercise of existing provision within the Cardiff Council offering. 2. Expand the Offering. Improve / expand the offering through using locations such as community hubs, which may be identified as potentially filling gaps in provision currently apparent and due to closures e.g. APC. 3. Council properties. Identify all Council properties and examine their offering for quality, range and suitability/ publicise 4. Use all Council buildings such as City Hall, New library Cardiff Castle, New theatre, St Davids Hall. 5. Future Council Development. Any future council building development or regeneration considers the provision of publically accessible toilet facilities as part of their design and compliancy.
Community Toilet Scheme	<p>The Welsh Government launched the Community Toilet scheme (CTS) in 2007.</p> <p>Background - The Welsh Government funding granted to Cardiff Council is currently £3000 a year, to facilitate grants for private enterprises to open up their toilets facilities to the general public. To date take up of scheme has been very poor. Fourteen signed up in 2012, to date two have left the scheme, but a further four have joined the scheme bring the total to sixteen. Other premises have expressed the lack of interest down to the increased demands on their facilities and possible mis-use. A lack of awareness of the scheme could also be a reason for the low registration of the grants.</p> <p>To improve the historical position in 2010/11 the council provided an additional £20,000 budget to “top-up” the CTS grants, so making it more attractive to businesses. The aim is to achieve an increased number of business and toilet providers in the high foot fall areas of the City.</p> <p>Currently uptake is low and needs promotion although currently promoted by City Centre management and the corporate communications team.</p>	<ol style="list-style-type: none"> 1. Partnership Offering / Provision. The Council will benefit by working in partnership to encourage a wide range of premises to make their facilities available to the wider public. (Currently there are over 100 toilet facilities provided by the private sector in the city centre and bay area). 2. Bus and Taxi facilities will need to be utilised more efficiently. This includes provision in the new Central square Transport Hub. This will benefit the night time as well as day-time economy. 3. Partnership Incentives. Explore the use of partnership opportunities, incentivising through a small fee being received for each new facility registered:- <ul style="list-style-type: none"> • 3rd sector promotion • Keep Wales Tidy • Chambers of Commerce • Hoteliers association

<p>Night Time Economy</p>	<p>The high concentration of pubs and clubs within the city centre and Cardiff bay generate several night time local environmental quality concerns, including urination. On the weekends and evenings there is a massive influx of people visit the pubs and clubs of the city. For special events, there can be an additional 250,000 people visiting the centre in the day and but also they remain for the evenings.</p> <p>Some Authorities turn to the installation of pop up style urinals, butterfly style urinals, wee-lie bins and temporary pissoirs located in key areas.</p> <p>Some of these mobile facilities have also been trialled in recent years in the city centre in St Marys Street and Greyfriars Road areas as part of the Operation Mistletoe campaign in the lead up to Christmas. Such temporary facilities are relatively expensive to provide and maintain and do not enhance the day time street scene that Cardiff has worked hard to achieve. In several cities where the temporary facilities were provided they attracted negative reactions from daytime visitors and shoppers. The most appropriate solution for the night time economy could be mobile weekend toilet units that are only provided at specific times and days, yet as stated above, such solutions prove costly to administer. Whilst this may not completely eradicate the problem of street urination, it has been suggested by the BTA, the Police and Westminster City Council that it would go a long way to making the city centre a more hygienic and welcoming place to frequent during the evening.</p> <p>It should be noted that such facilities have to service both sexes and if unsupervised can attract a high risk for the users and the operators through mis-use, anti-social behaviour and the possibility of attack or incident. Alternatively, more open urinals can reduce anti-social behaviour but provide less privacy for users and passers-by.</p> <p>Many cities, like Swansea and Westminster City already uses mobile weekend toilet units to help tackle the late night urination problem and linked these with education campaigns “don’t spoil it for everyone” and “rank” aimed at taxi drivers. Towns like Watford have built in under ground urinals that ‘pop’ out the ground at night to provide services for the night time economy and then return to an underground storage area in the morning, such facilities require extensive infrastructure and maintenance and is unlikely to be suitable for Cardiff city centre due to the extensive underground network of utilities in the city centre.</p> <p>Other authorities place their resources into street washing as they feel the problem cannot be tackled by placing toilets in one local. In Cardiff, historically, with the exception of the temporary facilities provided as part of the seasonal Operation Mistletoe, the emphasis has been on dealing with the effect of urination. Popular places used by the night time revellers include Blue Star Lane, The Golate, Crockerherbtown Lane, Millicent Street (section by</p>	<p>Finding a solution to the lack of night time toilet provision and the possible inebriated state of some individuals the answers are not always easy.</p> <ol style="list-style-type: none"> 1. Historic treatment. It is recommended that the Historic way that this issue is tackled is continued. With the exception of the temporary facilities provided as part of the seasonal Operation Mistletoe, the emphasis is to deal with the effect of urination e.g. Blue Star Lane, The Golate, Crockerherbtown Lane, Millicent Street (section by Tesco’s), telephone boxes and doorways in general. 2. New Technology. It is recommended that in instances where ‘Hot spots’ occur new technologies are adopted such as anti pee paints. https://www.youtube.com/watch?v=SzXHgANCnF4 http://www.mirror.co.uk/usvsth3m/residents-german-city-getting-revenge-5283159 This combined with a signage and communication strategy may reduce the need for priority washing by the City Centre Street Cleansing Teams. At the current time, priority privately owned areas (e.g. doorways) are washed in addition to the affected adopted highway areas. Due to financial pressures this will be reviewed going forward. 3. Business contribution. Furthermore this could be assisted by business making a contribution towards the management of the issue management of this issue, purchase pf materials / communications. 4. Business Responsibility. Additionally it is recommended that businesses should be encouraged to block off their doorways (e.g. installing pull-down shutters for use at night); businesses joining together to create a Business Improvement District (BID) with a portion of the generated funding being used for night time toilets, or the Council imposing a night time levy (e.g. as operated by Newcastle Council) on businesses that operate at night, again with a portion of the generated funds being used for night time toilets. 5. Business Feedback / cases. Ultimately further feedback and business case are to be obtained and explored from the current temporary night time provision to determine if providing facilities in strategic locations of the city centre and bay is more cost effective than street washing. 6. The use of pop up ‘pissoirs’ will be investigated in hotspots such as St Mary Street. This in accordance with previous scrutiny investigation into the subject of the night time economy.
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	<p>Tesco’s), telephone boxes and doorways in general. Hot spots are washed on a priority basis early morning by the City Centre Street Cleansing Teams. At the current time, priority privately owned areas (e.g. doorways) are washed in addition to the affected adopted highway areas. However, in conjunction with the unprecedented squeeze on public finances, this will be reviewed going forward.</p> <p>There are options for businesses to assist in, or make a contribution to, the management of this issue. These include: businesses blocking off their doorways (e.g. installing pull-down shutters for use at night); businesses joining together to create a Business Improvement District (BID) with a portion of the generated funding being used for night time toilets, or the Council imposing a night time levy (e.g. as operated by Newcastle Council) on businesses that operate at night, again with a portion of the generated funds being used for night time toilets.</p>	
<p>Access and Inclusion</p>	<p>All the provided facilities must comply with the Disability Discrimination Act (DDA) Part M requirements of the regulations and guidance exists to support the authority in complying. The facilities the council provides must be accessible for all residents and visitors to Cardiff.</p>	<ol style="list-style-type: none"> 1. Access Audits. In addition to an equalities impact assessment a full access audit of all locations currently within the Community Toilet scheme (CTS), will be conducted to establish suitability and compliancy. 2. Location Audit is conducted to establish gaps in provision, particularly associated to the removal of the APCs. This will inform an action plan. 3. Community participation and partnership working will facilitate this activity at minimal costs – costs to be established. 4. Ensuring that Changing Places Specification WCs are considered for installing in all Cardiff Council properties, but in particular those having a public function e.g. Hubs, shared facilities, schools and Parks / Leisure. Within this consideration the business case should allow for future proofing e.g. installing appropriate drainage and tanking if not hoists and sanitary ware.
<p>Cleanliness, Standards & Maintenance</p>	<p>A review of the current varying standards and maintenance regimes adopted across the Council is required. If Cardiff wishes to raise the current standards and visitor experience of toilets then one minimum standard for cleanliness, maintenance and fixture provision must be adopted by all the Councils facilities. The strategy requires that all public conveniences be brought up to and maintained to the same standard.</p> <p>An acceptable standard of cleanliness has been defined in terms of the outcome rather than the input. These standards should relate too;</p> <p>Cleanliness standard</p> <ul style="list-style-type: none"> • Clean, safe and dry floor • Loo roll – provisions of and quality of paper • Provision and emptying of bins <p>Maintenance standard</p> <ul style="list-style-type: none"> • Inspections levels • Speed and quality of repairs 	<ol style="list-style-type: none"> 1. Defined cleanliness standard for Cardiff council public conveniences in accordance with the Public Health (Wales) Bill and accompanying guidance. This should be used to establish / provide uniformity and allow for efficiencies in cleansing, procurement and maintenance. 2. Compliancy. Ensure that facilities are compliant to Part M Building Regulations as a minimum standard 3. In accordance with the Equalities Act 2010 the Council will also aim to cater for elderly users and those with special medical conditions, paying attention to the distribution of public conveniences and the frequency, distance between them but importantly the specification. 4. Changing places WCs will be investigated to look at where such facilities can be appropriately located – in partnership with the changing places campaign Cardiff will promote these locations

	<p>Fixture & fittings provision</p> <ul style="list-style-type: none"> • Hot and cold running water • Sustainable, water savings devices • Sustainable energy usage and lightly • Sustainable hand dryers instead of paper towels • Baby changing facilities • Soap dispensers • Locks • Sinks • Toilets • Disabled facilities & access 	
Funding potentials	The British Toilet Association (BTA) and other councils suggest a variety of funding options are available for improving existing provision and providing new facilities, including capital purchase, lease financing, lease maintenance, equipment rental, advertise funding and charging for facilities.	<ol style="list-style-type: none"> 1. Funding Opportunity Identification. It is fair to say that the increasing financial pressures faced by council, requires a partnership strategy and has already identified that Council is not best placed to deliver quality WC facilities independently. As such Partnerships and shared opportunities must be considered a driver.
Awareness and Partnership	<p>Across Cardiff there are many toilets that are accessible to the public. Within Cardiff there is a need to improve the signposting of public conveniences throughout the city, but especially in the city centre and areas that attract high tourist numbers.</p> <p>As well as increasing the number of tradition signposts for Council or partnership facilities, the Community Toilet Scheme funds should be explored for promoting facilities in the larger shopping areas. In return for the toilet grant, premises would allow Cardiff Council to promote their toilet facilities as accessible. In order to make the scheme more attractive, promotion of the premises through web adverts or capital times articles could be explored.</p>	<ol style="list-style-type: none"> 1. All public and retailer conveniences will be clearly identified and locatable through directional signage, and new media apps. Web links, apps and visitor information should be provided to signpost your nearest facilities. Although traditional sign posts are required, web links could be promoted in the high footfall areas, which lists the local facilities available. Such a web link could also be used as a promotional tool for the Community Toilet Scheme partners. 2. Existing New technology solutions could be adopted in partnership to improve awareness of local toilets e.g. travel websites and accessibility resources such as the development of an in house accessible information portal. 3. Web sites and Apps, such as 'public toilet map' and 'looseeker' are already used by Cardiff to list the Council facilities could be promoted to visitors. Best practice and imitative ideas should be explored, such as a case study of the SatLav text messaging service operated by Westminster City Council, which makes use of mobile phone technology to help the public locate their closest accessible toilets as well as numerous 'apps' that could be explored to help visitors find the nearest toilet facilities. 4. The council already have a web page on the Community Toilet Scheme. Sponsorship and advertising of the scheme partners could be explored as an additional benefit to supporting the Community Toilet Scheme.
Marketing & Sponsorship	In the private sector it is common place that companies with seek sponsorship deals e.g. Mothercare sponsor baby changing facilities, Imperial Leather sponsor soap dispensers, for their toilet facilities. So, allowing the facilities to provide high quality fixtures and fittings at a reduced price. In addition, in high usage facilities advertising space on the interior toilet doors is sold as an additional income stream.	<ol style="list-style-type: none"> 1. Marketing and sponsorship opportunities should be centrally led to maximise income for advertising space and sponsorship deals on all appropriate Council Facilities and also to develop buy-in to the community toilet scheme.
Public Consultation	Understanding what the residents and visitors to Cardiff think and want from the public conveniences is important. Through public consultation and the other advice and assistance of the British Toilet Association, Cardiff can improve the current 'well below standard' of public convenience provision in	<ol style="list-style-type: none"> 1. Engagement. Conduct a series of engagement activities with special interest and local groups:- <ul style="list-style-type: none"> • Cardiff Council Access Focus Group • 50 + forum • Heath board

	<p>line with public expectation, be kept informed of new ideas and gain valuable insight and information from toilet providers.</p> <p>The below figures illustrate the publics feelings about WC provision in Cardiff in 2007; 9 years ago. As such it is reasonable to expect that their feedback would be more negative should such an exercise be conducted today</p> <p>July 2007 survey results;</p> <p>How would you rate public conveniences in...?</p> <p>Parks & Gardens 4.2% V.good 20.5% good 45.0% poor 30.2% V poor</p> <p>City centre 12.4% V.good 39.4% good 37.4% poor 10.9% V poor</p>	<ul style="list-style-type: none"> • Citizen Panel
Planning	<p>Currently there is limited public conveniences consideration given through the planning process. An SPG (strategic planning guidance) is required to ensure section 106 monies are secured for the provision of facilities from any new major developments. The SPG will allow consideration for the provision of public conveniences in all future planning applications, utilising every opportunity possible to improve the provision in the city, where any new venture is likely to attract a high volume of visitors, and thus will require adequate toilet provision.</p>	<ol style="list-style-type: none"> 1. Building Control. Greater Building Control involvement should be adopted to ensure planning applications account for Part M building regulation and suitable Toileting numbers / frequency in new developments. 2. SPG for transport. The New SPG for transport should make consideration towards numbers of car parking spaces in conjunction to toileting provision, so as to utilising every opportunity possible to improve the provision in the city, where any new venture is likely to attract a high volume of visitors, and thus will require adequate toilet provision. 3. LDP should make reference towards Toilet provision in the city under high visitor volumes 4. Public Conveniences Strategic Planning Guidance. Consideration should be made towards a public conveniences Strategic Planning Guidance; produced to capture section 106 and community tax levy monies, but also ensure the provision of public facilities are considered for new major developments.
Antisocial behaviour	<p>The facilities across the city suffer from vandalism, anti-social behaviour, drugs activities and unfortunately on a too frequent occasion deaths. Depending on the location of the facilities the number of incidents varies and is not restricted to late opening hours.</p> <p>The act of urinating in public is a criminal offence that the Police have powers to take action under Public Order Act, 1986, section 5. However, the act is open to interpretation of common sense and individual circumstances, which can mean it is difficult to prosecute in court.</p>	<ol style="list-style-type: none"> 1. Automated Door Systems. Install automated open and lock down systems to the unmanned toilet facilities throughout the city. 2. Public Safety Measures. Liaise and consult closely with the Police Authority, CPOs and Community Safety and Drug Action Team to implement appropriate measures to ensure the safety of staff and all persons using public conveniences. 3. RADAR keys. Refit all unmanned accessible WCs with RADAR key locks, publicise RADAR, and RADAR key availability in an through council properties
Events	<p>Increased pressures created through significant and frequent international events have a significant impact on the WCs provision in the city, and if not catered for have the potential to promote antisocial behaviours, public health issues and crime.</p>	<ol style="list-style-type: none"> 1. Partnership working with Network Rail to ensure adequate daily and events WC provision. 2. Increased partnership working with local stakeholders. 3. Increased dialogue with Rightacers Partnership, regarding new premises and their designs, which may

	<p>In the short term (from April 2016) the above factors will potentially increase due to the removal of current provision as listed below.</p> <p>Importantly however, this situation is exacerbated through the closure of WCs in Marland House as a whole and central square due (service / utilities routed from Marland house) to the revitalisation of the area and new infra structure.</p> <p>As such this leaves the area in drastic need of WC provision, especially during events where there will be no suitable provision to cater for high daily footfall (30 thousand per month approximately) let alone the significantly increased footfall associated to events, who will be using the train station as a main transport artery and gathering point.</p>	<p>permit potential WC capacity, this may include the use of the upcoming Transport hub.</p> <p>4. Working with Partners to look at sponsorship potential for temporary WC facilities during peak usage e.g. events etc.</p>
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Conclusion

Public conveniences in Cardiff council are in a wide ranging state of repair, and are often of poor quality, poorly maintained and resourced.

It is only through 3 key drivers that WCs can be provided in Cardiff to a standard demanded by an international capital city

- Working Partnership across council and externally
- Communication and Information
- Availability / frequency and quality

The recommendations to be taken forward by the City Operations Directorate will assist in addressing the core concerns as illustrated within this document.

Appendix 1: Council run Public Convenience locations in Cardiff

Cardiff Council - Public Conveniences

City Centre / Suburbs

Service Area	Address	APC ?	Disabled Access	Radar Keys	Opening hours	Baby Changing	Leased /Owned by CC	Cleaning Arrangements	Post Code	Status - Open / Closed
Parks	Cowbridge Road East	No	Yes	Yes	Approx 7am to dusk	No	Cardiff Council	Service level agreement	CF5 1BJ	CLOSED approx. 2012
Parks	Llandaff City	No	Yes	No	Approx 7am to dusk	No	Cardiff Council	Service level agreement	CF11 9JL	CLOSED April, 2015
External Provider	Llandaff Fields	No	Yes	Yes	Approx 7am to dusk	No	Cardiff Council	Service level agreement / Now forms part of a catering facility.	CF11 9JL	Open
Parks	Whitchurch Road	No	Yes	Yes	Approx 7am to dusk	No	Cardiff Council	Service level agreement	CF14 3QX	CLOSED approx 2011
Parks	Caedelyn Parc	No	No	No	Approx 7am to dusk	No	Cardiff Council	Service level agreement	CF14 1BH	Open
Parks	Waterloo Gardens	No	No	No	Approx 7am to dusk	No	Cardiff Council	Service level agreement / Grounds	CF23 5PG	Open

								Maintenance		
Parks	Cefn Onn Park (North)	No	No	No	Approx 7am to dusk	No	Cardiff Council	Service level agreement	CF14	CLOSED 2002 approx
Parks	Cefn Onn Park (South)	No	Yes	Yes	Approx 7am to dusk	Yes	Cardiff Council	Service level agreement	CF14	Open
Parks	Roath Park Lake (East)	No	Yes	Yes	Approx 7am to dusk	Yes	Cardiff Council	Boatstage staff / Service Level Agreement.	CF23 5PG	Open
Parks	Roath Park Lake (West)	No	Yes	Yes	Approx 7am to dusk	Yes	Cardiff Council	Boatstage staff / Service level agreement.	CF23 5PG	Open
Parks	Victoria Park (Paddling Pool)	No	Yes	Yes	Approx 7am to dusk	Yes	Cardiff Council	Service level agreement & seasonal paddling pool attendants.	CF5 1BJ	Open
Parks	Splott Park	No	No	No	Approx 7am to dusk	No	Cardiff Council	Games attendant	CF24 2SJ	CLOSED 1998 approx
Parks	Thompson Park	No	Yes	Yes	Only when staffed	No	Cardiff Council	Service level agreement	CF5	Open
Parks	Sophia Gardens Car Park	No	Yes	Yes	09.00 16.00	Yes	Cardiff Council	Staff on site	CF11 9SZ	Open
Parks & Sport	Roath Pleasure Gardens	Yes	Yes	Approx 7am to dusk	Yes	Cardiff Council	Service level agreement	CF14 4EP	Parks & Sport	Roath Pleasure Gardens

Parks	Poncanna Caravan Site	No	Yes/disabled showers	Yes	caravan Site use only	Yes	Cardiff Council	Staff on site	CF11 9LB	Not Public / caravan Site use only
Bereavement	Pantmawr Cemetery	No	Yes	No	During cemetery opening hours	No	Cardiff Council	DSU cleaning	CF14 7TD	Open
Bereavement	Thornhill Cem (entrance)	No	No	No	During cemetery opening hours	No	Cardiff Council	DSU cleaning	CF14 9UA	Open
Bereavement	Thornhill Crematorium	No	Yes	No	During cemetery opening hours	No	Cardiff Council	Staff on site	CF14 9UA	Open
Bereavement	Cathays (Chapel)	No	Yes	No	During cemetery opening hours	No	Cardiff Council	Staff on site	CF24 4PY	Open
Bereavement	Western Cemetery	No	Yes	Yes	During cemetery opening hours	No	Cardiff Council	Staff on site	CF5 5TB	Open
Waste Management	Albany Road	Yes	Yes	Yes	24 Hour Mon-Sun	Yes	Leased, due for closure 1 st April 2014	Automatic	CF24 3LH	Closed / April 1 st 2016

Waste Management	Delta Street, Canton	Yes	Yes	Yes	24 Hour Mon-Sun	Yes	Leased, due for closure 1 st April 2014	Automatic	CF11 8HJ	Closed / April 1 st 2016
Waste Management	Four Elms Road, Splott	Yes	Yes	Yes	24 Hour Mon-Sun	Yes	Leased, due for closure 1 st April 2014	Automatic	CF24 1LE	Closed / April 1 st 2016
Waste Management	Frederick Street	Yes	Yes	Yes	24 Hour Mon-Sun	Yes	Leased, due for closure 1 st April 2014	Automatic	CF10	Closed / April 1 st 2016
Waste Management	Heol Y Deri, Rhiwbina	Yes	Yes	Yes	08.00-18.00 Mon-Sun	Yes	Leased, due for closure 1 st April 2014	Automatic	CF14 6HJ	CLOSED
Waste Management	Penline Road, Whitchurch	Yes	Yes	Yes	24 Hour Mon-Sun	Yes	Leased, due for closure 1 st April 2014	Automatic	CF14 2AA	Closed / April 1 st 2016
Waste Management	Ty Glas Road	Yes	Yes	Yes	24 Hour Mon-Sun	Yes	Leased, due for closure 1 st April 2014	Healthmatic	CF14 5ER	Closed / April 1 st 2016
Harbour Authority	Barrage (temp until Barrage Café built)	No	Yes	No	Open during barrage opening hours	Yes	Leased Harbour Authority	Community Maintenance Services	CF64 1LQ	Closed March 2014
Harbour Authority	Barrage two toilets under	No	Yes one disabled	No	Open 24 hours	Yes	Owned Harbour	Community Maintenance	CF64 1TQ	Open

	the Control Building		toilet				Authority	Services		
Harbour Authority	Barrage Environmental Building	No	Yes	No	Open during barrage opening hours	Yes	Owned by Harbor Authority	Community Maintenance Services	CF104LY	Open

Appendix 2: Best Practice (According to British Toilet Association)

The BTA have established the following criteria for judging the quality of 'away from home' toilet provision:

Signage & Communication

- Directional signage
- External building signage
- Internal customer communication signage

Décor & Maintenance

- Adequate state of repair both internal and external fixtures & fittings
- Sufficient sanitary fittings, taps, locks on doors, hooks etc.

Cleanliness

- Walls, ceilings and floor areas
- Fixtures and fittings - basins, bowls, seats, taps etc.

Hygiene Equipment

- Hand washing and drying facilities
- Supply toilet tissue
- Provide sanitary product disposal

Air Quality

- Ventilation, drainage smells etc.

Extras

- Added value enhancement - vending, flowers etc.

Security

- Sufficient lighting including entrances and external areas

Accessible Facilities

- DDA compliant provision for both sexes or a unisex facility

Baby Changing Facilities

- Provision for both sexes or a unisex facility

Overall Management & Customer Care

- Clear evidence that the facilities are being properly managed

Appendix 3: Relevant Legislation

There are two key pieces of legislation that relate to the provision of Public Toilets:-

- 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.
- Under section 87(3) (c) of the PHA 1936, local authorities are allowed to charge for use of public conveniences, but not urinals. However, this exemption was removed by the Sex Discrimination Act (Amendment) Regulations, in April 2008. This will allow greater scope for local authorities to fund improvements urgently required within many public conveniences.

Additional forms of legislation that offer best use of available powers to local authorities are:-

- Local Government (Miscellaneous Provisions) Act 1976. Under section 20 of this act, councils have the power to require toilet provision and maintenance for public use in any place providing entertainment, exhibitions or sporting events, and places serving food and drink for consumption on the premises.
- The Public Lavatories (Turnstiles) Act 1963. This act prohibits 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).
- Anti-Social Behaviour Act 2003 allows the Police, Local Authority Officers and Community Support Officers to issue fixed penalty Notices (FPN's) to anyone caught graffitising or vandalising property such as public toilets.

British Standard BS 6465-1:2006 secures an appropriate level of provision, design quality and accessibility for sanitary facilities in new buildings and buildings undergoing major refurbishment.

Additional forms of legislation that require consideration when providing public services are:

- The Disability Discrimination Act 1995;
- The Equality Act 2006;
- The Public Lavatories (Turnstiles) Act 1963; and
- The Anti-Social Behaviour Act 2003.

The Disability Discrimination Act 1995 requires service providers to do what is reasonably practicable in making adjustments to services so that they are accessible to disabled people. Additionally a requirement of the Disability Equality Duty, which came into force in December 2004, is to consider the needs of all sectors of the society they serve whilst promoting greater equality.

The Equality Act 2006 challenged all public authorities with promoting gender equality, giving local authorities the opportunity to consider ensuring a more balanced access to public toilets for men and women.

The Public Lavatories (Turnstiles) Act 1963 prohibits the use of turnstiles in any part of a public toilet managed or controlled by a local authority. This legislation came about following public concerns about the safety of turnstiles for specific users including pregnant women, disabled people and those people with luggage / bags of shopping.

The Anti Social Behaviour Act 2003 gives powers to the Police, Local Authority Officers and Community Support Officers to issue Fixed Penalty Notice's to anyone caught causing damage to property, including public toilets.