

2021

Public Convenience Strategy



NORTH
NORFOLK
DISTRICT
COUNCIL

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Content	
Introduction	2
Vision	2
Background	3
The current situation	4
The ambition	5
Managing the service	7
Implementation Plan	8
Appendix 1: Decision matrixes	10

Public Convenience Strategy

Introduction

In order to bring about a refreshed view of how we manage the public convenience portfolio to greater effect, we are seeking to create a strategic view of the public convenience assets and their management. This strategy seeks to provide a structured plan for assessing each facility, prioritising improvements based on public usage/need and to reflect the Council's desire to provide comprehensive, quality toilet amenities to support local residents, town centre businesses and visitors alike.

This strategy forms an integral part of the Council's corporate plan in the areas of both growth and financial sustainability as well as customer focus and quality of life goals. This approach supports wellbeing in the community and echoes the council's 'A better place' ethos.

This strategy will present an overview of the current facilities and reflect on growing trends and needs of our community and visitors. This will include reviewing alternative options for sites with very low usage, identifying any appropriate future need or improvements in the context of a green agenda. Identifying new policies and creating an implementation plan.

Key elements of this Strategy are the:

- Vision
- Ambition
- Implementation Plan
- Public Toilet Decision toolkits

The Implementation Plan will identify a number of recommendations which will lead to a capital works programme being developed which will detail upgrades and refurbishment of existing facilities where needed.

Where there is a community need for a new toilet, two decision making tools have been included to assist the council in making fair and unbiased decisions.

The Vision

To provide and maintain good quality publicly accessible toilets across North Norfolk where there is an identified need for public toilet provision. This is to be supported by a targeted investment programme by the Council and more innovative ways of managing public toilets.

For the management of this service area this means;

- A. On current provision;
 - To ensure a suitable investment programme is in place to maintain toilets to a high standard of cleanliness and functionality to enhance the safety, health and wellbeing of all users.
 - To ensure toilets are well signposted and easily accessible for all users
 - To review the existing provision and resolve strategic network gaps and over provision.
 - Actively consider alternative provision where feasible.
 - To regularly review expenditure and seek ways to reduce revenue costs.

B. On Future design of toilets to;

- reflect need
- be visually attractive and empathic to their surroundings,
- be safe, fully inclusive and accessible to users of all ages and abilities,
- be able to minimising occurrences of anti-social behaviour through careful design and future management,
- have minimal impact on the environment through good design and technology features.

Background

The **Public Convenience Review Document 2021** provides information on each of the **38 public toilets** managed by NNDC as well as an overview of the costs and challenges of the overall provision. The document also undertakes a short review of the approach of other local authorities to this challenge and some of the solutions found. A summary identifies the issues NNDC faces in providing these facilities in the future.

It is generally understood that the provision of public conveniences is not a statutory obligation and that the extensive resource budget is borne through a desire to provide local residents and visitors alike with infrastructure that supports the use of our town centres and coastal and Broad's resorts.

However, with rising costs and shrinking budgets it is appropriate to review provision and identify better, fairer and more efficient ways of working in order to ensure continued provision at a good standard.

The review document was discussed by the Business Planning Group who identified some aspects for the Strategy to consider. These elements are listed below.

Business PG comments

- The Council should aim to provide 1 'high standard' public provision at Cromer, Fakenham, Wells, Sheringham, North Walsham and Holt. These will include a separate accessible toilet, changing places facility, family room and all-gender facilities (where possible) with appropriate directional signage and fit-out decoration in NNDC's corporate colours.
- Explore:
 - outsourcing with assurance of continuation / the creation of a proactive programme to identify toilets to be transferred to new ownership along with limited budgets
 - different forms of operation
 - installation of solar panels and other green solutions
 - advertising/sponsorship
 - community toilet schemes
- Identify ways to:
 - Cap rising costs and lower expenditure - maintain toilets with same/less money
 - Target investment only where needed.
 - Maximise relief on NNDR (already completed)
- DO NOT consider charging

The current situation

We currently provide 39 separate toilet blocks in 23 localities. We have minimal accurate data on usage but we know many have high seasonal use in line with the many resort locations along our coastline and in the broad's region.



The Public Convenience Review document 2021 gives further details of each asset including its layout, provision and current condition.

Gathering Evidence

One of the key issues with changing how the service is managed is that public toilets can be a very emotive subject. Therefore, decisions are not always based on need or in the context of the wider portfolio, due, in part, to a lack of evidence from monitoring any change. This leads to decisions sometimes being made in isolation or at best on anecdotal evidence. Therefore, in order to progress the service; to clarify its function and determine best practice for the future it is necessary to gain solid evidence where possible.

In the Public Convenience Review document 2021 the result of counters measuring footfall of public convenience use was illustrated. This data collection was carried out at 9 of our 39 facilities. Whilst there are no real surprises in the diverse usage shown by the data collection exercise, we have no other information collated to help us make better, more informed decisions. We have anecdotal evidence of the need to keep facilities open, but no actual evidence on what exactly users want. Equally, we know there is some public provision through local visitor attractions and businesses, but we do not know the saturation of such provision, assuming it to be minimal because of the lack of national or large food/retail chains in the area.

With this in mind the service will need to undertake an audit to seek responses to some of the following questions:

- What is the true need? i.e. Do people value quality over extent of provision? Feeling safe over extended opening? (in other words - what exactly do the local population and visitors want?)
- Where is there (geographically) greatest need?
- Where use is low – is it because better provision is made close by?
- How many changing places should we / do we want to provide?

- Are there other services that could be included?
- Are we prepared for spending on toilet provision to increase? And if so by how much?
- If not – how do we reduce costs without reducing the ability to support local economies?

Our ambition

- 1) There is a keen desire to ensure all the district's key towns and resorts are served by at least one **High Standard facility**.

Currently, although it does not offer gender-neutral facilities (these are offered elsewhere in the town), we would consider that Cromer's North Norfolk Visitor Centre offers a 'high standard' of public toilet provision. In 2022, new facilities being installed at Wells and Fakenham will also be considered 'high standard' provision. Consideration is now being given to future facilities at North Walsham and Sheringham.

Where possible external funding opportunities need to be sought to reduce the cost to the Council.

In that vein, on 29 July 2021 the government announced funding proposals for a £30m Changing Places Toilet (CPTs) investment programme. Expressions of interest has been declared by NNDC. Every local authority that opted in to this programme was able to receive capital funding equivalent to the average cost of installing at least one Changing Places toilet in their area (based on cost average assumption of £40k).

Whilst the outcome of this funding submission has not yet been confirmed for the purposes of agreeing this capital request it has been assumed that a minimum of £40k will be forthcoming from this application process.

- 2) That a periodic 'assessment of need' is carried out to determine any changes to provision that may be required. This should include reviewing feasibility of alternative provision such as through a **Community Toilet Scheme** or **adoption** of the facility by alternative statutory body or, if appropriate future proofing safeguards are in place, a private provider.
- 3) Any facilities where it is considered a new facility would be more compliant and more cost effective than updating the current one, AND no other provision is feasible, must seek to:
 - include green energy solutions such as solar panels or ground source heat pumps.
 - use Decision Matrix 2 to assess the number of WCs required for that location and that these should include accessible toilets, a family room and all-gender facilities and,
 - include a changing place facility if it is a) located in a key resort or town (and no other provision is made) and b) if site size permits.
 - ensure the internal design is compliant with corporate branding and standard fitting/fixtures
- 4) Where a location could be considered to offer more WCs than required for that location and a facility is particularly difficult to maintain, is non DDA compliant and is within 800m of another facility, then this facility could be considered for closure.
- 5) Closure may also be considered where provision on an alternative site in the same locality is preferable and where the sale of the redundant asset would enable the construction of a new facility.

- 6) That periodic surveys of each asset should be undertaken to identify absences in standard provision based on customer experience to include aspects of convenience, lighting, etc as set out in the Loo of the year criteria.
- 7) That either a periodic survey (approx. 5 years?) be carried out to obtain customer satisfaction feedback on toilet provision in North Norfolk or an on-line public feedback system in enabled to capture feedback for consideration of issues and ideas to further improve service provision.

Key elements of High Quality Facilities

Accessible toilets Accessible toilets with standard provision of space and equipment have been in operation since the 1970s so many of the Council facilities provided these as part of the creation of the building. The council uses the radar key system to restrict use, although these are now widely and cheaply purchased by anyone. Accessible toilets assume some level of ability to use the facility alone or with some assistance and these differ from the equipment required by changing rooms or changing places facilities.

Changing Places Originating in 2006, Changing Places facilities are designed for people who require a hoist to use a toilet. The facilities differ from standard accessible or disabled toilets as they include additional features such as an adult change table, hoist, shower, screens and large circulation spaces. There has been an increasing interest in the provision of Changing Places facilities across both the private and government sectors, particularly in locations that attract regular crowds, such as sports and recreation facilities.

Changing Places facilities are vital pieces of community infrastructure which allow members of the public who with specific needs to participate in the day-to-day activities across the District. The key barrier that constrains Council's in providing these facilities is lack of space/footprint requirements of the facility (min 12m²) and expense of facility (£12k for kit alone).

Family Rooms – offer a larger gender neutral space for families – specifically young children/babies to use. They would include a toilet, baby change, and sufficient space for sole use of a small family group and pushchair/pram etc. Space/footprint of current facilities is usually a barrier to the Council offering this facility.

All Gender toilets – (aka Gender neutral/unisex) are becoming more popular to keep in line with equality and diversity legislation. Although not universally popular they do offer a completely self-contained room with hand washing and drying facilities and individual external doors. This does enable improved management of the facility because during maintenance or repair, it is rare to have to close all units at the same time.

Considered opening times - High standard facilities should offer long opening hours to service evening customers as well as early morning ones, such as market traders. This is particularly key where the facility is close to a transport hub.

Regular cleansing/inspection – High standard facilities require regular cleaning and inspection particularly in peak season/times. Complaints need to be dealt with quickly and effectively and should be seen as a key indicator for change.

Maintenance and Décor – Such facilities need to be well maintained through surveys and inspections with priority given to any remedial work. Corporate colours, quality fixtures and fittings and clear signage is also a key element of these facilities.

Loo of the year awards¹- The ‘Loo of the Year Awards’ offer a useful criteria tick box list that the Council should seek to comply with whether or not the facility is entered for the competition. The criteria include things like; cubicle size, user convenience, cleanliness, flooring, lighting etc. Full details can be seen via the link below.

Q Are there any more?

Managing the service

The service needs to continue on the basis of providing an excellent service. In order to do this effectively it needs to gather evidence where possible to inform future decision making and this includes collecting customer feedback, actively taking a more strategic view of its portfolio and regularly reviewing how and why something is being done.

Ability to reduce costs

With the current situation regarding rising interest rates (particularly to energy supplies) and pressures to find green solutions not to mention supply chain difficulties with obtaining goods and materials it could be concluded that making substantial cuts to running costs is not realistic or feasible if the current desire to provide a geographically wide ranging, quality service is upheld.

It would be anticipated that an increase in improvements to assets would realise a short term reduction in wear and tear related maintenance as would the installation of improved designs around vandalism but it would be unrealistic to assume these would be negated entirely.

Resources are an ongoing issue for the Service and it is easy in such circumstances to focus on reactionary maintenance over strategic planning. This is entirely understandable as a prime need by the user of the convenience is that they function! However, it is important to get ahead of the curve and to look at the long term provision and how this is best provided. Only on a solid evidence base can we ensure the delivery of the ambition.

Ensuring due diligence and consideration

It must be remembered that whilst a holistic approach is desirable for clarity and focus, determining the most appropriate response to an issue should be site/context specific and what works in one location to deter anti-social behaviour may not apply in other locations. Responses should also consider the diversity and density of activities around the toilet, particularly evening activities, 24-hour availability presents a range of challenges, particularly in relation to safety and perceptions around anti-social behaviour during the evening. The provision of additional toilets to service the night time economy is not considered necessary due to the availability of privately owned toilets found in restaurants and bars. It is therefore recommended that the Council should retain existing operating arrangements continue to monitor this need as development and land use patterns change over time.

¹ [Enter The Loo of the Year Awards](#)

Implementation Plan

Step 1: Seek to enable periodic or ongoing customer feedback (by April 2022)

Through an on line submission of comments/feedback or through a dedicated questionnaire, obtain feedback on the public conveniences, what the needs are and where they are required. Aim to create a base line to work against to gauge the effect of improvements.

Step 2: Undertake a holistic audit of NNDC's public convenience assets (by June 2022)

One of the key features of reviews undertaken by other authorities is to take a holistic view of the portfolio. What this enables is the ability to take an objective view of the provision and align it with other data including visitor numbers, local businesses and attractions and other local provision. In addition, information on accessibility, convenience and desirability can help to shape future provision and prioritise key developments. By acknowledging 'not all things are equal' will enable budgets to be spent proportionately, helping to identify where capital spend should be allocated and where new, additional or key facilities should be sited.

Given the general desire to maintain current facilities it is difficult to identify significant budget savings without reducing provision but as part of this process a review of costs could be undertaken to identify any savings or income generating elements such as advertising or car park levy.

In addition to seeking to ensure our provision fulfils need, it may be possible to created added value by taking a fresh look at other elements, for example;

- Are there opportunities to make environmental improvements? (ie PV panels)
- Are there better ways to provide the service?
- What future demands and legislation may change what we provide in the future?

In addition, a comprehensive review could culminate in a strong vision or statement of intent – a written 'standard' on what the Council wishes to provide, backed up by evidence and supported by key stakeholders alike.



Ensure the audit contains information on each site with regard to; cleansing requirements, opening hours, perceived safety, lighting etc.

NB This element is likely to require additional funding and should proceed as a separate project through due process.

Step 3: Review audit (by Sept 2022)

Identify and prioritise improvements identified. Submit capital bids and implementation changes if funding is approved. Use Sheringham and North Walsham proposals as a test bed for evidencing change.

Step 4: Evidence work requests and needs (on going)

When requests for new build or refurbishments of public toilet facilities are received then use the decision matrix to determine the priority of the request or whether a different approach would be more suitable.

Step 5: Create supporting policies to clarify decision making processes (by Sept 2022)

Step 6: Prepare a 10-year plan/works programme (as part of Asset Management Plan - autumn 2022)

It is important to future proof the provision through a realistic improvement/management programme. This should be a holistic plan showing the results of the audit and identifying costs for improvements. The plan should also include conclusions regarding outsourcing and/or community toilet scheme development.

Whilst stronger evidence is gathered to inform the requirements the following decision matrixes (appendix 1) can be used to identify need and prioritise refurbishments.

As the plan is implemented it will be necessary to submit project proposals and capital bid forms in line with Council procedures.

Appendix 1 Decision Toolkits

Decision matrix 1 – assessing need

Public Toilet use - assessment of need											
Locations	Resident Pop	Key tourist hot spot?	Nos of Key facilities (ie banks, range of shops)	Other stand alone public toilet facilities?	Estimated provision by shops, cafes etc to customers?	Less than 500m to public car park, railway/ bus station?	KEY				
Bacton	1249	MEDIUM	LOW	NO	LOW	NO					
Blakeney	758	HIGH	MED	YES	MED	YES					
Cromer	7738	V HIGH	V HIGH	NO	VERY HIGH	YES					
Fakenham	7785	MEDIUM	V HIGH	NO	HIGH	YES					
Cart Gap (Happisburgh)	875	MEDIUM	LOW	NO	LOW	YES					
Holt	4189	HIGH	V HIGH	YES	VERY HIGH	YES					
Horning	1146	MEDIUM	MED	NO	MED	NO					
Hoveton	2078	MEDIUM	HIGH	NO	MED	YES					
Hickling	935	MEDIUM	LOW	NO	LOW	YES					
Ludham	1278	MEDIUM	MED	NO	LOW	NO					
Mundesley	2727	HIGH	HIGH	YES	MED	YES					
North Walsham	12901	LOW	V HIGH	NO	MED	YES					
Overstrand	980	HIGH	MED	NO	MED	YES					
Potter Heigham	1045	MEDIUM	LOW	NO	LOW	YES					
East & West Runton	1639	HIGH	MED	NO	MED	YES					
Sea Palling	596	HIGH	MED	NO	HIGH	YES					
Sheringham	7365	V HIGH	V HIGH	YES	LOW	YES					
Stalham	3615	MEDIUM	HIGH	NO	MED	YES					
Walcott	546	MEDIUM	LOW	NO	LOW	NO					
Walsingham	761	HIGH	MED	NO	MED	NO					
Wells	2283	V HIGH	V HIGH	YES	HIGH	YES					
Weybourne	513	MEDIUM	LOW	NO	LOW	YES					

Key tourist spot?	Very High	Has significant hostelry enterprises and visitor attractions throughout the year
	High	Caters for large seasonal influx with some B&Bs, cafes etc but no single attraction
	Medium	Has a good number of seasonal visitors primarily with specific aim (ie visit beach, racecourse, broads, pilgrimage)
	Low	Local economy not largely reliant on visitors
Nos of Key facilities (ie banks, range of shops)	Very High	Lots of shops , banks, service provision inc schools and libraries
	High	A range of small shops
	Medium	Likely to be one or two food stores and other gift or specialist shops
	Low	One or two shops
Other standalone toilets	As identified on British toilet map or local knowledge	
Customer toilets <small>Cafes, Restaurants, Hotels, Large shops and chains</small>	Very High	> 8 may be provided
	High	>5 but <8 toilets may be provided
	Medium	>2 but <5 toilets may be provided
	Low	<2 places toilets may be provided

Scoring Need	Pop.	Tourism	No of facilities	Other PUBLIC toilets	Customer provision	Close to transport hub?			
	1pt/1000 (rounded)	VH 10, High 7, med 3, low 1		approx no WCs provided	Est no (ie pubs, cafes) low = -1, high = -5	Yes = 1 No=0	Min WC provision	Actual prov	Tolerance within 2
Bacton	1	3	1	0	-1	0	4	4	ok
Blakeney	1	7	3	-1	-3	1	8	9	ok
Cromer	8	10	10	0	-5	1	24	49	high
Fakenham	8	1	10	0	-3	1	17	18	ok
Cart Gap (Happisburgh)	1	3	1	0	-1	1	5	6	ok
Holt	4	10	10	-5	-5	1	15	8	low
Horning	1	3	3	0	-3	0	4	6	ok
Hoveton	2	3	7	0	-3	1	10	15	high
Hickling	1	3	1	0	-1	0	4	7	high
Ludham	1	3	1	0	-1	0	4	13	high
Mundesley	3	10	7	-4	-3	1	14	13	ok
North Walsham	13	1	10	0	-3	1	22	12	low
Overstrand	1	7	3	0	-3	1	9	7	ok
Potter Heigham	1	7	1	0	-1	0	8	7	ok
East & West Runton	2	7	3	0	-1	1	12	11	ok
Sea Palling	1	7	3	0	-1	1	11	9	ok
Sheringham	7	10	10	-5	-5	1	18	30	High
Stalham	3	3	7	0	-3	0	10	5	low
Walcott	1	3	1	0	-1	0	4	5	ok
Walsingham	7	3	1	0	-3	0	8	7	ok
Wells	2	10	10	-8	-5	1	10	24	high
Weybourne	1	3	1	0	-1	1	5	1	low

Decision matrix 2 – for refurbishment or replacement decision

Question	For example	Response	Suitable Evidence base
Does the implementation of Matrix 1 show an on-going need?		YES/NO	Undertake survey
Is there a demonstrated community demand or volume of requests for this facility to be replaced or refurbished?		YES/NO	<ul style="list-style-type: none"> • Evidence from the community or Council audits/records that the existing facility is not adequately functioning • Maintenance requests from community • Community surveys • Local masterplans
Is there a H&S reason these facilities should be replaced or refurbished?	Broken or dangerous fittings/structures/poor hygiene, evidence of vermin	YES/NO	Internal or external surveys
Is the existing public toilet in poor condition?	Vandalism, wear and tear, features not working, issues with smell or vermin	YES/NO	observations or anecdotal information from the community, Council staff, cleaning, service or maintenance contractors
Does the existing toilet have a low level of usage?	Location and siting, opening hours and availability	YES/NO	<ul style="list-style-type: none"> • Counters if previously used • Observations or anecdotal information from the community, Council staff, cleaning, service or maintenance contractors • Maintenance costs • Water usage, levels of toilet paper, soap consumed weekly, monthly or annually

Does the toilet have appropriate fixtures or fittings?	DDA Compliance Universal access Site specific features	YES/NO	Inspections / surveys set against optimum provision levels
Is there an existing public or planned toilet nearby?	Toilets within 800m of the proposed location Evidence of community toilets that are accessible within 800m? (e.g. libraries, community centres, indoor sport/ recreation centres) Privately operated public toilets within close proximity? (e.g. Shopping Centre, restaurant)	YES/NO	<ul style="list-style-type: none"> • Site survey and investigation • Town centre strategies • National Toilet map
Does the toilet enhance community safety, health and wellbeing or offer social value?	Does it significantly contribute to existing network? Needs of different groups? Locality & environment	YES/NO	<ul style="list-style-type: none"> • Site survey and investigation • Social engine to measure social value of investment

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