FLINTSHIRE COUNTY COUNCIL

DRAFT LOCAL TOILETS STRATEGY

JULY 2023

CONTENTS

EXECUTIVE SUMMARY	3
BACKGROUND & INTRODUCTION	4
THE BENEFITS OF THIS STRATEGY	7
REVIEWING THE STRATEGY	8
MAPPING LOCATIONS	9
DETAILS OF EXISTING COUNTY FACILITIES AVAILABLE TO THE PUBLIC	111
ADDITIONAL FACILITIES WITHIN THE COUNTY	144
NEEDS ASSESSMENT	155
OUTCOME OF PUBLIC ENGAGEMENT	17
FUTURE OPTIONS	19
APPENDIX - ACTION PLAN	21

EXECUTIVE SUMMARY

In July 2017, the Public Health (Wales) Act 2017 received Royal Assent, bringing together a range of practical actions for improving and protecting health. Part 8 of the Act includes Provision of Toilets and introduces new responsibilities for Local Authorities to provide local toilet strategies.

To deliver a strategic approach to the provision of toilets across Wales, the Public Health (Wales) Act 2017 requires Local Authorities to assess local needs and facilities, and to publish a local toilets strategy for its area.

The duty to prepare a local toilets strategy does not require councils to provide and maintain public toilets directly, nor are they required provide additional dedicated facilities. They must however take a strategic view on how facilities can be provided and accessed, taking account of such things as location, accessibility, facilities, frequency of use and quality of existing sites, as well as determining whether additional or fewer sites are required by their local population. The legislation published by Welsh Government has no funding for additional provisions attached to it.

Since 2012 Flintshire County Council have undertaken three separate reviews of toilet provision throughout the County with the previous strategy published in May 2019. These reviews highlighted that isolated facilities regularly attract antisocial behaviour, which puts people off using them. As a result, Flintshire aimed to adopt a more enabling approach by promoting the use of existing toilets in Council buildings such as libraries and Connects Centres, which people feel more confident and comfortable using. Whilst the previous strategy was published in May 2019 with a 12-point action plan, this was adversely affected for a number of years by the global pandemic.

This Strategy sets out to develop on the work previously been undertaken and to assess the need of the local communities, along with the standard of the facilities being offered. The new strategy will therefore look to raise the condition and accessibility of the facilities across the county over the next 4 to 5 years. Consideration will be given to our duties under the Equality Act, such as the provision of "Changing Places" and gender-neutral toilets, as well as standard accessible toilets in the most appropriate locations. We aim to secure the future of the current provisions and explore ways to increase the number of public toilets available and improve access to all groups of people.

BACKGROUND & INTRODUCTION

In the guidance provided to Local Authorities in preparation for implementation of Local Toilet Strategies, the Welsh Government Cabinet Secretary for Health and Social Services explains that "Accessible, clean toilets that are well located in places such as town centres, parks, promenades, cycle trails and walking routes can help encourage people to take exercise and stay more physically active. This has clear health and economic benefits. Conversely, toilets that are poorly designed, inadequately maintained and inappropriately located can create an atmosphere of neglect that discourages use. A lack of adequate toilet facilities can impact on a person's physical and mental health, as well as affecting the wider environmental health of the population." This appreciation of the benefits of available facilities is further noted when the go on to state "Toilets for public use matter to everybody and remain a high-profile issue. They are, however, even more important to certain groups within society, including older people, people with disabilities, people with particular needs (including certain medical problems), women, children and young people and their families. These groups can be disproportionately affected by poor provision."

Flintshire County Council has recognised the benefits and issues related to public conveniences, and started the process of reconciling the facilities under the Council's control back in 2012. At this time a report to Cabinet was submitted that identified that the County was at the time supporting 12 distinct sites, although the Council has no statutory requirement to provide a Public Convenience service and does not have a formal Policy to determine the location or type of facilities provided and that inconsistency has developed both in the location of the facilities and quality of the service provided across the County. It was noted at the time that some of the locations have been linked to antisocial behaviour, with reports received of substance misuse and vandalism taking place at the facilities. Whilst the majority of the information was anecdotal, there were records of complaints being received by the Council concerning specific sites. The site in Alexandra Street, Shotton was closed since June 2012, due to specific complaints of antisocial behaviour.

At the time of this report, it was noted that the Public Convenience service was managed within Streetscene with a budget allocation of £173,187 in 2012 -13. Repairs and maintenance at all of the facilities were being carried out by private contractors.

As a solution to some of the issues being encountered, it was identified that the Council was developing a programme of one stop shops, Flintshire Connects Centres, across the County and also manages numerous other Council buildings in close proximity to existing standalone Public Convenience facilities. The new Flintshire Connects Centres and the other facilities i.e. Leisure Centres could offer toilet facilities both for their own use and for use as wider Public Conveniences.

It was also recognized at that time that It is important that the Public Convenience service complements wider strategic Council objectives such as the promotion of Tourism and Town Centre marketing and the proposed new service provision will do this by ensuring well maintained facilities are provided in key locations across the County and that utilising Flintshire Connects Centres, other Council buildings and (where appropriate) privately owned facilities will both rationalise and improve accessibility to the service, providing the following advantages over the current service that included potentially longer opening hours which are more targeted to local need, and the reduced instances of anti-social behaviour and vandalism.

Consideration was given at the time to introducing a charge for using the facilities but concluded that such a charge would be more expensive to introduce and manage than would be raised as income, thus creating a further budget pressure on the Council. Charging would also increase the threat of vandalism at the facilities. Likewise the introduction of a 'Superloo' system was considered, but the cost was found to be prohibitive.

In 2016, a further report was present to the Cabinet with the intention of recognising that Flintshire's new strategy identified that isolated Public Toilet facilities regularly attracted antisocial behaviour and that many people would not use the facilities for this reason. It was proposed that the Council should promote the use of existing toilet facilities, within Council buildings e.g. Libraries and Flintshire Connects Centres, rather than the dedicated and often isolated facilities previously provided. This final stage of the review would consider the future of the remaining Public Convenience facilities in the County. This report recognised that the budget in 2016 to provide the public convenience service was £ 93,998 and made recommendations to reduce the existing provision of standalone dedicated facilities further to just 2 sites across the County. However, the Authority did offer the opportunity for Community Asset Transfer for these sites to the local community and Town & Community Councils, and although these were explored, none have been developed far enough to result in the transfer. Currently the County operate 3 stand-alone facilities, which are as follows:

- Bus Station, Mold
- Off High Street, Holywell
- Station Road, Talacre

So it can be seen that Flintshire County Council has already started the process of developing a strategy to manage the provision of local toilets, and in the first instance this looked to rationalise and improve the facilities offered to the public for use. To move forward with this process and align with the requirement of Part 8 of the Public Health Act (Wales), as back in the 2016 Cabinet Report it was noted that the Public Health Bill unveiled by the Welsh Government in June 2015 places a duty on local authorities to prepare and publish strategies for the provision of toilets for public use within their area, and whilst the Council has closed a number of dedicated facilities, access to other Council owned toilets have been improved.

An example of this approach would be the closure of dedicated facilities in Connah's Quay and Mold. The dedicated toilets in Connah's Quay were replaced with access to improved toilets facilities at a shared-use site that reduces maintenance and cleaning costs, removes the anti-social behaviour that the dedicated site attracted and improving the overall facilities on offer to the public in the area.

This approach will continue to be the basis of the strategy when it is required to be produced by the new legislation. It is clear that the Authority is aware that this is the start of a long-term process, and that not all existing toilet facilities at the time need to remain, especially if there are better alternatives. Efforts to increase the provision of additional local toilets has also identified that not all potential facilities within buildings can be made accessible to the public. And we accept that by making use of existing resources that this means that not every toilet brought into public use is likely to be fully accessible to everyone due to building limitations, and what is proportionate change to make the toilet fully accessible, however a much wider range of available toilets is to the benefit of all.

The 2016 Cabinet Report also recommended that the dedicated stand-alone facilities in New Street, Mold and Holywell be closed, and the details and actions within this strategy should support the provision of reasonable alternatives to the benefit of improving the overall facilities on offer to the public in the area.

THE BENEFITS OF THIS STRATEGY

Toilets for public use matter to everybody who goes "away from home" for some reason and remain a high-profile issue. They are, however, even more important to certain groups within society, including older people, people with disabilities, people with particular needs (including certain medical problems), women, children and young people and their families. These groups can be disproportionately affected by poor provision; for example, poor provision is understood to have particular negative impacts on older people, as some may be less likely to leave their homes without having confidence that adequate facilities will be available to them. This can contribute to increased social isolation and inactivity, as well as affecting people's ability to maintain independence and dignity in later life.

This strategy contributes toward achieving accessible and clean toilets wherever people live, work or visit. Need is likely to grow through new housing developments and through tourism. This is an opportune time to set a strategy for promoting access to toilet facilities where they are needed.

Part 8 of the Public Health (Wales) Act 2017: Provision of Toilets came into force on 31 May 2018 and places a duty on each local authority in Wales to prepare and publish a local toilets strategy for its area. The strategy is built around the principles of co-production, through local authority engagement with a broad range of potential providers and users.

Local authorities in Wales now have the responsibility to:

- Assess the need for toilet provision for their communities;
- Plan to meet those needs;
- Produce a local toilets strategy; and
- Review the strategy, update and publicise revisions.

Flintshire's previous local toilet strategy was approved and published in May 2019. The duty to prepare a local toilets strategy does not require local authorities to provide and maintain public toilets directly. The Local Authority must take a strategic view on how facilities can be provided and accessed by their local population. Upon review of this strategy, Flintshire County Council is required to publish a statement of progress.

The aim of this strategy is to review the quality and quantity of local toilets throughout the county and to provide or facilitate the provision of clean, safe, accessible and sustainable

toilets for residents and visitors to the County at locations where the need for such facilities has been identified.

This Strategy will require us to:

- · Review the current level of provision of public toilets
- Analyse the findings of the completed assessment of need activities for toilets available for use by the public in their area;
- Consider the requirements of the general population;
- Identify the needs for particular user groups;
- Survey the condition and usage of existing facilities;
- Identify any gaps in current provision;
- Adopt the use of new technologies and communications that it is envisaged will lead to an increased awareness of the locations of local toilets; and
- Provide a statement setting out the steps which the Local Authority proposes to take to meet this need; and any other information which the council considers appropriate.

REVIEWING THE STRATEGY

As set out in the Public Health (Wales) Act 2017 – Part 8: Provision of Local Toilets, Flintshire County Council will review the local toilet strategy within a year of each ordinary election for its area. The next election in Wales is 2027, If no changes are made to the strategy following the post-election review then the County will publish an interim progress statement covering a two year period commencing from the date of the last election.

Flintshire 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, should the County decide 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.

MAPPING LOCATIONS

It is intended that the information collated as part of preparing this strategy is replicated and made available in the most convenient manner so that people who need to visit a toilet can easily access information about the location, opening times, accessibility and type of facilities available.



Participating premises will also display a sticker in a prominent place, indicating that toilets are available for the public. The sticker will display the logo stipulated by Welsh Government. It is also intended that Flintshire County Council adopt this signage to promote

consistency across the area for those that wish to use facilities.

The British Toilet Association also recommends that signs be fitted on the outside with information like opening hours, contact information for reporting problems and the specific facilities provided inside, such as whether there is a baby-changing room.

The Council will periodically review and update the Welsh Government "Lle" data repository to allow access to accurate information by guide and map publishers, residents and visitors.

Once we have identified the toilets that will be publicised as available for use by the general public, Flintshire County Council will prepare a dataset to a given specification, and make it available as open data on the council website. The dataset will consist of the location and specified characteristics of the identified toilets. This data will also be consumed by the Welsh Government system and joined to other LA datasets to produce the national dataset for the Lle map. Lle is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment. Lle will generate all-Wales maps based on the datasets provided by local authorities that 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 link to the Lle portal is below:

http://lle.gov.wales/home

For data to be classed as open data it must 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.

The dataset will be available in Welsh and English. 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.

Flintshire County Council will show a link on its website to the Lle map as a whole to assist people in searching the data for other areas they may be visiting. Flintshire County Council promotes the use of The Dewis Cymru (www.dewis.wales) website as a resource that brings together local information, this information relating to Local toilets will be published on this website.

DETAILS OF EXISTING COUNTY FACILITIES AVAILABLE TO THE PUBLIC

								Wh	nat faci	lities a	re avai	lable?					
Name of	Postcode					Baby	chang	je			Disal	bled			A place		
Location											Oper	acces	SS	Lock	ed (RA	DAR)	incorporating
		Dedicated Facility?	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?
Bus Station, Mold	CH7 1LA	Υ	Y	Y	N	N	Y	N	N	Y	Y	Y	N	Y	Y	N	N
Station Road, Talacre	CH8 9RP	Y	N	N	Y	N	N	Y	N	N	N	N	Y	N	N	N	N
Off High Street, Holywell	CH8 7TR	Υ	Y	Y	N	N	Y	N	N	N	Y	Y	N	Y	Y	N	N

				Opening Times											
Name of Location	Postcode	Monday		Tuesday		Wednesday		Thursday		Friday		Saturday		Sun	nday
English		Open	Close	Open	Close	Open	Close	Open	Close	Open	Close	Open	Close	Open	Close
Mold, Bus Station	CH7 1LA	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00
Talacre Toilets	CH8 9RP	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00
Holywell Toilets	CH8 7TR	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00	08:00	17:00

		Are the toilets closed on any of the below days?										
Name of Location	Postcode	Are the toilets closed off peak?	Are services reduced off peak?	Christmas Day	Boxing day	New Years day	May bank holiday	Good Friday	Easter Sunday	Easter Monday	Spring bank holiday	August bank holiday
English		No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes
Mold, Bus Station	CH7 1LA	No	No	Yes	No	No	No	No	No	No	No	No
Talacre Toilets	CH8 9RP	No	No	Yes	No	No	No	No	No	No	No	No

			Are the toilets closed on any of the below days?										
Name of Location	Postcode	Are the toilets closed off peak?	Are services reduced off peak?	Christmas Day	Boxing day	New Years day	May bank holiday	Good Friday	Easter Sunday	Easter Monday	Spring bank holiday	August bank holiday	
English		No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	No/Yes	
Holywell Toilets	CH8 7TR	No	No	Yes	No	No	No	No	No	No	No	No	

ADDITIONAL FACILITIES WITHIN THE COUNTY

Below is a list of the facilities available throughout the county that are available to the public for use:

- Clwyd Riding Centre, Llanfynnydd (Changing Place Facilities)
- Caerwys, Drovers Lane
- Flint Leisure Centre
- Buckley Library
- Holywell Library
- Daniel Owen Centre, Mold
- Queensferry, Daleside Garden Centre

- Buckley Town Centre Public Toilets
- Connah's Quay, Fron Road
- Mold Leisure Centre
- Connah's Quay Library
- Mold Library
- Broughton Shopping Park
- Holywell Leisure Centre (Changing Place Facilities)

- Cilcain, Village
 Community Centre
- Buckley Leisure Centre
- Deeside Leisure Centre
- Flint Library
- Shell Garage, A55
- Flint Train Station

NEEDS ASSESSMENT

In an effort to capture the available facilities and the demand in an objective way, the following needs assessment has been developed. It is not intended to use this in isolation, and the information that becomes available through the engagement survey, and the full consultation will influence the holistic need for local toilets across the County.

	Description		ļ
	N/A		
	Very Low		
=	Low		
=	Medium		
=	High		
=	Very High		

		ldentif	ying Need				<u> </u>			
Town/Village	Shopping Need	Attraction Need	Transport Interface Need	Special Circumstances Need	Need Score	LA Operated Facilities	Other Public Sector Toilets e.g. Leisure Centres, Libraries, etc.	Community Council	Private	Has Need Been Met?
Mold	5	5	4	4	18	1	2	1	1	Yes
Holywell	4	4	3	3	14	1	1			Yes
Flint	4	3	4	3	14		2		1	Yes
Connah's Quay	4	3	3	3	13		1		1	Yes
Broughton	5	3	5	0	13		1		1	Yes
Buckley	3	3	3	3	12		2	1		Yes
Queensferry	3	3	3	3	12		1		2	Yes
Shotton	4	2	4	0	10					No
Saltney	2	2	3	2	9					Yes
Hawarden	1	3	2	0	6					Yes
Talacre	0	4	1	0	5	1				Yes
Mostyn	1	1	2	0	4					Yes
Sealand	0	1	1	0	2					Yes
Mynydd Isa	1	1	1	0	3					Yes
Ewloe	0	2	1	0	3					Yes
Caergwrle	0	0	2	0	2					Yes
Northop	1	1	0	0	2					Yes

Cont.

		Identif	ying Need				Existing Toile	et Provision		
Town/Village	Shopping Need	Attraction Need	Transport Interface Need	Special Circumstances Need	Need Score	LA Operated Facilities	Other Public Sector Toilets e.g. Leisure Centres, Libraries, etc.	Community Council	Private	Has Need Been Met?
Halkyn	0	1	0	0	1					Yes
Penyffordd	0	0	2	0	2					Yes
Greenfield	0	2	0	0	2					Yes
Bagillt	0	0	0	0	1			1		Yes
Caerwys	0	0	1	0	1			1		Yes
Aston	0	0	1	0	1					Yes
Hope	0	1	0	0	1					Yes
Ffynnongroew	0	0	0	0	0					Yes
Gronant	0	0	0	0	0					Yes
Trelawnyd	0	0	0	0	0					Yes
Whitford	0	0	0	0	0					Yes
Northop Hall	0	0	0	0	0			1		Yes
Cilcain	0	0	0	0	0				1	Yes
Brynford	0	0	0	0	0					Yes
Gwernaffield	0	0	0	0	0					Yes
Gwernymynydd	0	0	0	0	0					Yes
New Brighton	0	0	0	0	0					Yes
Mancot	0	0	0	0	0					Yes
Higher										
Kinnerton	0	0	0	0	0					Yes
Leeswood	0	0	0	0	0					Yes
Treuddyn	0	0	0	0	0					Yes
Llanfynydd	0	0	0	0	0					Yes

It needs to be reiterated that the duty to prepare a Local Toilets Strategy does not require councils to provide and maintain public toilets directly, nor are they required provide additional dedicated facilities.

OUTCOME OF PUBLIC ENGAGEMENT

In May 2023, an online questionnaire was carried out to gauge opinion on the three current, free-to-use Council owned public toilet facilities in Mold, Holywell and Talacre.

The questionnaire was based around attendance, awareness of the facilities, adequacy of the provision and suggested improvements. The questionnaire was live for 21 days and received 687 visits and approximately 430 responses per question.

575 of the visits were made by local residents and 26 of the replies represented local user groups or organisations.

Attendance:

The following questions were asked:

- How often do you visit Mold, Holywell and Talacre?
- Do you use the public toilets?
- Are they conveniently located?
- Are they open at the times you need them?

Summary of Responses:

The majority of people responding regularly visited Mold, Holywell and Talacre, but viewed that the public toilets were not conveniently located and in Mold they were not open at the timed they wanted to use them.

Awareness of Facilities

The following questions were asked:

- Are you aware of the facilities Flintshire offer?
- Is there enough information on where to find free to use public toilets?
- Is access to toilet facilities across the county sufficient?

Summary of Responses:

- The majority of respondents are not aware of the facilities Flintshire provide and they do not know how to find the toilets.
- There are not enough free to use facilities throughout the county

Adequacy of Provision

The following questions were asked:

- Do the toilets adequately meet your needs?
- Are the facilities accessible for those with disabilities?
- Are the changing facilities for babies, young children and those with disabilities adequate?
- Do you agree that the cleanliness is good in the free public toilets?
- Do you feel safe when visiting the facilities?

Summary of Responses:

- Respondents felt that the current facilities provided within Flintshire were inadequate for those with disabilities, babies and young children
- Cleanliness could be improved
- Some locations did not feel safe to use

Suggested Improvements

The following questions were asked:

To what extent would you agree or disagree with the introduction of environmentally friendly features in free public toilets? Summary of Responses:

 88% of respondents supported the introduction of environmentally friendly features

FUTURE OPTIONS

Letting policies

The Council could possibly consider options to introduce a clause in leasing agreements whereby when the Council is letting its own property to a suitable business like a shop or café, to include public access to toilet facilities. However, whilst this could be considered for the small number of shop units leased out, tenants may well raise issues around cleaning, maintenance and availability and the requirement could conceivably deter prospective tenants from taking a lease.

Future needs provided by the commercial sector through Council strategy and planning channels

Community Infra-structure Levy enables the Flintshire Local Planning Authority to raise funds from developers undertaking new building projects in their area. The funds can be used for a wide range of infrastructure costs, such as education, healthcare, police and fire and rescue, which is needed as a result of new housing for example. This may be one way to secure funding for future public toilet provision within or near new developments, on a need and demand-driven basis and depending on the prioritisation between new infrastructure needs. Consideration will be given to including local toilet provision in new schemes devised under the Community Infra-structure Levy.

Major Development proposals (Planning conditions)

Some large-scale commercial developments that are going to include cafes, bars, shops, entertainments for example, could possibly be required, as a Planning condition, to allow general public access to any toilet facilities that are being built in the premises. However, there is no policy support at national level for the imposition of planning conditions to allow the general public access to toilet facilities at private commercial premises. Therefore any such condition would fail the test that it must be necessary to make the development acceptable from a planning point of view.

Embed the Review of Local Toilets Provision into broader Council Initiatives

When reviewing plans and strategies across the organisation, Flintshire County Council will consider the need and provision for Local Toilets. This will include, but not be restricted to the review of the following:

- Local Well-being Plans
- Population Needs Assessments
- Local Development Plans
- Active Travel Routes and Maps; and
- Partnerships for Growth.

APPENDIX 1 - ACTION PLAN

No.	Objective	Target
1	Promote equal opportunities to provide appropriate, accessible, and effective services and facilities to all sections of the community without prejudice or bias.	Life of Strategy
2	Explore options that include working with the private sector, voluntary services, community councils and other council owned buildings to make local toilets available in places where they are most needed and encourage them to make the facilities available to the public.	Apr-25
3	Improve awareness and information available on toilet provision in the county by: ensuring that public toilets are signposted correctly, that the information on the Flintshire County Council website is correct and will regularly update the Lle open access data repository with WG, and that the Dewis Cymru website and third parties participate in the mapping scheme and that we display the toilet logo sticker in appropriate premises.	Mar-24
4	Review existing contracts and service provision to monitor cleansing operations and standards on a periodic basis to ensure the most efficient and effective provision within allocated resources.	Dec-24
5	Review the existing facilities to ensure that the best options for the provision of accessible toilets are made that best suit the need of the community and explore the options for the introduction of Changing Place facilities by producing a 4-year programme to ensure that Flintshire is providing appropriate, accessible, and effective services and facilities for local residents and visitors of the County.	Apr-24 – Mar-27
6	Streetscene & Transportation officers, along with other relevant officers of the council, are to continue to work with the police and residents, community groups and others to ensure that the facilities are as safe as possible whilst reducing antisocial behaviour and vandalism.	Apr-24
7	Explore alternative options and enhancements for the introduction of environmentally friendly features and ensure that sustainable development and energy is taken into consideration.	Apr-25