



ACCESS TO TOILETS

Headline report



REVIEW PURPOSE

The review is driven by members concerns that limited toilet provision is impacting on mobility for disadvantaged groups, particularly older people, disabled people, pregnant women and parents and carers of young children.



OUTCOMES

The primary outcome the review aims to achieve is that the council develops a Southwark Toilet Strategy with local stakeholders.

CONTEXT - LONDON AND NATIONAL LOO CAMPAIGNS

- i. The review took place during a resurgence of campaigns over the last few years for more loos, driven largely by older people and older people's campaign groups, led in part by Age UK London.
- ii. The GLA health select committee wrote a report: The Toilet Paper in November 2021. This made several recommendations to the Mayor of London, including that Local Authorities develop Toilet Strategies and also included several actions for TfL to improve toilet information, accessibility and provision.
- iii. In May 2023 London Councils held an event focusing on Toilet Strategies, Community Toilet Schemes and more.
- iv. Age UK London have produced several resources on producing Toilet Strategies, Community Toilet schemes and using planning and public information.
- v. Age UK London have supported local Southwark residents to campaign.

CONTEXT - CHANGING PLACES -1

- i. There is growing awareness of the access needs of people with higher access needs – people who are most disabled.
- ii. The government has provided funding for more Changing Places loos and Southwark has made good use of this.

CONTEXT - CHANGING PLACES -2

- i. There is now a new legal requirements to install Changing Places Toilets in Public Buildings. This applies to any new builds or major refurbishments in respect of :
 - Places of assembly, recreation and entertainment (e.g. art galleries, cinemas, libraries, museums, FE colleges) with capacity of 350+ or collections of smaller buildings such as zoos, theme parks with a capacity of 2000+
 - Shopping centres or retail parks with a gross floor area of 30,000m² or more
 - Retail premises with a gross floor area of 2500m² or more
 - Sport and leisure buildings with a gross floor area more than 5000m²
 - Hospitals and primary care centres
 - Crematoria and cemetery buildings

BACKGROUND –SOME HISTORY

The council has reviewed its approach to toilets twice formally in the last twenty years :

- i. In 2005 Cabinet agreed a mini review and decided to open up more toilets in the council's estate, work with stakeholders, including local supermarkets, to increase provision, improve signage and close toilets not DDA compliant,
- ii. In 2018 the Council Plan refresh undertook to create a network of accessible toilets and baby changing facilities.

HOW THE COUNCIL DELIVERS TOILETS

The council delivers toilets through:

- i. Public Conveniences it maintains on the street and in parks.
- ii. Opening up toilets in buildings owned by the council to the public, for example the office at Tooley Street and libraries.
- iii. Working with partners to increase publicly available provision, for example in Leisure Centres, Network Rail owned stations, encouraging provision of toilets as part of regeneration schemes and by stipulating more provision through planning.
- iv. The Southwark Plan requires public toilet provision in town centres. Large schemes for main town centres that are 1,000 sqm, or more, must provide free public toilets.
- v. Delivering more Changing Places loos by accessing funding and working with partners to install these in public places.
- vi. Supporting Community Toilets whereby the council works with business to open up toilets in café, pubs, supermarkets etc. to local people (although this is not currently active).
- vii. Provision of information on the council website and through AssessAble.

TOILETS ARE AN EQUALITY AND PUBLIC HEALTH ISSUE -1

- i. Lack of toilets disproportionately impacts on many people with a Protected Characteristic .
- ii. Older people and disabled people will often not leave the home unless they can be sure of adequate provision.
- iii. Parents with young children particularly need toilets.
- iv. Pregnant women need toilets more frequently and urgently.
- v. Women need more toilets than men, as they spend longer in toilets.

TOILETS ARE AN EQUALITY AND PUBLIC HEALTH ISSUE -2

- i. People with limited mobility often require larger cubicles to accommodate walking aids, including shopping trollies. People frequently travel with luggage, and other bags, which toilet cubicles should be designed to accommodate easily.
- ii. Loos for Southwark pointed out that while airports have mastered this problem, and provide large enough cubicles , railway stations, and other public places have often not yet managed to provide adequate facilities. This can be a particular problem in stations where safety announcements order passengers not to leave their luggage unattended, but tiny cubicles, with Sanitary Bins, and inward opening doors make this extremely difficult.
- iii. Race is a barrier to accessing public provision in café and pubs.
- iv. Men with prostate cancer need bins.

TOILETS ARE AN EQUALITY AND PUBLIC HEALTH ISSUE - RECOMMENDATION

Recognise that a lack of toilets disproportionately impacts on people with a Protected Characteristic, including older and disabled people, in particular. A Toilet Strategy ought to conduct an Equality Impact Assessment. Poor provision is a Public Health issue and negatively impacts on the health and wellbeing of residents.

The Equality Impact Assessment ought to include:

- i. Ensuring adequate provision for people who require a toilet more frequently,
- ii. Ensuring that all cubicles are large enough to accommodate walking aids,
- iii. Ensuring that different sex needs are catered for including ensuring provision recognises that:
 - Women take longer and require more toilets than men , and pregnant women often have a more urgent need,
 - Men with prostate cancer require sanitary bins.

TOILETS ARE AN ENVIRONMENTAL HEALTH ISSUE

- i. Poor provision is an environmental health issue and negatively impacts on the health and wellbeing of the community.
- ii. Homeless people are defecating and urinating in the streets and parks because there are no public toilets.
- iii. Parents are holding children over drains in the street because of poor provision.

ENVIROMENTAL HEALTH - RECOMMENDATION

- i. The lack of adequate, decent toilet provision is leading to unsanitary conditions in public spaces, particularly parks and the street. Poor provision is an environmental health issue. The council ought to work with partners to ensure, as far as possible, that there is adequate provision to meet the needs of the whole population of Southwark, including homeless people.

TOILET COLD SPOTS

- i. Provision is particularly poor in Peckham and Camberwell.
- ii. Peckham Rye Station is due to have a toilet – however it is unclear if this will only be a Changing Places Toilet and if other toilets will be provided in addition, and if they will be located behind a barrier. There is a preference amongst many people for toilets to be located in front of the barrier, however TfL's current guidance for new facilities is that they should be located in the ticket hall after the barrier, as they believe this helps to ensure facilities remain in a better condition for all users. At the same time TfL states that they expect staff to allow people through the barrier to use toilets wherever possible (see Mayor of London's response to the GLA Toilet paper report, Jan22).
- iii. In addition the Peckham Rye station upgrade there is also a council led Town Centre upgrade . Provision of a new town square, adjacent to Peckham Rye Station , was granted planning permission in 2016 , and this included new public toilets to be created in the arches adjacent to the new square.
- iv. Concerns about anti-social behaviour (ASB) are thought to be a concern here and there are concerns that this may hinder delivery. ASB can be mitigated through engagement and good planning. The council is a partner in the regeneration of the station led by Network Rail and leading the new square development at the front of the station and such can use its influence to ensure provision meets the public's needs and ASB is addressed.
- v. The plans above, and a new Aylesham Centre redevelopment in the north of Peckham , are likely to deliver substantial improvements to toilet provision over the longer term, but none are due until at least 2026 . In the meantime Peckham needs several toilets across the long length of Peckham Rye , and an a revitalised community toilet scheme could deliver this over the short to medium term.
- vi. Camberwell Green toilet provision is poor . The automatic toilet is frequently out of action , and was removed when the contract expired in 2022. Camberwell Library toilet is located nearby, and open weekdays until 8pm, Saturday daytime and Sunday afternoon. There were concerns raised in the Commission that this is not cleaned frequently enough. There is potentially an opportunity in nearby supermarkets and fast food places to increase provision.

TOILET COLD SPOTS - RECOMMENDATIONS

Improve provision in Peckham Rye Station and the new Town Square by prioritising this in the Toilet Strategy and Town Centre plans. Together the council and Network Rail ought to provide more transparency on the plan, and options for toilets at Peckham Rye Station and new Town Square, and consult with local residents and stakeholders to bring clarity by 2025. In addition the council ought to improve Camberwell Green toilet provision by a) ensuring the library toilet is cleaned frequently enough b) engage nearby supermarkets and fast food places through a Community Toilet Scheme.

TOILET – GOOD PRACTICE

The toilets at Sainsbury's East Dulwich were commended.

Southwark Park (Pavilion Café by the lake) has good toilets.

Dulwich Park will have the gold standard of a fully accessible Changing Place, that also meets heritage standards. This will cost £97,115 , including the associated ground work costs. This is covered by DLUHC's Changing Places Fund. This will open up the park to disabled residents.

The East Street Market Toilets are good . They are located on Portland Street near the junction with East Street. The toilets are open six days a week, when the market is in operation. They do not have an attendant but are cleaned regularly throughout the day. Whilst the toilets were commended in the commission as well kept, officers reported that the toilets are subject to vandalism on a regular basis.

COMMUNITY TOILETS

- I. Southwark had, until recently, a Community Toilet scheme whereby it would work with businesses to promote use of toilets , however this has fallen into disuse over the last few years and is no longer actively supported.
- II. The Local Economy team are willing to liaise with businesses through their fora to promote such a scheme.
- III. There are a variety of good Community Toilet schemes, including ones in Richmond and Lewisham.
- IV. Community Toilet schemes enable the opening up or more toilets, particularly during business hours, in a resource effective way. They do require some consistent investment from the council and cannot be the only solution.

COMMUNITY TOILETS - RECOMMENDATION

- I. Invest in a refreshed Community Toilet scheme using London boroughs, such as , Richmond and Lewisham as examples .
- II. Prioritise Peckham Rye, Camberwell and other cold spots, in the revived Community Toilet scheme .

ANTI SOCIAL BEHAVIOUR (ASB) - 1

The Commission heard that concerns about anti social behaviour are sometimes given as reasons not to open toilets, or restrict provision . An example of this is Peckham Rye station and Town Square where members and residents reported that concerns about ASB have been cited as a potential obstacle to delivery or may result in a toilet behind the barrier.

Officers said that anti- social behaviour has been an issue in Southwark and that Belair Park toilet suffered an arson attack and East Street Market Toilets have been destroyed twice, and immediately repaired, though this still means they are out of use sometimes. Despite this members reported that East Street Market Toilets are well looked after and appreciated.

The former GLA building , opposite Tooley Street, is currently under new ownership and the public have been consulted about future uses. A top public concern is that the toilets, which include a Changing Place, will remain open. These have been subject to anti social behaviour the there have been changes made to reduce ASB by amending the delivery and design. It is hoped that the consultation will model keeping this provision open and reducing ASB through engagement.

ANTI SOCIAL BEHAVIOUR (ASB) -2

AGE UK London supplied conducted some desk top research on the Commission's behalf on this issue, and provided a report, and this made the following points:

- I. Being clear that the value of clean , safe toilets, including the economic benefits to the entire community (such as business on the high street) and positive impact on resident's health and wellbeing is of more importance than the cost to maintain public toilets.
- II. Find out what the specific type of ASB is that people are concerned about as vandalism , drug use, sex work or using a toilet for shelter has different causes and approaches to mitigate .
- III. Take a partnership approach to develop measures and address concerns proactively. This can be by using various strategies such as regular monitoring, security measures, and cleanliness protocols, to ensure that the facilities are well-maintained and safe for all users. CCTV can work well.
- IV. Design toilets so they are located in places where there is good oversight by the community and that they are appealing.
- V. Collaborate with local law and council enforcement and community organisations to deter any anti-social behaviour in the vicinity and to develop a realistic plan based on capacity.
- VI. Where possible include attendants as their presence deters many forms of ASB.

ANTI SOCIAL BEHAVIOUR (ASB) - RECOMMENDATION

Toilet have a high value to the community and as such the cost of mitigating ASB is not a good reason to deny provision. ASB can be addressed through engagement with partners to improve location and design and make the most of local capacity to prevent and deter ASB . This ought to include understanding the types of possible ASB and working with the police, TfL, council enforcement and community organisations to mitigate and prevent. Consideration ought to be given keeping toilets clean and well maintained, and the use of attendants where possible.

OPENING UP SOUTHWARK COUNCIL ESTATE TOILETS - 1

- I. Since 2005 Southwark has opened up toilets in the council's control to increase public access.
- II. There is now an accommodation review looking at buildings in the council's control, and as part of this work will be done to look at increasing the amount of toilets that could be opened up to the public. There are around 200 buildings in the council estate, it and officers indicated that up to half may be able to be opened up to the public.

OPENING UP SOUTHWARK STAKEHOLDERS

ESTATE TOILETS -2

- I. There are also other stakeholder in the community who have a vested interest in better local toilet provision in the borough, that the council could work with.
- II. GP practices - which are independent businesses - could be asked to let their facilities be used by the local community. The wider NHS could also be encouraged to open up their estate to the public.
- III. TFL is also committed to improving toilet provision where funding allows. In 2022 TfL commenced an audit of its London underground facilities to make decor improvements, enable station toilets to be used over a longer period , facilitate access across the barrier and increase information.
- IV. The Mayor for London spatial plan has a specific plan (Policy S6) that requires large developments – such as shopping centres or large community spaces – and those where new, large-scale public realm is created, to provide free, publicly accessible toilets suitable for a range of users.

SOUTHWARK BOROUGH TOILETS - RECOMMENDATION

- I. The Commission welcomes the accommodation review of the council's estate and the potential this offers to open up more toilets to the public.
- II. In addition the Commission recommends that the council works with wider stakeholders such as local GPs, the wider NHS, TfL and developers to maximise toilet provision in the existing estate and in future buildings.
- III. The work on the accommodation strategy and engagement with wider stakeholders, to open up both the existing estate and expand provision, ought to be incorporated into a Toilet Strategy.

INFORMATION AND SIGN POSTING

- i. Southwark maps out toilet provision on the council website but the map is not always accurate.
- ii. Southwark uses AccessAble, which officers reported is a well used resource.
- iii. A paper copy map would be useful, as produced by Lewisham.
- iv. The Local Economy Team indicated they could play a role in ensuring business engagement and distribution and anticipated that libraries would stock copies.
- v. The Great British Public Toilet Map (www.toiletmap.org.uk) was commended by Loos for Southwark. It shows toilets of all kinds and can be filtered for specific facilities including 'accessible' and 'baby-changing'. There are currently 57 toilets mapped within Southwark.

INFORMATION AND SIGN POSTING - RECOMMENDATION

The Commission supports the continued use of AccessAble, which is a well used resource .

In addition the Commission recommends that :

- The website is kept updated in the short term and over the longer term more work is done as part of a Toilet Strategy to provide accurate information to residents and visitors .
- The Great British Public Toilet Map www.toiletmap.org.uk is updated , as this is an excellent resource.
- A map forms part of a revised Toilet Strategy / Community Toilet scheme and this would consist of a hard copy as well as digital offer. Lewisham have an excellent printed map that it would be useful to replicate in Southwark.

TOILET STRATEGY

Strategies are important as lots of different parts of the council have responsibility for different aspects of toilet provision. In addition the council can work with partners and other borough stakeholders, through fora such as the Health and Wellbeing Board, to collaborate on a borough wide toilet strategy. A good plan will bring these together.

Age UK say a good toilet strategy should include:

- i. Meaningful ongoing community engagement with residents. This should be a diverse group, including older residents, representative of the wider community. It is important that meaningful consultation is inclusive and that people without the internet are included.
- ii. A needs assessment based on mapping existing toilets available for public use, identifying gaps by working with communities and other partners to identify solutions.
- iii. An action plan to review and improve public information about provision. Consideration should be given to the quality of signage, maps, website information, and the use of newsletters, media, posters and leaflets to raise awareness about toilet locations.
- iv. Aim to mainstream public toilet provision into strategic policy such as urban planning policy.

TOILET STRATEGY - RECOMMENDATION

Develop a Toilet Strategy through engagement with a range of stakeholders, local people, mapping needs and gaps, co-creating solutions and provision of an action plan that interfaces with planning and regeneration.

LEADERSHIP

Developing and delivering a Toilet Strategy will take leadership from both elected members and officers to pull together the work of different council departments, build partnerships with community stakeholders, and engage with the public.

The Commission consider the either the cabinet member for Public Health or a Cabinet member with the Environmental Health and Streets for People brief in their portfolio is best placed to provide strategic leadership . Likewise a senior officer from either the Public Health team or Environment Department would be well placed to provide officer leadership.

LEADERSHIP — RECOMMENDATION

The Commission recommend that the Toilet Strategy is led by:

- I. The cabinet member for Public Health or a cabinet member with the Environmental Health and / or Streets of People brief in their portfolio
- II. A senior officer