



# Public Convenience Strategy [DRAFT]

This Document is also available in Welsh

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# Contents

Background	3
Introduction	4
Strategy Aims	5
Strategy Review	5
How has this strategy been developed?	6
How does the strategy fit in with other Council priorities and services?	6
Terminology	7
Local Provision	8
Mapping locations	9
Action Plan	10
Summary	13
Appendix One	14

Ref: WCBC/ER846/13012025



## Background

Wherever people go, outside of their own homes, they depend on toilet facilities for the enjoyment of their visit. Visitors to the county, who may be some distance from their homes, also depend on provision to accessible toilets. Toilets can make a significant impact upon the comfort of individuals and families who visit public spaces and their perception of the area as a desirable place to visit.

Provision of, and access to toilets is an issue that affects public health. There are around 136,000 people living in Wrexham County Borough with 5% aged under 4 and 20% aged over 65. The British Toilet Association (BTA) recommend that publicly accessible toilets should be provided on both a population and distance basis. The BTA recommended level is 1 cubicle per 550 female population and 1 cubicle or urinal per 1100 male population, which is a ratio of 2:1 in favour of women. One accessible toilet and also one baby change facility should be provided for every 10,000 population. Currently the provision in Wrexham exceeds the recommendation for accessible toilets and baby change facilities.

Accessible, clean toilets that are well located in places such as town centres, parks, cycle trails and walking routes can help encourage people to socialise, take exercise and stay more physically active. This has clear health and economic benefits. Conversely, 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.

Therefore the provision of toilets has implications for public and individual health, transportation, crime prevention, urban design, economic and cultural development and social equity and accessibility. It is an important factor in delivering a 'people friendly' environment for everyone who goes to shopping centres, leisure and entertainment venues, sports facilities, parks and green spaces, everyone who moves about on foot, or bicycle, private or public transport, whether for work or pleasure.

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.



## Introduction

This strategy should contribute 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.

The duty to prepare a local toilets strategy does not require local authorities to provide and maintain public toilets directly (see Terminology for a breakdown of providers). 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, Wrexham County Borough Council is required to publish a statement of progress.

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

- looking to the long term so we do not compromise the ability of future generations to meet their own needs;
- taking an integrated approach;
- working with others in a collaborative way to find shared sustainable solutions;
- involving a diversity of the population in the decisions affecting them; and
- acting to prevent problems from occurring or getting worse.

Due regard has been made to the above five ways of working when preparing, reviewing, consulting on and publishing this strategy.

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

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



## Strategy Aims

The aim of this strategy is to review the quality and quantity of local toilets throughout the county borough and to provide or facilitate the provision of clean, safe, accessible and sustainable toilets for residents and visitors to the Borough at locations where the need for such facilities has been identified.

To achieve this aim, we will:

- Identify the current level of provision of public toilets
- Analyse the findings of the completed assessment of need 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 and consider facilities not currently in general public use;
- Identify any gaps in current provision;
- Adopt and use new technologies and communications that it is envisaged will lead to an increased awareness of the locations of local toilets;
- Advise on the provision of adequate temporary toilets by the promoters/organisers of one off events; 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

## Strategy Review

Wrexham County Borough Council will prepare an interim progress report setting out the steps taken in line with their strategy every two year period commencing from the date of the last published strategy. The interim progress report will be published within six months of the end date of the two year period. Therefore, following publication, the first review will take place no later than 2 years from the adoption of the strategy. Wrexham County Borough Council will also review the local Public Convenience Strategy within a year of each ordinary election for its area.

Wrexham County Borough 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, Wrexham County Borough Council decides to revise the strategy it will publish the revised strategy and then prepare an interim progress report covering the two year period commencing from the date of publication of the revised strategy.



## How has this strategy been developed?

A public consultation was undertaken throughout November 2022 – January 2023 to assess the needs of residents, and people visiting or working within the county borough. The public consultation was publicised via the Council's "Your Voice" online consultation portal with several ways to respond, e.g. on-line and hardcopy. A total of 520 responses were received. The results are detailed in Appendix One and have been used to influence the content of the draft strategy.

Engagement with community groups and the public was undertaken to understand what is currently on offer and how any gaps in this contribution can be mitigated.

An exercise was also conducted whereby the Council contacted local businesses to ascertain whether they would be prepared to participate. There was a positive response from the local business community and we aim to increase the number of facilities via this method.

## How does the strategy fit in with other Council priorities and services?

The current Council Plan was approved in 2023. It sets out 6 well-being and improvement priorities. Promoting good health and well-being contributes strongly to three of Wales' Well-being Goals: a healthier Wales which is a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood; a more equal Wales which is a society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances); a resilient Wales where our workforce and services have the capacity and adaptability to meet people's needs and a Wales of cohesive communities which are attractive, viable, safe and well connected. The Public Convenience Strategy contributes to the well-being objective.

- Delivering Efficient Streetscene Services and Decarbonising our Environment
- Developing the Economy
- Ensuring Wrexham is a Fair and Safe Place
- Improving Education and Learning
- Promoting Good Health and Well-being (with a focus on social services and good mental health)
- Supporting a Highly Skilled and Engaged Workforce, Focussed on Delivering Services.



## Terminology

### Council-owned

#### Stand-alone – council managed

These are what many people would consider traditional public toilets. They have usually been stand-alone, purpose-built buildings providing separate areas for Ladies, Gents and more recently an accessible unit for disabled people. The council has been responsible for the maintenance, management and cleaning, by in-house staff.

#### Within council facilities and offices

Toilet facilities may be made available to the general public where the individual location, access and circumstances allow, such as libraries, sports centres and some council offices. This has often been part of a wider need to ensure that all services offered are accessible by all members of the community.

#### Run by third parties

These include traditional public toilets now managed by third parties such as Community Councils and council owned buildings which are managed and run by third party organisation, these include Freedom Leisure facilities.

### Commercial / Retail sector provision

Many toilet facilities provided by commercial and retail businesses have been primarily or solely for use by customers. Some shops in town centres understand that people come in to use the toilets and recognise that this may lead to people buying goods whilst inside. Town shopping centres and new mixed retail developments now generally make provision for toilet facilities for all visitors and shoppers. Most visitor and tourist attractions and entertainment venues such as cinemas provide toilet facilities. The Eagles Meadow development is a good example here and the operators have volunteered the facilities to be part of the Council's Strategy. Railway stations often provide toilet facilities and Officers have liaised with colleagues in Transport for Wales in relation to inclusion going forward.



## Local Provision

Providing toilet facilities in separate buildings has been the model for many decades and this approach may still have a role in certain circumstances. However, there may be increasing benefits from co-located provision in existing buildings wherever possible to reduce some of the negative aspects such as anti-social behaviour and vandalism and the associated costs.

Alongside commercial providers in significant retail centres with extended opening hours and in entertainment venues and visitor attractions, the case for publicly accessible toilets in a wider variety of community buildings and service centres will become stronger, drawing in a wider range of potential partners to fund and manage them.

Unfortunately public toilets are often the target of anti-social behaviour and vandalism. We work closely with North Wales Police to address these issues and try to keep facilities open. However, continued vandalism will result in public toilets being closed where repairs are deemed unaffordable.

The current budget for public toilets in Wrexham is insufficient to upgrade existing facilities and is primarily used to fund the cleaning, essential maintenance and reactive maintenance/ repairs following vandalism required to keep facilities open.

The current provision which is a mixture of providers, is as follows:

51 registered toilet locations and within these facilities there are

- 7 Changing Places
- 42 Baby Change
- 44 Disabled Toilets



## Mapping locations

This is an important part of our strategy so that people who need to visit a toilet can easily access information about the location, opening times, accessibility and type of facilities available.

Locations of toilets will be promoted via a mapping app specifically designed for mobile technology and smart phones. 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.

To assist Welsh Local Authorities with the publicising of information on the location of toilets, and help the general public identify the provision of toilets for public use, both locally and nationally, the Welsh Government have committed to producing a national map of toilets.

The map is produced within existing Welsh Government mapping infrastructure, via the [DataMap Wales website](#). The website will generate all-Wales maps based on the datasets provided by local authorities which can be configured to focus on either the national picture, or on more local areas. The data included in the DataMap will be available as an open data service accessible to everyone.

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

The [locations of all public toilets](#) run by Wrexham County Borough Council and the locations of businesses signed up to the community toilet scheme are shown on a map on the Council's website.

Wrexham County Borough Council promotes the use of The [Dewis Cymru](#) website as a resource that brings together local information, and the information relating to local toilets will be published on this website also.

The Changing Places Toilet Map system was exclusively developed by the BTA in partnership with Mencap and Pamis, the two leading charities working in this field. This mapping system identifies larger toilet facilities that cater for thousands of individuals across the UK who are suffering from Profound and Multiple Learning Difficulties (PMLD) and supporting their families and carers.

In Wrexham there are 7 such toilets located:-

- Wellbeing Hub, Chester Street, Wrexham (3 individual rooms)
- Ty Pawb, Chester Street, Wrexham
- Henblas Street Toilets, Wrexham
- Chirk Activity and Leisure Centre, Chirk
- Eagles Meadow Shopping Centre, Wrexham



## Action Plan

Our Action Plan following our 'assessment of need' Wrexham County Borough Council will:

Action Point	Lead Service Area(s)	Action Plan	Action Measure
Ensure that toilet provision is considered part of a successful place making approach in Wrexham.	Economy and Planning	Suitable toilet provision to be integral to place making.	Provision of suitable facilities in new place making decisions.
Continue to work with the private sector, voluntary services and Community Councils to explore options and make local toilets available in places where they are most needed.	All council services	Identify gaps in the provision of available toilets and work with establishments and businesses in the area to increase availability.	To increase available toilet provision to 60 by the end of 2025.
Promote equal opportunities to provide appropriate, accessible and effective services and facilities to all sections of the community without prejudice or bias.	All council services	Where there is the opportunity to add facilities to the scheme consideration to be given to inclusivity and accessibility.	Strategy will be subject to an Equality Impact Assessment (EIA) and consultation.
Ensure that the toilet logo sticker will be displayed at entrances at all appropriate Council buildings and private businesses that have agreed to be mapped.	All council services	Periodically carry out physical checks to ensure signage is visible.	All premises part of the scheme showing the logo.



Action Point	Lead Service Area(s)	Action Plan	Action Measure
Work with partners including Betsi Cadwaladr University Health Board, Wrexham University, Coleg Cambria and Transport for Wales; to encourage them to make the facilities available to the public, participate in the mapping scheme and to display the toilet logo sticker, in appropriate premises.	All council services	Contact to be made with those partners	Key partners engaged and providing facilities
Improve awareness and information available on toilet provision in the County Borough by updating information on the Wrexham Council website as well as improving street signage.	Media Team	Ensure the information on the website is current and includes any new facilities available	Communications Plan for promotional activities through the duration of the strategy
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 regarding council provision of facilities	Housing (Facilities and Assets) Environment and Technical Services	Review with in house cleaning provider	Reduction in complaints



Action Point	Lead Service Area(s)	Action Plan	Action Measure
Review existing accessible facilities to ensure that the best options for the provision of accessible toilets are made that best suit the need of the community and the local area	Economy and Planning	Liaise with town centre manager, community councils	Look to increase number of accessible facilities especially in areas lacking provision
Wrexham 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	All council services	Working with current Safety Partnership, Nightsafe and North Wales Police to identify and respond to any potential threat to users of the facilities	Reduction in intelligence indicating a reluctance to use facilities out of fear for personal safety.
Ensure that the Events Safety Advisory Group (SAG) continues to provide advice and guidance on temporary toilet facilities to be provided at organised events.	Safety and Advisory Group	Liaise with Environmental Health officers who are active participants on the SAG and provide appropriate support	Number of SAGs per year and appropriate facilities provided at events
Review the strategy in line with the stipulations of the legislation.	Economy and Planning	None	2 years after adoption of strategy



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## Summary

It is evident from the population assessment, involvement, and identification and mapping that provision of publicly accessible toilets is a significant concern for both residents and visitors to Wrexham.

There is a difference in type and quality of publicly accessible toilet facilities throughout the county, with levels of facilities and cleanliness varying. As demonstrated in the map / toilet listing, there are publicly accessible toilet facilities available throughout the county, but the majority are concentrated within the city centre. In addition to this, considering the BTA recommendations, there is a sufficient number of standard accessible toilets currently available. Although the city centre is catered for, a clear gap in publicly accessible toilet provision can be seen in some of the more rural areas. The provision of publically accessible toilets is essential to ensuring people's wellbeing and their overall enjoyment of Wrexham County, therefore long term solutions need to be developed in order to ensure future provision.



## Appendix One

We carried out a public consultation in 2023 to identify the main areas of focus for this strategy. The survey asked questions about how people use public toilets, how they felt about paying to use public toilets, facilities and overall what they thought of public toilets in Wrexham. Below are some of the responses:-

There were 520 responses to the survey, 92% of respondents are residents in the county, 79% stated that the city centre is the most visited area in the county and identified within the following groups:

- No particular facilities required - 64%
- Wheelchair user - 6%
- Parent/Carer with young adult/adult - 20%
- Parent/Carer with baby - 10%

### Question 1

In the city centre, area, village centre, attraction or country parks that you visit most often, is the provision of toilets adequate or inadequate to meet your needs Monday to Saturday between the hours of 9am to 6pm?

Group	Adequate	Inadequate	Don't Know
Parent/Carer with baby	24%	57%	14%
Parent/Carer with young adult/adult	22%	64%	11%
No particular facilities required	28%	48%	20%
Wheelchair User (Percentage shown of 27 responses)	11%	62%	11%



## Question 2

In the city centre, area, village centre, attraction or country parks that you visit most often, is the toilet accessibility adequate or inadequate to meet your needs?

Group	Adequate	Inadequate	None Available	Don't Know
Room size (347 replies)	40%	27%	15%	18%
RADAR key provision (332 replies)	6%	21%	21%	52%
User equipment (329 replies)	17%	25%	18%	40%
Changing Place Provision	6%	27%	19%	47%

## Question 3

Generally speaking, do you feel confident that you'll be able to find toilet facilities, which are open to the public and which meet your needs, (or those of the person that you care for) when out and about in the County Borough?

Response	Percentage of Replies (342 Replies)
Yes	9%
No	77%
Don't Know / Not Sure	13%



## Question 4

Thinking about Wrexham County Borough more widely, please indicate if you agree or disagree with the following statements.

Statement	Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
There are sufficient facilities	2%	6%	29%	50%	4%
The location of facilities is convenient	1%	5%	39%	51%	4%
The location of the facilities feels sufficiently safe	2%	6%	39%	50%	4%
There is enough information on where facilities are located	2%	5%	39%	51%	4%
The lack of facilities has stopped me from visiting certain locations	33%	28%	19%	12%	8%
Facilities are not open at the times I need them	31%	29%	16%	9%	16%
The cleanliness of facilities is generally good	9%	34%	24%	17%	16%
Toilets should be free to use	56%	24%	13%	4%	4%
I don't like using toilets in shops or restaurants because I feel like I need to buy something	52%	30%	13%	4%	2%



## Question 5

What would be the best way for you to find out where the nearest toilet and changing facilities are located when you are out and about?  
(Multiple Answers)

Response	Percentage of Replies
An app on my mobile phone	57%
A sticker or poster displayed in the window of premises where facilities are available	78%
Some other way	30%

## Question 6

Would you be willing to pay to use the toilet facilities in the County Borough?

Response	Percentage of Replies
Yes	54%
No	46%

