



Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

Merthyr Tydfil County Borough Council

Local Toilet Strategy

April 2019



Pan welwch yr arwydd hwn,
mae'n golygu bod croeso
ichi ddefnyddio'r toiled

When you see this sign,
it means you are welcome
to use the toilet

Executive Summary

Toilets for public use matter to everybody who goes “away from home”. 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.

Part 8 of the Public Health (Wales) Act 2017: Provision of Toilets came into force on 31st May 2018 and places a duty on each local authority in Wales to prepare and publish a local toilet strategy for its area.

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.

Although the Welsh Government, Public Health (Wales) Act 2017, Part 8 focuses on ‘Provision of Toilets’, the provision and maintenance of toilets in public places is a discretionary function of local authorities who have the power under section 87 of the Public Health Act 1936 to provide public conveniences. There is no duty for local authorities to provide public toilets directly. In considering the provision and maintenance of toilets for public use, the Council has to balance a competing local demand for a broad range of public services. Therefore The Council must take a strategic view on how facilities can be provided and accessed by the local population.

The overarching aim of this strategy is to provide or facilitate the provision of clean, safe, accessible and sustainable toilets for residents and visitors to the County Borough at locations where the need for such facilities has been identified.

Locations of toilets will be promoted via mapping on the Lle and Dewis websites and via apps 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. Mapping 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.

This strategy incorporates feedback following two public consultation exercises undertaken between September 2018 and March 2019. The first of the consultations was designed to assess the needs of residents, and people visiting or working within the County Borough following which a draft strategy was produced. The second public consultation sought views on the draft strategy. The responses received have been used to inform the content of the final Local Toilet Strategy.

This strategy sets out proposals, spanning the next two years, for exploring ways to increase the provision of toilets available for public use within the County Borough. This includes the expansion of the current Council portfolio by the building of a new bus station in the town centre and engagement with third parties to build on existing community partnerships.

Background

The Public Health (Wales) Act 2017 requires each local authority in Wales to prepare and publish a local toilets strategy for its area by 31st May 2019. In line with the statutory guidance Merthyr Tydfil County Borough Council, has set out a strategy to address the need for toilets in the community to try to improve both the standards and availability of publicly accessible toilets. The strategy is built around the principles of co-production, through local authority engagement with a broad range of potential providers and users.

Introduction

Wherever people go, outside of their own homes, they depend on toilet facilities for the enjoyment of their visit. Visitors to Merthyr Tydfil, who may be some distance from their homes, also depend on provision to accessible toilets.

The provision of public conveniences 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, car, van, lorry or public transport, whether for work or pleasure.

Toilets for public use matter to everybody who goes "away from home". 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.

Consequently the provision of toilets accessible to the public provides the infrastructure necessary to facilitate the enjoyment of the County Borough by visitors and residents alike. Well managed and maintained toilets can make a significant impact upon the comfort of individuals and families who visit public spaces in the area, and their perception of Merthyr Tydfil as a desirable place to visit.

Why do we need a strategy for providing toilet facilities?

This strategy should contribute toward achieving accessible and clean toilets wherever people live, work or visit. The County Borough is predicted to continue to grow with an expected 8% increase in resident population¹, which will include a significant increase in the proportion of elderly people, by 2024. Together with increasing numbers of visitors to the Borough this is an opportune time to set a strategy for ensuring toilet facilities are available where they are needed.

Local authorities in Wales now have the responsibility to:

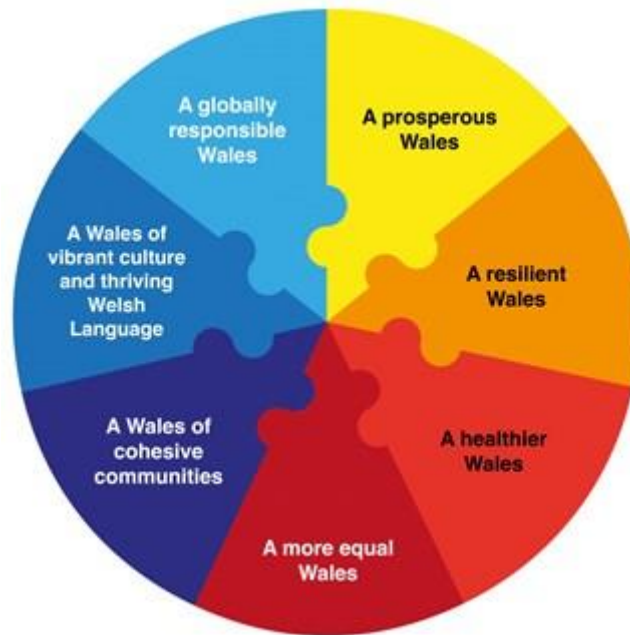
- assess the need for toilet provision for their communities;
- plan to meet those needs;
- produce a local toilets strategy; and
- review the strategy, update and publicise revisions.

Although the Welsh Government, Public Health (Wales) Act 2017, Part 8 focuses on 'Provision of Toilets', the provision and maintenance of toilets in public places is a discretionary function of local authorities who have the power under section 87 of the Public Health Act 1936 to provide public conveniences. There is no duty for local authorities to provide public toilets directly. In considering the provision and maintenance of toilets for public use, the Council has to balance a competing local demand for a broad range of public services. Therefore The Council must take a strategic view on how facilities can be provided and accessed by the local population.

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.

In order to create a more sustainable Wales The Wellbeing of Future Generations (Wales) Act 2015 requires public bodies to work towards seven Well-being Goals:

¹ Reference Deposit Local Development Plan 2016-31



The sustainable development principle is made up of five ways of working that public bodies should follow. 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 and is included in the integrated impact assessment.

How does this strategy fit in with other Council strategies and plans?

In order to succeed our local toilet strategy needs to integrate with other existing strategies and plans such as Our Cwm Taf – Cwm Taf well-being plan 2018-2023, Local Development Plan 2016-31, Economic Growth Strategy for Merthyr Tydfil 2018-2033 Destination Management Plan 2016-18, and the Taff Bargoed Valley Regeneration Strategy & Action Plan (2018).

Our Cwm Taf – Cwm Taf well-being plan 2018-2023 and the Local Development Plan 2016-31 act as overarching documents that set the strategic direction at a regional and local level.

Our Cwm Taf – Cwm Taf well-being plan 2018-2023 has three aims: strong economy; thriving communities; and healthy people. The objectives of the plan are to:

- grow a strong local economy with sustainable transport that attracts people to live, work and play in Cwm Taf.
- promote safe, confident, strong, and thriving communities improving the wellbeing of residents and visitors and building on our community assets
- help people live long and healthy lives and overcome any challenges

The Deposit Local Development Plan 2016-31's vision is "To strengthen Merthyr Tydfil's position as the regional centre for the Heads of the Valleys within the Cardiff Capital Region, to encourage a sustainable level of population growth and be a place to be proud of where:

- People learn and develop skills to fulfil their ambitions;
- People live, work, have a safe, healthy and fulfilled life; and
- People visit, enjoy and return."

It recognises that a collective effort is required to ensure the County Borough attracts investment and remains an attractive place where people want to live and are proud of. It states that over the plan period opportunities presented by the 'City Deal' within the context of the Cardiff Capital Region must be maximised. In particular, transport connections will be improved by the 'South Wales Metro', the dualling of the A465 and development of 'Active Travel' routes.

Access to open space and impacts on the rivers and lakes of the borough is repeatedly referenced acknowledging the importance of these assets both as resources for physical activity maintaining wellbeing, and tourist attractions that deliver visitor experiences

The Council's Corporate Wellbeing plan "Focus on the Future: Wellbeing in our Community" 2017-22 identifies 4 overarching Wellbeing Objectives to help improve

wellbeing for the people of Merthyr Tydfil and maximise our contribution to the seven Wellbeing Goals.

- Best Start to Life
- Working Life
- Environmental Wellbeing
- Living Well.

The local toilet strategy cuts across a number of these wellbeing objectives and aims to support these objectives by:

- Developing the environment and infrastructure for business to flourish
- Enhance and promote our natural environment, countryside, heritage and cultural assets
- Developing safer communities
- People having good physical and mental health
- People live independently

Looking back at historic provision of public toilet facilities in Merthyr Tydfil to where we are now

Increasingly the Council has and continues to face challenges to maintain standards of toilet provision, maintenance and cleaning due to limited funding and pressure on resources. In 2013 the Council undertook a review of public convenience provision in the County Borough against a background of efficiency savings. At that time the Council operated 7 facilities throughout the Borough three of which provided just a men's urinal facility. The decision was taken to close all of the existing facilities to facilitate savings of £65,380. In doing so the Council recognised that:

- Those with particular needs like families with babies and children, older people, people with disabilities or people with specific health concerns, the overseas tourist and visitors to the town could be disadvantaged.
- Visitors to the town will have their overall experience and impression of the town influenced by the lack of important facilities.
- Facilities would have to be sold, demolished or permanently made safe.

Following these efficiency savings a local community group expressed an interest in taking over one of the closed toilets located in the rural village of Pontsticill, as they were experiencing problems with walkers and tourists relieving themselves in improper locations. The group demonstrated that they were able to sustain the running costs to be incurred with the toilets. Following Cabinet approval the community group was granted a 25 year lease at a market rent (index linked) and

supported via a rental grant and other economic development grants. To date this model has been very successful.

Historically in order to encourage local businesses to open up their toilets and increase the number of toilets available for public use Welsh Government (WG) offered a Community Toilet Scheme Grant. Businesses were offered an annual recompense payment of £500. Unfortunately in Merthyr Tydfil there was zero take up of the grant aid. The reasons given were due to the onerous conditions, disabled access, 7 day opening etc. for such little money and the additional costs that would be incurred in terms of cleaning and consumables. In 2014/15 this funding was transferred by WG Revenue Support Grant and the Council ceased to support a Community Toilet Scheme.

Today the current provision of public toilets in Merthyr Tydfil focuses on parks and leisure facilities. The model is a complex one with premises either owned or leased by the Council or Merthyr Tydfil Leisure Trust and variable arrangements in place for cleaning and maintenance. These activities are undertaken either directly or via service level agreements between the parties.

It is arguable that since the introduction of the power to provide public toilets in the Public Health Act 1936, the dependence on public toilets to accommodate the toileting needs of the population, while away from home, has diminished significantly. Indeed, in the main, many of these commercial facilities benefit from more design standards when compared to traditional public toilets. In recent years Merthyr Tydfil has experienced considerable investment which has resulted in the regeneration of many locations. Consequently many private retailers and leisure facilities now provide public conveniences as part of their developments under building regulations e.g. Cyfarthfa Retail Park, Rhydycar Leisure Village and Trago Mills all provide high quality separate toilet facilities, incorporating WC's, baby and adult changing facilities and fully accessible toileting available over extended opening hours, and therefore designed to satisfy increased footfall. Whilst these are not public toilets, they are facilities which may be used by the public when visiting a particular store or shopping centre and means that there is less of an imperative for the Council to provide traditional Council run facilities.

Tourism continues to be an important component of the regional and local economy. Merthyr Tydfil is fast becoming a hub for activity tourism and is recognised as being one of the most desirable regions in Wales in terms of adventure tourism. It is a base for walking and cycling (close proximity to Brecon Beacons and Bike Park Wales) means that the availability of clean, accessible toilets available to the public is increasingly important to the local economy.

Going forward there are positive plans to increase the provision of public toilets in the town centre as part of the relocation and construction of a major new bus station development. The Council aspires to locate 11 public toilets within the new bus

station facility proposed for the town. The current scheme is pending a funding award from Welsh Government, if successful work could commence as soon as summer 2019. The scheme would have 2 disabled facilities, 4 female, 5 male (including 3 urinals) and 2 baby changing facilities. Rainwater harvesting would also be used to flush the public and tenant area conveniences. A history of abuse of the toilet facilities which were previously located at the existing bus station in terms of drug use, vandalism and cleanliness means that users of the new facilities are likely to incur a small charge.

Aims and Objectives

The overarching aim of this strategy is 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.

Objectives:

- Identify the current level of provision of public toilets
- Identify where there are gaps in the current provision
- Expand the offering of clean, safe and well maintained facilities by working with partners and community engagement
- Facilities accessible to all
- Facilities suitable for the location making it viable and inclusive
- Enough facilities for the local population and users
- Evening and overnight provision at key locations where specific need is established
- Increased awareness and easily found facilities
- User information available through mapping of provision on Lle and Dewis websites.
- Use of new technologies and communications leading to an increased awareness of the locations of toilets available for public use
- Maximise availability through Council partnership and commercial provision
- Provision of adequate temporary toilets by the promoters/organisers at one off events
- Sustainable provision within the budget available.

Reviewing the Strategy

Once the strategy has been put in place there is a requirement for it to be periodically reviewed. The Council will publish an interim progress report setting out the steps taken in accordance with this strategy every 2 years commencing from when the Council last published or 2 years from the date of the last post-election review of this strategy. Publication of the review is required within 6 months. Consequently this strategy will be reviewed in May 2021 and the report published in November 2021.

How has this strategy been developed?

Recognising the importance and challenges associated with production of the strategy a multidisciplinary task group was put together so that it would be developed with input from a cross section of Local Authority departments. This approach was considered vital in order to capture all available baseline data and to maximise opportunities to improve toilet provision in the County Borough. Members of the task group included representatives from Environmental Health, Planning, Estates, Economic Development, Regeneration and tourism, Rights of Way, Environmental Services, Corporate Communications, Business Change, and Merthyr Tydfil Leisure Trust. The Cabinet member for Regeneration and Public Protection was also a member of the group demonstrating political commitment to the strategy.

Due regard has been made to demographic and local health data contained at Appendix 3.

Engagement with other public bodies, community groups, private enterprise and the public has been undertaken to understand what is currently on offer and how any gaps in this offering can be mitigated.

A public consultation was undertaken throughout September 2018 to assess the needs of residents, and people visiting or working within the county borough with a view to identifying gaps in provision and how these might be addressed. The public consultation was publicised via the Council's online consultation system. A total of 438 responses were received comprising 149 complete and 289 partial responses. It is recognised that the number of responses is statistically small and the results must therefore be considered with caution. A summary analysis the needs assessment consultation can be found at Appendix 1.

At the same time the Council contacted all of the national retailers who operate within the Borough as part of a collaborative exercise across Wales to seek an agreement in principle that their toilet facilities could be used by the general public. The purpose was to establish whether these businesses would be prepared to be part of the strategy by allowing their toilet facilities to be used by non-customers, signposted via national websites and phone apps and agreeing to display a sticker showing the national toilet logo. Only 1 business located within the Borough volunteered to offer their toilet facilities to the public and to be mapped. However, feedback obtained from the needs assessment survey, indicates that the public do in fact use and rely on facilities provided by the larger stores such as the supermarkets particularly in the town centre.

A similar exercise was also conducted whereby the Council contacted 141 local businesses to ascertain whether they would be prepared to participate. There were 13 responses and 6 agreed to allow their facilities to be used by the public and to be mapped. Using the overall findings of the assessment, which identified the main

gaps in provision specific businesses which have or had previous relationships with the Council were targeted for individual follow up contact.

In addition the Cwm Taf Health Board and healthcare premises including doctors, dentists and opticians were also contacted to establish whether there are premises with toilets that are publicly accessible that could be mapped and sign posted for public use.

How will publicly available toilets be signposted and mapped?

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.

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. 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>

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.

The Welsh Government has not developed an app, as many people are unable to use a smartphone for a number of reasons. It is more appropriate to focus on ensuring the information is available online through a wide range of websites and via traditional offline methods.

However, as the data provided by local authorities is to be made available as open data, it will be available for reuse by third parties, 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. It is envisaged that the locations of toilets will be promoted via a mapping app specifically designed for mobile technology and smart phones via third parties.

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. The British Toilet Association (BTA) also recommends signs be fitted on the outside with information like opening hours, contact information for

reporting problems and the specific facilities provided inside, such as if there is a baby-changing room.

The Council will also post information on the [Dewis](#) website.

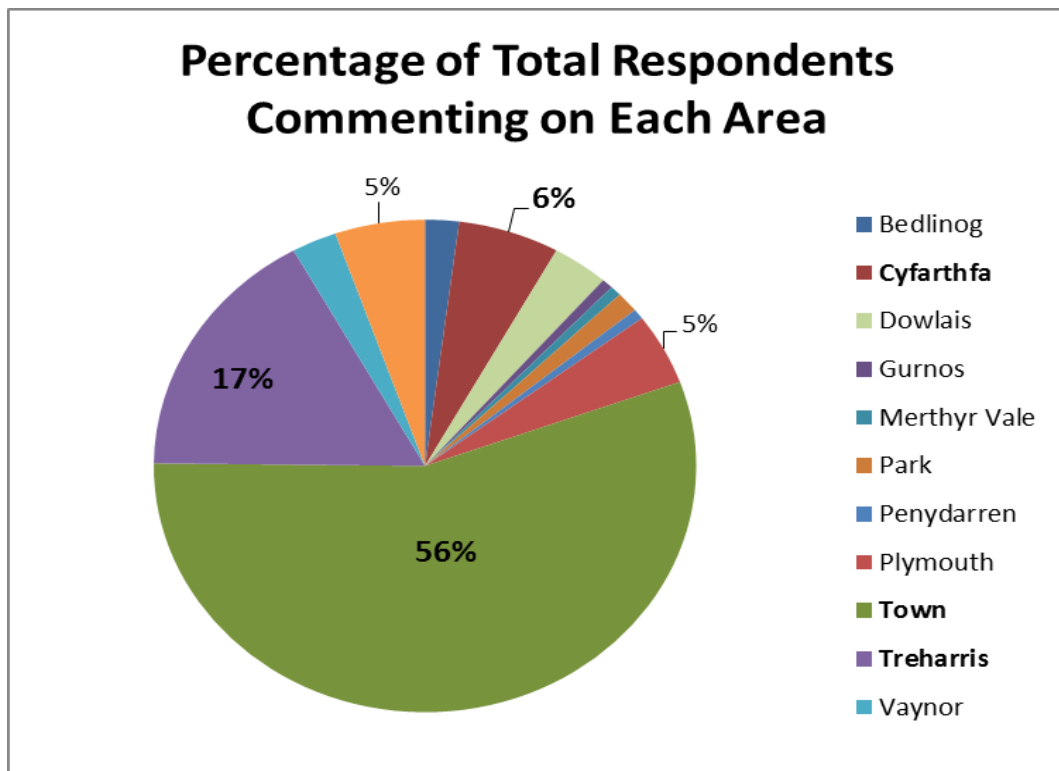
A list of publicly available toilets where there has been agreement that they can be mapped is contained at Appendix 2. Full details of location, opening times and facilities available will be included on the Lle and Dewis websites and updated at regular intervals.

What did we learn from conducting the needs assessment?

The key findings of the needs assessment are:

General Overview

The majority of respondents to the needs assessment survey, 88% are resident in the Borough. As part of the needs assessment respondents were asked which areas they visited most often. The results are summarised in the chart below with 3 areas identified as being the most popular namely town ward with 56% followed by Treharris 17% and Cyfarthfa with 6%.



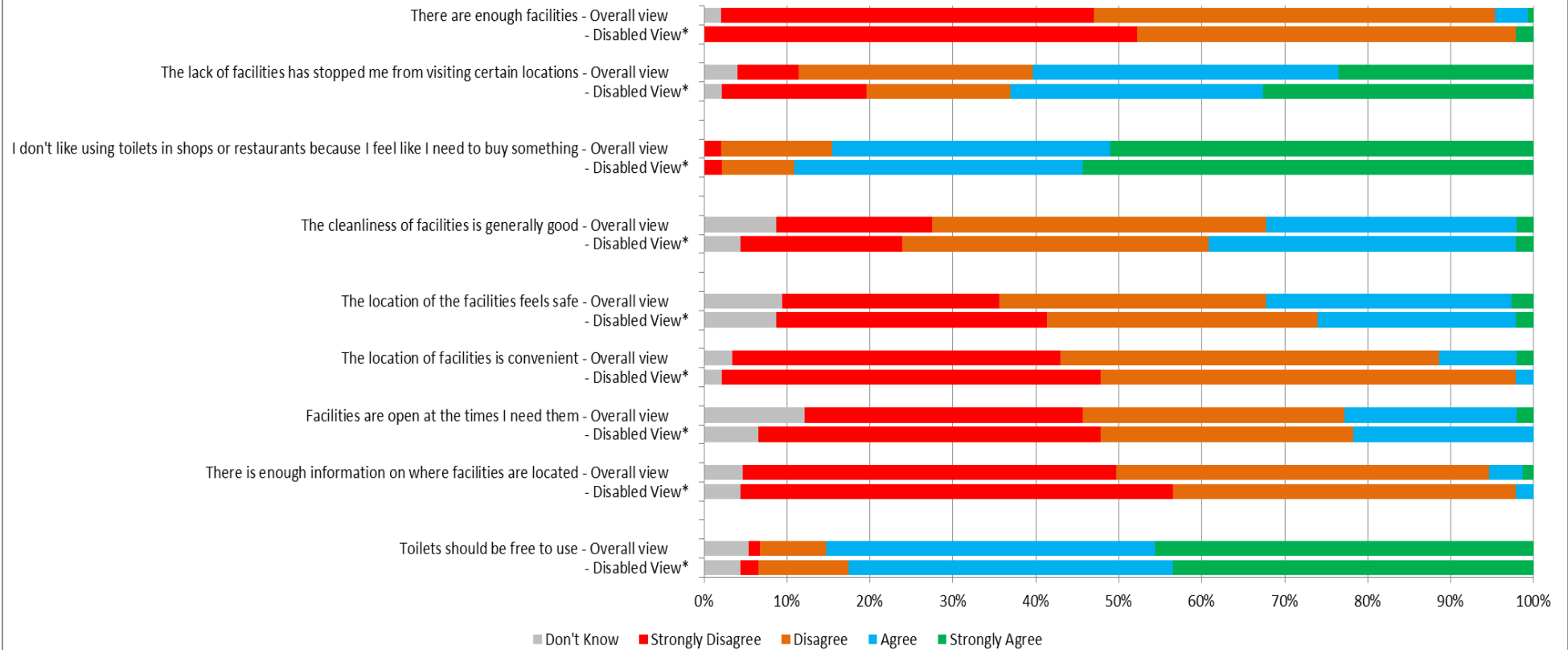
The chart below shows summarises the main findings of the needs assessment taking into account all areas. The most striking, and not unexpected gap between need and provision is the overall lack of toilet facilities available for public use, which has a direct impact on whether people will venture away from home. People were

reluctant to use outlets where they felt they needed to make a purchase and there were concerns about the cleanliness of some toilets, and safety.

There was an almost universal view that there is insufficient information on where the toilets actually are.

The chart also shows that there were no significant differences between the in the responses received relating to able or disabled toilet provision.

Opinions of the Respondents on Toilet Provision in the Borough as a Whole



. * Includes those respondents with long-term illnesses.

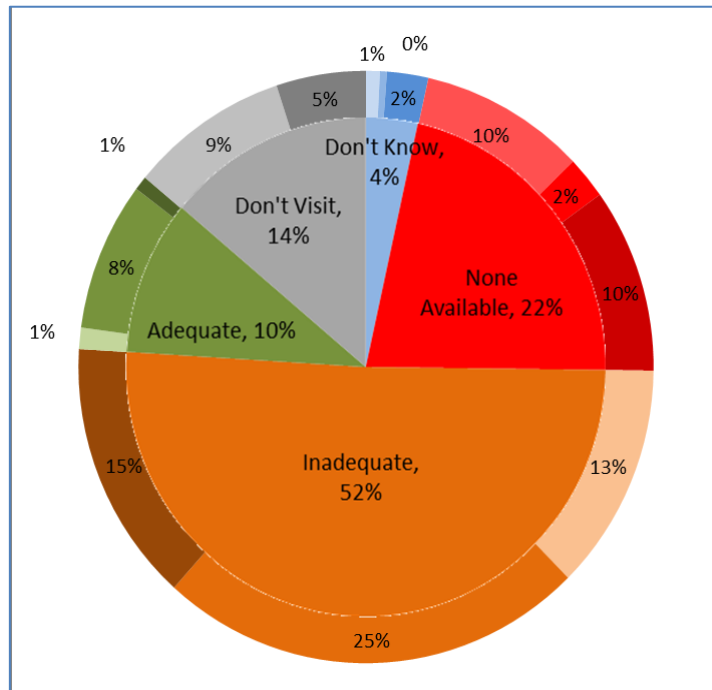
Town Centre

The town centre is the most popular destination identified by the needs assessment and is the main transport hub for people arriving by train or bus. Council toilet provision should be primarily for shoppers and visitors in areas of high volume footfall. We know from our continuous monitoring of footfall using GEO-Sense that there are 1,485,994 average visitors per year which equates to 212,285 per month and an average of 45,030 per week. The data captures both repeat and new visitors to the town, how long they visit and the times that they visit. The BTA makes recommendations on the number of toilet facilities needed in an area based on population density, gender mix and footfall. The ideal level is recommended as 1 cubicle per 550 females and 1 cubicle or urinal per 1100 males, which is a ratio of 2:1 in favor of women. One accessible toilet and also one baby change facility should be provided for every 10,000 population.

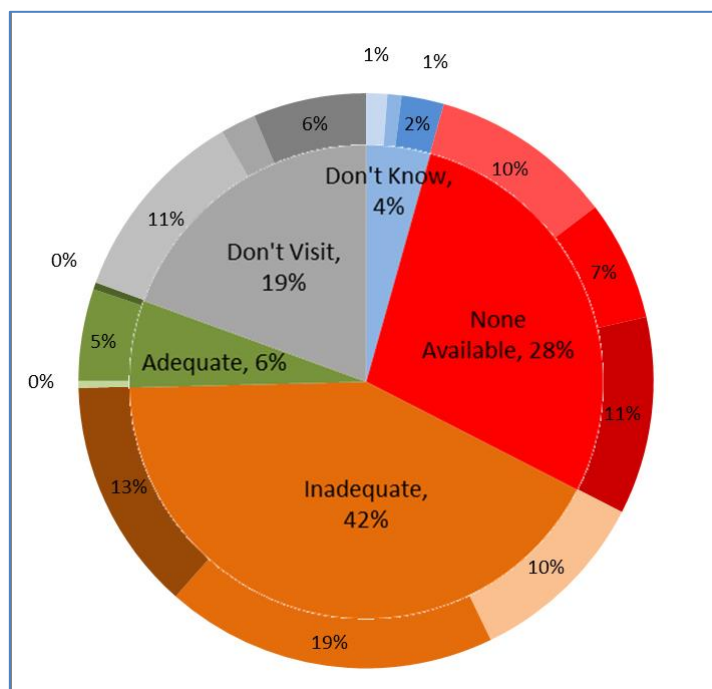
Significantly, there is no signposting to toilet facilities and there are currently no publicly funded toilet facilities provided. Toilet provision is totally reliant on private businesses which offer facilities for customers, some of which lock their toilets to prevent non customer use. Telephone feedback from local businesses confirmed the latter practice is prevalent in the immediate vicinity of the bus station because of concerns about anti-social behaviour, vandalism and drug abuse. It was suggested by business owner that some financial incentive may persuade some businesses to change their approach.

The table below gives an overview of the responses received about the provision of toilet facilities in the town centre. There is a clear message from respondents that the provision of toilet facilities in the town area is insufficient either because toilets are not available or inadequate. Respondents confirmed they felt uncomfortable using toilets in some businesses because they felt they needed to make a purchase. More detailed analysis has found that identified gaps in toilet provision in the town centre are more pronounced on weekends and bank holidays. The indoor market, located in the town centre, offers customer toilet facilities. Comments made by individual tell us these facilities are valued and well used, but these facilities are unavailable on Sundays and bank holidays (except Good Friday when they are open) which correlates with the findings of the survey.

Graphs Showing Respondents' opinion of the adequacy of toilet provision in Town on Weekdays (top) and Sundays / Bank Holidays (bottom)



	Inner Circle	Outer Circle		
	Whole Day	Before 9am	9am to 6pm	After 6pm
Response	Don't Know			
	None Available			
	Inadequate			
	Adequate			
	Don't Visit			



Facilities provided by shops and others are normally limited to the place's opening hours for safety and security reasons. Respondents have commented that there is no toilet provision after 6pm unless the public use customer facilities in public houses/restaurants. Development of the night time economy and changes in demographics and human activity in town centres means they are increasingly becoming leisure and entertainment hubs rather than predominantly centres for retail/commercial trade. Night time economy growth has unfortunately led to an increase in alcohol-related anti-social behaviour acts which includes 'street fouling' and the need for night toilet facilities. This situation is compounded by rough sleepers who frequent the town centre for whom there are no available toilet facilities.

It is also recognised that in order to avoid urination and fouling in public places publicly accessible facilities need to be in close proximity to key night-time gathering points such as taxi ranks, car parks, railway/bus stations and bus stops. The new tram trains which will be introduced as part of the South Wales Metro will not have toilets on board so any upgrading of the railway stations will need to take this into consideration. Passengers wherever they are on the tram-train network should be no more than 14 minutes away from a toilet.

There is a significant gap between toileting needs and the facilities that are currently available in the town ward. The current offering needs to be reviewed to see what steps the Council can undertake to facilitate an improvement.

Attractions

The region is fast becoming a hub for activity tourism and is recognised as being one of the most desirable regions in Wales in terms of adventure tourism.

Parks such as Cyfarthfa and Parc Taf Bargoed attract tourists and residents and can often include children's play areas; whilst enjoying the parks it is unlikely that there will be other facilities close by which people can use,.

Parc Taf Bargoed has Green Flag status and offers walks, sports and water adventure. The needs assessment identified that there are no public facilities open in Parc Taf Bargoed on a Saturday and the toilets close at 3.30pm on the days when they are open. The public commented that would like to see provision throughout the weekend and longer opening hours as these are popular times for people to visit. In addition there are no facilities available for baby changing. Consequently the focus should be on maintaining existing access to toilet provision in these areas and exploring ways that opening hours and facilities could be extended.

Comments relating to the poor cleanliness of the toilets at the entrance to Cyfarthfa Park were a recurring theme.

Public Consultation on the draft toilet strategy

It is important to us that the views of as many stakeholders as possible are taken into account in producing the toilet strategy. The draft toilet strategy was published on the Council's website for public consultation, which ran for 12 weeks between 20th December 2018 and 14th March 2019. In addition a range of organisations were contacted by e mail and letter to seek the views on our proposals to improve access to publicly available toilets. A list of those contacted as part of the consultation is included at Appendix 4.

A total of 84 responses were received. A summary of the responses received can be found at Appendix 5.

Improving access to toilet facilities:

Recognising that there is no quick fix and that austerity measures mean that the Council is continuing to face financial pressures the Council is committed to the following actions to mitigate the gaps between what toileting provision is available and identified need:

Provide facilities suitable for the location- Review provision of publicly available toilets at key transport interchanges and key entry points including the bus and train station stations located in the Town centre. This has been identified as the area where the greatest needs gap exists. It is proposed that new public toilets will be provided that will be owned and managed by the Council. Use of the toilets will incur a charge to aid with sustainable upkeep and reduce antisocial behaviour. The toilets will be located in the proposed new bus station development which is part of a wider programme of town centre regeneration. Consideration to be given to location of the new toilets bearing in mind the BTA recommendation that people should not have to walk more than 500m to a toilet facility.

Clean, well maintained and safe- An undertaking that all toilets in Merthyr Tydfil Council County Borough Council and Merthyr Tydfil Leisure Trust buildings will be open and signposted for public use. (except for schools, care homes and other buildings where the facilities are located in sensitive areas not accessible to the public). The Council will review cleansing operations and standards on a periodic basis to ensure the most efficient and effective provision within allocated resources. The Council will continue to work with the Police, Community Safety and residents, community groups and others to ensure that the facilities are as safe as possible.

Sustainable provision within the budget available-The Council is committed to sustainability in its own operations, including the provision of toilet facilities, as well as across the district more widely through climate change and carbon

management plans. Going forward sustainability will be factored in to all new Council developments.

To provide accessible information via mapping of toilet provision- Improve awareness and information available on toilet provision in the County Borough by updating information on the Lle open access data repository with WG and also updating the Dewis website. A link will be provided from the Merthyr Tydfil Council website.

Easily found facilities with good direction signage and individual facility information signs- Not everybody has access to the internet or mobile technology, particularly the older generation. The provision of physical signposts to direct the public to available toilets in areas associated with transportation hubs e.g. indoor market and the new bus station is seen as important. Display of the toilet logo using stickers displayed at entrances at all Council, Merthyr Tydfil Leisure Trust, Cwm Taf Health Board, community facilities and businesses that have agreed to being mapped will help to promote awareness about the locations of publically available toilets.

Maximise availability through partnership and commercial provision- Continue to work with local businesses to promote use of their toilet facilities. Explore possible ways to financially incentivise businesses to open their toilets up to the public in areas where gaps in provision have been identified by the needs assessment. Explore options to increase local toilet provision through sponsorship, advertising and partnership working.

Liase and work with Town and Community Councils to provide toilets in as many locations as possible. Explore opportunities to increase the provision of publicly accessible toilets in key rural locations along the Taff Trail by working with community groups.

Letting policies- Although there are currently no Council owned commercial town centre properties available consideration could be given to the introduction of a clause in future Council leasing agreements. The clause would require suitable business like a shop or café, to include public access to toilet facilities. This would need to be balanced against any potential backlash such as a decrease in rental income or that the requirement could conceivably deter prospective tenants from taking a lease.

Provision of adequate toilet facilities by the promoters/organisers at one-off events- Toilet facilities for people attending special, one-off outdoor events need to be considered, whether through temporary installations or through the use of existing facilities at or near the event location, by agreement with the Council. The Events Safety Advisory Group provides guidance for event organisers and including the use of land for events in the open, including highways under the direct control of the Council. Advice and guidance on temporary toilet facilities is

provided as part of a consistent, proactive and integrated approach to the provision of support services and regulatory functions for events and a sound financial framework for this support, as well as ensuring compliance with Health & Safety standards. The Event Safety Advisory Group will continue to work with event organisers to ensure they provide adequate toilet facilities for people attending. Smaller temporary events organised at short notice are more challenging but the Council will work with organisers to try to secure adequate toilet provision.

Green spaces- Merthyr Tydfil County Borough Council recognises that there are strong links applicable to the need for toilet facilities in parks including play areas and more informal green spaces such as the country parks. Popular attractions such as Cyfartha Park and Parc Taf Bargoed attract tourists and residents and include children's play areas. It is unlikely that there will be other facilities close by which people can use, whilst enjoying the park therefore the Council will strive to maintain toilet provision in these areas and explore ways that might allow for extended opening hours. For example- Once the Parc Taf Bargoed Hydro Project is revenue producing and lease obligations fully complied with it may be possible to permit the current warden post to be fully funded from the Project. This could provide the release of funds from current park warden budgets to provide additional facilities e.g. baby changing and additional opening hours

Tackling homelessness- Explore options for providing facilities for the rough sleepers to reduce the amount of human fouling in the town centre and along the Taff Trail.

Legal powers- Powers may be used to ensure that public toilets are provided and maintained for public use in relevant commercial premises. The Local Government (Miscellaneous Provisions) Act 1976 section 20 allows a local authority to require any business classed as a place of entertainment or selling food and drink to the public for consumption on the premises, to provide public toilets. These powers will be exercised where possible.

Consideration will be given to including local toilet provision in the Community Infrastructure Levy. - Community Infrastructure Levy enables the Merthyr Tydfil County Borough Council to raise funds from developers undertaking certain new building projects in their area. The funds can be used for a wide range of infrastructure costs, such as education, highways etc., that 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.

Conclusions

More than ever success of any strategy is about working in partnership to get the most from scarce resources. This will include establishing a new relationship between the public, private and voluntary sectors to drive forward sustainable public toilet provision.

We know from our needs assessment and public consultation exercises that the gap between what is needed and what is currently on offer is significant, particularly in the town centre. The Council has taken on board the comments received as part of the needs assessment. We realise as a local authority we cannot afford to plug this gap by working in isolation.

In order to achieve this aim we propose a series of actions that we can take over the next 2 years at the end of which the strategy will be subject to review.

We propose to improve the level of clean, safe publicly available toilets by increasing our own toilet portfolio linked to the regeneration of the town centre bus station. In addition we will seek to explore ways we can work in collaboration with and private sector/voluntary sectors to improve provision at all locations where a need has been identified.

All of the publicly available toilet facilities will be signposted and mapped, so that residents and visitors will know where to find them, when they are open and what facilities are available.

Appendix 1

Summary of responses to needs assessment consultation

Consultation took place from 3rd to 28th September 2018. The survey was available online via Smart Survey and people were signposted to the survey via MTCBC's Facebook page, Twitter page and corporate website. Paper copies were also provided to the 50+ forum by the Supporting People Coordinator.

438 people accessed the survey online, however only 149 surveys were completed.

Key findings:

- 131 respondents were residents of Merthyr Tydfil
- 83 responses were relating specifically to the Town Ward
- Cyfarthfa Park was listed as the attraction visited most often, followed by Parc Taf Bargoed
- The majority of respondents felt that the toilet provision was either inadequate or no facilities were available
- 93.3% of respondents disagreed that there were enough facilities
- 90% of respondents felt like there was no enough information on where facilities are located
- 84.6% of respondents don't like using toilets in shops or restaurants because they feel like they need to buy something
- 85.2% of respondents felt that toilets should be free to use

Demographic:

- 74.5% of respondents were age between 36-64 years old
- 68.46% were female
- 86.58% were of white ethnicity
- 36.17% of respondents either had a disability or long-term health problem

Appendix 2

Location of Council/ Merthyr Tydfil Leisure Trust publicly available toilets

Location	Post code
Aberfan Community Centre	CF48 4QQ
Civic Centre	CF47 8AN
Cyfarthfa Park Pandy Toilets	CF47 8RE
Cyfarthfa Park Model Railway	CF47 8RE
Cyfarthfa Park Splashpad	CF47 8RE
Cyfarthfa Park Canolfan (outside)	CF47 8RE
Cyfarthfa Park Canolfan (inside)	CF47 8RE
Cyfarthfa Castle	CF47 8RE
Merthyr Tydfil Leisure Centre	CF48 1UT
Orbit Centre	CF48 1DL
Redhouse	CF47 8AE
Registrars Office	CF47 8DP
Taff Bargoed Park (Pavillion)	CF46 8AP
Taff Bargoed Park (Lakeside)	CF46 6AU
Thomastown Park (below flat)	CF47 OHE

Location of Cwm Taf Health Board publicly available toilets:

Location	Post code
Keir Hardie Health Park	CF48 1BZ
Prince Charles Hospital	CF47 9DT

Location of Private Business publicly available toilets:

Location	Post code
Dynevor Arms	CF48 4HH
Fir Tree Community Centre	CF46 5BW
Hills Plymouth Cricket Club	CF48 4BJ
Indoor Market	CF47 8ED
Pentrebach Labour Club	CF48 4BY
Rock UK	CF46 6RD
Superbowl	CF48 1UT

NB: This is a list of toilets that, at the time of writing, are publicly available. Full details of location, opening times and facilities available will be mapped on the Lle and Dewis websites and updated at regular intervals.

Appendix 3

Local Context

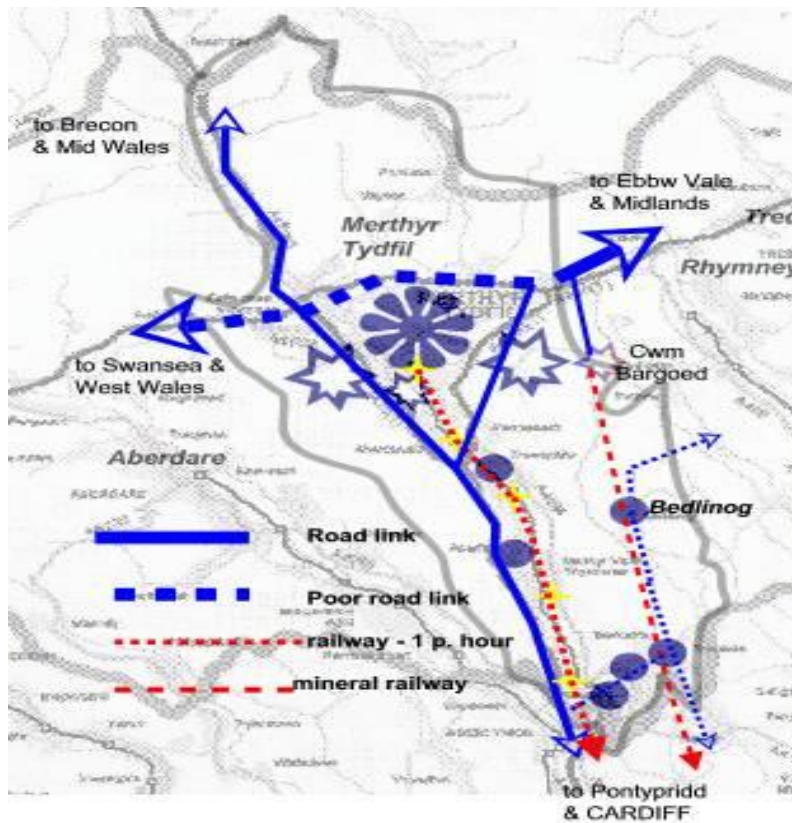
The County Borough of Merthyr Tydfil is situated in the Heads of the Valleys Plus area within the South East Wales Capital Network region. Covering an area of c.11,100 hectares it is the smallest local authority in Wales. Approximately one fifth of the County Borough lies within the Brecon Beacons National Park to the north.

Merthyr Tydfil benefits from a number of strategic transport corridors that enable it to play a strategic role in the Heads of the Valleys area and the Capital Network region. It is intersected by the A465 (Heads of the Valleys road) & A470 in the north and the A470 & A472 in the south. These allow easy access to West Wales, East Wales & the Midlands and Cardiff / M4 corridor to the south. It is estimated that c. 600,000 people and 150,000 jobs are within 30 minutes of Merthyr Tydfil.

The County Borough has a population of 59,700. Of this approximately 43,000 reside in the main town – Merthyr Tydfil. The town functions as the main commercial, retail and service centre of the County Borough and the Heads of the Valleys Region. It contains administrative headquarters (e.g. the County Borough Council), primary shopping areas, the majority of the County Borough's employment opportunities and many other higher order services & facilities which also serve surrounding settlements. The rest of the County Borough comprises of eight interdependent settlements situated south along the Taff and Taff Bargoed river valleys. These contain a range of lower order services & facilities serving local needs and more limited job opportunities. The historical development of the County Borough has been heavily influenced by the location and exploitation of mineral resources.

The area contains an assortment of urban, semi-urban and rural communities located in a variety of natural, semi-natural and historic environments. It is rich in outstanding wildlife habitats, historic landscapes and archaeological features. The steeply sloping valley sides with their high ridges and moorland vegetation define the character of the area; affording an environmental and ecological context for its settlements.

In terms of Merthyr Tydfil's widely acknowledged industrial heritage the potential of the area to act as an important tourist destination / resource has yet to be fully realised.



Merthyr Tydfil is recognised, within national plans, as having a critical role to play in the success of the Cardiff Capital Region. However, for it to contribute to regional objectives it must overcome economic & social challenges at the local level not least economic inactivity, long-term health issues and out-migration. Achieving this will not only require a coordinated and targeted approach but significant investment. The latter of these points can be particularly difficult in the current economic climate. As the funding available for economic and community regeneration gets tighter the need to target its investment to where it's needed most and can have greatest effect grows. At the policy and programme level resource allocation usually has an area or regional focus, lacking the sophistication to drill down to the local level. This is problematical when there are places which exhibit severe levels of deprivation. Sustained, targeted intervention is required if Merthyr Tydfil is to achieve local, regional and national regeneration objectives.

Socio- economic profile

This section summarises information contained within our socio-economic analysis of Merthyr Tydfil (2018) and that of supporting documents such as the Labour market strategy (2017).

Economic restructuring during the late 20th Century has brought about considerable economic and social challenges for the County Borough. The impact of this has been worsening economic & social conditions and the greatest fall in population of all Local Authorities in Wales (7.5% between 1991 and 2004). This out-migration has been acknowledged by the Local Development Plan (LDP) (2011) as contributing to a high rate of dependency where fit, younger people leave to take up employment, or to enter higher education, and sicker, older and more disabled population remain. The current rate, which is higher than the Wales average, is 71 dependents for every 100 people of working age.

The socio-economic condition of Merthyr Tydfil is such that 8 of its 36 Lower Layer Super Output Areas (LSOA) (22%) are amongst the most deprived 10% of LSOAs in Wales. Furthermore: 30% of its LSOAs fall within the 20% most deprived LSOAs in Wales; 61% of its LSOAs fall within the 30% most deprived; and 81% of its LSOAs fall within the 50% most deprived. The County Borough compares unfavourably with Wales and Great Britain averages across many key socio-economic indicators and faces significant challenges around: high levels of economic inactivity; low educational attainment and skill levels; low quality jobs and opportunities; and high incidences of long term health problems.

Prior to the latest economic downturn the number of jobs in Merthyr had been steadily increasing since 1998, due principally to growth in the public administration, education and health sectors, and latterly manufacturing, transport & communications and construction. The county borough is now fast becoming a 'hub' for tourism with the creation of associated jobs (albeit lower skilled, lower paid jobs). Despite this growth the County Borough's job-density and wage levels continue to be lower than the Wales and United Kingdom averages. Even before the downturn, many of the sectors strongly represented in the County Borough were not expected to grow over the next 10-15 years. Compounding this issue the County Borough's LDP identified that the area is not well represented in the likely "key growth" sectors such as air transport, computing services and financial and professional services.

- The difference in the economic activity, employment and unemployment rates between Merthyr and Wales has steadily narrowed since 2011 and rates in 2016 are almost equal on all these measures.

- Unemployment and Worklessness remain significant issues across Wales and in the borough, whilst qualification levels remain lower for Merthyr residents in general, and for those employed at workplaces in the borough. There remain significant skills issues which place some challenges on bringing higher value, higher skill employers to Merthyr, though the situation is improving. Emerging growth sectors (tourism, retail and care services) in the County Borough have primarily low skilled, low paid jobs.

- Merthyr Tydfil is currently a net exporter of labour to other areas, with more people travelling to work outside the borough than those who travel in to work.
- Just over 8,500 people travel in to workplaces in Merthyr from areas outside the Merthyr area with 83 per cent coming from four particular areas – RCT, Caerphilly, Blaenau Gwent, and Cardiff.
- 8,790 employed Merthyr residents work in workplaces located outside Merthyr Tydfil with 72 per cent travelling to locations in RCT, Cardiff, Caerphilly, and Blaenau Gwent.
- Merthyr Tydfil is over reliant on employment in the public sector and lacking in private sector opportunities in higher value, higher wage employment. The high levels of employment in the public sector are likely to be falsely inflating overall wage levels in the county borough and are likely to be increasing the tendency for employees to be travelling in from outside the authority area.
- Merthyr wage levels for all those working in Merthyr are generally lower than those earned by Merthyr residents who work outside of the borough (41 per cent who commute outside the borough to work). This is one factor that could contribute to recruitment difficulties for those seeking to recruit to posts based in Merthyr particularly in male dominated industries such as Manufacturing, Engineering.

Access to services and activities is a particular concern to the rural communities of Cwm Taf. The percentage of households with no car in rural Cwm Taf is high compared to the Wales average (27% rural Merthyr Tydfil, 28% in rural RCT compared to 23% across Wales). Feedback provided at a workshop delivered by Rural Action Cwm Taf, in October 2014, highlighted some of the risks and issues affecting the local rural community. These included accessibility and isolation concerns, lack of public transport and the support of community facilities.

Families living in poverty are not just the ones suffering from ill health or unemployment; fuel poverty and in-work poverty are real issues facing the communities in the Rural Action Cwm Taf area. Through the reduction of non-statutory services locally, this poverty is compounded by fewer community engagement hubs, threatening the community cohesion of a rural area, leading to increased isolation for some members of our rural communities and a reduction in access to services.

Cuts to public sector support to public transport will also limit the rural communities' access to services further, which will put greater demands on community facilities to provide additional services such as public toilets.

Appendix 4

List of organisations contacted as part of the 12 week public consultation

Group
VAMT
Health & Social Wellbeing Group
Safer Merthyr Tydfil
Public Service Board
Parent Network
50+ Forum
Youth Forums
Early Years
Social Enterprises
Business Forum
Homeless
Shelter Cymru
Merthyr Tydfil Housing Association
Hafod Housing Association
Wales & West Housing
Merthyr Valley Homes
Supporting People
Local Councillors
Bedlinog Community Council
Dawn Bowden AM
Gerald Jones AM
Community / Leisure facilities
Canolfan Soar
RedHouse
Friends of Cyfarthfa Park
Friends of Parc Taf Bargoed
3G's
Town Centre Partnership
BID
Countryside Access Forum
Green Spaces Network
MTCBC Staff
MTCBC Unions
Visit Merthyr
The College Merthyr Tydfil
Cwm Taf University Health Board
British Deaf Assoc Wales
Disability Can Do
Disability Wales
National Autistic Society – Merthyr Branch

Parkinsons Groups
Merthyr Eyelights
Visual Impairment Merthyr
Sensations
Dwarf Sports Association
Merthyr Tydfil Institute for the Blind
RCT & Merthyr MS Society
Disability Sport Merthyr
Race Council Wales
Race Equality First
SEWREC
Umbrella Cymru
Stonewall Cymru
Menter Iaith
Welsh Language Forum / Urdd
Sports Wales
Welsh Athletics
Doctors Surgeries
Welsh Language, Commissioner
Equalities and Human Rights commission
Crohn's+Colitis UK
Diabetes Wales
Stroke Association
Arthritis Care
Helping Hands
Tenovus Cancer Care
ProstateCymru
Carers Wales
South East Wales Carers Trust

Appendix 5

Summary of responses to the 12 week public consultation

The consultation process

A 12-week consultation took place from Thursday 20th December 2018 until Thursday 14th March 2019.

The survey was available online via Smart Survey and people were signposted to the survey via MTCBC's Facebook page, Twitter page and corporate website.

Paper copies were available at Council Reception desks in the Civic Centre and Unit 5 buildings.

The survey was also sent by email to all staff and Councillors and to various stakeholders and local and national organisations, including VAMT, the 50+ Forum, Shelter Cymru, Safer Merthyr Tydfil, Crohns & Colitis UK, Helping Hands and Disability Sport Merthyr.

457 people accessed the survey online. 84 surveys were completed. We feel that the relatively low completion ratio (18.38%) was due to the fact that people were asked to read the Draft Strategy at the beginning of the survey in order to answer the following questions:

1. Please indicate your interest in this consultation (Please tick all that apply):
2. Does the summary of the needs assessment accurately reflect toilet provision within Merthyr Tydfil County Borough?
3. In your opinion, has the strategy missed an opportunity to increase awareness of toilet provision in Merthyr Tydfil?
4. In your opinion, has the strategy missed an opportunity to increase toilet provision in Merthyr Tydfil?
5. Do you have any comments on how the Council intends to improve access to toilet provision over the next 2 years?
6. Do you have any other comments that you feel are relevant in developing a local toilet strategy for Merthyr Tydfil?
7. If you feel that your response to this survey has been influenced (positively or negatively) because of any of the following: your ethnic origin, gender, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality or responsibility for any dependents, please give details:

Results of the consultation

Key findings:

- 90.48% of respondents were residents of Merthyr Tydfil
- 61.90% of respondents were of the opinion that the summary of the needs assessment accurately reflects toilet provision in Merthyr Tydfil
- 71.43% of respondents were of the opinion that the strategy missed an opportunity to increase toilet provision in Merthyr Tydfil. Some comments regarding this were as follows:
 - *There should never have been such a gap in the provision of public toilets at the existing bus station. The toilets are still there but not accessible. The new bus station is a long way away from being started, if ever.*
 - *Potentially businesses could be offered a percentage reduction in business rates if they were willing to offer free toilet provision. The restrictions on disabled/m/f toilets should be lifted on small businesses who offer this facility.*
 - *WE need to increase good quality toilets at Car Parks and shopping and Transport areas*
 - *Toilet provision was reduced many years ago - more are needed, especially in the town centre.*
 - *It's difficult to increase toilet provision as that would require either reopening the bus station toilets or building new facilities. The financial pressure on the Council is greater now than years ago.*
 - *More should be done to engage local businesses to open their facilities to the public. Small grants or incentives should be considered*
 - *As local businesses don't seem to want to engage in opening up their provision to members of the public and as there is a reluctance by members of the public to use business facilities, there should be some sort of publicly funded provision,*
 - *It makes a great show of the fact that there will be several toilets in the new bus station but fails to mention that they will only be accessible whilst the building is open which doesn't even cover the full operating hours of the station.*
 - *With the new trains to Cardiff not having toilets on them, ALL stations along the line must have toilet provision as standard. There also needs to be provision throughout the café/pub district in the Town Centre for regular toilet stops. This needs to be public provision.*

There were 32 comments in response to question 5 (Do you have any comments on how the Council intends to improve access to toilet provision over the next 2 years?), a selection of which can be seen below:

- *Upgrading the facilities should start immediately. It is very difficult sometimes when having travelled to Merthyr from down the valley in order to travel further afield to be able to access toilet facilities and still catch buses. There was a lot of money wasted converting the bus station toilets and then expecting the cafe workers to clean them, considering the amount of people who would need to use them.*
- *They need a toilet block like what they had by the bus stop for people to use, which in turn creates jobs cleaning and maintaining the toilets.*
- *There may be community groups that would be interested in running a community facility - not sure this is in there.*
- *Bring back public toilets to the bus station even if we need to pay 30p to use them*
- *Pay workers to maintain and take care of these facilities. Employment for local people and useable amenities for visitors and locals.*
- *Comments are that people are not using town centre shops etc. because of the undesirable people hanging around the town yes this has an impact but this is in every town but the toilet facilities in Merthyr & surrounding area are terrible.*
- *Public toilets needed in Pentrebach retail park. Had to leave my shopping and drive to co-op as my child needed to go. No facilities available.*
- *REAL sign posting is essential.*
- *Improvement could be made by refecation of other towns and cities globally, where access has been successful based on their local strategy.*
- *Many places also provide clean and modern provision by way of giving people the right to pay ie: money, card.*
- *It's essential for an ageing society to gain access to clean and safe toilet facilities along with the many other minority groups of people noted.*
- *More consideration needs to be made to toilet provision especially on a weekend and after normal working hours. The provision needs to be manned/monitored to prevent their misuse which in turn will prevent them the public needs the facility using them. .*
- *Work together with local businesses to allow public to use their facilities if they have them would be beneficial. Better signage to public facilities would be good.*
- *You acknowledge there are insufficient toilets in the areas of the borough but there is no mention of outside the town area, what about the other wards?*
- *I think the websites will be attractive to the young but you must include basic signs also as there will be a large proportion of elderly that cannot use the internet*

- *Greater use of facilities in existing business and commercial premises, perhaps with inducement through rates or other authority funding*
- *The bus station should have toilets that stay open out of shopping hours.*

Some additional comments were as follows:

- *Signage pointing towards toilets is a feature in many town centres and tourist attractions which helps both locals and visitors alike. Another feature in well visited towns and tourist attractions is the provision of a number of provision of maps at gateways/main thoroughfares with you are here showing places of interest including toilets.*
- *The strategy focuses too much on web site/internet access when addressing how it will "advertise" locations of toilet facilities and assumes that many people have access to phones and internet.*
- *It seems that it may improve awareness of local facilities.*
- *There are many large retailers who are happy for you to pop in and use their facilities and this isn't recognised in the provision list.*

Demographic of respondents:

- 54.76% were age 51+
- 60.71% were female
- 40.47% either had a disability or long-term illness or health problem