

<b>LONDON BOROUGH OF BRENT</b>	
<b>Executive - 12 September 2005</b>	
<b>Report from the Director of Environment and Culture</b>	
For action	Wards affected:

Forward Plan Ref: ES-04/05-269

## Report Title: PUBLIC CONVENIENCE STRATEGY

### 1.0 Summary

1.1 This report examines current provision of public conveniences (PCs) in Brent, located on the public highway, Parks Tubes and Train stations and in Council Buildings (for example One Stop Shops and Libraries). The report suggests ways to improve existing facilities and steps to be taken to formulate an overall strategy for future provision in the borough. The report also considers provision of toilets in Wembley Stadium and surrounding area.

### 2.0 Recommendations

- 2.1 The Executive approves the strategy framework for the provision of public conveniences in the borough as set out in paragraph 5.2 below, to go out for consultation with key stakeholders and residents.
- 2.2 The Executive instructs Officers to explore the possibility of installing a Universal Superloo (USL) in Neasden shopping centre, and to consider installing another USL in Harlesden within the Town Centre, in a continuing effort to ensure that there are adequate toilet facilities in all the town centres in the borough (as referred to in 6.2 below).
- 2.3 Alternative use to be made of the redundant toilet buildings on the Harrow Road NW10 and Victoria Road NW6 as set out in paragraph 7.1 and 7.2 below.

### 3.0 Detail

3.1 The Council currently provides public toilets across the Borough on the public highway, in Parks and in certain Council Buildings (for example One Stop Shops and Libraries). All public highway-based PCs are accessible by disabled users. Although there is no statutory obligation on Local Authority to provide public toilets, the formulation of a strategy for PCs in Brent would provide direction on how the Council intends to maintain and improve existing provisions.

## **4.0 Background**

- 4.1 The old purpose-built brick public conveniences were expensive to clean and service and were also in a poor state structurally. Some of these have been replaced since 2000. The contract with JC Decaux to provide new fully Automatic Public Conveniences including regular cleaning and servicing, in exchange for advertising concessions has resulted in 6 such automatic facilities being installed and these are located as shown in appendix A. The maximum potential under this Contract is for 10 'Universal Superloos', but it has not been possible so far to increase from the existing 6 sites due to lack of suitable locations that are acceptable in planning terms. There is no immediate prospect of the JC Decaux contract providing further toilet facilities.
- 4.2 In addition to the 6 JC Decaux toilets, another 3 automatic toilets (Superloos) have been installed in St Johns Road and Douglas Avenue in Wembley, and in Tavistock Road Harlesden. These toilets are maintained by Brent and is inspected and cleaned twice daily

## **5.0 Proposed Strategy**

- 5.1 The need for public conveniences is mainly in public areas that are frequented by residents and visitors. These areas include town centres, large shopping parades, parks, cemeteries, council buildings, sport centres, tube and train stations. It is proposed that all new toilets are linked to service provision and include disabled facilities, also where possible provide baby changing areas, and should be accessible for over 12 hour periods.
- 5.2 Officers therefore suggest a strategy framework that will develop our approach for public toilets over the medium term as follows:
- a. To use British Toilet Association (BTA) charter to develop a policy that sets consistent standards for the quality of all facilities in the borough.
  - b. Ensure all Town Centres have adequate public toilet provisions accessible to all members of the community
  - c. Officers would investigate the possibility of installing PC's in secondary shopping parades, accessible to all members of the community
  - d. Work in partnership with local businesses, Town Centre Managers and other stakeholders to supply access to further conveniences to minimise costs, where this helps us achieve other aims within this framework;
  - e. Ensure adequate provision of PCs around the Wembley event area, utilising s106 monies where appropriate;
  - f. Adequate directions to the toilets for both foot and car users, as appropriate
  - g. Proper signage, both outside and inside the toilets, including name of location, facilities available, person/authority responsible and how to contact if required. Where appropriate, community languages will be used.

- h. Hot and cold running water to wash basins in all facilities provided, with adequate provision for soap
- i. Adequate provision for hand drying
- j. Lockable toilet tissue dispensers, preferably with spare rolls/tissue
- k. Sanitary towel disposal units inside all ladies cubicles
- l. Properly designed and equipped access toilets, to include adequate disposal facilities
- m. Dedicated and properly equipped baby change facilities in both male female toilets or as a unisex facility
- n. Effective cleaning regime and management, to ensure proper standards of cleanliness at all times.
- o. Where possible PCs should be located close to CCTV cameras which may help members of the public to feel more secure when approaching the building and also reduce the incidence of anti-social behaviour.

5.3 Officers would be carrying out consultation on the strategic proposals set out in this document, especially those immediately above. Following an agreed timescale for consultation (in table immediately below) a further report will come back to Members for approval.

<b>Month</b>	<b>Action</b>
September	Consider recommendations in this paper
November	Consult key stakeholders and residents on public toilet strategy framework, including proposals in this document
January 2006	Report submitted to Members

## **6.0 Public Conveniences in Brent**

- 6.1 The need for public conveniences is mainly in public areas frequented by residents and visitors. These areas include:
- Town centres – Appendix A1
  - Secondary shopping parades – Appendix A2
  - Parks – Appendix A3
  - Cemeteries – Appendix A4
  - One Stop Shops – Appendix A5
  - Library – Appendix A6
  - Sports/Leisure Centres – Appendix A7
  - Tube Station – Appendix A8

A list of current publicly-accessible conveniences on the public highway is shown in Appendix A.

### **Town Centres**

- 6.2 Town centres are those that are listed in the Council's Unitary Development Plan and shown in Appendix A1. The town centres would benefit from adequate PC provision that could mean two PCs each, preferably located where there is a suitable site that benefits from necessary services and at opposite ends of the town centre where appropriate. Some town centres like Kilburn also benefits from PCs provided by neighbouring boroughs, or are quite contained and may need less.
- 6.3 This arrangement will not be suitable for Wembley Town Centre where there is a recognised requirement for a greater amount due to the number of visitors attending events at the Stadium and the Arena. Further information on Wembley appears below.

### **Secondary Shopping Parades**

- 6.4 Some shopping parades have grown in size and would benefit from one PC. We suggest developing criteria for siting PCs on secondary shopping parades. As examples of criteria, we can consider:
- distance from existing public convenience;
  - number of shops in parade; and
  - customer traffic density.

Officers have identified possible locations in secondary shopping parades suitable for the installation of PCs based on the above criteria. However precise locations within these parades have not yet been identified. See Appendix 2 below.

### **7.0 Redundant Toilets**

- 7.1 There are two redundant toilets located on the Harrow Road NW10 and Victoria Road NW6. These buildings would make excellent satellite depots for street cleansing storage purposes.
- 7.2 Conversion would continue the improvements we have already made with respect to street cleaning. The new Government Best Value Performance Indicator "BV199" requires a much more thorough approach to cleansing and management of the Streetscene. Achieving a high level of performance under BV199 is one of the Council's PSA targets, and can earn us a Performance Reward Grant. To address the problem an agreed programme of intensive cleaning will take place in each Ward four times a year. Intensive cleaning relies to some extent on mechanical sweeping and these machines need to be stored in a safe place. These redundant toilets are an ideal place to store these machines. Examples of such toilets are:
- The redundant toilet in Victoria Road NW6 which has a new superloo directly in front of it.

- The redundant toilet on the Harrow Road has been closed for years, Officer has not received any requests from residents for this toilet to be reopened and the area is not heavily pedestrianised.

## **8.0 Public Toilet Usage**

- 8.1 The British Toilet Association (BTA)'s best practice guidance recommends that there should be a minimum of 1 toilet for every 10,000 persons. The guidance does not mention whether the Public toilet needs to be located on the public highway or in Council Buildings. What is of more importance to the BTA is accessibility and creating a safe environment that is comfortable for the users.
- 8.2 In Brent the total population is around 267,766 people (mid-year estimate 2005), thus requiring a minimum of 26 toilets. The tables in Appendices listed below show that there are over 70 toilets located on the public highway, Council Buildings, Parks, and Tube and Train Stations that members of the public can use, this amount far exceeds the minimum requirements stipulated by the British Toilet Association (BTA) of 1 toilet per 10000 persons.
- 8.3 Changing demographics and human activity in Brent and provision of toilets in private businesses (i.e. hotels and shopping precincts) will affect the demand for public conveniences. The opening of Wembley Stadium and other developments taking place within the Wembley area may necessitate the Council playing a facilitation role. This would involve Council Officers working with local businesses to determine how privately owned toilets can be made accessible to public use.

## **9.0 Toilet Provision for Wembley Stadium – (See Appendix C)**

- 9.1 In Wembley there is work underway to identify sites for additional event day toilets in relation to the new Wembley Stadium. These toilets would be funded through monies allocated as part of the s106 agreement.
- 9.2 The new stadium includes over 2,300 toilets with 43 accessible externally without the need to give up a ticket.
- 9.3 Wembley Park Station and Wembley Central Station improvements (planned for stadium opening) include some toilet provision. The St Mowin redevelopment proposals also include some toilets below Wembley Square. Toilets have been sought at Wembley Stadium Station but these will only be available after a later stage of the hub project is completed and a ticket office is provided.
- 9.4 In Olympic Way the existing toilet block is now owned by Quintain. Quintain are required to pay £100,000 (or provide toilets up to that level of expenditure) under the section 106 Agreement in respect of their development next to the stadium.

## **10.0 Financial Implications**

- 10.1 Any further provision of Universal Superloos within the existing JC Decaux contract will not have cost implications for Brent. However, as discussed at 4.1 further provision is dependent on suitable advertising sites being found, and for those sites then gaining planning consent.
- 10.2 Outside of the JC Decaux contract, the initial installation costs for new Universal Superloos are around £15k each.
- 10.3 The proposal to increase the number of public conveniences in Town Centres to two per Centre would necessitate an additional six Universal Superloos, and thus the capital costs to Brent (outside of the JC Decaux contract) would be in the order of £90k, with ongoing revenue costs of between £90k and £150k per annum.
- 10.4 If this Strategy for Town Centre provision is agreed, Officers will use existing provision (either through the JC Decaux contract, or existing revenue budget) to provide a further two facilities. However, any provision above this will require additional funds.

## **11.0 Legal Implications**

- 11.1 Under section 87 of the Public Health Act 1936, a local authority may provide public conveniences, but is not under a statutory duty to do so.
- 11.2 Should the Council decide to procure additional public conveniences and servicing and maintenance of them (including the procurement of public conveniences pursuant to the Quintain s106 agreement if undertaken by the Council) then the procurement will need to be undertaken in compliance with the requirements of the Council's Standing Orders and the EU Public Procurement Regulations.

## **12.0 Diversity Implications**

- 12.1 The proposals in this report have been discussed with members of the StreetCare Equalities Group and they have outlined below the following Equality issues:
- a. That all PC sites should have:
    - a. adequate provision for men and women;
    - b. unisex facilities for use by mentality and/or physically disabled people with carers of the opposite sex;
    - c. unisex area with nappy-changing facilities; and
    - d. equipment made on a scale suitable for use by young children.
  - b. That all cubicles for women should contain paper bags for soiled sanitary towels and a disposal bin in which to place them. The bins for soiled sanitary towels must be carefully monitored to ensure they are serviced or emptied with sufficient regularity;

- c. Instructions for toilets are currently in English, French and German. Instructions should more carefully follow the needs of the Borough's citizens as well as larger tourist groups;
- d. Insufficient information available on street signage and other Council offices regarding location of toilets;
- e. Some residents feel that the toilets (especially the old style) are unsafe. A typical comment on this theme includes: "they are magnet for anti-social behaviour (drug use, vandalism, sexual activity)";
- f. Some degree of mistrust regarding the new toilets (i.e. will they get locked in or will the doors automatically open whilst still inside);
- g. The general perception that public toilets are unhygienic (from all section of the community); and
- h. Lack of baby changing facilities. These were installed initially but were heavily vandalised and later removed.

### **13.0 Staffing/Accommodation Implications (if appropriate)**

13.1 Costs for any additional staffing have been included in the revenue running costs.

### **14.0 Environmental Implications**

14.1 The improved provision of PCs should help reduce health risks and environmental pollution caused by members of the public urinating in the streets or alleyways.

### **15.0 BACKGROUND INFORMATION**

#### **Details of Documents:**

British Toilet Association advice

Discussion with other boroughs

Earlier reports on PCs in the borough

J C Decaux

**16.0** Any person wishing to inspect the above papers should contact Neal St Lewis, StreetCare Service Unit, Brent House, 349/357 High Road, Wembley, Middlesex HA9 6BZ, Telephone: 020 8937 5079

**Richard Saunders**  
**Director of Environment and Culture**

**Neal St Lewis**  
**Street Scene Manager StreetCare Service Unit**

## Key

**PC:** Public Convenience

**APC:** Automatic Public Convenience

**BTA:** British Toilet Association

**USL:** Universal Super Loo

## Appendix A-Existing Public Conveniences on the Public Highway

Public Toilet Location	Male/Female	Hours of Operation	Disabled Facilities	Baby Change Facilities
High Road, NW10 (access via Richmond Avenue by Summerfield Store)	1 -Unisex	24hr	Yes	No
Kingsbury Road, Car Park rear of Barclays Bank London, NW9	1-Unisex	24hr	Yes	No
Barham Park Sudbury in car park adjacent to Harrow Road frontage	1-Unisex	24hr	Yes	No
Queens Park Car Park	1-Unisex	24hr	Yes	No
St Johns Road Wembley by rear of Marks & Spencers	1-Unisex	24hr	Yes	Yes
Douglas Avenue by Ealing Road Wembley	1-Unisex	24hr	Yes	Yes
Tavistock Road, Car Park, Harlesden, London, NW10	1-Unisex	0800 to 1700 hrs	Yes	Yes
Victoria Road, NW6	1-Unisex	24hr	Yes	No
Kensal Rise NW10	1-Unisex	24hr	Yes	No



## Appendix A1

Town Centres	Male/Female	Hours of Operation	Disabled Facilities	Baby Change Facilities
<b>Kingsbury - 1</b> Kingsbury Road, Car Park rear of Barclays Bank London, NW9	1-Unisex	24hr	Yes	No
<b>Wembley – 2</b> St Johns Road Wembley by rear of Marks & Spencers and Douglas Avenue by Ealing Road Wembley	2-Unisex	24hr	Yes	Yes
<b>Harlesden - 1</b> Tavistock Road, Car Park, Harlesden, London, NW10	1Unisex	0800 to 1700 hrs	Yes	Yes
<b>Kilburn 1</b> Victoria Road, Kilburn NW6	1Unisex	24hr	Yes	No
<b>Neasden</b> Shopping Precinct	0	0	0	0

## Appendix A2

### Shopping Parades Locations identified by Officers as suitable for the installation of Public Conveniences

Shopping Parades	Male/Female	Hours of Operation	Disabled Facilities	Baby Change Facilities
Craven Park Road NW10	0			
College Road j/w Harrow Road	0			
Dudden Hill Lane j/w High Road Willesden	0			
Preston Road	0			
Queensbury	0			

### Appendix A3

<b>PARKS</b>	<b>Male and Female</b>	<b>Hours of Operation</b>	<b>Disabled Facilities</b>	<b>Baby Change Facilities</b>
Gladstone Park	1-Unisex	0800 to 2000hr	1	0
Roundwood Park	1-Unisex	0800 to 2000hr	1	1

### Appendix A4

<b>Cemeteries and Mortuaries</b>	<b>Male and Female</b>	<b>Hours of Operation</b>	<b>Disabled Facilities</b>	<b>Baby Change Facilities</b>
Alperton	3 1-male 2 -female	9am to 7pm	1	1
Carpenders Park	2 1-male 1-female	9am to 7pm	1	No
Paddington	2 - unisex	9am to 7pm	2	2
Willesden	2 1- male 1 - female	9am to 7pm	2	No

### Appendix A5

<b>One Stop Shops</b>	<b>Male/ Female</b>	<b>Hours of Operation</b>	<b>Disabled Facilities</b>	<b>Baby Change Facilities</b>
Kilburn	1-Unisex	0900 to 1700hr	No	No
Harlesden	1-Unisex	0900 to 1700hr	1	1
Town Hall	1-Male 1-Female	0900 to 2000hr	1	1
Brent House	1-Male 1-Female	0800 to 2000hr	0	1

## Appendix A6

Library	Male/ Female	Hours of Operation	Disabled Facilities	Baby Change Facilities
Barham Park	1 - Unisex	Monday -11am – 6pm Tuesday- 9am – 6pm Wednesday- Closed Thursday -9am – 8pm Friday -Closed Saturday- 9am - 5pm Sunday- Closed	Yes	No
Cricklewood Library & Archive	1 Unisex	Monday -11am - 6pm Tuesday - 9am - 6pm Wednesday - Closed Thursday - 11am - 8pm Friday - Closed Saturday - 9am - 5pm Sunday - Closed	Yes	No
Ealing Road Library	1 Unisex	Monday - 11am - 8pm Tuesday - 9am - 6pm Wednesday - Closed Thursday - 9am - 8pm Friday - 9am - 6pm Saturday- -9am - 5pm Sunday - 12 noon – 5pm	No	No
Harlesden Library	3 1 Male 2 Female	Monday - 11am – 8pm Tuesday -9am – 6pm Wednesday - 9am – 6pm Thursday - 9am – 8pm Friday - 9am – 6pm Saturday - 9am – 5pm Sunday - Closed	Yes	Yes
Kensal Rise Library	3 (for staff use only)	Monday - 11am – 6pm Tuesday - 11am – 7pm Wednesday - Closed Thursday - 11am – 7pm Friday - Closed Saturday - 9am – 5pm Sunday - Closed	Yes	No
Kilburn Library	1			
Kingsbury Library	1	Monday - 11am – 8pm Tuesday - 9am – 6pm	Yes	Yes

		Wednesday - Closed Thursday - 9am – 8pm Friday - 9am – 6pm Saturday - 9am – 5pm Sunday - Closed		
Neasden Library	1	Monday - 11am – 6pm Tuesday 11am – 6pm Wednesday - 11am – 6pm Thursday - 11am – 6pm Friday - Closed Saturday - 9am – 5pm Sunday - Closed	1	No
Preston Library	1 (no public toilet, staff allows customers to use staff toilets)	Monday - Closed Tuesday - 9am -8pm Wednesday - 9am – 6pm Thursday 9am – 8pm Friday - 9am – 6pm Saturday - 9am – 5pm Sunday - 12 noon – 5pm	Yes	No
Tokington Library	No Public toilets	Monday - 11am – 6pm Tuesday - 11am – 6pm Wednesday - Closed Thursday - 11am – 6pm Friday - 9am - 5pm Saturday - Closed Sunday - Closed		
Town Hall Library	2 1 Male 1 Female	Monday - 11am – 8pm Tuesday - 9am – 8pm Wednesday - Closed Thursday - 9am – 8pm Friday - 9am – 6pm Saturday - 9am – 5pm Sunday - Closed	Yes	No
Willesden Green Library	13	Monday - 11am - 8pm  Tuesday - 9am - 8pm Wednesday - 9am – 6pm Thursday - 9am – 8pm Friday – Closed	Yes	2

## Appendix A7

Sports/Leisure Centres	Male and Female	Hours of Operation	Disabled Facilities	Baby Change Facilities
Bridge Park CLC	8 3 male 3 female 2 disabled	Mon to Fri 0700 to 2200hr Sat 0700 to 1900hr Sun 1000 to 2000hr	2	0
Charteris SC	2 1 male 1 female	Mon to Fri 0800 to 2200hr Sat 0900 to 1900hr Sun 1000 to 2000hr	1	0
Vale Farm SC	11 5 male 1 disabled 4 female 1 disabled	Mon to Fri 0630 to 2200hr Sat and Sun 0800 to 2200hr	3	2

## Appendix A8

Tube Stations	Male and Female	Hours of Operation	Disabled Facilities	Baby Change Facilities
Willesden Green	1(for disabled users only)	0500 to 2200hrs	Yes	No
Dollis Hill	3 1 male 1 female 1 disabled	0500 to 2200hrs	Yes	Yes
Preston	2 1 male 1 female	0530 to 2100hr	No	No
Kingsbury	2 1male 1 female	0530 to 2200hr	Yes	Yes

## Appendix C – Wembley High Road Existing and Proposed sites

### Toilet provision: Potential sites

	Locations (west to east)	Plot Size	Problems/Constraints	Benefits
LDA	South of new Station footbridge on LDA land (Plot 6b)	Large	Close to residential behind	Visible location Close to Stadium Recently cleared site
1	Outside Greyhound Pub, Oakington Manor Drive	Small	Unlikely to be acceptable to pub Not on direct stadium-station route Reduces highway visibility	Help existing misuse at site Close to Stadium
2	Adjacent to Greyhound Pub, Oakington Manor Drive	Large	Electricity sub-station Not on direct stadium-station route Loss of green space site	Help existing misuse at site Close to Stadium
3	336-342 High Road (Floors-2-Go/Kwick-fit)	Large	Loss of retail floorspace Land purchase/rental cost Application in for new development	Visible location Easily adaptable No residential

	Locations (west to east)	Plot Size	Problems/Constraints	Benefits
4	Brent House western boundary landscaping	Medium	Plot gradient Loss of green space 'Wrong' side of road for events	above Visible location
5	Copland School landscaping eastern boundary	Medium	School development plans Unlikely to be acceptable to school Loss of green space 'Wrong' side of road for events	Visible location
6	Footway outside Ujima House, High Road	Small	Unlikely to be acceptable to Ujima	Visible location
7	Adjacent to Eddies bar, High Road	Small		Visible location Help existing misuse at site
8	Imperial House car park, High Road	Medium	Loss of car parking spaces Uninviting location	
9	Footway along Café Quarter, High Road	Small	Unpopular site with retail units Existing contract for advertising booth Removes footway space at busy site	Visible location
10	Land between 397 and 397a (Old Post Office)	Small	'Wrong' side of the road for events	Near existing noisy uses
11	Footway outside Chesterfield House, Park Lane	Small	Unpopular site with retail units Reduces highway visibility	Visible location
12	St. Johns Road jct with Elm Road	Large	Access to adj private parking uses Adj to residential area Not on direct stadium-station route	Existing 'superloo' unit
13	Land between 397 and 397a (Old Post Office)	Large	Beyond direct stadium-station route Close to stairway crowd movement Plot gradient	Near to marshalling area Derelict site

'Appropriate' uses:

Small - Single unmanned 'superloo' unit

Medium - Larger unmanned 'superloo' units  
 Large - Manned temporary/permanent facility

**Table: Provision by type of facility and gender**

Location	Male Urinals	Men Women / Changing	WW/Changing	Disabled	Notes
Wembley Park Station	18	4	5	1	
Olympic Way	20	5	12	1(M) 1(F)	
Wembley Stadium (total)	1056	201	995	190	
<i>(Wembley Stadium - external access)</i>	24	5	12	2	
QED Wembley Park Boulevard area	tbc	tbc	tbc	tbc	
Wembley Stadium Station	tbc	tbc	tbc	tbc	
St.John's Road	-	-	-	1	
Wembley Central Square	6	3	7	1	
Wembley Central Station	5	2	5	1	
<b>TOTAL</b>	<b>1105</b>	<b>215</b>	<b>1024</b>	<b>196</b>	<b>2540</b>
<b>(external)</b>	<b>73</b>	<b>19</b>	<b>41</b>	<b>8</b>	<b>141</b>