

Committee(s): Porth Health and Environmental Services Committee	Dated: 9 th July 2024
Subject: Public Convenience Provision	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Providing excellent services Vibrant thriving destination Flourishing public spaces
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Bob Roberts, Interim Executive Director of Environment	For Decision
Report author: Joe Kingston, Assistant Director Gardens and Cleansing	

Summary

This report highlights current public convenience provision in the Square Mile and outlines options for the future.

There are 20 sets of public conveniences for use within the City of London available at different times of the day and night. This is a non-statutory function for the City Corporation, and as such it is supplemented by various commercial third parties, including retail centres and national rail stations. Current Corporation facilities include two attended public conveniences near key tourist spots, four 'urilifts' near night-time economy locations, and toilets in public car parks and libraries.

Since 2009, the City Corporation has also managed a Community Toilet Scheme (CTS) which has 68 participating locations. Members of the public can access these facilities for free, with locations and hours available on the City Corporation's website.

Despite income from charging, the net cost to the City Corporation of operating its public conveniences is significant, with the facilities at Tower Hill & Paternoster Square losing around £340k pa combined (not including overheads). These facilities have considerably higher usage numbers than those at Bank Station and Eastcheap which were closed in 2021 when your committee was faced with delivering a balanced budget whilst absorbing a 12% (£1.2m) savings target.

Considering concerns being raised about the current provision of public conveniences, Members requested that officers undertake a root and branch review. This report sets out the findings from that review and recommends a number of actions that can be delivered within current budgets. Given wider budget constraints, further options are fully dependent on additional sources of funding being identified.

Recommendation(s)

Members are recommended to agree the following (within currently agreed budgets):

- Review and enhance the publicity and signage for the City's public toilets at all locations
- Refurbish the toilet facilities within the City's car parks
- Identify potential locations for additional urilifts
- Explore opportunities for a limited reopening of the public toilets at Blackfriars (after the completion of the Tideway project)
- Review the benefits, promotion and funding of the Community Toilets Scheme
- Press for further private sector provision of public toilets through the Planning process
- Work with ParkGuard to focus their nighttime economy resources on anti-social behaviour hotspots
- Explore additional funding opportunities to reinvest into the provision and maintenance of public toilets

Main Report

Background

1. The provision of public conveniences in the City is currently delivered as a partnership between the City Corporation and the private sector, with a network of 20 facilities available at various times of the day and night across the Square Mile.
2. Despite there being no statutory requirement for the City to operate or fund public conveniences, it does so both directly through its attended public toilets and urilifts, and indirectly by making the facilities in some of its key buildings available for public use.
3. Under its Community Toilet Scheme, the City also offers a small financial payment to premises to allow public use from non-customers, and these are supplemented in turn by toilets provided by retail centres and national rail stations as part of their operating model and / or Planning requirements.
4. The last major review of public toilet provision was in 2021, when your Committee was faced with the considerable challenge of seeking to deliver a balanced budget whilst absorbing 12% savings (£1.2m). Given the relative lack of usage and significant operational costs of operating the toilets at Bank Station and Eastcheap, these were closed in order to prevent further cuts elsewhere in the service.

Current Position

Existing Provision – Attended Public Conveniences

5. The City Corporation maintains two attended public conveniences located close to the City's main tourist attractions of St Paul's Cathedral (at Paternoster Square) and the Tower of London (at Tower Hill).
6. Both locations are limited to daytime opening (Mon-Fri 8am to 8pm; 9am to 5pm at weekends) to match the respective tourist trade (Tower Hill extends to 7pm in the summer) and both are attended throughout their opening times. This is not just because their usage requires constant monitoring and cleaning, but also because evidence has shown that unattended toilets attract a much greater degree of anti-social behaviour (ASB) and damage.
7. ASB is also a contributory factor as to why these facilities are not open later in the evening, as regrettably lone workers in such facilities are at greater risk than if they are part of a wider facility such as a train station.
8. In terms of usage, Tower Hill is by far and away the most frequently used facility, with just over 400,000 users last year. To illustrate, this equates to roughly two users per minute during opening times, with its 'popularity' no doubt linked to its proximity to the City's coach park bringing tourists to the Tower of London and Tower Bridge. However, this figure is still somewhat short of the number of users pre-Covid, when then facility attracted over 500,000 users pa at its peak.
9. Usage at Paternoster Square is much lower with just over 70,000 users last year, or the equivalent of one person every three minutes. By comparison, the toilets at Bank Station had 28,000 users pa before their closure (a third of the usage at Paternoster and just over 5% by comparison to Tower Hill).
10. Given the staffing required to manage these facilities, the cost of operation is significant, amounting to around £580k pa in total for the two, not including repair and maintenance, and other overheads.
11. The income for both facilities is derived from a 50p entry fee which has not changed since it was introduced over 10 years ago. This was done at the time to offset the losses the facilities were making, and although they now take a combined £240k pa from users, this makes the net cost of running the City's two public conveniences around £340k pa. This has to be absorbed within Environment's wider local risk budget, and any reduction in footfall and usage has to be offset with equivalent savings or additional income from elsewhere within the department's budget.
12. Other providers such as Network Rail are able to offer their toilets free of charge because they can absorb their resource costs within a wider facility, but the City is not able to do this, meaning that charging a fee has had to become an essential part of the City's operating model for these facilities.
13. The City's fees have not increased in that time partly because of the desire to keep them affordable for users but also because of the need to keep the coinage

as simple as possible, meaning any potential increase to help cover costs would likely have to move from 50p to a £1. Payment can be made by both cash and card at both facilities, but despite cashless being offered for some time, a considerable number of transactions remain with coins.

14. Removing charges completely might increase usage but would further erode the financial position and increase the current loss. In addition, there is no firm data to suggest removing fees would reduce public urination in the vicinity. To illustrate this, the Tower Hill area does not generally have an ASB issue when the public toilets are open, whereas there are issues of public urination in the vicinity of the toilets at Liverpool St station which are free for the public to use.
15. Therefore there are both benefits and disbenefits to changing the current fee, but at present there is no hard data to confirm to what extent patterns of usage or income would result from a change.
16. Finally, other operating models for attended public conveniences have been tried elsewhere but these have not been a commercial success. In particular, Westminster City Council sought to have a private contractor operate their public conveniences on behalf of the Council, but this proved commercially unsuccessful and they decided to return them to public operation.

Past Provision – Attended Public Conveniences

17. In 2021, your Committee was faced with the difficult challenge of delivering a balanced budget whilst absorbing a 12% (£1.2m) savings target. Given the options available, it was agreed at the time to close the two least used (and greatest loss making) public conveniences at Bank Station and Eastcheap.
18. The facilities at Eastcheap were of Victorian design with accessibility issues and would have required significant investment and modernisation, with the close proximity of the toilets at Cannon St station also a factor.
19. More recently, Transport for London have proposed a major safety scheme to enhance the pedestrian facilities and road safety aspects of the Eastcheap / Cannon St / Gracechurch St junction, meaning there is every expectation that the entrance to this underground structure will have to be demolished to make way. As a result, options for the Eastcheap toilets are not being pursued.
20. The facilities at Bank Station were located within the London Underground structure but were operated by the City. As noted earlier, their usage was relatively small by comparison to the City's other attended toilets plus there are public toilets available within the Royal Exchange, reducing the impact of their closure. They currently remain 'mothballed' and could be reopened if alternative funding could be found (see options below).
21. Finally there were public toilets on the Embankment in the structure beneath Blackfriars Bridge that were demolished as part of the Tideway project for London's 'super sewer'. Thames Water are under an obligation to reprovide those facilities at the completion of the scheme, but the affordability of reopening them for continuous public use will be limited given the continuing budget

constraints. However, a limited reopening regime may be possible (see options below).

Existing Provision - Urilifts

22. There are four 'urilifts' in the City of London located close to areas of nighttime economy activity at Bishopsgate, Cornhill, Charterhouse Street and Watling Street. Each one is buried in the ground during the day but are then raised every evening between 8pm - 4am.
23. The facilities are free to use but have some obvious constraints, in particular that they are only practically available for use by men. It's also challenging to collect data about their usage and they require space underground which is an issue in the City given the number of utility cables and pipes under our streets. They are also relatively expensive to install at around £100-150k each.
24. Similar to the toilets at Bank Station and Eastcheap, these facilities were closed as a result of the need for your Committee to make savings in 2021, but they were reintroduced late last year following the provision of additional funding of £45k pa from the On-Street Parking Reserve to support the City's Cleansing operation and to enhance our public realm. The On-Street Parking Reserve might be a source of funding for future urilift facilities, but the attended public conveniences do not sit within the OSPR's strict ringfencing criteria and so this cannot be used to fund their reopening.
25. Environment's Highways Team are currently using ground penetrating radar to map the subsurface of the City of London as part of a separate project to identify space underground between the utility pipes and cables. This provides an opportunity to identify further locations where urilifts might be possible underground, albeit additional funding would have to be identified first to purchase and install them.

Existing Provision – Other City Corporation Premises

26. In addition to these bespoke public conveniences, public toilets are also available in three of the City's public car parks. These are free to use and are open 24hrs a day, cleaned and managed by the car park attendants at these sites.
27. The City Corporation also allows public access to toilets in the Guildhall (north and west wing), the Barbican Centre and its two public libraries at Artizan Street and Shoe Lane, the latter two just in the daytime aligned to their respective opening hours.
28. It is fully appreciated that the availability of these facilities is much less well known, and those in the car parks require a degree of refurbishment. Nevertheless these are a valuable additional resource that requires better signage and promotion given that they are within the City Corporation's gift to provide.

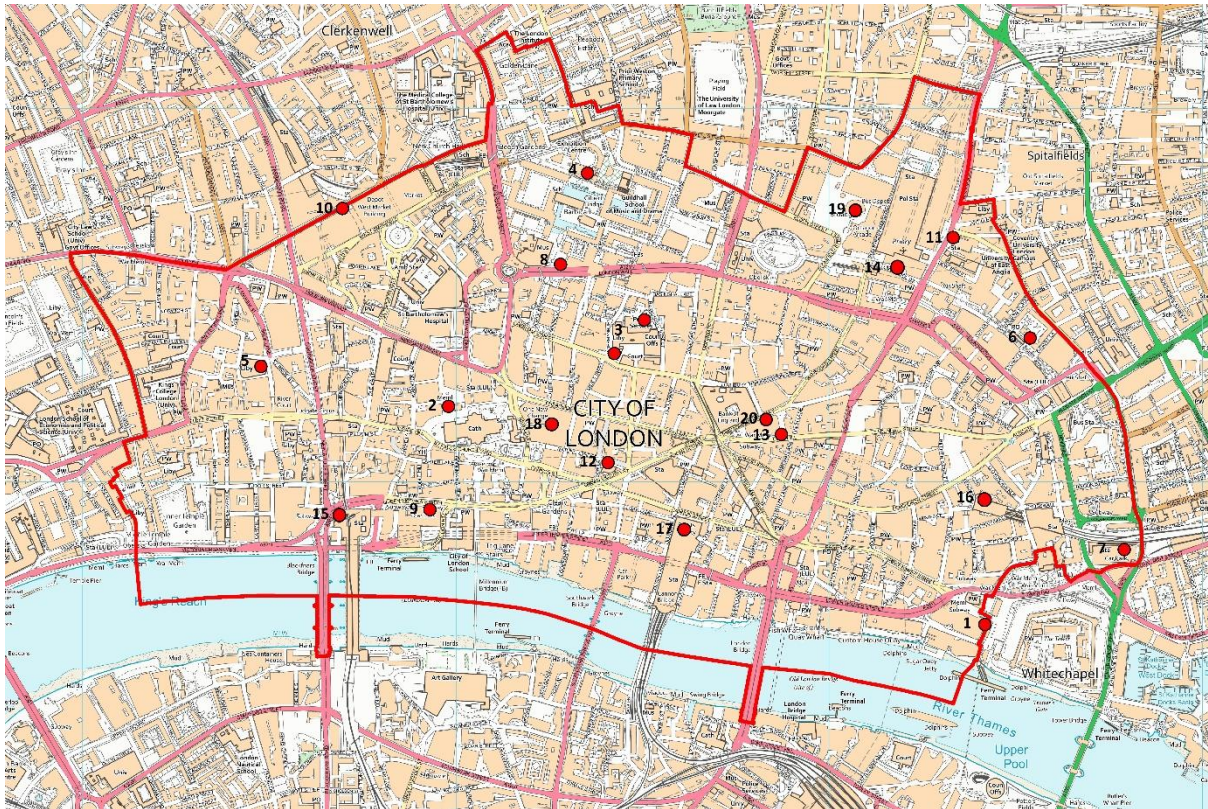
Existing Provision – Commercial Premises

29. Aside from locations that are in the control of the City Corporation, there are several other facilities available for free public use. These include those connected to retail centres at One New Change, Royal Exchange and Broadgate Circle, as well as the main National Rail stations within the City at Blackfriars, Cannon Street, Liverpool Street and Fenchurch Street.

Existing Provision – Summary

30. In total this amounts to 20 publicly accessible facilities throughout the Square Mile available at different times of the day and night:

Type	Location	Daytime	Evening
Attended Public Conveniences	Tower Hill (1)	✓	
	Paternoster Square (2)	✓	
City Corporation Buildings	Guildhall (3)	✓	✓
	Barbican Centre (4)	✓	
	Shoe Lane Library (5)	✓	
	Artizan St Library (6)	✓	
City Corporation Car Parks	Minories (7)	✓	✓
	London Wall (8)	✓	✓
	Baynard House (9)	✓	✓
Urilifts	Charterhouse St (10)		✓
	Bishopsgate (11)		✓
	Watling St (12)		✓
	Cornhill (13)		✓
Network Rail stations	Liverpool St (14)	✓	✓
	Blackfriars (15)	✓	✓
	Fenchurch St (16)	✓	✓
	Cannon St (17)	✓	✓
Retail	One New Change (18)	✓	✓
	Broadgate Circle (19)	✓	✓
	Royal Exchange (20)	✓	✓



31. As can be seen above, these represent a wide geographical spread across the City and, although it is fully appreciated that not all facilities are open at all times, most parts of the City have one within easy reach.

Existing Provision – Community Toilet Scheme

32. The City Corporation established a Community Toilet Scheme in 2009 to help increase the amount of toilet provision in the City. It began with an initial target of 50 participants but exceeded that target, with 68 premises currently members, the majority of which are open in the evening. The opening hours of the toilets are based on hours of trading / opening, and members of the public are not charged should they use the facilities.

33. Locations are available to find on the City Corporation's website and premises should be identified by a 30x30cm sticker displayed in their window. The sites are audited at twice a year to ensure they are displaying the correct signage, that staff are aware of the scheme and that the toilets are maintained to an acceptable standard.

34. In return for offering their facilities to passers-by, the businesses can claim up to £600 pa for additional expenses, although not all do. Based on the claims made by existing scheme members, the City's current budget allocation is £40k pa.

35. It is acknowledged that this scheme is challenging to publicise those premises that are available for public use, plus there is no easy method of identifying how many people make use of them who were not already at that particular pub or restaurant.

36. Nevertheless they remain an important toll to supplement the provision of public toilets, and they act as a reminder to the City's entertainment trade that they can support the public at large in providing such welcome facilities in partnership with the City.

Anti-Social Behaviour

37. Officers monitor reported instances of anti-social behaviour (specifically public urination and defecation) and liaise with relevant departments (for example Licensing, Community Safety, and the homeless outreach team) across the Corporation and the City of London Police to enable services to be best targeted to both proactively and reactively clean and clear identified hotspots with available resources.

38. Current Urilift provision is located in areas identified with high levels of anti-social behaviour as a result of the local night-time economy.

Signage and Wayfinding

39. It is recognised that appropriate and visible signage and wayfinding is essential to direct individuals to facilities. Many of the available toilets within the Square Mile are not included on the Legible London monoliths and maps. Officers are in the process of auditing all the on-street signage and wayfinding to identify where it is not clearly indicated when within a two or three-minute walk.

40. Signage at some City Corporation owned properties, such as car parks, the Guildhall and the libraries (as well as some members of the Community Toilets Scheme) currently do not clearly indicate there are toilet facilities available to members of the public, and this needs to be addressed.

41. All the facilities currently available to members of the public, including the community toilets, are on the City Corporation's online map along with opening times. This is available as open source data and numerous apps, including Toilets4London, pull locations from this to signpost users towards facilities.

Planning

42. The City Plan 2040 Policy 'HL6 Public Toilets' requires the provision of directly accessible public toilet facilities for a range of users in major retail, leisure and transport developments particularly near visitor attractions and public open spaces and existing major transport interchanges.

Options

Signage and Wayfinding

43. All the City Corporation's public toilets facilities would benefit considerably from a refreshed approach to signage and wayfinding which is joined up to ensure there is general awareness regardless of whether they are operated by the City Corporation, the retail sector, or Network Rail. Officers will look to identify a

budget to complete a review of current signage and wayfinding provision to update and improve this wherever possible.

Additional and refurbished facilities

44. Officers will review the results of the Highways Team's ground penetrating radar map of the subsurface of the City of London to identify space underground between the utility pipes and cables where further locations for urilifts might be possible underground. Should feasible sites be identified officers will explore options for funding.
45. Alongside the City Surveyors department, officers will undertake a condition survey of the public toilets located in in City Corporation car parks. Once assessed officers will explore options for funding for refurbishing these sites and improving access.

Community Toilet Scheme

46. The benefits of the Community Toilet Scheme are difficult to quantify, but closing the scheme in its entirety would likely be a retrograde step in that it does increase the numbers of toilets available which is particularly important at night. It also reinforces the need for a partnership approach to public toilet provision between the public and private sectors. and given not all the current business make a claim for costs, the
47. One option is for the City to withdraw the £600 subsidy and redirect that £40k budget to other areas of need, such as improved signage, communications on toilets in general and the operational requirements from other facilities. It would be difficult at this stage to quantify the impact of withdrawing that funding to members of the scheme but some businesses will likely remain given the publicity it affords to their premises..
48. There is also the opportunity provided by the national British Toilet Association Community Toilet Scheme which would help in joining up publicity and promotion for the premises in the City.

Planning

49. Officers within Planning have agreed to work with the Cleansing Service to actively promote the need for such facilities in future developments for the longer term.

Anti-social behaviour and ParkGuard

50. Officers will continue the liaison approach with partners and stakeholders across the Corporation to enable services to be best targeted to both respond to instances of anti-social behaviour. This approach will inform the tasking and focus of ParkGuard deployment and will also be used to inform on street signage and behaviour change campaign planning.

Attended Public Conveniences

51. In terms of the toilets at Blackfriars, Tideway is expected to complete some time in 2025, and although funding is not currently available to staff them full time, reopening them for major events such as London Marathon, Lord Mayor's Show and New Year's Eve would be an affordable option. Alternatively, there is the potential to work collaboratively with potential retail concessions that might be located in close proximity.
52. Reopening the attended public conveniences at Bank Station would require additional funding as this cannot be resourced within the Environment Department's existing budget envelope. In particular, around £20k would be required as a one-off cost to refurbish them following their closure, plus around £100k pa would be needed to fund the staffing required to attend them, plus additional overheads such as repair and maintenance. (To be clear, this would be for daytime opening only in line with the City's other toilets).
53. Should Members wish for officers to explore this possibility, several funding options may be possible, such as:
- Increasing the charge for users at Paternoster Square and / or Tower Hill, enabling the additional funding to be generated within the Cleansing Service itself
 - Seeking financial support from Transport for London, particularly given the commitment from the Mayor to provide £3m pa in additional funding for public toilets in London Underground stations
 - Potential internal funding bids such as the Community Infrastructure Levy (note the On-Street Parking Reserve is not available given its ringfencing criteria)
 - Funding support from the Business Improvement Districts.

Recommendations

54. To summarise the above, the following options are recommended:
- Review & enhance the publicity and signage for the City's public toilets at all locations
 - Refurbish the toilet facilities within the City's car parks
 - Identify potential locations for additional urilifts
 - Explore opportunities for a limited reopening of the public toilets at Blackfriars (after the completion of the Tideway project)
 - Review the benefits, promotion and funding of the Community Toilets Scheme
 - Press for further private sector provision of public toilets through the Planning process
 - Work with ParkGuard to focus their nighttime economy resources on anti-social behaviour hotspots
 - Explore additional funding opportunities to reinvest into the provision and maintenance of public toilets

Strategic implications – this approach supports the delivery of the Corporate Plan, specifically the supporting the outcomes to providing excellent services, a vibrant

thriving destination where people feel safe with minimal antisocial behaviour, and flourishing public spaces where enjoy spending time.

Financial implications – There will be financial implications dependent on the options approved by members. Officers have only recommended options which do not negatively impact on local risk budgets. Some of the options recommended require further investigation and funding from various internal sources which is subject to separate processes and approvals.

Resource implications – The majority of proposed options can be delivered within the current level of resourcing. However, any increase in staffed public conveniences will require additional staff who are currently employed via an agency.

Legal implications - None

Risk implications - None

Equalities implications – A test of relevance has been considered for the outline options in this report and all will require a full equalities impact assessment to be carried out once members have provided officers with a direction of travel. Full equalities impact assessments will be provided in future reports where any projects have been further scoped and developed.

Climate implications - None

Security implications – None

Conclusion

55. The City Corporation's recent approach to managing public conveniences has been shaped by budgetary constraints, leading to closures and mothballing of facilities. Despite this, a significant network of accessible toilets remains in place, supported by initiatives like the Community Toilet Scheme. The continued operation of two attended public conveniences and the deployment of urilifts aim to address both public needs and mitigate antisocial behaviour.

56. The various approaches proposed include improving signage, sconsidering additional funding source and exploring new opportunities for collaboration, particularly with TfL. These measures aim to ensure that public conveniences in the City of London remain accessible, well-maintained, and capable of meeting the needs of residents, workers, and visitors.

Appendices

- None

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