



Llangollen Town Council's response to Denbighshire's Public Toilet Needs Assessment.

Llangollen Town Council wish to respond to the consultation document being consider under the requirements of Part 8 of the Public Health (Wales) Act 2017.

The Town Council notes, and welcomes, the statement that **no decisions** have been made to close toilets anywhere in Denbighshire at this stage and that a report will be taken to a Scrutiny Committee in the autumn before Cabinet are asked to make any decision.

Clearly individual Members are free to complete the questionnaire, but the following comments are the Town Council response to the consultation as resolved at a Council meeting held on the 20 August 2024.

Why do public toilets matter?

Whilst the Public Health Act 1936 gives local authorities a power to provide public toilets, it imposes no duty to do so, and this lack of compulsion, together with a perception of nuisance associated with them, has arguably resulted in a steady decline in the provision of public toilets in recent years.

Public toilets however matter, for a variety of reasons. The lack of toilets or restricted opening times can result in street fouling of which the Town Council staff have direct experience in that the curtilage of the Town Hall has been subjected to this type of activity when the current toilets are closed.

Additionally, a lack of public toilets results in certain groups feeling anxious about going out. Older people, for example, do not readily leave their homes without the reassurance that they will have access to public toilets, which can lead to individuals deliberately dehydrating themselves which can cause ill-health, with consequent burdens on the NHS. Older people rely on public toilets, being more likely to suffer from conditions such as incontinence, urgency and prostrate problems as they age.

Disabled people and their carers also lack the freedom to leave their homes without the reassurance of adequate toilet facilities being available. People who have Colitis or Crohn's Disease, diseases that can strike at any age, can experience the sudden and uncontrollable need to use a toilet and having an 'accident' in public is every patient's worst fear and can have a devastating effect on their ability to undertake everyday activities such as going to work, shopping or socialising. An estimated 10 million people in Britain have disabilities and more than one third of people aged over 50 are registered as disabled in some way.

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For people with profound and multiple learning disabilities the absence of suitable provision such as the Changing Places toilets, prevent many from travelling into town centres and spending money, a direct support to the local economy. Public authorities are required by the Disability Equality Duty to consider all sectors of the society they serve.

Tourists and visitors also rank the availability of toilets high in their lists of reasons why a location is worth visiting. If you are a visitor and there on a temporary basis, provision of toilets becomes absolutely fundamental, most journeys start and finish with people going to the toilet. There are therefore direct benefits to local authorities providing public toilets, of which tourism is one. Investment in good toilet provision has been shown to increase retail turnover, tourist numbers, and economic growth.

Denbighshire's tourism figures have seen a rise for 2023 in comparison to the previous year. The latest STEAM (Scarborough Tourism Economic Activity Monitor) figures show that the total visitor numbers for Denbighshire in 2023 reached 6.39 million, an increase of almost 6% (5.9%) in comparison to 2022 figures. The data also shows that the number of day visitors to the county for 2023 was 4.72 million, a 7.5% change when compared to 2022. The total economic impact of tourism was £736.05 million, a jump of 17.1% on the previous year.

Commenting on these statistics Councillor Jason McLellan, Leader of the Council and Lead Member for Economic Growth & Tackling Deprivation said: "Denbighshire has both stunning coastal areas as well as scenic rural patches, which allows it to be a very well-rounded offer for tourists, who travel far and wide to come and visit our beautiful county. Once again, we welcome increased tourism figures for Denbighshire year on year, which demonstrate the importance of tourism to the local economy, and the bounce back the tourism industry has achieved after a difficult few years."

Llangollen plays a significant contribution in attracting a large number of tourists due to the significance and attractiveness of the town and the heritage of the town and surrounding area. Key visitor attractions include:

- the world-famous International Musical Eisteddfod, which takes place every year during the second week of July and attracts averaging 40-50,000 visitors per annum
- Pontcysyllte Aqueduct and Canal WHS averaging 333,000 visitors per annum
- Llangollen Railway – The only standard gauge heritage railway in North Wales
- with 100,000 visitors per annum
- Castell Dinas Bran averaging 40,300 per annum
- Plas Newydd open daily from April to September averaging 150,000 per annum

Additionally landscape attractions within the vicinity of Llangollen include the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty, the Horseshoe Pass and the

Panorama support an active and growing outdoor activities sector which account for many thousands of visitors each year.

The visitor economy not only makes a direct contribution to a local economy but also provides an invaluable indirect economic impact through supporting businesses in the supply chain. Its wide-reaching remit helps create attractive places to both live and work in addition to wider benefits to local communities; an increased choice of facilities such as places to eat out, local shops, events and exhibitions, as well as conservation of local heritage and the natural landscape.

Llangollen is no different with tourist making a significant contribution to the diversity of the retail offer in the town and a vibrant café culture. Therefore, any actions that could affect or hinder the development of tourism should be resisted.

Community Toilet Schemes.

Whilst these schemes are being promoted by the County Council as a possible solution to offer an alternative approach to the provision of public toilets, there are problems connected with them. These toilets are not suitable for large numbers of visitors needing the toilet at the same time. Why would a restaurant put up with 50 people getting off a coach and ploughing into their cafe with no return to the business for use of its facilities?

These facilities will be open only when the business is open; this means 10am until midnight in some pubs but means far shorter opening hours in other establishments. The Service Provider/Proprietor also retains the right in exceptional circumstances to refuse a member of the general public admission to their premises and/or use of their toilet facilities. This means that the toilets are not public in the same sense that municipal toilets are public; the scheme's toilets are open to the public, provided that the service provider is prepared to accept them.

Therefore, Community Toilet Schemes should be seen as an extension and enhancement to the existing public toilet provision within an area and not as a replacement.

County Council priorities and services.

The overall ambition of Denbighshire County Council's Corporate Strategy 2017 – 2022: a prosperous Denbighshire is to ensure that Denbighshire is a place where residents and businesses are well connected and resilient; where young people have opportunities for affordable housing and acquire skills and jobs to lead successful and fulfilling lives and where we all enjoy an attractive and protected environment. To achieve this, the County Council will support economic growth and a healthier and happier, caring Denbighshire

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In terms of the economy the County Council's Economic and Community Ambition Strategy 2013-2023 recognises that tourism accounts for 10% of employment in Denbighshire and that the County Council aim to address the issues and challenges, and make progress towards achieving its strategic outcomes for maximising opportunities for tourism sector growth the County Council strategy focuses on the following areas:

- Outdoor and activity tourism
- Food and drink tourism
- Welsh language, culture and heritage
- Work with accommodation providers to improve the quality and quantity of visitor accommodation across the county
- Work with tourism businesses generally, with a particular focus on tourism skills development
- Develop a Denbighshire Events strategy, integrating both major and local events

In addition, the County Council has identified that traditional town centres are at risk from changes in consumer habits. The trend across the UK is a decline in town centre retail, largely due to out of town and online retail opportunities. Lower access to personal credit also impacts as incomes have been squeezed in the current financial circumstances. Town Centres therefore need to become multi-purpose, more than merely retail areas, offering opportunities for leisure and entertainment, as well as for living and working.

In respect of the strategic outcomes for maximizing opportunities for growth to provide for town centres and the high streets of the future the County Council strategy focuses on the following areas:

- Develop initiatives for empty shops – including visual improvements, temporary uses and securing permanent new tenants
- Develop initiatives to promote and assist independent retailers
- Promote diversification and introduce new, non-retail uses which will help support the future vitality and viability of town centres and improve the evening economy
- Review parking/traffic management in all towns and consider changes that will promote economic sustainability or growth.

Having considered the why toilets matter in a vibrant tourist town with an aging population; and given the County Councils strategic plans and strategies the Town Council finds it difficult to equate the decision to close the public toilets in Llangollen in the light of the impact that the decision could have on the local tourist economy and the continued viability of the high street.

The Town Council also believes that equalities legislation places a duty on all sectors of Local Government to advance equality of opportunity between people who share a protected characteristic and those who don't and remove or reduce disadvantages

suffered by people because of a protected characteristic. Given the adverse effects that the closure of public toilets has on most notably older people, the disabled and pregnant women as cited previously in this response then there is a clear statutory reason to provide public conveniences.

Equally as the Public Health (Wales) Act 2017 requires the local authority to evidence that it has reviewed the needs of the local population and to produce a strategy that shows how it will try to meet these needs, and therefore the actions of the County Council to consider the closure of public conveniences is counterintuitive in respect of Llangollen and its prominence as a visitor destination frequently cited as being the jewel in Denbighshire's crown.

Members of the Town Council thank you for the opportunity to comment on this consultation and trust that you will take note of the comments provided.

Yours sincerely,

Carole Roberts.
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