

Appendix C



**COMPREHENSIVE IMPACT
ASSESSMENT**

PUBLIC TOILET PROJECT

Comprehensive Impact Assessment Template

Assessment being undertaken		Public Convenience Review
Group: Commercial Services		Commercial Services
Service:		Environment Services
Name of Officer/s completing assessment:		Emma Widdicombe
Date of Assessment:		31 October 2018 updated Dec 2018 and 29.01.19
1.	<p>Why are you doing this CIA?</p> <p>Provide a brief explanation of the reason. Is it: new/change in policy, procedures, strategy, function, service.</p>	<p>Further to the review of the public conveniences in South Hams a number of toilets have been identified to be transferred to the Parish Councils however, should this not arise, these facilities could close. The purpose of this CIA is to identify if the proposed closure of these selected public toilets will impact on health & safety, equality & diversity etc and to assess whether any mitigating action is required.</p>
2.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p>	<p>South Hams District Council resolved to make a £226,000 saving in the cost of providing and maintaining public conveniences. It was agreed these savings would be achieved through the installation of pay on entry at its higher footfall facilities with anticipated income of £36,000 to be achieved by 2019/20 and the proposed transfer of a number of identified public conveniences to Parish/Town Councils or should this not occur the closure of these sites where the footfall and cost of running are low with a saving of £180,000</p>

		<p>by 2020/21.</p> <p>The Council has a power but not a duty to provide public conveniences (Public Health Act 1936). It currently provides 41 public toilet facilities within the South Hams at a cost of just under £1 million. The aim of this project is to provide a sustainable level of public conveniences within the available budget.</p>
3.	<p>Who implements or delivers the above? State if this is undertaken by more than one team, service, and department including any external partners.</p>	<p>The project will be managed by the public review project group which consists of officers from environment services, assets, support services, property maintenance, ICT, legal and the project sponsor being the Executive Director/Group Manager. The team have met with Parish and Town Councils as required to discuss the freehold transfers.</p>
4.	<p>Equality and Diversity, safeguarding, health, safety and wellbeing - Who will be affected by this proposal? Is the proposal likely to result in positive or negative impacts/risks? If so what are they? What plans do you have in place, or are developing, that will mitigate the likely identified negative impacts/risks?</p>	<p>All members of the public and local communities which include more specifically:</p> <ul style="list-style-type: none"> • Users with chronic health issues (bowel and bladder problems) • People with young families • Disabled people • Parish and Town Councils who could potentially be recipients of existing facilities • Travellers • Homeless people • Young people • Older people • Pregnant mothers • Public health teams • Outdoor/mobile workers

- Holiday makers/day visitors
- Private businesses (restaurants/pubs/shops/cafes)
- Tourist groups

Positive Impacts

- Through devolution these public conveniences will be spared from closure, or even enhanced
- Services may be designed in accordance with local priorities and needs, using local knowledge and resources
- There may be the potential to foster a greater degree of civic pride and increased involvement in public services by local residents
- Where alternative facilities have been recognised eg pub, café this may have a positive impact on local businesses due to increased footfall, with an increase in money spent in local areas
- The hours of opening of the alternative facilities may offer a variety of opening hours which would not cause significant disadvantage.
- The Council has retained some facilities and will be introducing charges at others to ensure that they remain open and operational

Negative Impacts

- A reduction in the provision of public conveniences will mean users will have to travel further to find alternative provision, where it is available
- Individuals with disabilities, older people or individuals with health related problems may find alternative facilities difficult to use

		<ul style="list-style-type: none">• It is likely that there will be an increased demand for remaining facilities• Some groups such as elderly, those with particular disabilities and mothers with young children will be negatively affected. However, the availability of alternative facilities and the remaining facilities available will go some way to mitigating the worst impacts.• Closure of public toilets may have a restrictive effect upon the willingness of certain groups to access public space, socialise and shop. This in turn can lead to isolation and negatively impact upon a person's well-being. Disabled people, older people, mothers and fathers of young children and carers and people with chronic health problems all need easy access to toilet facilities.• Lack of toilet facilities at the right time and right place contributes to dirty streets that are unsanitary, unpleasant and can spread infection. Public toilets in places of open space help to encourage people who may need regular toilet access to take exercise and stay physically active.• Public toilet provision is an important issue for areas relying on tourism income, or seeking to develop their profile as a visitor destination. Tourists choose their destinations based on previous experience, looking up feedback on the internet and knowledge of facilities. Meeting visitor's needs is vital to secure repeat trade and build a sustainable economy. However, there is also a view that reduced availability of facilities would not impact on a family's choice to visit certain areas. The perception is that private
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facilities are more modern and have better facilities for mothers and babies.

- Older people are more likely to suffer from incontinence problems and other health related issues that require them to use the toilet more frequently. Lack of toilet facilities will result in older people staying at home.
- Young children are less likely to be able to wait to use the toilet and mother with babies may need baby changing facilities. Pregnant women are more likely to need the toilet more frequently and will be disadvantaged if there are a lack of facilities.
- Some toilets identified for closure include disabled facilities. Those with mobility problems may find it harder to get to alternative facilities. Lack of toilet facilities prevent disabled people from taking part in everyday activities and going out.
- Carers who look after older people, disabled and young people may be disadvantaged.
- There could be negative impacts to homeless individuals who use public toilets as somewhere to wash as well as a toileting facility. Homeless people may also suffer from stigma, and may not be or may not feel welcome in some establishments.

To mitigate the impact the following has been carried out:

- Towns and villages with multiple facilities have been

		<p>assessed and alternative toilet provisions identified</p> <ul style="list-style-type: none"> • Areas with low usage have been identified first for transfer/closure in order to maximise the benefit of those facilities kept open in higher use areas. • Toilets identified for closure are low usage sites • There will be appropriate knowledge transfer and due diligence processes prior to devolution and during negotiations
5.	<p>Information Management – What type of information will be required to deliver this proposal? Is the proposal likely to result in increased risks to the information? If so, what are they? What plans do you have in place, or are developing, that will mitigate the likely identified negative impacts/risks?</p>	<p>To achieve the aims of the project, data will be required on the service running costs.</p> <p>During negotiations with Town & Parish Councils, it will be necessary for data to be shared.</p>
6.	<p>Community Safety/Crime and Disorder - Who will be affected by this proposal? Is the proposal likely to result in positive or negative impacts/risks? If so what are they? What plans do you have in place, or are developing, that will mitigate the likely identified negative impacts/risks?</p>	<p>If toilets are closed there is a risk of vandalism of the empty building.</p> <p>Positive</p> <ul style="list-style-type: none"> • Where toilets have been devolved to Parish and Town Councils it will have a positive impact in terms of keeping properties in use and reducing the risks associated with crime and vandalism in disused premises <p>Negative</p> <ul style="list-style-type: none"> • Risk of vandalism and antisocial behaviour of the empty building should closure occur

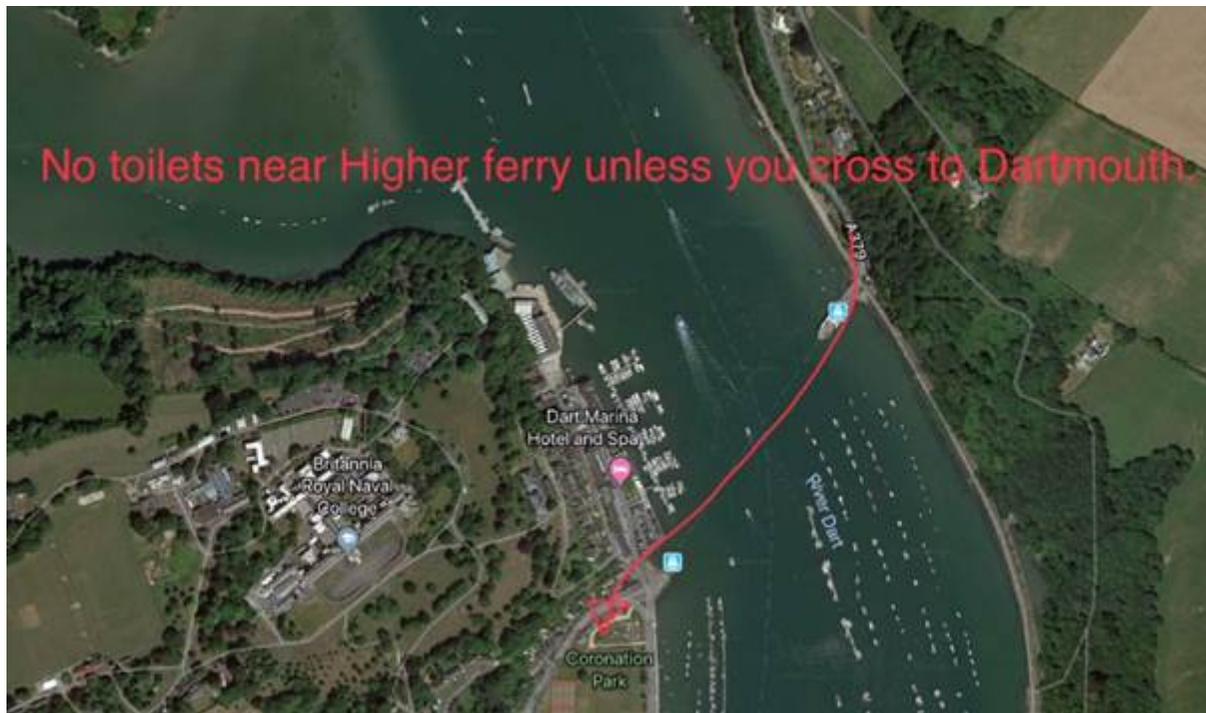
7.	<p>Have the impacts identified in Questions 4 to 6 been assessed using up to date and reliable evidence and data? Please provide a link to the evidence/data or state what the evidence/data is. The data and research page on the intranet is a useful resource.</p> <p>Do you need to engage or consult with any representative group/s?</p> <p>Are our staff affected? Have the unions or staff forums been involved? If not do they need to be?</p>	<p>A full review of existing facilities including types and quality has been carried out as well as detailed assessments of costs. See details per toilet below</p> <p>Consultation has been undertaken with the Town and Parish Councils</p> <p>Consultation has also taken place with National and Local Interest Groups to inform them of the project brief and requested feedback or meetings if desired.</p> <p>A members drop in session was also carried out</p>
8.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? The full impact of the policy/decision may only be known after the proposals have been implemented.</p>	<p>Once a transfer of services and assets has taken place, in legal terms the Council no longer retains an interest or responsibility therefore in such cases there is an argument that the need for ongoing monitoring does not arise. However, in the short term there will need to be a clear communications and support to direct enquiries appropriately.</p> <p>Where facilities may close the opportunity to dispose through sale or demolition would be considered. However, during this time empty buildings would be monitored by our MLO's for antisocial behaviour and vandalism</p>
9.	<p>Are there other implications not covered by this CIA that</p>	<p>No other implications.</p>

	<p>need to be considered? These can include: staffing, procurement and contracts, property, climate change, transport, waste and economy. If yes then please explain.</p> <p>Refer to the Committee Report Template Guidance page for further information.</p>	
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Summary of Comprehensive Impact Assessment Implications (These should be copied and pasted into your report)	
Equality and Diversity	Alternative facilities have been identified where possible. Acknowledge that this project will result in a reduced service but the result will be the provision of a sustainable number of public toilets (the higher footfall facilities) within the available budget.
Safeguarding	Vulnerable customers are more likely to be affected by the outcome of this review. However, as above, alternative facilities have been identified.
Community Safety, Crime and Disorder	The installation of PoE should result in reduced vandalism within toilets and will discourage anti-social behaviour. Closed facilities will be sold where feasible so that empty, unused buildings are not left as targets for vandals, and, in the meantime, will be monitored.
Health, Safety and Wellbeing	Alternative facilities have been identified where it is proposed that public toilet facilities are closed. Where PoE is proposed, disabled customers will still have free access to toilets (where we have disabled facilities in place) using a RADAR key.
Other implications	

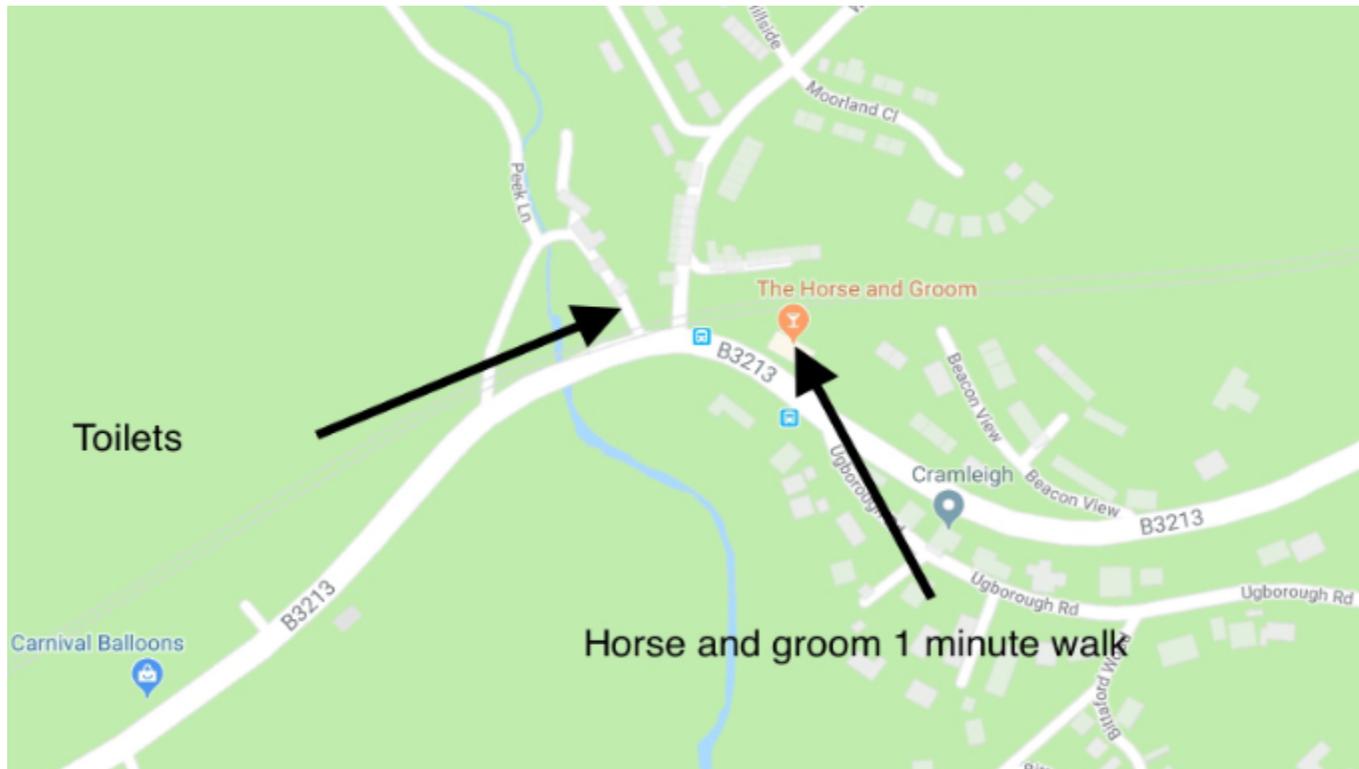
Higher Ferry, Kingswear

- Minimal usage due to very poor access to the toilets. Minor use by the occasional walker. The increased capacity on the higher ferry and the crossing times means this toilet is no longer required as in previous years
- No other toilets in the area unless you cross on the ferry where there are a number of toilets
- Already subject to winter closure Nov – Feb with no complaints



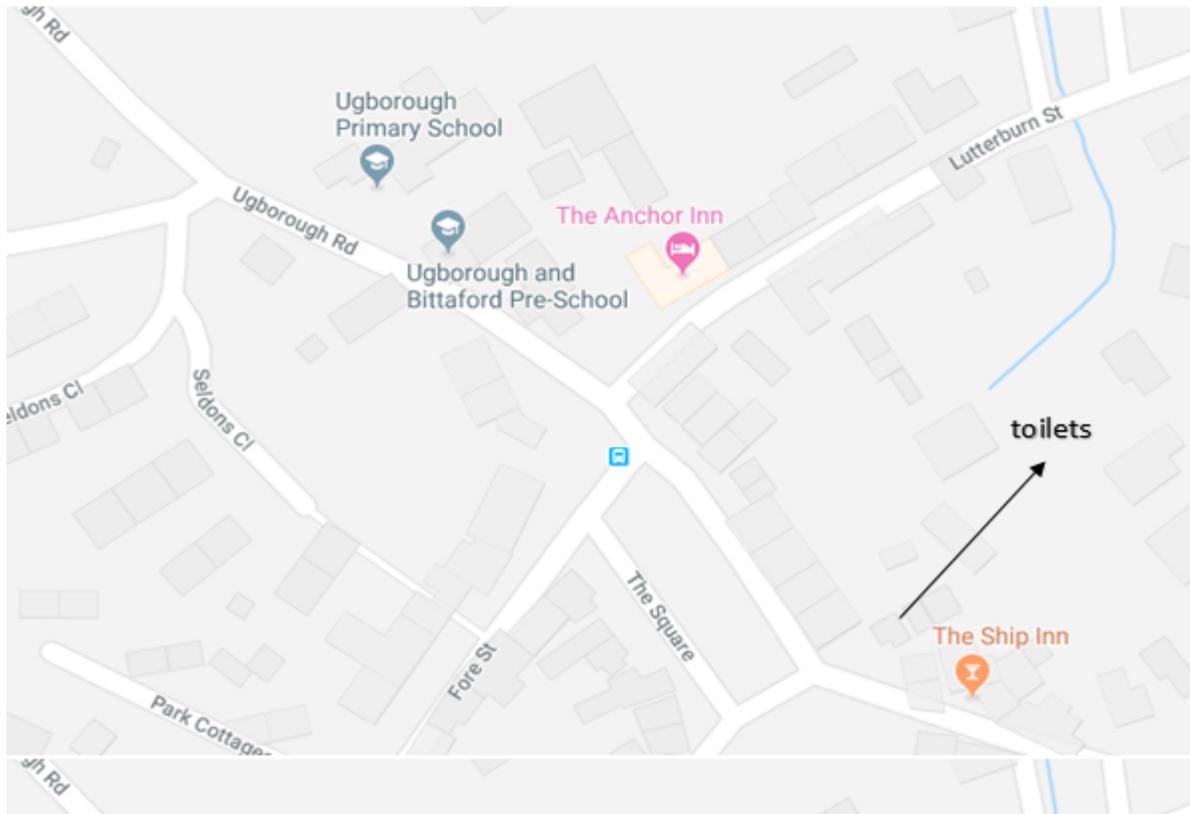
Bittaford

- Already subject to a seasonal closure of Nov – Feb
- Minimal usage
- There is one public house – The Horse and Groom located 1 minute walk (approximately 0.04 miles) from the public toilets and another public convenience in Ivybridge which is a short drive



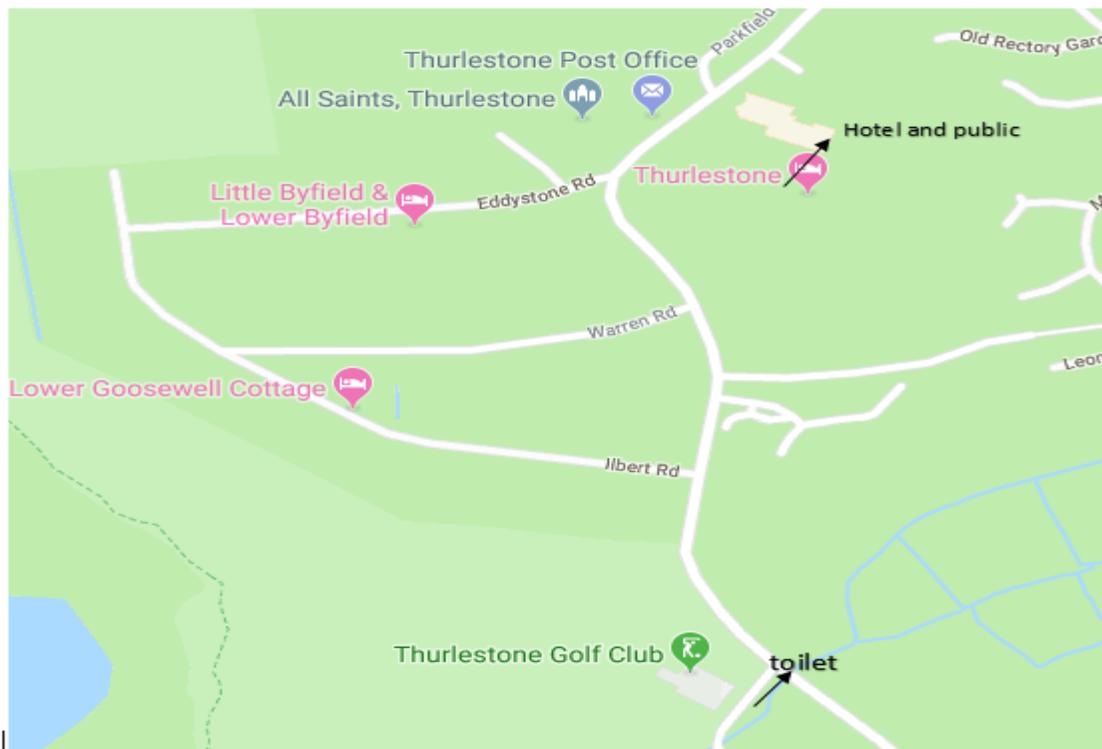
Ugborough

- Already subject to a seasonal closure of nov- feb
- Minimal usage
- There are currently two public houses located in the area with The Ship (approximately 0.05 miles) located directly in front of the toilets and The Anchor Inn located a short walk (approximately 0.11 miles) from the public toilets.



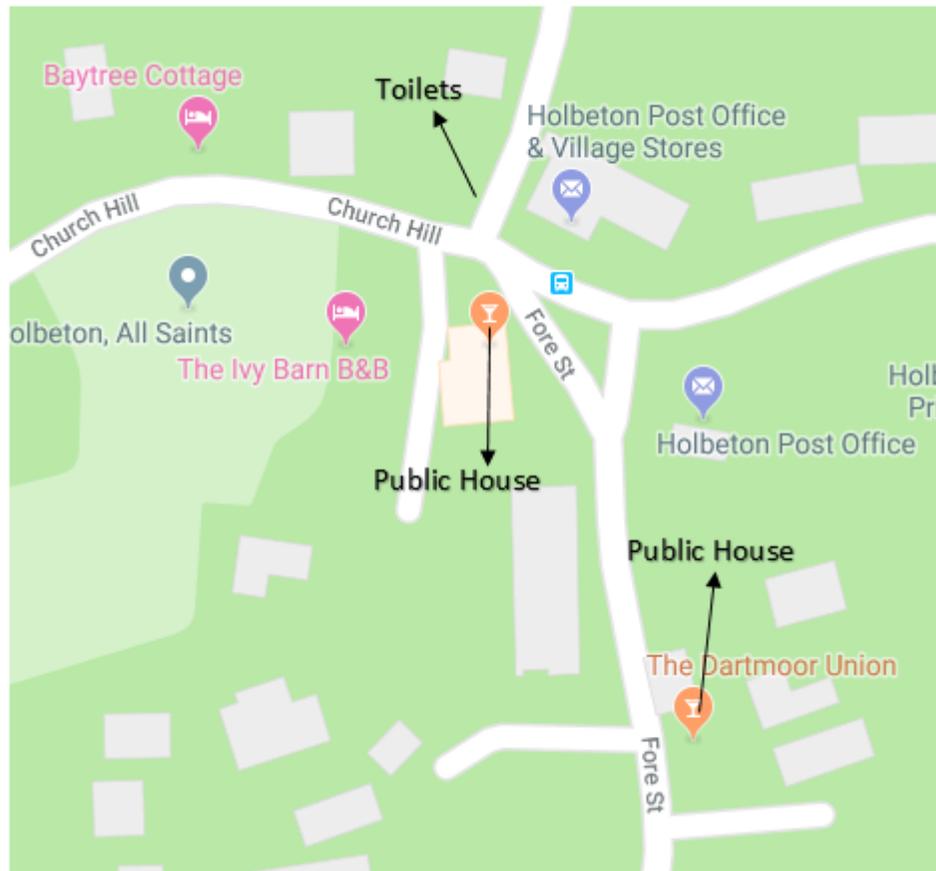
Thurlestone

- Already on a seasonal winter closure Nov-Feb
- Minimal use due to location
- There is the Thurlestone Hotel/Public House located approximately 0.4 mile walk from the current public toilets



Holbeton

- The Parish Council already clean this toilet during the winter shutdown of Nov-Feb
- There are no cafes within the village but two public houses – Dartmoor Union (approx. 0.13 miles) and Mildmay Colours (approx. 0.03 miles), a short walk from the current toilets



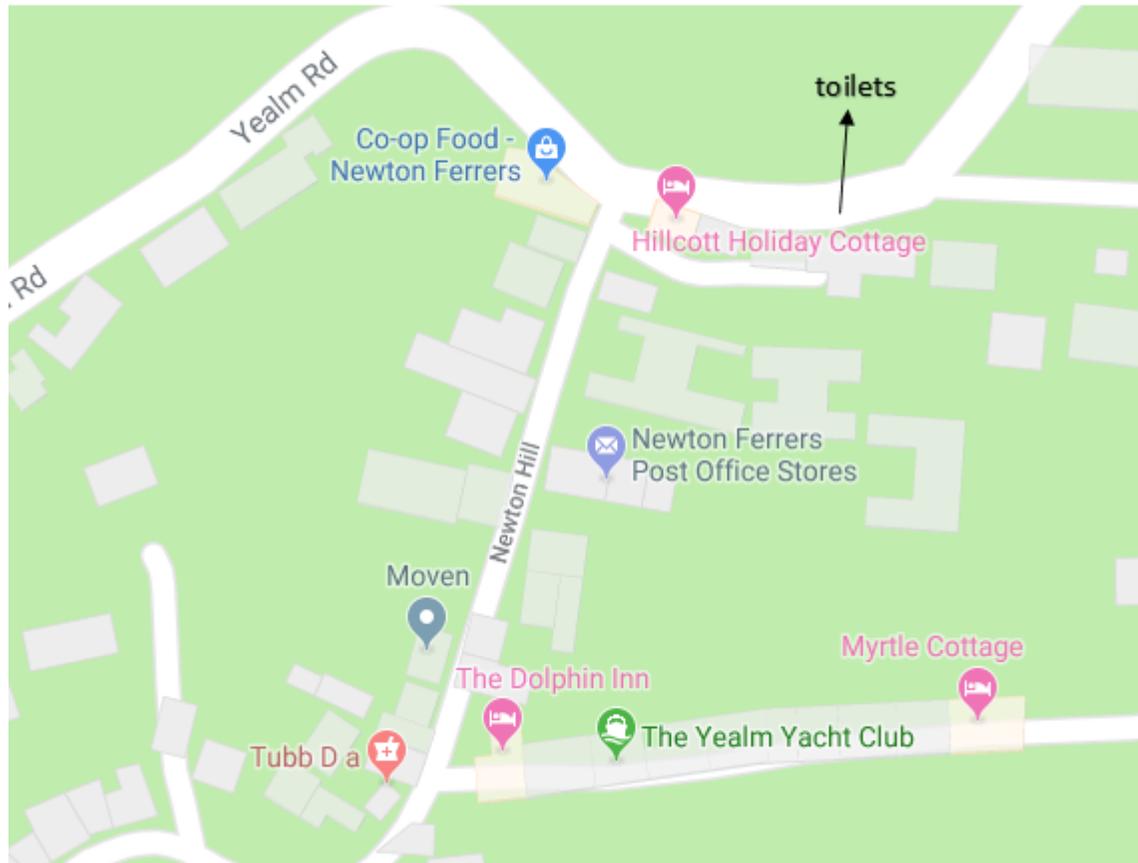
Staverton

- Seasonal closure already applies from Nov – Feb
- Sea Trout Inn located across the road from the current public toilets (approximately 0.07 miles).



Newton Ferrers

- Seasonal closure already applies between Nov-Feb
- There is a café located within the village but they do not want customers just using the toilets. There is also a public house (The Dolphin approximately 0.12 miles) located a short walk from the current toilets.



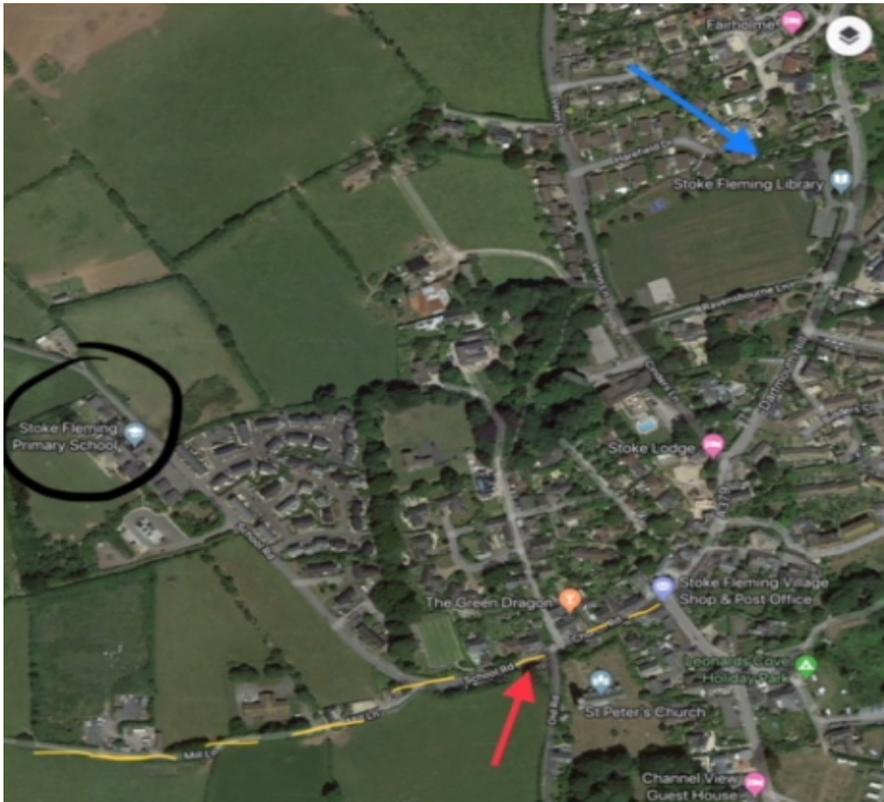
Lower Ferry, Kingswear

- There are currently two public houses located within close proximity to the current public toilets as well as the Steam Train toilets located next to their café



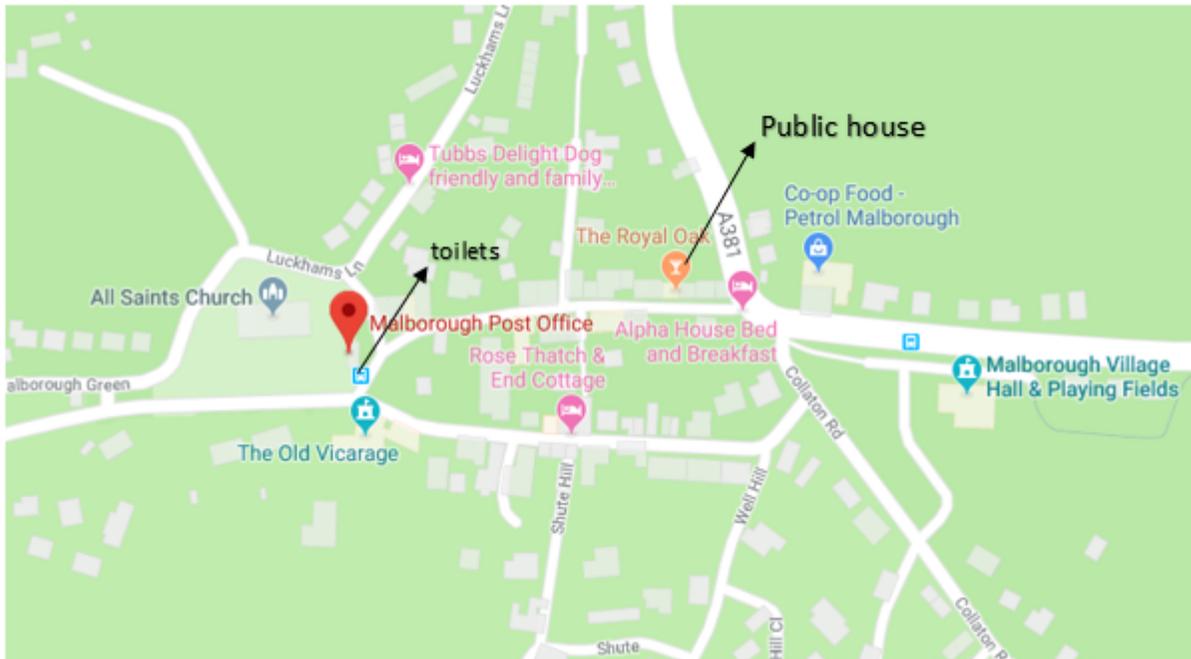
Stoke Fleming

- Minimal usage but is located on a footpath used by visitors to the area or potentially on the school visit
- There are toilets available to use in the playing field however only open when events are on at the field
- The Green Dragon public house is located on the same road as the toilets but with limit opening hours



Malborough

- Already subject to reduced cleaning in from Nov – Feb
- The Royal Oak public house is located 0.1 miles from the current toilets and alternative public conveniences available in Salcombe



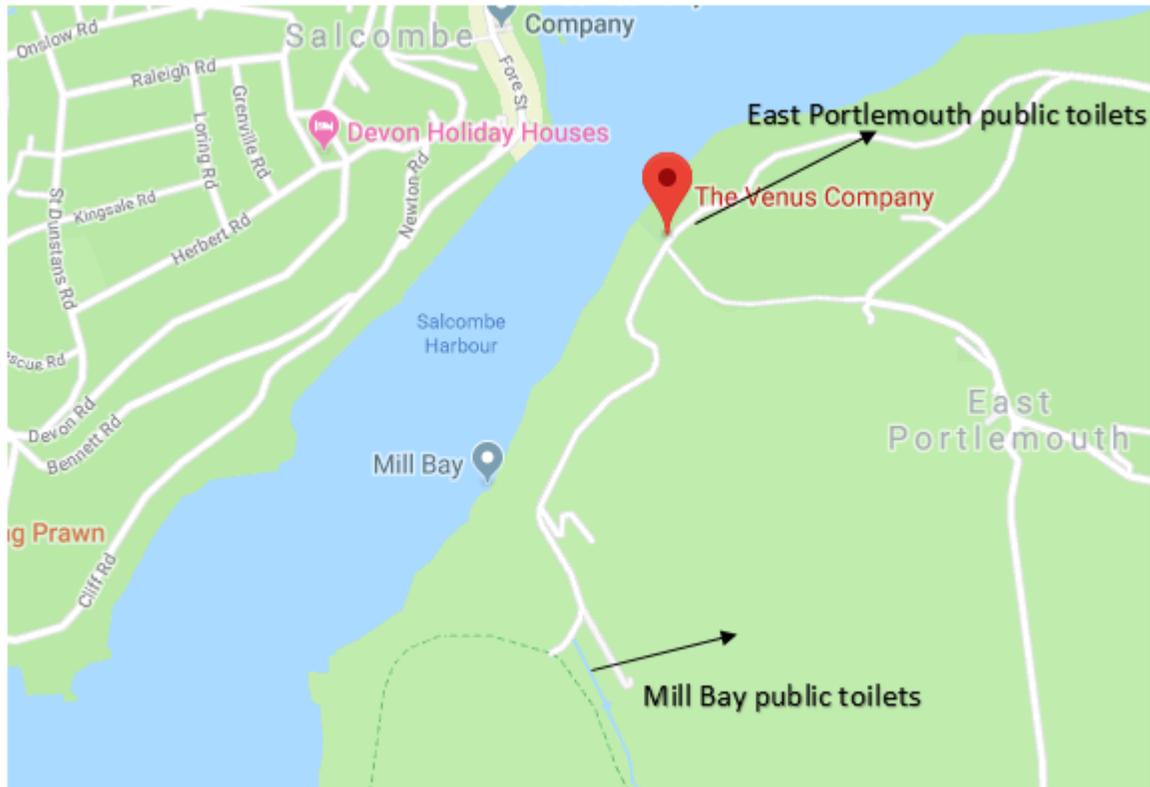
Manor Gardens, Dartmouth

- There are numerous restaurants, public houses and cafes with toilets provided in the centre of Dartmouth which is a short distance walk (approximately 5 minutes) from the Manor Garden toilets
- Public toilets are also available at Royal Avenue Gardens, Coronation Park, Market Square and the Castle which are provided by Dartmouth Town Council
- Access to these toilets are down a number of steps and are not highly visible to the general public unless you knew they were there



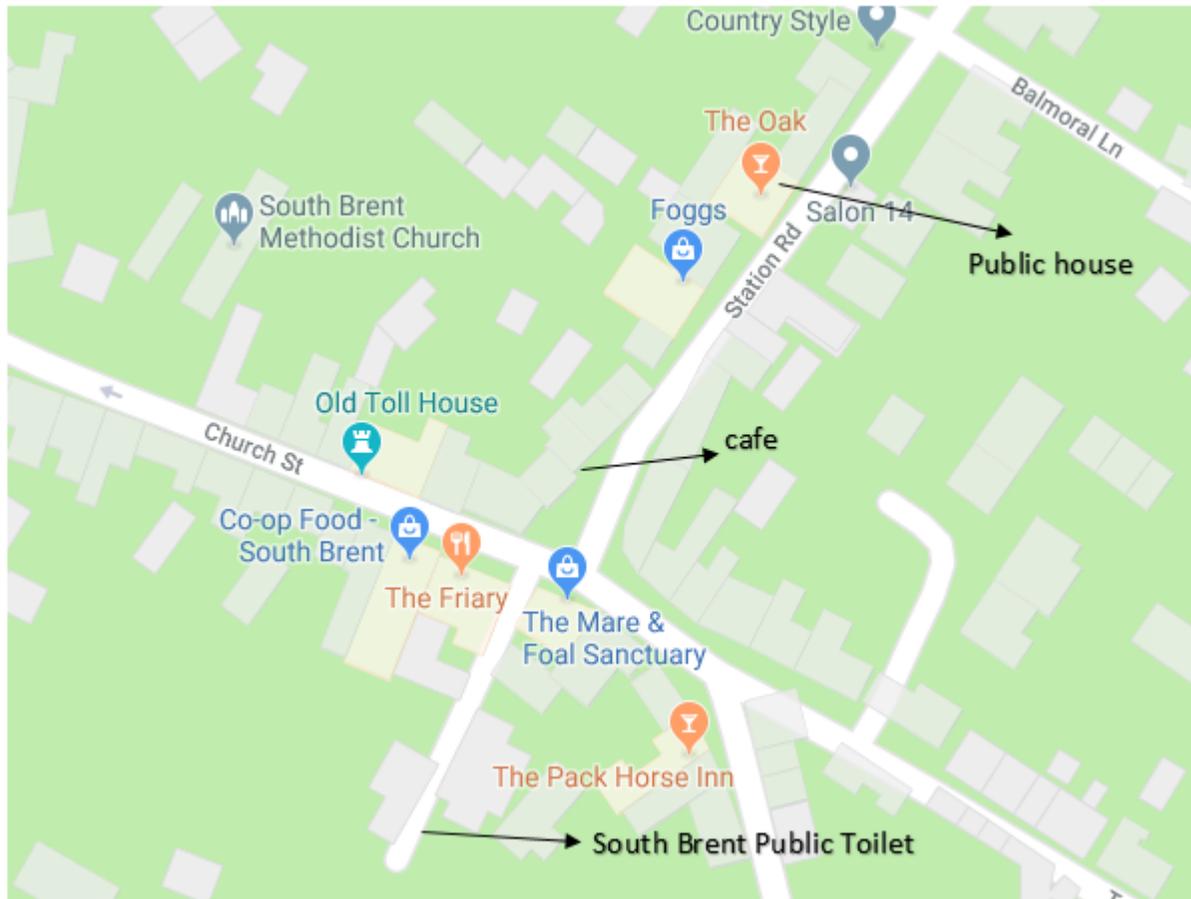
Mill Bay, East Portlemouth

- Alternative public toilets available at Ferry Steps, opposite the Venus Café which is a 0.5 mile walk from the current Mill Bay toilets



South Brent

- There are cafes and public house within the centre of South Brent which have toilet facilities



Shipley Bridge, South Brent

- Closest public toilets would be those in South Brent
- Public toilet already subject to a winter closure from Nov-Feb



Cliff House Gardens, Salcombe

- Already subject to a winter closure of Nov-Feb
- Numerous public houses, restaurants and café providing toilets within a few minutes' walk of these toilets
- Whitestrand and Creek public conveniences also located within walking distance



Public Conveniences	Location	Tourism and Retail	Seasonality	water usage	Proximity to public space	Council car park / service within 50m	Disabled Facilities	Historical or Future Issues	Fit for purpose	
SCORING	Major Town 7 Small Town 5 Village 3 Rural 1	Yes 5 No 0	All year 5 Mar-Oct 3 Peak 1	High 9 Medium 7 Low 5	<100m 7 101-500m 5 501-1km 3 >1km 1	Yes 3 No 0	Pass 3 Fail 0	High 1 Medium 3 Low 5 None 7	Yes 3 No 0	
yellow = transfer/close Green = proposed pay on entry Red = closed Blue = already pay on entry										
Kingswear HF	1	0	3	5	1	0	3	3	0	16
Bittaford	3	0	3	5	1	0	0	5	3	20
Newton Ferrers	3	5	3	5	1	0	0	7	3	27
Thurlestone GC	1	0	3	5	5	0	0	7	3	24
East Prawle	3	5	3	5	1	3	0	3	3	26
EP Ferry	3	5	3	9	7	0	0	3	3	33
Ermington	3	0	3	5	1	3	0	7	3	25
Ugborough	3	0	3	5	1	0	0	7	3	22
Holbeton	3	0	3	5	1	0	0	7	3	22
Malborough	3	0	3	5	1	0	0	7	3	22

Slapton	1	5	3		1	3	3	3	0	
Staverton	3	0	3	5	1	0	0	7	3	22
Bowcombe	1	0	3	5	7	3	0	7	3	29
Noss	3	5	3	5	7	3	0	7	3	36
Salcombe Cliff House	7	0	3	5	7	0	0	5	3	30
Dartmouth MG	7	0	3	7	7	0	0	5	3	32
Loddiswell	3	0	5	5	1	0	3	5	3	25
EP Millbay	1	5	1	9	7	3	3	3	0	32
South Milton Sands	1	5	3	9	7	0	0	5	3	33
Shipleigh Bridge	1	5	5	5	7	3	3	5	3	37
Challaborough	3	5	1	9	7	0	3	7	3	38
Strete Gate	1	5	3	9	7	3	0	5	3	36
Salcombe South Sands	1	5	3	9	7	0	3	7	3	38
Kingswear SQ	3	5	3	5	1	0	3	5	3	28
Dartmouth P&R	7	5	3	7	1	3	3	5	3	37
Hope Cove	3	5	3	9	7	0	0	7	3	37
Salcombe North Sands	1	5	3	9	7	3	3	5	3	39
Stoke Fleming	3	0	5	9	1	0	3	7	3	31
South Brent	3	5	5	5	1	0	3	7	3	32
Dittisham	3	5	3	5	7	3	3	3	3	35
Kingsbridge FO	7	5	5	9	1	3	3	3	3	39
Modbury	5	5	5	5	1	3	3	7	3	37
Wembury	1	5	5	9	7	0	0	5	3	35

Beesands	3	5	3	9	7	3	0	7	3	40
Totnes Coro	7	5	5	9	5	3	3	5	3	45
Torcross	3	5	5	9	7	3	3	7	3	45
Bigbury	3	5	5	9	7	3	3	5	3	43
Salcombe Creek	7	5	3	9	5	3	3	7	3	45
Kingsbridge QY	7	5	5	9	7	3	3	5	3	47
Ivybridge	7	5	5	9	7	3	3	5	3	47
Salcombe Whitestrاند	7	5	5	9	7	3	3	7	3	49
Totnes Civic	7	5	5	9	7	3	3	7	3	49
Totnes Quay	7	5	5	9	7	3	3	7	3	49