



Denbighshire County Council Local Toilet Strategy Interim Needs Assessment 2024

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Introduction

Under the requirements of Part 8 of the Public Health (Wales) Act 2017, we are required to develop and publish a Public Toilet Strategy.

The Strategy should identify how we assess the need for public toilets in Denbighshire, and how we will manage this need.

Note: There is no legal requirement for the Council itself to provide public toilets, however the Council is required to:

1. Provide evidence that it has reviewed the needs of the local population
2. Developed a Strategy that evidences how these needs are being met, or will be in the future, for example through Community Toilet Schemes.

This needs assessment will be used to help the Council develop its Local Toilet Strategy for 2024-2026.

We will provide:

1. Definitions of what may be considered a public toilet
2. Outline the methodology we have used to identify which communities which pass the criteria for a needs assessment
3. Provide a breakdown of toilet need within each community which currently has public toilets owned or operated by Denbighshire County Council, and/or which we assess as being in need of public toilet provision

A full needs assessment will be carried out before the next Strategy is reviewed in 2026.

Note: there will be some communities within Denbighshire which have public toilets, but which do not pass the assessment criteria to be included in the public council's toilet strategy. We will include these toilets in our assessment of current provision, however these would be considered 'additional' public toilets and will have no impact on the way that remaining communities are assessed for their needs.

What is a public toilet?

Public toilets (sometimes called public conveniences) are toilet facilities which the public can use. These can include purpose-made toilet blocks, or toilets within existing buildings such as offices, shops, hotels and restaurants.

Public toilets can be charged for their use, but to be considered a public toilet, there should be no other charges incurred. For example, a toilet in a café that requires you to buy a drink or food item before you can use the toilet would be a private customer toilet, rather than a public toilet.

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Methodology for assessing the need for public toilets in Denbighshire

The methodology we intend to use will be to consider the 'toilet ratio' of each community in Denbighshire, and then to apply the additional considerations from the Statutory Guidance (listed on the next page). We will then consult with the public, local town and community councils, and a range of charity or third sector organisations to see if people agree with our analysis of need, and to identify any additional concerns or additional needs that cannot be provided from statistical data cross-referencing alone.

Statistical analysis: which communities need public toilets?

The first step in assessing local needs is to analyse existing data and cross-reference it with what we know about existing local toilet provision.

To do this, we will use 'toilet ratios'. This means the number of public toilets available for every certain number of people in the local population. The following recommendations on assessing toilet ratios are provided by the awarding body 'Loo of the Year' Awards¹:

- At least one toilet facility should be provided in every settlement with a population of over 5000.
- In town centres and tourist areas toilets should be within a short walking distance, and should ideally be at a max of 300m centres in the busiest areas and max 500m centres generally in town centres.
- Major centres, transport hubs and visitor attractions should include at least one 'Changing Places' toilet.
- Female = 1 cubicle per 550 women and female children.
- Male = 1 cubicle or urinal per 1,100 men and male children
- 1 unisex accessible toilet cubicle for every 10,000 population.
- 1 unisex baby changing facility per 10,000 population.

¹ <https://www.loo.co.uk/46/Toilet-Ratios> (last accessed 12th January 2024)

The Statutory Guidance (issued 2018) for developing Local Toilet Strategies states that Local Authorities should give consideration to a range of factors when assessing the needs for public toilets. We will state how we intend to assess each factor, in conjunction with the toilet ratios outlined on the previous page:

1. An assessment of the local population, including age, gender and additional health needs:

We will use the basic premise of 1 cubicle per 550 female and 1 cubicle per 1100 male population, with additional consideration of:

- a. Wales' average population of over 65s is 21.3% of the usual population. We will add one additional female cubicle per 550 population and one additional male cubicle per 1100 population for every 5% of the population older than the Wales average of 21.3%
- b. Wales' average population of children aged under 4 years old is 4.9% of the usual population. We will add one additional baby change facility requirement for every additional 5% of population aged under 4 greater than the Wales average of 4.9%
- c. 1 additional disabled cubicle for every 5% percent of population with a disability greater than the Wales mean percentage of 21.1% of the population

2. An assessment of the gender balance of the current provision

We will use the existing toilet ratio guidance to assess the gender balance of toilet provision (at least 1 toilet for every 550 females and 1100 males in the local population)

3. An assessment of locations, including popular destinations and distance between facilities

We will use existing toilet ratio guidance to assess whether there are toilets within 300m of the centre of each community over 5,000 in population, and within 500 metres of public car parking in other busy locations.

4. An assessment of availability and accessibility, opening hours, usage

We have no way of assessing the usage of all public toilets currently controlled by the Council, however we can estimate usage in fee-charging toilets based on income received. When we audit public toilet provision from other providers (e.g. shopping centres, supermarkets) as part of our substantive needs assessment, we will aim to understand their availability and usage wherever possible.

5. Charges, access for people with disabilities, Changing Places and baby changing facilities

10 out of 20 toilets currently provided by Denbighshire County Council charge between 40p for entry. 10 toilets are free of charge.

A detailed breakdown of the opening hours, number of unisex disabled cubicles and baby change facilities currently provided by the Council (up until April 2024) can be found in a separate document entitled ***Denbighshire County Council Public Convenience portfolio assessment 2024***

Changing Places are toilets which can be used by people with profound and multiple disabilities (PMLD). These toilets will have more space than a 'standard' disabled toilet, and will be fitted out with additional equipment such as hoists, adult changing tables, showers and grab rails.

For Changing Places toilet need, no clear definition of a 'major hub' was provided with the toilet ratio guidance, however for the purposes of this Needs Assessment, the Council will use the following definition:

- a. A community with a resident population of more than 10,000 people **or**
- b. A community which receives more than 10,000 day visits per week

Denbighshire County Council is currently aware of 2 x changing places toilets within the county:

- Ysbyty Glan Clwyd – more information on the Changing Places website: [Ysbyty Glan Clwyd | Changing Places Toilet](#)

- Tesco Prestatyn Superstore – more information on the Changing Places website:

[Tesco Prestatyn Superstore | Changing Places Toilet](#)

6. An assessment of the condition of existing facilities

We will assess Council-provided facilities and any facilities which are part of the Community Toilet scheme. We will not assess the condition of facilities which are not owned or maintained by the Council and which are not part of the Community Toilet Scheme.

7. Consideration of seasonal variations, including local events and seasonal population growth

When considering seasonal variations, we will use the Scarborough Tourism Economic Activity Monitor (STEAM) model to consider visitor numbers.

We have no concise way to assess visitor need versus residential need, but halving the recommended toilet ratio of at least 1 facility per 5,000 of population to ensure that there is at least 1 facility per 2,500 visitors per week in addition to the residential toilet ratios should ensure there is adequate provision. Therefore in assessing day visits, we propose to ensure there are at least additional 2 female cubicles, 1 male cubicle, 1 disabled facility and 1 baby change facility per 2,500 visitors per week (as a whole year average).

8. Consideration of social factors such as, whether facilities are a target for abuse and anti-social behaviours or perceived to be in a dangerous location

For Denbighshire County Council assets we will use staff reports, and customer service requests received via the Council's C360 form to assess the suitability of public toilets currently owned by the Council for future use (whether by the Council or by any other body or organisation).

At this stage we are not including an assessment of privately-owned public toilets such as toilets in supermarkets, motorway-style service stations etc, however we may do this in future reviews of provision within the county.

9. Consideration of future requirements, including local development plans

The Strategy is currently set to be reviewed every 2 years. Long-term the Council will seek to work with private providers of public toilets to review access to public toilets and ensure that both current and future population needs are being met.

10. Consideration of statistics in relation to population statistics; deprivation measures and projections for demographics such as older people, children, benefit claimants etc

Population statistics have already been considered at 'parish' level when determining toilet ratios. Short-term the Council will be seeking to address existing imbalances in public toilet provision across Denbighshire and longer-term will seek to understand how the changing population will impact toilet use

11. Analysis of current usage, including popular times, population assessment, transient visitors, such as van and lorry drivers, or those on coaches and buses

As previously stated, Denbighshire County Council does not have footfall monitoring facilities in any of its current portfolio, however can use income received on charging toilets to calculate the total number of visits to these toilets. The population assessment will include both resident population from NOMIS Labour Market data, and last financial year STEAM data to assess transient need.

Assessment of need, by community and visitor population

This assessment will use statistical data from the NOMIS Labour Market website², and STEAM tourism data provided to Denbighshire County Council to assess the baseline need for toilet facilities within each of Denbighshire's main towns.

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² Visit <https://www.nomisweb.co.uk/reports/localarea> and search for town/community as a 'Parish'

Rhyl

Residential need:

- 12,777 females – requirement for 24 female cubicles
- 12,372 males – requirement for 13 male cubicles
- 18% of the population of Rhyl is aged over 65, 2.7% **lower** than the average for Wales – therefore no additional need for facilities based on an older population
- 39.4% of Rhyl households have at least one person with a disability, compared to the Wales average of 21.1% - requirement for 3 disabled toilets for general recommendation of 1 per 10,000 population, and 4 additional toilets for each 5% of population over the Wales average who has a disability. Total requirement of 7 disabled toilets
- Requirement for at least 2 baby change facilities (at least 1 per 10,000 population)
- 6.7% of the population of Rhyl are aged under 4 years old, 1.8% **higher** than the average for Wales. Therefore no **additional** need for facilities based on a younger population
- Requirement for at least 1 Changing Places toilet.

Visitor need:

- Average day visitor numbers for 2022 = 23,423 visitors per week (1,218,000 visitors over the whole year)
- Additional requirement for 19 female cubicles, 10 male cubicles, 2 disabled change facilities and 2 baby change facilities

TOTAL NEED:

- 43 female cubicles
- 23 male cubicles
- 9 disabled facilities
- 4 baby change facilities
- 1 Changing Places Toilet

Prestatyn

Residential need:

- 9,827 females – requirement for 18 female cubicles
- 9,022 males – requirement for 9 male cubicles
- 24.5% of the population of Prestatyn is aged over 65, 3.2% **higher** than the average for Wales – therefore no additional need for facilities based on an older population
- 32.7% of Prestatyn households have at least one person with a disability, compared to the Wales average of 21.1% - requirement for 1 disabled toilet for general recommendation of 1 per 10,000 population, and 3 additional toilets for each 5% of population over the Wales average who has a disability. Total requirement of 4 disabled toilets
- Requirement for at least 1 baby change facilities (at least 1 per 10,000 population)
- 5.7% of the population of Prestatyn are aged under 4 years old, 0.8% **higher** than the average for Wales. Therefore no **additional** need for facilities based on a younger population
- Requirement for at least 1 Changing Places toilet.

Visitor need:

- Average day visitor numbers for 2022 = 19,365 visitors per week (1,007,000 visitors over the whole year)
- Additional requirement for 15 female cubicles, 8 male cubicles, 2 disabled change facilities and 2 baby change facilities

TOTAL NEED:

- 33 female cubicles
- 17 male cubicles
- 6 disabled facilities
- 3 baby change facilities
- 1 Changing Places Toilet

Rhuddlan

Residential need:

Rhuddlan has a population of 3,709 therefore there is no residential need for a toilet facility in this location

Visitor need:

- Average day visitor numbers for 2022 = 2,288 visitors per week (119,000 visitors over the whole year)

TOTAL NEED:

- No defined need for this community to have toilet facilities

Llanelwy (St Asaph)

Residential need:

Llanelwy (St Asaph) has a population of 3,355 therefore there is no residential need for a toilet facility in this location

Visitor need:

- Average day visitor numbers for 2022 = 2,365 visitors per week (123,000 visitors over the whole year)

TOTAL NEED:

- No defined need for this community to have toilet facilities

Denbigh

Residential need:

- 4,523 females – requirement for 9 female cubicles
- 4,463 males – requirement for 4 male cubicles
- 17.2% of the population of Denbigh is aged over 65, 4.1% **lower** than the average for Wales – therefore no additional need for facilities based on an older population
- 29.6% of Denbigh households have at least one person with a disability, compared to the Wales average of 21.1%. As the general recommendation is for 1 disabled toilet per 10,000 population, and Denbighshire County Council are recommending 1 additional disabled toilet for each 5% of population over the Wales average who has a disability, there is a total requirement of 1 disabled toilet for Denbigh
- No baseline requirement for baby change facilities as the population is fewer than 10,000
- 6% of the population of Denbigh are aged under 4 years old, 1.9% **higher** than the average for Wales. Therefore no additional need for facilities based on a younger population
- No requirement for a Changing Places toilet as the population is fewer than 10,000

Visitor need:

- Average day visitor numbers for 2022 = 5,923 visitors per week (308,000 visitors over the whole year)
- Additional requirement for 4 female cubicles, 2 male cubicles, 2 disabled change facilities, and 2 baby change facilities

TOTAL NEED:

- 13 female cubicles
- 6 male cubicles
- 3 disabled facilities
- 2 baby change facilities

Ruthin

Residential need:

- 2,800 females – requirement for 5 female cubicles
- 2,661 males – requirement for 3 male cubicles
- 21.8% of the population of Ruthin is aged over 65, 0.5% **higher** than the average for Wales – therefore no additional need for facilities based on an older population
- 27.3% of Ruthin households have at least one person with a disability, compared to the Wales average of 21.1%. As the general recommendation is for 1 disabled toilet per 10,000 population, and Denbighshire County Council are recommending 1 additional disabled toilet for each 5% of population over the Wales average who has a disability, there is a total requirement of 1 disabled toilet for Ruthin
- No baseline requirement for baby change facilities as the population is fewer than 10,000
- 6% of the population of Ruthin are aged under 4 years old, 1.9% **higher** than the average for Wales. Therefore no **additional** need for facilities based on a younger population
- No requirement for a Changing Places toilet as the population is fewer than 10,000

Visitor need:

- Average day visitor numbers for 2022 = 4,788 visitors per week (249,000 visitors over the whole year)
- Additional requirement for 2 female cubicles, 1 male cubicles, 1 disabled change facility, and 1 baby change facility

TOTAL NEED:

- 7 female cubicles
- 4 male cubicles
- 2 disabled facilities
- 1 baby change facility

Llangollen

Residential need:

Llangollen has a population of 3,658 therefore there is no residential need for a toilet facility in this location

Visitor need:

- Average day visitor numbers for 2022 = 5,269 visitors per week (274,000 visitors over the whole year)
- Additional requirement for 4 female cubicles, 2 male cubicles, 2 disabled change facilities, and 2 baby change facilities

TOTAL NEED:

- 4 female cubicles
- 2 male cubicles
- 2 disabled facilities
- 2 baby change facility
- 1 Changing Places Toilet

Corwen

Residential need:

Corwen has a population of 2,325 therefore there is no residential need for a toilet facility in this location

Visitor need:

- Average day visitor numbers for 2022 = 3,000 visitors per week (156,000 visitors over the whole year)
- Additional requirement for 2 female cubicles, 1 male cubicle, 1 disabled change facility, and 1 baby change facility

TOTAL NEED:

- 2 female cubicles
- 1 male cubicle
- 1 disabled facility
- 1 baby change facility

Summary of current County Council provision

As part of the next Strategy review and accompanying needs assessment, we will aim to provide an assessment of provision of public toilets from other providers.

For the purposes of this current needs assessment, we will only be assessing provision of toilets which are currently owned or operated by Denbighshire County Council (up to April 2024)

A full breakdown of provision by town is available in a separate document entitled *Denbighshire County Council: Public Toilet portfolio assessment*.

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Rhyl

Rhyl's needs have been assessed as:

- 43 female cubicles
- 23 male cubicles
- 9 disabled facilities
- 5 baby change facilities
- 1 Changing Places Toilet

Across all locations in Rhyl there are:

- 30 female cubicles
- 10 male cubicles
- 2 disabled facilities, with a further two decommissioned due to parts being obsolete
- 1 unisex toilet
- 3 baby change facilities in female toilets, 2 baby change facilities in male toilets

Based only on provision of Denbighshire County Council's public toilets, the public toilet shortfall for Rhyl is therefore as follows:

- 13 female cubicles
- 13 male cubicles
- 7 unisex disabled facilities
- There are adequate baby change facilities across both genders, however consideration should be given to ensuring an equal provision of baby change facilities in unisex/gender neutral facilities, or across both sets of gendered facilities
- There is a need for Rhyl to have at least one Changing Places toilet.

Prestatyn

Prestatyn's needs have been assessed as:

- 33 female cubicles
- 17 male cubicles
- 6 disabled facilities
- 3 baby change facilities
- 1 Changing Places Toilet

Across all locations in Prestatyn there are:

- 12 female cubicles
- 7 male cubicles
- 3 disabled facilities, with a further one decommissioned due to parts being obsolete
- 2 unisex toilet facilities
- 1 baby change facility in female toilets
- Prestatyn has a Changing Places toilet located in the Tesco Superstore

Based only on provision of Denbighshire County Council's public toilets, the public toilet shortfall for Prestatyn is therefore as follows

- 21 female cubicles
- 10 male cubicles
- 6 unisex disabled facilities
- 3 unisex baby change facilities

Dyserth

There is no identified need for Dyserth to have public toilets based on residential population data. STEAM tourism data is not available for Dyserth, and therefore the Council deems that there is unlikely to be serious seasonal need for public toilets either.

In Dyserth there are:

- 1 female cubicle
- 1 male cubicle

Based only on provision of Denbighshire County Council's public toilets, the provision of public toilets in Dyserth exceeds the local need for them.

Rhuddlan

There is no identified need for Dyserth to have public toilets based on residential population data. STEAM tourism data is not available for Rhuddlan, and therefore the Council deems that there is unlikely to be serious seasonal need for public toilets either.

In Rhuddlan there are:

- 2 female cubicles
- 1 male cubicle
- 1 unisex disabled cubicle

Based only on provision of Denbighshire County Council's public toilets, the provision of public toilets in Rhuddlan exceeds the local need for them.

Llanelwy (St Asaph)

There is no identified need for Llanelwy (St Asaph) to have public toilets based on residential population data. Averaged over the whole year, STEAM tourism data for Llanelwy suggests there is insufficient visitor numbers for the city to need public toilets.

In Llanelwy there are:

- 2 female cubicles
- 1 male cubicle
- 1 unisex disabled cubicle

Based only on provision of Denbighshire County Council's public toilets, the provision of public toilets in Llanelwy exceeds the local need for them.

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Denbigh

Denbigh's needs have been assessed as:

- 13 female cubicles
- 6 male cubicles
- 3 disabled facilities
- 2 baby change facilities

In Denbigh there are:

- 4 female cubicles
- 3 male cubicles
- 1 unisex disabled facility
- 1 unisex baby change facility

Based only on provision of Denbighshire County Council's public toilets, the public toilet shortfall for Denbigh is therefore as follows:

- 9 female cubicles
- 3 male cubicles
- 2 unisex disabled facilities
- 1 unisex baby change facility

Ruthin

Ruthin's needs have been assessed as:

- 7 female cubicles
- 4 male cubicles
- 2 disabled facilities
- 1 baby change facility

In Ruthin there are:

- 2 female cubicles
- 1 male cubicle
- 1 unisex facility
- 1 unisex disabled facility
- 1 unisex baby change facility

Based only on provision of Denbighshire County Council's public toilets, the public toilet shortfall for Ruthin is therefore as follows:

- 5 female cubicles
- 3 male cubicles
- 1 unisex disabled facility

Llangollen

Llangollen's needs have been assessed as:

- 4 female cubicles
- 2 male cubicles
- 2 unisex disabled facilities
- 2 baby change facilities
- 1 Changing Places Toilet

In Llangollen there are:

- 10 female cubicles
- 3 male cubicles
- 1 unisex facility
- 1 unisex disabled facility
- 1 unisex baby change facility, and 1 baby change facility within female facilities

Based only on provision of Denbighshire County Council's public toilets, the public toilet shortfall for Llangollen is therefore as follows:

- 1 unisex disabled facility
- 1 unisex baby changing facility
- 1 Changing Places toilet

Corwen

Corwen's needs have been assessed as:

- 2 female cubicles
- 1 male cubicle
- 1 disabled facility
- 1 baby change facility

In Corwen there are:

- 6 female cubicles
- 6 male cubicles
- 1 unisex disabled cubicle
- 2 baby change facilities

Based only on provision of Denbighshire County Council's public toilets, the public toilet need for Corwen has been met in terms of total number of cubicles.