

**Submission
No 39**

INQUIRY INTO PUBLIC TOILETS

Organisation: SGS Economics and Planning

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31 October 2024
Amanda Cohn
Chair, Inquiry into Public Toilets
NSW Parliament

Dear Amanda,

RE: INQUIRY INTO PUBLIC TOILETS

We at SGS were very excited to see the NSW government establish an inquiry into public toilets. Renewed planning and investment in this essential piece of infrastructure is long overdue.

Who are we?

SGS Economics and Planning is a leader in community infrastructure planning. We bring extensive experience in community infrastructure planning, service delivery, design, funding, and delivery options. We have prepared and contributed to numerous public toilet projects, including most recently the City of Moonee Valley (Victoria) Public Toilet Background Study and Plan.

Such work aligns well with SGS' purpose – to shape policy and investment decisions for sustainable places, communities and economies. SGS is a B Corp certified and Australian employee-owned firm. We are committed to serving the public interest through our advisory work, and do so through rigorous evidence-based research and analysis, data visualisation, and engagement with decision-makers, communities, and stakeholders.

Why plan for public toilets?

Public toilets are infrastructure that supports our basic human needs. They cater to all people: residents, workers, visitors, and those experiencing homelessness. Their effective provision and management can also help to achieve a range of local government objectives related to safety, accessibility and inclusion, activation and recreation, and even economic development.

But for something so important, public toilets often fall short of our needs – they often can't be found when we need them, are sometimes unsanitary or inaccessible, and may be perceived as unsafe and unattractive. They're also disappearing in many major cities in the US, UK, and Australia as local authorities contend with the unenviable task of spending increasingly constrained budgets. In Australia, the City of Sydney's 2014 Public Toilet Strategy acknowledged that the City was still characterised by a lack of access at some key locations and that public urination can be a problem in entertainment precincts.

For these reasons, planning for public toilets is as necessary as the toilets themselves. A strategic, coordinated approach that assesses the network as a whole and identifies opportunities for improvements to service levels and operations enables efficiencies and achievement of objectives that is not possible when undertaking provision and maintenance on an ad-hoc basis alone.

Challenges under the current setting

Under the current setting, local governments are the primary owners and managers of public toilets in Australia. And in fact, public toilets are often the most common building type on their asset register. But many local governments continue to deliver and manage their public toilets on an ad-hoc basis, replacing facilities without determining if they are needed and with what and how many components, missing where there are gaps in the network or areas of overprovision, and basing layout and design on minimum requirements rather than best practice standards.

Where local governments do prepare a public toilet strategy/plan, they are doing so in the absence of national or state standards that set out how public toilets should be provided and managed. This places a significant resource burden on each individual Council, necessitating that they seek out the proper expertise and conduct their own research, essentially 'starting from scratch'. This is one reason why many simply don't undertake this work at all.

Another key reason is funding. Public toilets' costs are not currently offset or directly subsidised in any form, and their investment is competing with many other Council services and programs. Although the cost of each facility is lower than that of larger community facilities, they often get bumped down the list of capital works programs in favour of higher-profile facilities that are perceived as having a greater impact.

What role should state government play?

Greater guidance and support is needed from a higher tier of government to ensure that communities' access to safe, accessible, and clean toilets across the public realm is improved and preserved.

This could take several forms, described below.

1. Provision standards

Access to public toilets is all about convenience; it's important that they are adequately provided within – or within a short walk from – nodes of activity such as commercial centres and open spaces. Acceptable 'walkable' catchments should be established in consultation with key stakeholders such as the Continence Foundation and disability groups. SGS has utilised standard catchments of 400m of major centres/open spaces, or 800m of lower-order centres/open spaces.

Appropriate levels of provision (i.e. how many stalls and what components/fixtures and fittings are appropriate for lower-traffic vs. higher-traffic locations) should also be determined. This should consider anticipated volume of users and maximum wait times as well as the size of the catchment/location in relation to other toilets. SGS has developed a public toilet hierarchy that sets out various levels of provision with appropriate opening hours and cleaning schedules.

Development and adoption of such provision standards would then allow local government to determine where, and how many, public toilets should be provided.

2. Design guidelines

Public toilets should be easy to find and accessible to people of all ages, abilities, genders, and backgrounds. This means that beyond DDA compliance, planning must consider the principles of universal design and crime prevention through environmental design (CPTED). There is also potential for automation and environmentally-sensitive design (ESD) of public toilets.

There are many case studies across Australia that illustrate high quality design of public toilets. Compilation of these alongside a suite of design guidelines would greatly assist local government planning for public toilets, and reduce uncertainty around what best practice looks like. SGS have developed a design toolkit that sets out such guidelines.

3. Innovative funding models

There are other ways to help offset the costs of public toilets that aren't currently implemented widely in Australia, such as:

- **Ad space:** public toilets as platforms for static and digital advertising, as is commonly done with public transport infrastructure.
- **User-pays systems:** users have to pay a small fee for use of a public toilet; in return, users are guaranteed a high level of cleanliness and hygiene.
- **Community toilet schemes:** partnership between government and local businesses that extends use of private toilets to non-customers during business hours. This access is provided in exchange for cleaning and maintenance services, or contributions from government to help cover provision of goods such as soap and paper, and/or cover maintenance and cleaning costs.

4. New grants/funds

There are many existing state and federal grants available to local government to share the cost burden of providing community facilities, but none that are targeted towards public toilets. A dedicated grant/funding stream could help to ensure investment in their provision and renewal is better prioritised and delivered on.

NSW could lead in this respect by establishing new funding streams for public toilets for local governments or other providers in the network who make their toilets available for public use.

SGS has long been advocating for these forms of support, and working alongside local government to more effectively plan for public toilets in the meantime. We have attached an article penned last year for the Local Government Information Unit (LGIU) that discusses these same themes.

We are well-placed to assist state government further with development of standards, frameworks, and models. SGS brings a mix of both qualitative and quantitative skills required for this work, as well as nuanced understanding of policy and systems of governance and a long track record of working with local, state, and commonwealth government for over 30 years.

We look forward to seeing the outcomes of the inquiry, and continuing to innovate and lead in this space. Please don't hesitate to get in touch with us should you wish you discuss this submission further, or what's next for public toilets in NSW.

Kind regards,

Liz Webster

Associate

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Canberra, Hobart, Melbourne, Sydney