BVSC Public Toilets Strategy
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<th>Revision</th>
<th>Date</th>
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<td>1</td>
<td>19 May 2020</td>
<td>Draft for Council report</td>
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<td>Minor edits as adopted by Council 10 June 2020</td>
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Introduction

The provision of safe and accessible public toilets is an important function of local government. Bega Valley Shire Council owns and manages a large portfolio of public toilets. These are located as stand-alone infrastructure within reserves as well as often being integrated with other infrastructure such as libraries, sportgrounds, community halls and other facilities.

As an inclusive Shire it is important to recognise everyone needs access to public toilets they can use with ease and dignity. The design of Council-owned toilets has evolved to reflect changing attitudes to safety, privacy and maintenance, and to address areas of need that had not previously been prioritised. These include the needs of senior citizens, and people with a disability and their carers.

Ongoing asset management is a challenge for Council in many areas and provision and upkeep of public toilets is typical of that challenge. Bega Valley Shire Council services a large, long shire area including a number of towns and small villages. A small population over a large area with high visitor numbers over a relatively short peak holiday period makes balancing provision and service levels within available budgets a challenge.

It is also important to acknowledge there are other publicly accessible toilets used throughout the shire. These include those at shopping centres, service stations and provided by other agencies such as within National Parks.

This strategy provides guidance for siting and servicing of new toilets and for refurbishing existing facilities with the intent being provision of safer, more accessible more manageable public toilets. It is not intended for this strategy document to be prescriptive. It should be considered within the facility and project context and the needs of users. The Strategy and the information within it will help greatly to give an understanding of what type of facilities best meet the changing needs of the community as Council works through the challenges of its asset management program.

Background

BVSC currently maintain and manage 51 ‘typical’ public toilet sites across the shire. This is an average of approximately 1 facility per 665 residents. This provision level varies from 1 facility per 308 residents in the Bermagui Area to 1 facility per 3804 residents at Tura Beach.

A further 31 BVSC public toilet facilities are located at sports grounds and town halls which may have restricted/limited access as they are only open when facilities are in use. Public toilets are also provided at 5 libraries and 6 swimming pools. Additional public toilets are provided throughout the shire by National Parks, Roads and Maritime Services, State Water, service stations, shopping centres and restaurants.

The majority of facilities are aging and, while functional for basic use, often do not meet the current and changing needs and expectations of many users.

There is no question there are opportunities for improvements. The first step is to set out what and where they are and identify actions to work through to see them achieved. This strategy document
presents a broad overview of the current situation and measures and actions to manage challenges in provision and servicing of facilities, and work toward improvements.

**Aim Statement**

To provide well maintained, appropriately located, suitably provisioned and accessible public toilets to residents and visitors to the Bega Valley Shire.

**Goals**

1. To support liveable places, active and healthy communities’ and protect the environment through the adequate provision of accessible public toilets that are sustainably designed and managed.
2. Develop a program of improvements as identified through the actions within this strategy and see them implemented.
3. To engage with, listen to and inform the community in relation to decision making processes regarding the provision of public toilets.

**Objectives**

These guidelines are intended to assist with the meeting the following core objectives:

- Equity of access and suitability for needs
- Safety of users and those maintaining
- Appearance, sustainability and asset management
- Ease and efficiency of maintenance
- Providing useful and available information to the community

In meeting these core objectives new and renovated buildings are required to comply with legislation such as the National Construction Code of Australia and relevant Australian standards.

**Note:** This is a strategy document. It is not a technical manual. The requirements, limitations and circumstances of each site and project will need to be assessed on their merits.

1.1.1 Equity of Access

In response to community feedback, the BVSC Community Strategic Plan (CSP) highlights issues in relation to public toilets, including:

- Difficulties residents and visitors have finding and using accessible public toilets
- The need for more accessible toilets with adult-sized change tables at destination parks
- Toilets that are unexpectedly locked, or difficult to access and use

The strategy has been developed to assist in meeting these areas of need and in meeting the CSP’s broader aims.

A national public toilet map shows the location of more than 16,000 public and private toilets across Australia. Details can be found at [www.toiletmap.gov.au](http://www.toiletmap.gov.au).

**Access Actions:**

1. Improve public toilet directional and information signage and online information
2. Develop a program of practical and simple improvements to existing facilities to improve accessibility
3. Prioritise key sites for upgrade to meet compliance with current standards and higher service levels where possible

1.1.2 Safety

This strategy aims to acknowledge and mitigate against a range of actual and perceived safety risks to person and property that may be encountered at public toilets. These include:

- Anti-social behaviours such as vandalism
- Loitering and drug abuse
- Physical safety risks from poor lighting, wet surfaces and the like

The principles of Crime Prevention through Environmental Design (CPTED) is accepted in the design and criminology fields as a useful tool to reduce the likelihood of crime through building design. Planning referring to CPTED principles can reduce actual crime and unintended behaviours and improve public perception of personal safety.

For example, a consideration is whether the site and/or structure is visible. If an existing toilet is extremely isolated and screened from view, then a renewal at that site is not likely to reduce vandalism or other unintended behaviours. A more open and visible site will improve passive surveillance and real or perceived safety concerns.

Environmental items that can have influence on the real and/or perceived safety and security of a public toilet include:

- Visibility of the structure and its approaches
- Accessibility and the level of general use
- Building design and cubicle configuration
- Optimisation of natural lighting
- Proximity to other facilities
- Orientation of the building

Safety Actions:

1. Develop a program of practical and simple improvements to existing facilities to improve on the items listed above.
2. Ensure the items listed above are addressed in planned capital projects.

1.1.3 Costs and Value – Capital and Maintenance

Public toilets come at a cost to build and are also service and maintenance intensive facilities that represent significant capital investment and ongoing operating expenses. On average it costs about $13k to clean and maintain a typical public toilet building each year. The cost of a new building is largely related to the size of the building and provision of facilities within. Costs can range from $80k to over $200k.

Like other high service assets, the operations and maintenance costs of a public toilet over its lifecycle is much greater than the capital cost to build the asset. This reflects the importance of the facilities being the right scale to be ‘fit for purpose’ for their typical levels of use. While over provision will cost more in terms of initial build costs, it will cost much more in additional operations
and maintenance costs over the life of the facility. This reflects that capital and maintenance costs are related. The larger the building the more it will cost to service and maintain. Public toilets can be designed to minimise maintenance and cleaning costs and requirements. In effect good design can improve the efficiency of cleaning and servicing.

In providing durable, lower-maintenance structures, Council will also minimise the environmental impacts of building maintenance and replacement.

Getting the size of the building and mix of facilities right to balance user needs and expectations is important in managing cost, use and value in provision. This can be particularly challenging in areas of short period ‘peak’ demand such as during peak tourist periods. From an asset management perspective, it is costly to build larger facilities to cater for short periods of peak use. The best value to the community is in buildings that service regular typical use well, with consideration given to methods of most easily supplementing provision during short periods of increased peak demand. Examples include:

- Portable toilets can be provided, through the relevant approval process, if a planned event a requires a higher provision.
- Consideration can be given to providing service points to enable the use of well-designed temporary toilets where/when site facilities will not meet known short period seasonal demands.

Service specifications and frequency should be related to the amount use. They are typically developed to establish a constant and reliable servicing program to deliver ‘fit for purpose’ amenities. When formulating cleaning schedules toilets can be generally categorised into groups based on usage rates and the areas they service. The high seasonal variance in usage rates within the Shire needs to be taken into consideration and schedules adjusted to accommodate peak tourist periods. In addition to regular cleaning, additional services should be programmed at suitable frequencies scheduled to remove grime and build up dust and cobwebs.

Cost and Value Actions

1. Develop shire wide service level specifications and frequencies based on levels of use and service needs to provide ‘fit for purpose’ facilities.
2. When planning capital projects apply a typical needs-based approach for the facility considering the area it services to balance provision levels, user expectations, building cost, servicing cost and value.

1.1.4 Asset management, appearance and sustainability

Asset management planning is a process to ensure delivery of services from infrastructure is provided in a financially sustainable manner. BVSC asset management documents detail information about infrastructure assets including actions required to provide an agreed level of service in the most cost-effective manner.

Many of the Asset Management risks and consequences discussed in the Recreation Asset Management Plan (RAMP) relate to directly to levels of service, and provision levels in particular. Both the quantity and location of assets and facilities are a key element in determining the amount of resources needed to look after those assets, keep them in ‘fit for purpose’ condition and renew them at the end of their service life.

The information in the RAMP demonstrates the provision challenge for Bega Valley Shire Council, including in servicing a large, long shire area including several towns and small villages.
In noting the asset management challenge, consideration should be given to the suitable provision of public toilets in the shire particularly where:

- The use of an area has changed since existing facilities were built
- There are multiple facilities within close proximity which are surplus to general use requirements
- The current facilities are in unsuitable locations

**Asset Management Actions:**

1. Continue to review an update asset data and information to be used to inform decision making.
2. Apply a fit for purpose approach to asset delivery and servicing.
3. When planning asset renewals consider changes in use and need since the existing assets were built, other facilities nearby, best location to meet current and future need.
4. In areas of high provision consider reduced building scale and/or inclusions to suit typical user needs.
5. In areas of high provision and low use consider rationalisation if a facility is over servicing the type and use of the area.

### 1.1.5 Design and Purpose

Council has a large number of aging public toilets. Many of these were designed and built 30+ years ago and standards and community expectations and have changed. The following are examples of problems resulting from what is now considered inappropriate design and poor management.

- Poor casual and general surveillance
- The building is obscured by topography and vegetation
- Maze-like entrances can make access difficult
- Maze-like entrances and screened internal spaces can create the potential for limited supervision or anti-social behaviour
- Poor public image due to failure to remove evidence of anti-social behaviour
- Dark and unpleasant interiors due to lack of natural lighting and ventilation
- Gender specific facilities can lead to duplication and over provision
- Gender specific facilities limiting toileting and change options for carers and families (e.g. male caring for aging mother or young daughters)

However, thoughtful design and management approaches can eliminate or greatly reduce these problems.

Building materials need to consider the planned life of the building, be appropriate to the locality and be easy to clean. Initial cost savings in specifying cheaper, less durable materials can inevitably result in future maintenance costs. However, this should be considered relative to the expected and desired life of the building. In some instances, a shorter lifecycle builds maybe appropriate if changes to need, expectations, and demand are expected.

**Design Actions:**

1. Eliminate building and facility issues of the past through improved design and building layout.
2. Consider the planned life of the building in design and materials selection.
1.1.6 Information

Information and communication (public and staff) is important. Simple signage showing opening hours, emergency numbers, security information and mechanisms to report critical incidents helps all users and Council staff in the use and management of public amenities.

The National Public Toilet Map

The National Public Toilet Map (NPTM) shows the location of more than 17,000 public and private toilet facilities across Australia. It is a project of the National Continence Program and is supported by the Australian Government Department of Health. It provides information regarding the location, opening hours, availability of baby change rooms, and accessibility for people with disabilities and details of other toilets nearby.

The Bega Valley Shire Council website directs users to the National Public Toilet Map when enquiring about public toilets.

Information Actions

1. Improve public toilet information and directional signage and online information
2. Regularly forward updated BVSC information to be included in the National Public Toilet Map.

Forward Improvement Program

A four-year program has been developed to guide improvements and capital works. The program considers facility need, asset age and condition and also other related or planned works in the area. It has also been noted where there is currently not accessible facilities. There may be changes to the program if circumstances change; such as changed funding availability or further planning for associated projects.

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<tr>
<th>Town / Area</th>
<th>Site</th>
<th>Need / Service priority</th>
<th>Asset Age/Condition</th>
<th>Other Project Links</th>
<th>Works Priority Score</th>
<th>Existing Accessible Amenities</th>
<th>Works Type / Scope</th>
<th>Program Year</th>
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**Table Notes**

- **Use / Service Priority** relates to the level of use of a facility and also the level of provision in the surrounding area. (3 = high service priority)
- **Asset Age / Condition** relates to the quality of the asset and when it will be due for renewal or require works to keep it in a fit for purpose condition. (1 = very good – 5 = very poor)
- **Other Project Links**, Public amenities are often related to other recreation and parkland assets. Other project links relates to plans for improvements of other assets nearby which will impact on use and/or expectations. (3 = links to other planned works – 1= limited related works in the area)
- **Works Priority Score** collates the 3 items above. A higher score indicates higher need use and value of the project to the community.
Appendix 1.

Project Development Guidelines

Prior to undertaking a construction or refurbishment project it is valuable to identify visitor needs and numbers. Before examining the physical attributes of a site and its surrounds it is important to review any history of safety and behavioural problems and to identify planning, environmental and other approval requirements.

2.1. Project brief and Site assessment

*Site and Needs Assessment*

Develop project brief based on site information and expected facility requirements including:

- Typical number of site visitors
- Expected users (does the site attract users with specific needs)
- Expected frequency of use, including of peak and quiet times
- Expected security and maintenance regimes

Obtain input and advice from other stakeholders such as:

- Regular user groups
- Maintenance staff
- Neighbouring residents and businesses

*Seasonal and Peak Demand*

Across the shire area is not unusual for there to be short periods of high or peak demand. These periods usually relate to annual holiday periods and community or seasonal events. From an asset management perspective, it is costly to build and service larger facilities to cater for short period peaks. The best value to the community is in buildings that service general use well, with consideration given to most easily supplementing provision during the short peak periods as required.

*Site planning*

Parks and other open spaces are subject to planning, environmental and other controls. In many cases the construction of a toilet block in parkland is permitted, subject to building certification. However there are may be site and project attributes that trigger other environmental approvals. Examples include, cultural heritage, tenure or site ownership, or a site near sensitive environmental areas.

*Siting guidelines*

Locate and orientate the proposed facility within the site to optimise ease of access, sight lines, casual surveillance opportunities and natural light and ventilation. The aims are to:

- Maximise visibility of the facility including suitable directional signage
- Optimise equitable access to the facility
2.2 Building Design Guidelines

The aim is to provide a safe, secure and accessible facilities with high levels of visibility, durability, security, light, ventilation and within allocated budgets.

Council is working with many aging facilities. Generally, the relevant standards that apply to a building are those that were in effect at the time a facility was built. It is known and acknowledged that many facilities do not comply with current standards. Ideally many would be replaced but due to the demands of fully funding an asset renewal program that is unlikely to be possible.

These guidelines will be applicable to new public toilet facilities and to the renewal of existing buildings.

Asset Management

Council is working with an ageing asset group and this is posing challenges. In noting the asset management challenge consideration should be given to the suitable provision of public toilets in the shire.

Building Size and Inclusions

The BCA does not provide meaningful guidance on the number of cubicles required in parkland or standalone amenities. In these circumstances the number of water closet (WC) pans, urinals and hand basins should be determined through understanding typical use of the site and known peak demand events and periods.

Unisex facilities that open directly to public space afford the best protection from vandalism and undesirable behaviour. Unisex facilities also enable access for more users, a good example being family use.

Gender-specific toilet facilities may be considered for areas of high demand, and where the separation of facilities assists in more efficient use. The allocation of unisex or designated-gender toilet facilities can be assessed on a site-by-site basis.

Accessible or PWD (persons with a disability) cubicles

A minimum of one unisex accessible cubicle must be provided and at least one unisex toilet. The unisex-accessible cubicle must be provided in accordance with AS1428.1, Disability (Access to Premises - Buildings) Standard, and relevant sections of AS1428.2 where possible.

Cubicles for people with ambulant disabilities

Where multiple cubicles are provided, one or more cubicles for people with ambulant disabilities must be provided. These cubicles feature grab rails on each side of the WC pan and require more circulation space around the cubicle door (refer to AS1428.1).

Baby Change Facilities

Change tables can be installed in PWD cubicles for general use within accessible cubicles in accordance with AS1428.1, Disability (Access to Premises - Buildings) Standard and relevant sections of AS1428.2 if possible and reasonable.
‘Changing Places’ facilities

These facilities are for people with high-need disability and their carers, allowing them to take extended excursions or participate in activities away from their home or place of care. A ‘Changing Places’ is a more specialised facility and typically includes a WC pan, a hoist and an adult sized adjustable change table. As these facilities are typically unstaffed and contain special equipment, location and access to them needs to be carefully considered. Not all sites are suited to ‘Changing Places’. Examples of locations that may be suitable include high use areas such as town halls, destination parks with other surrounding facilities and swimming pools. Carers may require instructions to operate the equipment to avoid injury and damage. Typically, a space of 3m x 4m is needed.

Due to the specialised equipment a ‘Changing Places’ room does generally not function as an accessible WC and should ideally be provided as a separate facility if possible. ‘Changing Places’ facilities are not covered by current Australian design standards. Designers should refer to the British Standard BS8300 and Changing places.org design guidelines for layouts, sizes and equipment specifications.

Urinals

Urinals typically require a ‘maze’ or screened lobby space, which is not supported in CPTED principles as the screening can provide cover for loitering or unwanted encounters. Urinals also make a facility gender specific with no option for female use if site use changes. Generally, the provision of urinals in new or refurbished stand-alone facilities is not favoured. Select locations may warrant the provision of urinals such as sites with generally higher male use such as a designated male changing room.

Additional Features of Public Facilities

Consideration should be given to the provision of shared parent/children’s cubicles with side-by-side adult and child pedestals in spaces that have children-friendly facilities. This should be assessed on a site-by-site basis.

Sharps bins Public toilet facilities are sometimes used by people to inject both legal and illegal drugs. Council does not condone illicit drug use but recognises that it does take place. For health and safety reasons and to minimise the risk of harm to all members of the community Council will consider installing sharps disposal bins in high use public toilets. Sharps containers should be installed where the need is identified.

Cubicle configuration

The preferred design approach is to avoid and remove screened lobbies or any type of enclosed communal lobby. This design approach provides benefits such as increased visibility of the structure and accountability of users. An example of this approach is cubicles containing WC pan only with shared hand basins outside in open public space. This also allows access to water and hand basins without the need to enter the building. Where discreet approach to cubicles is appropriate a translucent, mesh or battened screen can be used.
**Change Spaces**

There are a number of popular beaches across the Bega Valley and some people prefer to use an enclosed change area. The cooler winter climate and the short peak demand holiday periods relate to the demand for these types of change areas. Provision of traditional change spaces can increase the scale and size of a building considerably and in turn the construction and ongoing maintenance costs. They can also be limiting if a carer and the person/s being cared for are not the same gender. An alternate option is to include an extended change bench area and towel hooks in facility cubical/s and accessible facilities. This is a balanced approach which provides some enclosed change areas with a modest increase in building size. This approach also removes common integral change areas which some people are uncomfortable. It is now often used in sports and public pools changerooms. Provision of traditional communal change areas should only be considered in areas of very high need.

**Improvements Through Minor Works**

It is noted that there are often opportunities for improvements to existing facilities and surrounds through minor works that work toward these guidelines and current standards. These improvements include works such as addition of improved pathways, appearance improvements, changes to improve light and air flow and installation of elements such as baby change tables or hand rails. Due to existing sites, building and project constraints it is noted that those minor works might not be able to meet full compliance with current technical standards but can deliver a marked improvement toward meeting user expectations and some (if not all) of the objectives of these guidelines. It is the intent that those improvements are made ahead of scheduled asset renewals to improve the usability, quality and useful life of an asset; and to better meet community expectations.

**Building Structure**

All building finishes should be robust, impact-resistant, weather-resistant, easily cleaned, graffiti-resistant and comply with relevant current Australian Standards.

**Floors**

Surface should be mid-to-dark colour to hide dirt and grime. Surfaces should be non-slip. Floors must be provided with falls to floor wastes.

**Walls**

Light, bright surfaces will improve light levels and create a safer environment and create contrast with floors. Surfaces must be impact resistant and easy to clean.

**Plumbing fixtures**

Suitable noggings and internal framing needs to be provided to support wall-mounted basins, grab-rails and accessories. Consideration should be made to conceal water supply and drainage pipework in secure but accessible ducts and ceiling spaces where practical and possible.

Tapware and cisterns should be robust and vandal-proof, with replacements readily available from major manufacturers. Tapware is to be designed for ease-of-use.
Other fixtures and fittings

There are a number of other fixtures and fittings that can be considered for inclusion in public amenities. Not all may be relevant or required for all facilities. Fundamentally inclusion needs to comply with relevant standards and fixtures need to be robust and vandal-proof, with replacements readily available from major manufacturers. Examples of fixtures and fittings include toilet roll holders, grab-rails, clothing hooks, shelves and polished steel mirrors.

While they may seem simple inclusions provision of soap dispensers, hand dryers and paper towel dispensers can create other problems. It is not uncommon for these items to get misused or damaged, resulting in them being not available for use and requiring high levels of maintenance. Soap can create slippy floor surfaces. Inclusion should only be considered in high use and highly serviced sites where the risk of damage is minimal.

External works and lighting

The requirements for external and internal lighting will vary from site to site. For example, lighting needs will differ between a toilet that is closed in the evening and a toilet that is open all hours. External lighting to the building should meet the requirements of current Australian Standard AS.NZS 1158.3.1, with additional requirement to meet the Disability Standard (Access to Premises - Building).

Select vegetation that minimises future garden and building maintenance and/or maintain shrubs and garden bed species near amenities buildings to a suitable height to not impact visibility and surveillance.

Management, Maintenance and Security

Fundamentally facilities are constructed to be used. Consideration of the proposed management of a facility is essential during the initial design stages. If they are closed, they are not available to users. However, it may be difficult or impractical to leave facilities opened for extended hours. Thought needs to be given to:

- Opening and closing hours and requirements to open and close facilities
- Consistency of operating times and servicing
- Availability and access: arrangements and mechanisms for locking of the facility
- Security measures

Information

Information and communication (public and staff) is important. Simple signage showing opening hours, emergency numbers, security information and mechanisms to report critical incidents helps all users and Council staff in the use and management of public amenities.

The National Public Toilet Map

The National Public Toilet Map (NPTM) shows the location of more than 17,000 public and private toilet facilities across Australia. It is a project of the National Continence Program and is supported by the Australian Government Department of Health. It provides information regarding the location, opening hours, availability of baby change rooms, and accessibility for people with disabilities and details of other toilets nearby.

The Bega Valley Shire Council website directs users to the National Public Toilet Map when enquiring about public toilets.