



Caught Short

A PUBLIC TOILET STRATEGY FOR SOHO

produced by
Orbitl + Crystal Associates

on behalf of the
Soho Neighbourhood Forum

THE PROJECT IN NUMBERS



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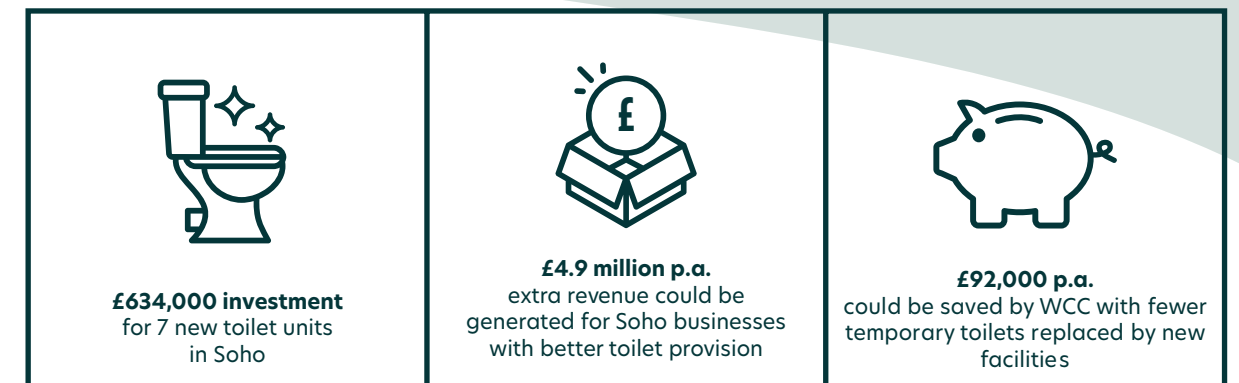
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THE HEADLINES



THE RETURN ON INVESTMENT FOR SOHO



UK TOILET, HEALTH & DIVERSITY STATS





1. EXECUTIVE SUMMARY

1.1 The brief

Caught Short, the Soho toilet study, was commissioned by The Soho Neighbourhood Forum (SNF / Plan for Soho). The public consultation with Soho residents and businesses leading up to the publication and adoption of the Neighbourhood Plan in September 2021, carried out by the Forum, found that the lack of sufficient permanent public toilet provision was an issue of major importance.

The study sets out to determine how many additional public toilets Soho needs and where these could be sited in order to be most effective.

The research, undertaken by data analytics and city planning consultancies Orbitl and Crystal associates, was paid for out of the Soho Neighbourhood Forum's CIL (Community Infrastructure Levy) funds.

During the course of the investigation, the study also sought to answer two fundamental and interrelated questions, namely:

1. What constitutes the right level of public toilet provision for Soho? and
2. What is the harm caused by having insufficient provision?

1.2 The methodology

Our approach to developing this public toilet strategy for Soho follows the British Standard BS 6465-4:2010: 'Sanitary installations - Code of practice for the provision of public toilets' guidance.

The study combines both qualitative and quantitative research among visitors, businesses, and residents, alongside in-depth interviews with subject-matter experts, stakeholders and representatives of vulnerable groups, and a review of best practice and design internationally. Detailed on-the-ground surveying was also carried out, to find the best solutions.

The team reviewed recent solutions in similar city centres to shape their recommendations. We have specified the type, locations, and cost estimates for the provision for a set of new public toilets in Soho. This includes recommendations as to where the SNF might invest neighbourhood CIL funds in new facilities. Such investment is intended to encourage both WCC and the private sector to co-invest and support the initiative.

“We all need toilets everywhere we go to shop. So, if you want to build local economies, if you want to attract visitors and tourists and bring money back into our towns and cities and get it flowing, you’ve got to have public toilets.”

- Toilet expert

1.3 Key findings

Key findings during the course of the study include:

a) Street fouling and urination remains a significant problem in Soho

29 fouling and urination hotspots were identified across the Soho neighbourhood.

Out of a street cleansing budget of almost £28.5 million across the borough of Westminster, around £5-7 million is being spent on street cleansing in Soho every year, a proportion of which is due to the proliferation of public urination in the area.

"The lack of toilet provision is an indictment on society. No one is going to urinate or defecate in the street unless they have no alternative."
- London Assembly Member

b) The provision of permanent public toilets in Soho is inadequate

There are currently only three permanent public toilet facilities available for use within the Soho area.

The toilets on the corner of Carnaby and Great Marlborough Streets are only open during the day, and are underground and therefore not accessible to all.

Only the one Automatic Public Convenience (APC) on Broadwick Street and one 'butterfly' urinal (with a broken 'wing') on the north side of Soho Square Gardens are available after 6pm each day. This is to serve over 73,000 visitors between 6-9pm.

"The current situation is a sign that the council has let Soho get out of control. There are significant mental health issues arising from allowing an area such as Soho to become the party capital of London, and arguably of the UK."
- Councillor

c) Soho needs more loos

Based on the minimum requirements of BS 6465 Parts 1 and 4 and our analysis of the nighttime footfall data, Soho would need at least 19 urinals and 58 cubicles.

Even including the Broadwick Street APC and the 10 chemical toilets, this still amounts to a current shortfall of 47 cubicles.

d) The temporary loos are unsightly and unpopular

Nine temporary/movable four-bay urinals and ten 'Portaloos'-type chemical toilets are installed at points around Soho from Thursday evening to Monday morning, at an estimated annual cost of £243,960 or £12,840 per unit.

As a Council report concedes, "The main issue with these facilities is that they are not aesthetically pleasing, and as such residents and businesses object to them being sited nearby or outside of their entrances for a longer period."

These views were confirmed in our surveys and in-depth interviews, along with negative feedback from women in particular.

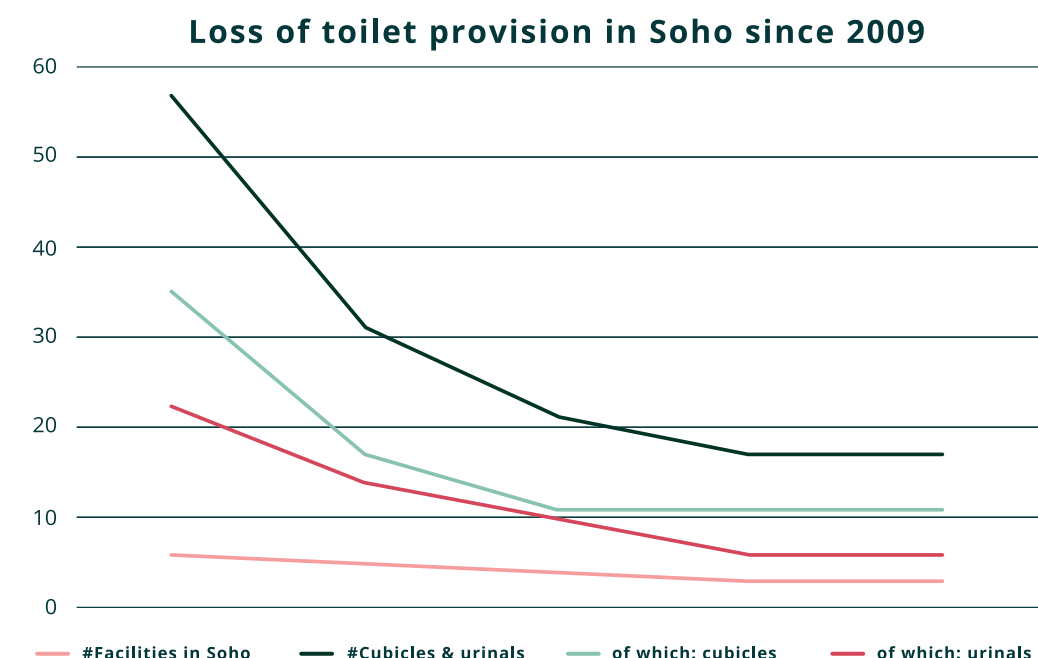
The key benefits of these units, however, is that they are easy to move around to tackle changing problem areas. They are also undoubtedly being used - collecting 1,000 to 4,000 litres of urine per day in total, which provides evidence of the underlying demand.

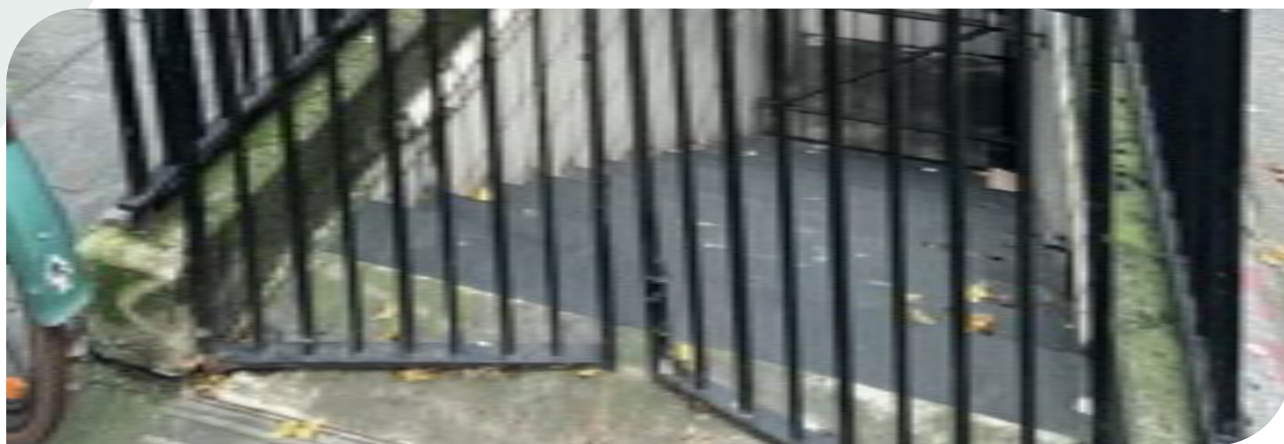
"Forcing people to effectively go in a plastic bucket in the street is demeaning to this great nation."
- Hotelier

e) A significant loss of provision in Soho and surrounding area

Since the closure of the underground toilets at Oxford Circus in 2009, the Soho area has reflected the national picture and lost significant public toilet provision.

The number of permanent toilet facilities in Soho has reduced by 50%, i.e. from 6 to 3.
The number of cubicles and urinals at these locations has reduced by 70%, i.e. from 57 to 17.

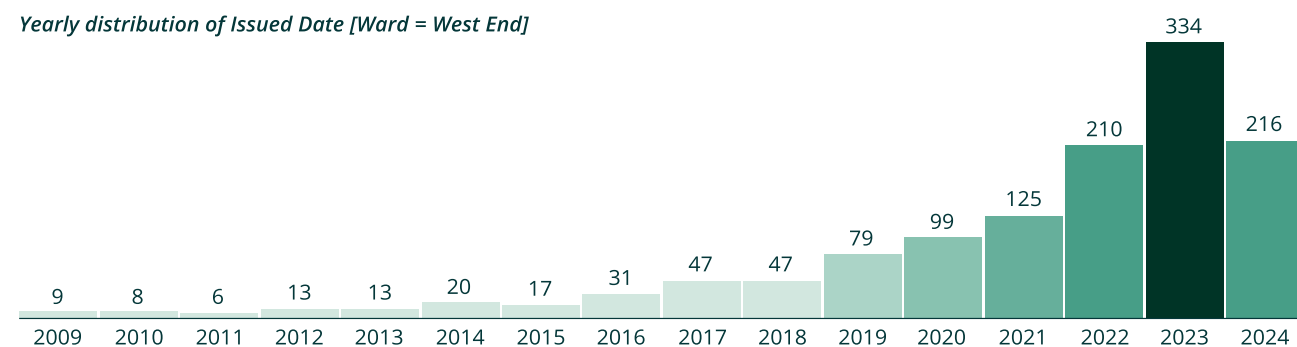




f) More alcohol licences but fewer toilets

According to our analysis, the number of alcohol licences in Westminster has risen by 34% over the past 15 years to 4,183 (495 premises of which are located in Soho, according to analysis by The Soho Society), while the number of permanent public toilet cubicles and urinals in Soho and its immediate surrounding area has fallen by 70% over the same period.

Yearly distribution of Issued Date [Ward = West End]



"There is a direct correlation between the amount of alcohol someone has consumed and the possibility to divert them from their direction of travel to use a loo. A sober person will move about 200-300 yards, whereas someone who has drunk 6 pints will move about 10."
- Toilet provider

g) Significant impacts of the demand/supply gap in Soho

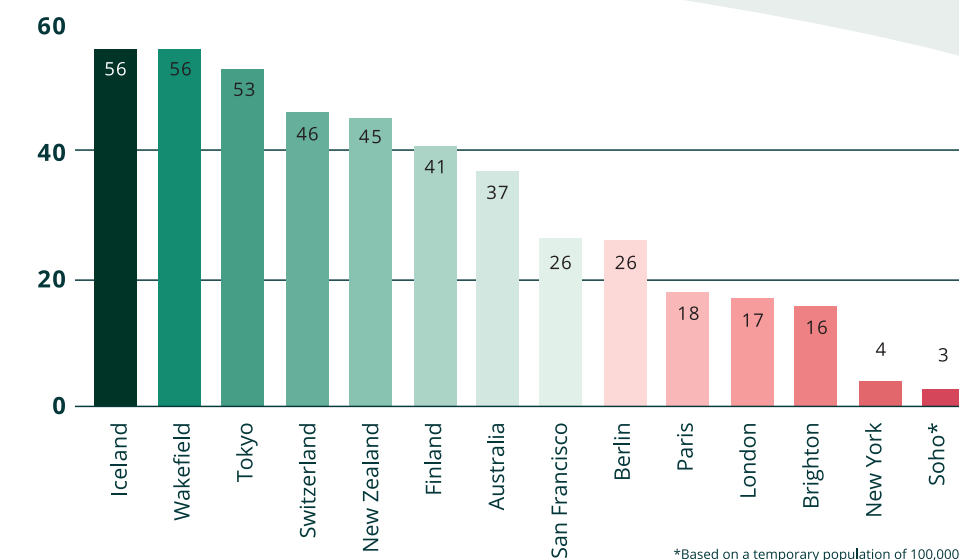
Key impacts of the demand/supply gap in Soho include health risks, exclusion of women, the disabled and other vulnerable groups, degradation of the Conservation Area and quality of life of residents, damage to Soho's reputation and economic potential, and increasing crime and antisocial behaviour.

h) Soho compares poorly against local and international benchmarks

Soho's current permanent provision is poor compared to other cities, as shown in the chart below. For example, Paris's provision of 18 public toilets per 100,000 population - generally regarded as the 'European standard' - compares with 3 for Soho, based on Soho's effective peak population of 100,000.

Benchmark - public toilets by city district / city / country

toilets per 100,000 people



"You go to New York, Paris or Berlin - they're cities dealing with the same issues that we have here, but they're provided for."
- Hotelier

i) There is a sound business case for investment

It is estimated that the indicative investment of £634,000 required to provide the 7 new facilities, and the indicative annual cost of servicing, could be offset in the first year.

This is through capital funding which is already available (e.g. CIL funds), additional revenues received through charging for toilets, the 'purple' and 'grey' pounds and more tourists and other visitors.

Analysis of data collected from visitors and other sources indicates that addressing concerns about toilet provision amongst occasional visitors to Soho could, over time, once visitor behaviour changes, be worth a further £4.9 million per year in revenue for Soho businesses.

The indicative annual cost of servicing and maintenance of £95,212 across the 7 new permanent facilities could be more than offset by £141,240 of savings arising out of the reduction of 11 of the temporary urinals and portaloos (chemical toilets).

And all while making Soho a more attractive and inclusive place to visit.

The estimated spending power of UK households with at least one disabled person is £274 billion i.e. the 'purple pound'.

The 'grey pound' (spending power of consumers over 50) is estimated to be worth £320 billion per annum.

j) The Mayor's Oxford Street pedestrianisation project could help

Westminster City Council's (WCC's) £100 million+ Oxford Street Programme (OSP) was criticised for not including any public toilet provision in its plans, despite the issue being repeatedly raised during the public consultation process. As the OSP has now been cancelled, following the announcement by the Mayor of London, Sadiq Khan in September of his plan to pedestrianise Oxford Street, it is hoped that this omission will be corrected under the new scheme, particularly as the Mayor's plan is likely to place even greater pressure on existing facilities.

"So long as we can find locations [on Oxford St] where we've got water and electricity easily accessible, we plan to look at that very carefully and put toilets there, certainly on the East side of Oxford Street, which borders Soho."
- Councillor

k) Transport for London (TfL) to provide additional capacity

TfL is in the process of reopening 'mothballed' toilet facilities and retrofitting new ones in key interchange stations across the London Underground network, with new funding - £3 million per annum - from the Mayor of London. While no decision has yet been made in respect of Tottenham Court Road station, its heavy usage and strategic location make it a compelling candidate.

"It should be a statutory obligation on TfL, when they are redeveloping stations, to put toilets in them."
- Parliamentary Candidate

l) A possible reprieve for Broadwick Street

The Dutch firm 2theloo, which operates high-quality 'commercial' toilet facilities in a number of European countries, including one in Covent Garden, has expressed its interest in taking over the lease on the underground facilities at Broadwick Street, currently the subject of a planning application by the LIFT coffee company.

"We should reopen every single resource available for use as a public toilet, and renege on any deals that have been done, if necessary. It makes no sense to be closing purpose-built facilities when there is a clear and present need for them."
- Councillor

"Improve signage and use technology like QR codes to direct people to available toilet facilities."
- Councillor

1.4 Key recommendations

Key recommendations identified during the course of the study include:

Maintain/improve existing provision: Ensure that the current public toilet provision in Soho is adequately maintained (or improved) and available for use, including the currently closed underground toilets at Broadwick Street. Appoint a 'roving' attendant to ensure adherence to cleaning and maintenance standards and discourage antisocial behaviour.

Replace and upgrade: Replace the butterfly urinal on the north side of Soho Square with increased, more suitable provision, potentially with a 2-3-cubicle accessible facility with a urinal or urinals inside and/or outside the building.

Introduce new facilities at sites in Soho: The study has identified seven initial locations for new provision in addition to the upgrade at Soho Square. The indicative total investment required is £634,000.

The proposals would provide:

- **8 new cubicles** bringing the total from 11 to 19 - 33% of the suggested minimum requirement levels and only 54% of the 2009 level
- **14 new urinals** bringing the total from 6 to 20, in line with the minimum requirement and the 2009 level

Proposed locations are the south side of Soho Square as well as 'pop-up / flip-up' urinals in problem 'hotspots', including Charing Cross Road / Moor Street, Wardour Street, Little Marlborough Street, Carnaby Street, Ramillies Street and Noel Street.

Other sites/solutions to be considered:

- TfL to prioritise new toilets in or around Tottenham Court Road station - the most heavily used transport node for visitors to Soho - in partnership with WCC, property owners and other key stakeholders
- The proposed Oxford Street pedestrianisation scheme to include additional toilet provision
- 'Toilet stores' to be prioritised in currently vacant retail units in Soho and on Oxford Street, where they would make a welcome alternative to the many 'American candy stores' currently blighting London's premier retail district
- **Improve signage** to all facilities, specifying the distance/walking time to each and indicating the nature of the facilities provided. Ensure that all are listed and accurately described on apps and websites such as Toilets4London and the Great British Toilet Map
- **Hold a design competition** for a 'destination' toilet

"As a premier tourist destination, Soho would be perfect for a quirky, Instagrammable destination toilet."
- Toilet designer

2. THE NATURE OF THE PROBLEM

The problem of street defecation and urination is multifaceted, as are the solutions. This section addresses the main topics which are covered in greater detail later in this report.

2.1 Problem #1 - Is it a problem?

A word-search of The Soho Clarion back issues reveals that the issue has been a live one for Soho's residents, workers and visitors alike for decades.

This sentiment has been backed up by our conversations in the focus groups, the Soho Neighbourhood Forum's Annual General Meeting, in-depth interviews, the business and visitors surveys and other research - as the images and 'Urination and fouling heat map' below from our street surveys show.

"The principal problem for Soho is street urination, which is a very hard nut to crack because people want the provision where and when it's needed but not when it isn't, so you get a conflict between businesses, their customers and residents."
- Toilet provider



In the April 2024 WCC Night Safety Audit, antisocial behaviour (ASB) and public urination linked to the absence of adequate public toilet facilities were noted as significant concerns. In the surveys conducted as part of the audit, only 37% of respondents said they felt safe while out at night in the West End.



Oxford Street receives 100 million visitors a year and Regent Street 80 million, so the current level of provision is a significant problem, because there are often no facilities open."
- Property manager

2.2 Problem #2 - A global issue

Every year on 19 November, the United Nations (UN) draws the world's attention to the global sanitary crisis on World Toilet Day.

"Today, 4.5 billion live without a safe toilet and 892 million people still practise open defecation," the UN website states. "The impact of exposure to human faeces on this scale has a devastating impact upon public health, living and working conditions, nutrition, education and economic productivity across the world."

The UN's Sustainable Development Goal 6 (SDG 6) ensures the availability and sustainable management of sanitation and water for all by 2030.

Specifically SDG Target 6.2 is: "By 2030, achieve access to adequate and equitable sanitation and hygiene for all and end open defecation, paying special attention to the needs of women and girls and those in vulnerable situations."

However, according to the UN, the world is not on track to reach its 2030 target.

Although the main focus of SDG Target 6.2 may be on providing domestic toilets in rural areas in countries in the 'developing world', countries like China, with its so-called 'toilet revolution', demonstrate that providing adequate public conveniences in its towns and cities, with a focus on tourists, is key - see section 3.42.

According to the World Health Organisation (WHO), at a high level of generality, a £1 investment in toilets and sanitation brings a return of £5.

2.3 Problem #3 - The decline of British toilets

When first introduced in 1852, Britain's public conveniences could justifiably claim to be 'the envy of the World'. Many of the country's finest surviving examples date from this Victorian heyday and remain the subject of popular tourist excursions, such as London Loo Tours.

In 2010 there were 5,159 toilets run by major councils in the UK. By 2018 this had reduced to 4,486. By 2020, the figure was 2,900 - a 44% drop over 10 years, according to BTA (British Toilet Association) figures.

This picture has been more than reflected in Soho. Since 2009 the number of facilities has reduced by 50%, from 6 to 3 and the number of toilets within these facilities by 70%, from 57 to 11.

*"15-20 years ago, the level of provision was much better, with underground facilities at Broadwick St and Oxford Circus, but this has been steadily eroded since then."
- Property manager*

2.4 Problem #4 - Increased licensing

While the number of toilets have reduced, the number of alcohol licences issued by Westminster City Council has risen by 34% over the past 15 years, the effects of which are detailed in October 2020's Cumulative Impact Assessment report ([link](#)), the current edition of which was published in December 2023 ([link](#)).

*"Licensing in Soho has changed, to favour an excess of restaurant provision. I want to see it change in future to avoid an extraordinary amount of cheap alcohol consumption at the heart of the village."
- Councillor*

2.5 Problem #5 - Diversity of need

In an area such as Soho, there is a 24-hour population with needs that vary throughout the day. If toilets are to be an asset, and not a liability, they need to be well designed, operated and maintained.

Today there are more types of toilet users than used to be considered in the past. Hence it becomes important to first ascertain what facilities there are in the area, how they are being used and what gaps in provision exist at various times of day. Once you know what you have, you can plan to improve the provision, both in terms of geographical distribution and the needs of specific groups.

Today one needs to consider that there are different types of facilities for people with various levels of disability, unisex facilities, gender-specific facilities, some provision for people with carers and others for people with shopping and other baggage.

2.6 Problem #6 - Legislation

As a House of Commons report on the Provision of Public Toilets published in 2008 put it, "Lavatory humour is rife in British culture, but the provision of public toilets is no laughing matter."

But while the Public Health Act 1936 gives local authorities the power to provide public toilets, it imposes no statutory duty to do so, and it is this lack of compulsion, together with the perception of nuisance associated with them, that has largely contributed to a steady decline in their provision in recent years.

The British Toilet Association (BTA), has been lobbying successive UK governments for over 20 years, advocating for safe, clean and affordable public toilets as part of an integrated, nationwide sanitation strategy. The recent Levelling-up and Regeneration Bill (section 57) had included provision for a Toilet Commissioner, whose priority would be to assess the provision and need for public toilets throughout England and put in place a National Strategy for Local Authorities to follow, to devise a Toilet Plan for each council area, but this provision was dropped by the previous government.

The Toilet Paper, published in November 2021, sets out the London Assembly Health Committee's three principles for improving public toilet provision in London, namely:

Duty - all levels of government should have a duty to provide public toilets. The government has a duty to make the provision of public toilets compulsory and to provide ringfenced funding for local authorities to achieve this purpose. Regional and local government should also use the tools at their disposal to improve provision.

Directions - all Londoners and visitors have the right to be able to find a toilet that suits their needs in a way that is accessible to them.

Data - Londoners need toilet policymaking to be based on current data, so that population needs can be met and improvements can be measured.

Other key legislation relating to public toilets includes:

- There is no particular right to access a toilet in public and local authorities do not have a statutory duty to provide them
- Businesses that provide toilets for their customers have no legal duty to do so for non-customers
- Workplaces must provide suitable conveniences for their staff
- Anywhere that offers goods or services to the public must make sure that disabled people have equal access to their facilities, including toilets

Important laws and documents in this regard can be found in Appendix 16.

2.7 Problem #7 - Austerity

The austerity years of the Cameron-Clegg Coalition government (2010-15) saw many longstanding public facilities close, as councils looked for ways to implement cuts without compromising (other) essential services.

Now in 2024, we seem to be in a similar or even more serious situation.

Nevertheless, the UK seems to be out of step with the rest of Europe in this regard, as a number of the public toilet providers that we engaged with during the course of the study had either recently fulfilled or won substantial procurement contracts for hundreds of new standalone units in cities such as Berlin, Paris, Stuttgart, Amsterdam and Rotterdam.

"The British authorities' view of toilets as a drain on resources and a magnet for antisocial behaviour contrasts sharply with that of the Japanese, for example, who see them as an integral part of hospitality culture and an essential component of all infrastructure projects."
- Expert in accessible design

2.8 Problem #8 - Reduced private provision

As early as 2005, councils such as Richmond, Camden, Croydon, Lambeth, Waltham Forest and Wandsworth had begun introducing Community Toilet Schemes (CTS - more on which elsewhere in this report), outsourcing their former obligations to the private sector by providing financial incentives for businesses to open their toilets to non-paying customers.

Among the most obliging and best-equipped participants in these schemes were department stores - now an endangered species themselves, as Oxford Street stalwarts such as Debenhams, BHS and House of Fraser have all left Oxford Street in recent years, as Fenwick's did Bond Street earlier this year.

2.9 Problem #9 - Soho's narrow streets

The complex, multilayered character of Soho, with its residents and revellers, and its 96 narrow streets and alleyways, lies at the heart of the issue that this report seeks to address.

Two implications of Soho's unique street layout are the complexity of where to site new toilet provision and the fact that its narrow alleyways also provide secluded spots for people to urinate and defecate.

"Tyler's Court was the #1 toilet [during Covid] - ladies at one end, gents at the other. It was the epicentre of excrement."
- Market trader

2.10 Problem #10 - Temporary toilets

According to Westminster City Council, a total of 25 temporary public toilets (13 4-bay movable urinals and 12 'Portaloo'-type chemical toilets) are currently located across the borough.

In Soho, 9 of these temporary urinals and 10 chemical toilet cubicles are installed at 8 locations around Soho, shown in the table in Appendix 2.

These are highly unpopular, particularly with residents, although they are seen as a "necessary evil" in the absence of sufficient permanent provision.



"There is no optimal level of public toilet provision that will fully address the street urination issue. We need to strike a balance of finding suitable locations in an intensely busy area to provide such facilities, so that people can see where they are and how to use them, whilst competing with many other needs in a crowded public realm."
- Council officer

"Of all WCC's toilet provision, temporary urinals are the most highly effective means of tackling street urination."
- Council officer

"People using Portaloo's in Soho late at night are sitting ducks for criminals."
- Restaurateur

2.11 Problem #11 - Crime in Soho

A number of our expert interviewees likened the incidence of street urination in the area to that of broken windows or graffiti as an indicator of neglect and associated lawlessness.

Westminster has the highest crime rate of any London borough, at 462.8 crimes committed per 1000 population - and Soho has the highest rate in Westminster, at 5,134 per 1000. The total cost of crime in Westminster is estimated to be £365 million per year.

As the map below shows, the incidence of crime in Soho tracks closely to both the concentration of licensed premises and street fouling/urination hotspots illustrated elsewhere in this report.

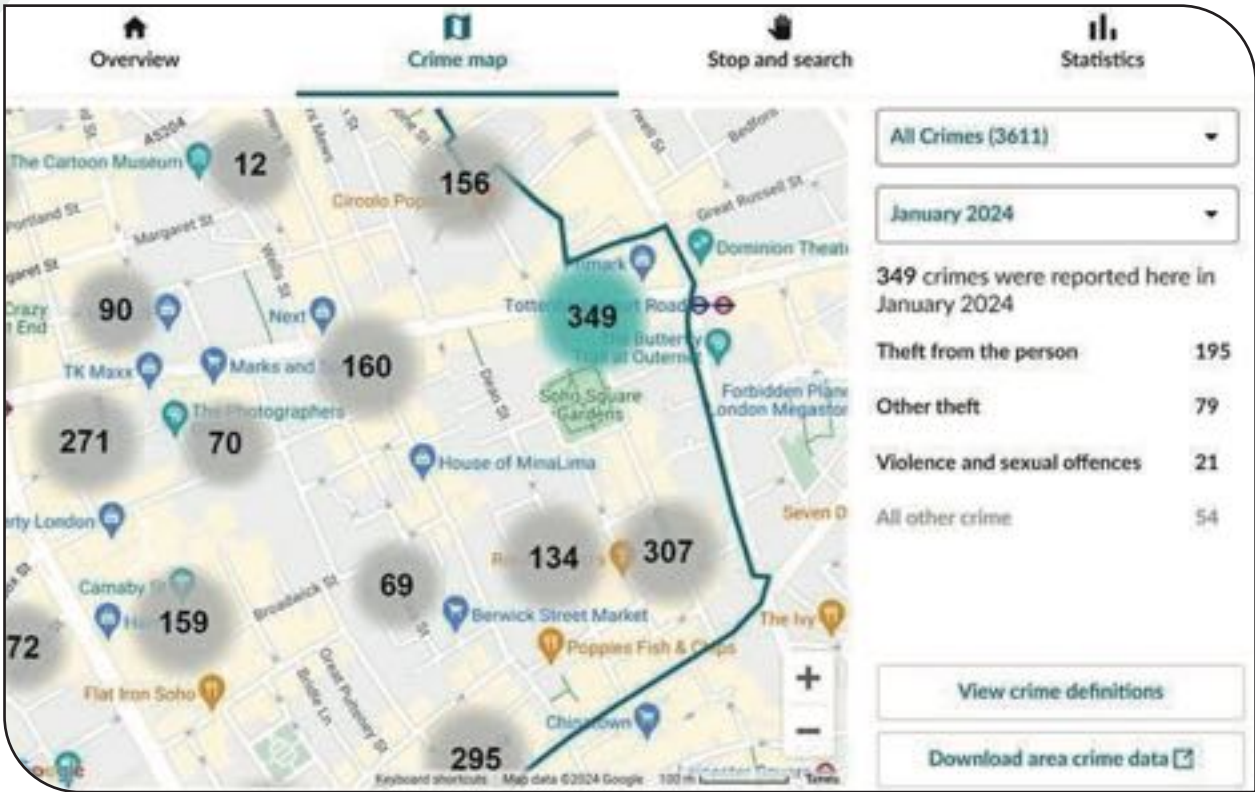


Fig. A screenshot from the Metropolitan Police's online crime monitoring platform

2.12 Problem #12 - Damaging Soho's reputation / brand

The issue of toilet provision has a significant impact on Soho's reputation as a leisure destination, and this is indicated in survey results. Amongst respondents to the visitor survey, approximately 56% indicated that they felt the lack of public toilets in Soho made the area less pleasant to visit. In a separate survey of individuals who had not visited Soho in the 12 preceding 12 months, 7% of respondents cited issues related to cleanliness as at least partly responsible for their decision to stay away.

"I find it hard to imagine that Soho's brand is enhanced by having to wade through people's urine late at night."
- Parliamentary Candidate

2.13 Problem #13 - People staying away on health grounds

The closure of public toilets can have a significant impact on people's health, especially those with medical conditions that necessitate frequent toilet use. A 2019 report from the Royal Society for Public Health (RSPH) found that for 20% of people in the UK, fear of or knowledge of a lack of facilities nearby can tie them to within a small distance of their home, acting as a "loo leash".

For those with medical conditions requiring more frequent toilet use, this figure rises to 43%. The report also found that over half of the British public restrict fluid intake due to concern over the lack of toilet facilities.

The findings suggest that not only is the lack of toilet provision making going out in public uncomfortable, but that it could also hinder the UK's wider public health efforts. In addition, the decline in public toilet provision may also discourage people from going out and thus impact negatively on the local economy.

For example the spending power of UK households with at least one disabled person, the so-called 'purple pound', is £274 billion. The 'grey pound' (spending power of consumers over 50) is estimated to be worth £47 billion per annum. Suppressing demand from these demographics has an impact on high street spending.

"Covid and other viruses live in faeces and urine, so proper cleaning is essential for preventing the rise of superbugs and future pandemics."
- Toilet expert

"There are 14 million people on the disability register in the UK, with another 10 million classified as 'urgent users' - over 55 or with medical conditions - equivalent to one third of the total population."
- Toilet expert

"We know that nine in ten people with the conditions plan their journeys based on access to toilets."
- Healthcare charity executive

2.14 Problem #14 - The cost of cleaning the public realm

According to WCC, the budget for street cleansing in Westminster for 2024-25 is £28,474,200, with more than 50% of this concentrated in the West End. We estimate around £5 -£7 million of that is spent in Soho.

Two of the local Business Improvement Districts (BIDs) that border Soho, New West End Company (NWECC) and the Heart of London Business Alliance (HoLBA), told us their combined spend is over £1.2 million pounds on additional cleaning in their respective areas. This is over and above that provided by WCC.

The cost of cleaning public spaces continues to rise, and according to a report by the Association for Public Service Excellence, public satisfaction with cleaning is at its lowest for five years.

'Wild toileting' in the Royal Parks due to toilet closures during the COVID lockdown led to a reported clean-up cost of around £230,000.

*"Soho doesn't need to be Singapore - it just needs to be basically clean."
- Hotelier*

*"It doesn't need to be a 24/7 thing - Soho's streets don't need cleaning on a Monday night, they need cleaning on a Sunday morning."
- Restaurateur*



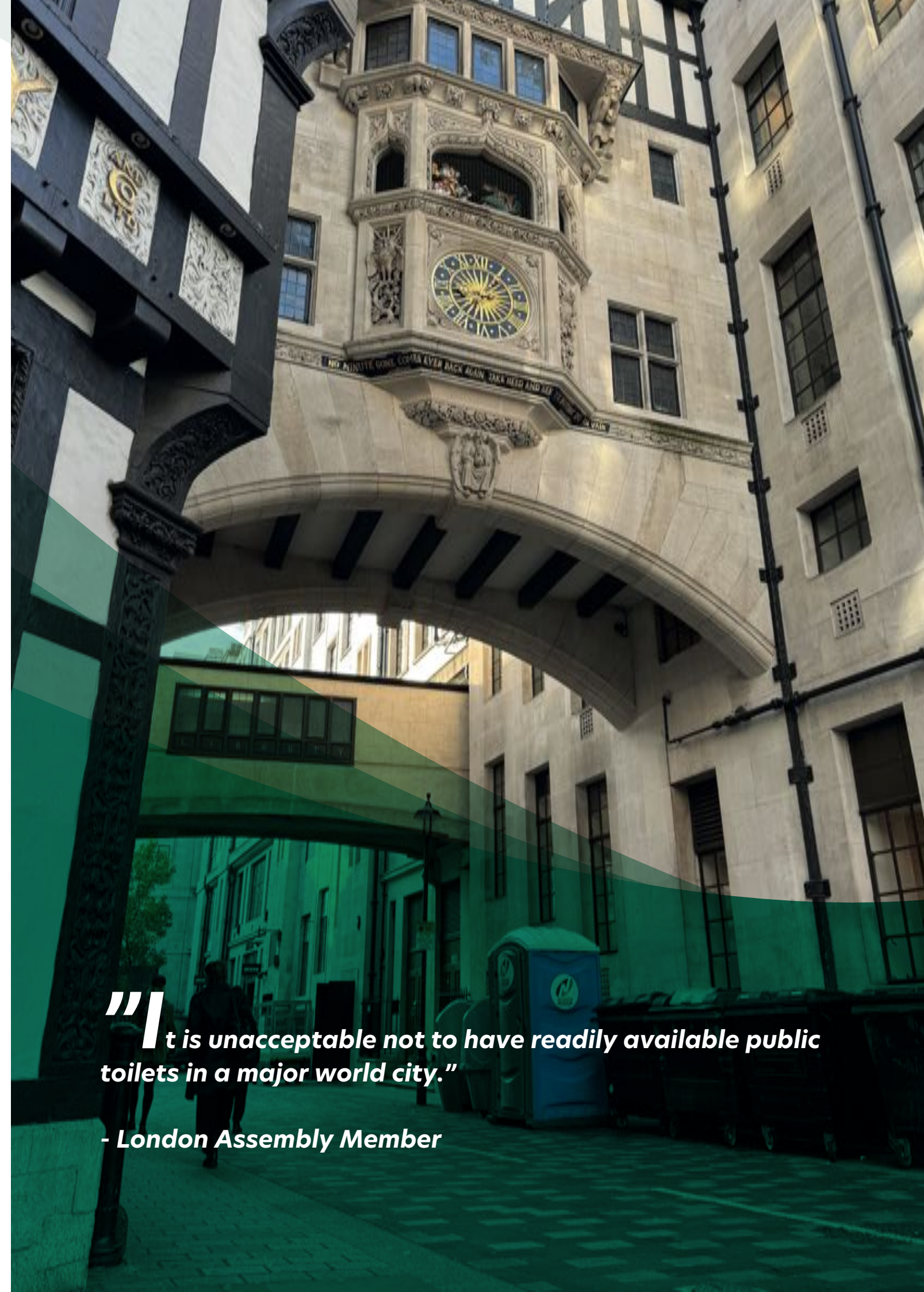
*"Of course it's a problem! The streets smell disgusting every morning, particularly in Summer, and really need to be steam cleaned every morning, but they aren't."
- Housing officer*

*"We spend £600,000 per year on additional cleaning to deal with the problem [of street urination]. We send teams around to disinfect hotspots on a daily basis."
- BID officer*

*"There needs to be more regular street cleaning. Forcing BIDs to organise and pay for security and basic hygiene is an abdication of responsibility on the part of government."
- Restaurateur*

"It is unacceptable not to have readily available public toilets in a major world city."

- London Assembly Member



3. THE RESEARCH

The study combines both qualitative and quantitative research among visitors, businesses, and residents, alongside in-depth interviews with subject-matter experts, stakeholders and representatives of vulnerable groups, and a review of best practice and design internationally. Detailed on-the-ground surveying was also carried out, to ensure that the most appropriate and cost-effective solutions can be implemented for the benefit of all.

This section lays out the key findings from each of these areas of research.

3.1 On-the-ground surveying

This part of the research involved numerous street surveys, meetings and desktop research, during which we uncovered a significant amount of relevant information which is summarised in the following four subsections:

- Toilet provision in Soho
- Footfall data
- Impact of poor provision on stakeholders
- Sources of funding

3.2 Toilet provision in Soho

This subsection sets out the existing provision in Soho, temporary provision, lost provision, provision in the wider area and what would be an adequate level of provision for Soho.

a) Public toilets defined

‘Public toilets’ - as proposed by Dr Clara Greed, Emerita Professor of Urban Planning at the University of the West of England (UWE) in Bristol - may be defined as comprising both traditional ‘on-street’, local authority public toilets and ‘off-street’ toilets to which the public has right of access, for example in restaurants, shopping malls, and department stores, which, together, may be defined as ‘away from home toilets’.

The primary focus of our report has been the former, while touching on the topic of Community Toilet Schemes as per section 3.9 and a toilet ‘store’ solution such as that provided by 2theloo.

b) Existing permanent provision in Soho

Public conveniences (PCs) in Soho, like the rest of the UK, have been through a number of highs and lows - mainly the latter.

Within the Soho area there are currently three permanent public toilet facilities available for use:

Broadwick Street, APC	The APC (Automatic Public Convenience) is now semi-automatic, as it is no longer self-cleaning
Carnaby / Great Marlborough Street, underground	Average usage is 433 visits per day, of which two-thirds are men. Refurbishment planned
Soho Square, ‘butterfly’ urinal	One ‘wing’ is broken and the unit is due to be replaced

The Broadwick Street underground toilets have been closed since the height of lockdown in 2021. More detail on this current permanent provision can be found in Appendix 1.



c) Temporary provision in Soho

Pre-Covid deployment consisted of 12 urinals from Friday to Monday across the borough. During Covid, social distancing warranted an increase in facilities, as well as a drive to provide additional units to meet gender equality requirements.

Post Covid, the Council continues to deploy 25 urinals and portaloos across the borough and 19 in Soho from Thursday evening to Monday morning. The additional deployment days align with new working patterns, and the resulting impact on weekend hospitality demand. According to WCC, the units are cleaned and emptied each morning between 6-8am. The location of the 19 units in Soho and their type are listed in Appendix 2.

Some locations are not currently shown on the website, such as at Cambridge Circus and the Soho Square junction with Soho Street. According to the WCC website, temporary toilets are placed in another five locations outside of Soho: at the Charing Cross Road junction with Irving Street, Craven Street, Great Windmill Street, the Haymarket junction with King Charles II Street

and at the Oxford Street junction with Great Titchfield Street.

As a Council report, the 'Public Convenience Update' issued in September 2023 concedes, "The main issue with these facilities is that they are not aesthetically pleasing, and as such residents and offices object to them being sited nearby or outside of their entrances for a longer period."

The forecast cost for the supply of temporary toilets across the borough was £345,000 for 2023-24 and is £321,000 for 2024-25. With around 76% of the temporary provision in Soho, this would mean a cost relating to Soho of £243,960 or £12,840 per unit.

Although there are no figures available for individual locations, as the units' contents are emptied into a single tanker, WCC quotes an average daily volume of 1000-4000 litres per day across the borough.

The company which supplies the units, John Nixon Ltd (trading as Nixon Hire), did not respond to our requests for comment, so all figures are those provided by the relevant council officers.

Other facts to consider:

- Most people urinate 6 or 7 times every 24 hours
- The average urine production in adult humans is around 1.4 litres per person per day
- People need to be able to access toilets fairly quickly - no more than two minutes' queuing time according to guidance

"The reason Soho Portaloos smell is that: a) people pee on the floor and b) the chemicals can only absorb so much odour before they become saturated. The loos at fancy festivals are cleaned twice a day - how often are Soho's?"
- Toilet provider



d) Lost provision in Soho and the surrounding area

As per the chart and table below, the number of permanent toilet facilities in Soho has reduced by 50%, i.e. from 6 to 3. The number of cubicles and urinals at these locations has reduced by 70%, i.e. from 57 to 17.



Year	# Facilities in Soho	# Cubicles / urinals in Soho	Of which: Cubicles	Of which: Urinals	
2009	6	57	35	22	Includes Oxford Circus
2011	5	31	17	14	Loss of Oxford Circus
2022	4	21	11	10	Broadwick Street closed
2023	3	17	11	6	Cambridge Circus removed & Soho Square urinal broken
TODAY	3	17	11	6	
% decline	-50%	-70%	-69%	-73%	

If the Piccadilly Circus toilets are included, the total reductions are slightly lower but still significant - i.e. the total number of facilities has reduced by 43% (from 7 to 4) and total cubicles and urinals by 48% (from 83 to 43) from 2009 to today. The number of cubicles has reduced by 45% (from 53 to 29) and the number of urinals by 53% (from 30 to 14).

Other points to note:

- As mentioned above, in 2009, the underground public toilets at Oxford Circus, one of Soho's most important transport nodes, were closed and filled in with concrete as part of Transport for London's (TfL's) redesign of the pedestrian crossings at the interchange - just four years after they were renovated at a cost of £300,000 - thus placing additional pressure on those facilities that remained, in particular those at Carnaby/Great Marlborough Street. Replacement overground toilets were planned (and approved on 6th March 2012) to be sited at the Oxford Street end of Old Cavendish Street, between John Lewis and the since-closed House of Fraser, but never built.
- In 2022, WCC officially closed the underground public toilets on Broadwick Street, removing them from public use for 25 years by leasing the site to a coffee chain. Objections to the decision remain ongoing at the time of writing.
- In January 2023, the 'UriLift' pop-up urinal at Cambridge Circus was removed, pending an investigation into the accidental death of a maintenance worker. Despite the Health and Safety Executive (HSE) issuing a Safety Bulletin regarding the incident in June last year, no alternative provision has yet been made. A similar urinal was also removed from Villiers Street, near Embankment tube station.
- Earlier this year, TfL announced that the APCs on Princes Street (which supplemented the daytime provision at Carnaby/Great Marlborough Street) and The Strand would in future be reserved for the exclusive use of its drivers and no longer available to the public.

e) Provision in the wider area

There is provision outside of Soho but as the visitor survey suggested, people are less inclined to go too far if they need a toilet.

For reference, this includes: Piccadilly Circus Underground Station, Leicester Square, Charing Cross station and a urinal on Adelaide Street by St Martin-in-the-Fields.

More detail on these can be found in Appendix 3.

f) Provision across London

Based on our analysis - see Appendix 4 - the number of Local Authority-run public toilets across London has reduced from 404 in 2011 to 334 today, i.e. a 17% reduction.

Westminster ranks 8th out of the London boroughs for Local Authority-run public toilets and has seen a reduction of 32% in the number of facilities from 25 to 17.

Some boroughs have looked to compensate for the loss of public toilets with a Community Toilet Scheme (CTS). The following section takes a look at CTS as an option for Soho.

g) Community Toilet Schemes

Community Toilet Schemes (CTS) enable members of the public to use toilet facilities in a range of approved local businesses and other organisations during their opening hours. Effective Community Toilet Schemes can play an important part of public toilet provision when implemented alongside other projects aimed at improving provision.

In research by AgeUK London published in September 2022, 'London Loos - Public toilets in London', which surveyed nearly 600 older Londoners, four in five respondents said that they would not be confident going into a shop or café and asking to use the toilet if the business was not part of a Community Toilet Scheme. In contrast, three in four survey respondents said that they would be confident asking to use the toilet in a business that they knew was part of a Community Toilet Scheme.

The AgeUK London research found evidence of at least 13 active CTSs in London with a further four boroughs in the process of setting up a scheme.

Our analysis suggests there are now 15 active CTSs operating in 15 London boroughs, with 476 members - as shown in Appendix 5. The size of the schemes range from six members in Ealing to 127 local businesses participating in Hounslow.

According to their websites, Croydon and Tower Hamlets plan to introduce new schemes. Southwark's CTS scheme has "fallen into disuse", according to a council report in May 2024, although there are calls to revive at least part of it.

One common issue for such schemes - highlighted during the course of our study and an interview with a Merton Councillor - is that businesses which initially join the scheme decide for various reasons not to continue or to actively participate. Among the recommendations included in Merton Council's June 2023 review of its public toilet provision were that the Council should lead the way by making its own toilet assets available and public sector organisations like the NHS asked to do likewise, followed by the voluntary sector and not-for-profit organisations such as churches. The report also recommended that businesses should be encouraged to join the borough's CTS when applying for planning permission, using S106 agreements to ensure more than minimal provision in any new developments.

In 2008, the Department for Communities and Local Government produced a step-by-step guide to setting up and operating a CTS, based on practice in the Royal Borough of Richmond upon Thames. This was highlighted in the AgeUK London report with the following characteristics of successful Community Toilet Schemes:

Active management by the local authority, with careful selection and monitoring of the selected sites.

- The CTS receives full support from the local authority from inception and on a long-term basis.
- The CTS has an agreed budget.

An issue for Soho is that the majority of businesses are small and have limited provision - much of it either up- or downstairs and therefore not accessible to all. Our business survey highlighted

that a majority would therefore be reluctant to be involved, with more than 66% of businesses surveyed indicating that they would be opposed to allowing members of the public who are not customers to use their toilets.

Interestingly, those businesses who said that they currently allow non-customers to use their toilets indicated that a financial contribution to their upkeep would not significantly affect their decision to do so, suggesting an aversion to any obligation to make their facilities available to the wider public.

*"Community Toilet Schemes are helpful around the edges but don't really deal with the fundamental issues."
- London Assembly Member*

h) What constitutes an adequate level of toilet provision?

The British Standard BS 6465-4:2010, ‘Sanitary Installations - Code of practice for the provision of public toilets’ sets out the minimum requirements for a variety of settings.

The standard was published on 30 November 2010, and is about to be updated, but serves as the best indicator for calculating an adequate number of toilets for an area such as Soho.

BS 6465-4:2010 sets out guidance for high, medium and low use areas. Given the nature of Soho, the following guidance applies:

- Large centres should have the highest level of toilet provision, with attendants if possible, and the widest range of facilities, including accessible toilets.
- A Changing Places toilet for severely disabled people should also be included. [See BS 8300]
- Fully operational 24-hour toilet facilities should be available to provide for the daytime shoppers, nighttime drinkers, shift workers, commuters, etc, going through the area at all times.
- In town and city centres and tourist areas - such as Soho - toilets should be within a short walking distance, i.e. within 300 metres in the busiest areas and 500 metres in less busy areas.

BS 6465-4:2010 sets out guidance for the sufficient numbers of toilets and/or urinals that should be provided. Key determinants are:

- Likely population
- Length of stay
- Arrival rate
- Gender ratio
- Peak times - including daily, weekly and seasonal variations

The BS 6465-4:2010 acknowledges the British Toilet Association’s recommendation that “a Local Authority should provide no fewer than one cubicle per 550 women and girls or one urinal per 1100 men and boys dwelling in the area.” It adds that any large number of people visiting an area regularly - such as Soho - would have to be added to these population numbers and thus serve as a guideline.

Our analysis of footfall data from the London Datastore suggests that over 18,000 people visit Soho’s nightclubs. Assuming a 50/50 split for males and females, Soho would need around 9 urinals and around 16 cubicles for women. During the day, with over 100,000 people, Soho would need 91 cubicles and 45 urinals.

The table below shows the BS 6465-4:2010 minimum requirements for toilets in shops and shopping centres with a retail area in excess of 1,000 m2. We have used this as a proxy, despite Soho covering a significantly larger area.

	Male	Female
WC	1 per 500 males; plus 1 per every additional 1,000 males or part thereof. Where urinals are not used, WC numbers to be half of those used for females	1 per 100 females up to 500, plus 1 per every additional 200 females or part thereof
Urinal	2 for up to 500 males, plus 1 for every additional 500 males or part thereof	N/A

Based on our analysis of the footfall data (see section 3.2), peak daytime visitors are over 100,000 on a Saturday afternoon and around 18,000 after midnight.

Assuming visitors during the day and evening are 50/50 male and female, the minimum requirement for toilet provision would be:

Nighttime

Based on 9,000 male and 9,000 female visitors after midnight on a Saturday, the minimum requirement compared with the current permanent provision is as follows:

	Male (min requirement)	Male (current provision)	Female (min requirement)	Female (current provision)
WC	10	1	48	1
Urinal	19	1	N/A	0

Even if the 10 temporary chemical toilets are included, WC provision for both males and females is significantly inadequate.

Notes:

Females: 5 WCs for the first 500 females, plus 43 WCs for the additional 8,500 female visitors.
Males: 1 WC for the first 500 males, plus 9 WCs for the additional 8,500 male visitors.
Males: 2 urinals for the first 500 males, plus 17 WCs for the additional 8,500 male visitors.
The 1 WC shown against male and female current provision refers to the Broadwick Street APC.
Urinals for females could be a potential solution, via the likes of PEEQUAL (See Appendix 12).

Daytime

Based on 50,000 men and 50,000 women visitors during the day, the minimum requirement compared with the current permanent provision is as follows:

	Male (min requirement)	Male (current provision)	Female (min requirement)	Female (current provision)
WC	51	5	253	7
Urinal	102	6	N/A	0

Notes:

Females: 5 WCs for the first 500 females, plus 248 WCs for the additional 49,500 female visitors.
Males: 1 WC for the first 500 males, plus 50 WCs for the additional 49,500 male visitors.
Males: 2 urinals for the first 500 males, plus 100 WCs for the additional 49,500 male visitors.
The current provision for male and female both include the Broadwick Street APC.
The current provision also includes the 4 male cubicles, 5 urinals and 6 female cubicles at the Carnaby / Great Marlborough Street facility, which is open until 6pm.
Urinals for females, as provided by the likes of PEEQUAL, could potentially be a part of the solution.

3.3 Footfall analysis

In order to calculate a suitable level of toilet provision for Soho, it has been crucial to understand how many people visit Soho each day, the peak times during the week, their length of stay, how much they spend and their specific needs.

However, readily available accurate footfall data for Soho has proved surprisingly hard to come by.

This section outlines the overall visitor numbers for the West End, local Transport for London (TfL) stations and our detailed analysis of data from the London Datastore.

a) Footfall in the West End

Based on conversations with landlords and neighbouring Business Improvement Districts (BIDs), annual footfall figures for the West End around Soho include:

Oxford Street receives 100 million visitors per year
Regent Street receives 80 million
Heart of London Business Alliance (HoLBA), in St James’s, receives 200 million

b) Footfall from TfL stations

In response to a Freedom Of Information (FOI) request, TfL provided the project team with typical daily passenger entry and exit data for for the four main Underground stations serving Soho, namely: Leicester Square, Oxford Circus, Piccadilly Circus and Tottenham Court Road, the latter including the Elizabeth Line Station on Dean Street.

Tottenham Court Road was found to be the busiest of the four, with peak entries of 99,084 and

peak exits of 98,291, followed by Oxford Circus with 72,508 and 83,561, Leicester Square with 61,205 and 51,025, and Piccadilly Circus with 40,451 and 41,799.

The busiest days of the week were Saturday and Thursday, and the least busy Sunday and Monday. A full table of the data provided can be found in Appendix 7.

c) Footfall in Soho

As footfall data from the London Data Store and Soho Monitoring Study indicate that between 80,000 and 120,000 visitors and workers access Soho on a daily basis, this equates to a minimum provision of 58 cubicles - well above the current level of 11, even with 10 temporary chemical toilets.

It is this “gap” between demand and supply which lies at the heart of Soho’s ‘toilet trouble’. More data and detail on the footfall analysis can be found in Appendix 6.

3.4 The impact of poor provision on stakeholders

This sub-section covers the impact on the various stakeholders and how it manifests itself.

a) Women

As mentioned earlier in the report, there is currently only one accessible public toilet in Soho, on Broadwick Street, and only one additional facility for female users, on Carnaby/Great Marlborough Street, which opens at 11am and closes at 6pm.

Many women we spoke to said they preferred to use toilets at local department stores. However, the availability of toilets has significantly reduced over recent years with the closure of stores such as Debenhams and Fenwick.

This is clearly inadequate, especially as women and girls make up half the population, 60-80% of shoppers in a shopping centre such as Soho are typically female, and theatre audiences are usually 70% women.

On average, women need twice as long as men to use the toilet (90 vs 45 seconds).

Historically, facilities such as (Richard) Whittington’s Longhouse (1423-1851) included equal provision for women and men. Despite the introduction of facilities such as the Camden Ladies’ Convenience in 1905, however, true toilet equality remains elusive to this day.

Subject matter experts we spoke to during the course of our research advocated overweighting female provision by a factor of 2:1 in order to provide true equivalence, given the difference in time it takes for women and men to urinate.

b) People with disabilities and medical conditions

With around a third of Britons either disabled, over 55, or suffering from medical conditions such as prostate cancer, Crohn’s and Colitis or Irritable Bowel Syndrome (IBS) that make them “urgent users” of toilets, it is no surprise that the current level of provision limits the time that many potential visitors spend in Soho - or makes them avoid the area altogether.

For example, up to 20% of the UK population suffers from IBS (Irritable Bowel Syndrome) and studies suggest that up to 25% of people have some degree of paruresis (Shy Bladder Syndrome).

Indeed, almost 40% of respondents to our visitor survey who reported needing frequent access to a toilet for medical reasons said that they avoid visiting the area when they can because of concerns related to toilet provision.

As previously mentioned, the 'purple pound' (the spending power of UK households with at least one disabled person) is estimated at £274 billion per annum in the UK and thus poor toilet provision could mean lost revenue to Soho's businesses.

c) Older visitors

Too many older Londoners currently avoid leaving their home as much as they would like because they are not confident they will be able to access a toilet if they need to. This is a key cause of social isolation. To tackle this, as part of its Out and About campaign, AgeUK has launched 'London Loos' - a call for better public toilet provision in the capital.

One in five of older people interviewed by AgeUK London experience 'the loo leash' - where people don't leave home as much as they might like because they are anxious they won't be able to find a toilet when they need to. The AgeUK survey also revealed that 9 in 10 Londoners (90%) sometimes, or always, consider whether there is a public toilet available before leaving home.

The same concern can mean people drink less than required, which can lead to dehydration. Dehydration is associated with a higher risk of ill health in older people, from having an infection, a fall or being admitted to hospital. For those that can't walk or wheel far or fast the lack of toilets can be more acute. Three quarters of the population say that there are not enough toilets in their area.

And the economic impact? As already mentioned in this report, the 'grey pound' (the spending power of UK consumers over the age of 50) is estimated at £320 billion p.a. by Saga PLC, a company specialising in holidays, insurance and other financial products aimed at older consumers.

Numerous people we spoke to also pointed to a perceived change in the demographic of the out-of-towners drawn to Soho post-lockdown.

With fewer family-friendly productions being performed in the neighbourhood's theatres, and older customers increasingly concerned about "getting caught short", there appears to be a shift towards increasing numbers of young and middle-aged male drinkers, with the youngest predominantly consuming off-sales alcohol in areas such as Soho Square, and the 35 to 40-year-olds with the financial wherewithal to do so packing out the area's pubs and clubs.

"I think [the current situation] definitely excludes some people from using Soho, with older demographics and families staying away, and a younger, more hedonistic crowd, who are more reckless with the public realm, taking their place."
- Council officer

d) Residents

Over the course of our research, many residents recounted tales of urination and defecation on their doorsteps, in stairwells, and even in communal lobby areas of their buildings.

The impact of street urination and defecation in Soho affects residents particularly heavily, with the exposure to excreta and resulting distress posing risks to both their physical and mental health.

At the same time, the vast majority we spoke to complained of the detrimental effect of the current temporary toilet provision on the Soho Conservation Area, describing them as ugly, expensive, unsanitary, obstructive to pedestrians and unsuitable for open public space, with male users' genitals clearly visible to passers-by, especially at children's eye level.

During one site visit made by our team, in the middle of the afternoon, the female councillor accompanying us was visibly shocked when a man began urinating into one of the units positioned by the south gate of Soho Square Gardens just as we were passing through.

e) Businesses

Over the course of our research, a majority of businesses also told us that they had personally witnessed people urinating and/or defecating in the street in Soho, with many citing it as a regular occurrence.

Several interviewees and focus group respondents highlighted the health risks posed by the prevalence of faeces in a densely populated area in which the preparation of food (on the street, in the case of Berwick Street Market) is one of the most important economic activities.

A majority of businesses also reported that they spend an average of 3 hours per week cleaning urine and other waste from the outside of their premises, equivalent to an additional annual cost of £495 per business, when applied to the London Living Wage of £13.15 an hour. This mean average calculation conceals the fact that for businesses in high-risk parts of Soho, however, the annual cost will be significantly higher.

f) Tourists

Tourism contributes £76bn to London's economy, employing about 1 in 5 workers in London.

London is the international gateway to the rest of the UK, and a vibrant inbound tourism industry here in the capital helps to increase the number of UK-wide international visitors, benefiting destinations across the country.

Inbound visits to London are edging closer towards pre-Covid 2019 levels, with the full-year figure of 20.27m international visitors to London in 2023 compared to 21.7m in 2019 from International Passenger Survey data.

Figures for London from the start of 2024 are still to be determined, but VisitBritain's provisional update shows that for the first time, UK inbound visits surpassed pre-pandemic levels, reaching

8.7m visits in Q1 2024, whilst UK visitor spend tracked higher than Q1 2019.

But we haven't fully recovered yet - and some of London's competitors have done better.

The tourist visitor numbers and overall spend are not available at the Soho level. However, we do know from the surveys that toilets are an important factor in deciding whether or not to visit - see section 3.6.

g) Nighttime economy workers

According to the London Datastore there are around 1.37 million people working in London during the evening or the night.

This includes people who work in health, professional services, accommodation and food services, transportation, arts, entertainment and recreation.

Various studies suggest there can be long-term health effects such as an increased frequency of urinary tract infections, incontinence, kidney stones, constipation, haemorrhoids, appendicitis and colon cancer, arising from the lack of adequate toilet provision. This can negatively impact nighttime workers given the closing time of the Carnaby/Great Marlborough Street toilets at 6pm as well as reduced access in bars and restaurants.

h) Rough sleepers

The majority of people we spoke to did not believe that rough sleepers were a significant contributor to the problem of open urination and defecation in Soho.

What became clear from our research, however, is that homeless people suffer disproportionately from discrimination by businesses who otherwise allow non-customers to use their toilets.

There is provision at Network Rail stations open to all, as well as facilities at The Connection at St Martin-in-the-Fields, but these are time limited and not within the boundaries of Soho.

A number of toilet providers we interviewed highlighted the need to incorporate design features to any new facilities to deter rough sleepers from using them as accommodation and thereby preventing others from accessing them for the purpose for which they were intended.

3.5 Sources of funding

The financing of the further provision and management of public toilets in Soho is a critical issue in dealing with the antisocial behaviour of street urination and open defecation. A number of means exist to get additional resources into the neighbourhood.

a) Late Night Levy

The City of Westminster has one of the highest concentrations of late night licences in the UK, yet no Late Night Levy, whilst adjoining boroughs like Camden, which also covers a third of the West End, has had one since 2016, covering nightspots like Camden Town.

The City of Westminster has over 3,700 licensed premises in total. These include nearly 500 pubs, bars and wine bars, over 1,000 restaurants, 56 theatres, 136 nightclubs and dance venues with licences to serve alcohol. In Soho itself, it is estimated that there are 495 licensed premises, of which 121 have late night licences with terminal hours between 1.00 and 6.00am. These late night licensed premises have a capacity of 22,827. More recently, between 2020 and 2023 an additional 51 new alcohol licences were granted, with a capacity of over 4,245.

The West End Cumulative Impact Zone has been identified because the cumulative effect of the concentration of late night and drink-led premises and/or night cafés has led to serious problems of disorder and/or public nuisance affecting residents, visitors and other businesses.

The extent of crime and disorder and public nuisance in the Soho neighbourhood arises from the number of people there late at night, a considerable number of them being intoxicated.

New public services would include police, health and emergency, transport, and environmental services (cleansing and refuse services) in places like Soho under chronic strain from existing levels of activity, adversely affecting civic amenities and the quality of residential life.

The levy, before it comes into force, requires the licensing authorities to consult with the Metropolitan Police, the Mayor of London, licensed premises and other relevant authorities before deciding whether to introduce the levy in the area.

Under the standard terms of the levy, the police would receive at least 70 percent of net levy revenue, with the licensing authority retaining up to 30 percent to fund other activities besides policing, although the precise division of this revenue split is open to negotiation. So, along with funding the enforcement of the law by the Police with regard to urination, defecation and other antisocial behaviour associated with alcohol intoxication, it can help fund facilities for the relief of such antisocial behaviour on the street, as well as the management of new or existing public toilet facilities.

After meeting with Camden Council representatives and discussing their Late Night Levy, it is clear that there is much to be learned from their experience in Camden Town since 2016, and scope for WCC to work together with Camden on late night issues across the whole of the West End.

With its 180 licensed premises and 8,000 residents, Shoreditch's profile is quite different from

Soho's but it does share many of the same challenges related to the hosting of a thriving nighttime economy. As unlikely as it may seem, Shoreditch has even fewer public toilet facilities than Soho - just one, in Liverpool Street Station. What it does have, however, is a successful Late Night Levy, which it uses to pay for temporary toilet provision, additional policing, accreditation and training of door staff, and a WAVE radio system connecting them to a team of local enforcement officers - all of which make a night out in Shoreditch a safer and more pleasant experience for visitors, and help to mitigate against the sort of "residential cleansing" which has hollowed out Soho's resident population in recent years.

The amount levied on businesses is set at a national level, according to rateable value, and applied across the whole of the local authority, so it would not be too difficult to calculate the amounts involved annually, once it is established in which rateable value bands the late night licences exist within the City already. Once the figures have been established and consultations undertaken, it would be realistic for it to be incorporated into the budget for 2025/26. At present, estimated annual Night Levy revenues for Westminster City Council range from £500,000 upwards.

There is also a case to be made for a London-wide levy which, if implemented, could make an even more significant difference.

Furthermore, our survey of businesses' views on potential solutions suggests some openness to the idea. When asked about the idea of introducing a Late Night Levy, businesses were fairly evenly split, with a small majority in favour.

Given the costs of the additional temporary facilities that the Council currently deploys in Soho, one does wonder why the previous administration has not done this already. It would also help the new administration to distinguish itself from its predecessor. Interestingly, premises that are members of Business Improvement Districts (BIDs), can qualify for a 30 percent discount, which could potentially strengthen the case for the creation of a BID for Soho.

b) Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area using an annual Westminster Charging Schedule calculation. The money can be used to fund a wide range of infrastructure that is needed as a result of development.

Public infrastructure includes all kinds of services and facilities needed to support life in the City of Westminster. Infrastructure includes roads and public transport, communications services like broadband, water and wastewater systems and drainage, schools, sporting and recreational facilities, parks and other open spaces, railway stations, bus stops, and community centres. Public realm improvements and creating new public spaces and community facilities such as playgrounds, community hubs, and other places where people gather. Toilet facilities should also be seen as public infrastructure.

"Public toilets are a vital piece of social infrastructure. They are about health and wellbeing, ridding the body of toxins while out and about. They are also about social inclusion, allowing the elderly, young families, pregnant women, people with disabilities and medical conditions such as Crohn's and Colitis to have freedom of mobility and play a meaningful role in their communities."
- Toilet expert

The present CIL collected in Soho is £581,445.31, of which £94,200 has been spent already, leaving £487,245.31 still to be allocated and spent. Future developments in Soho and the surrounding area would lead to further CIL monies becoming available, such as the major proposal currently being worked on in respect of Huguenot House, off Leicester Square.

c) Overnight Levy / Tourist Tax

Tourist taxes, also known as transient visitor levies, are typically small fees that are levied indirectly through accommodation providers or holiday companies. They are usually aimed at overnight visitors and can be charged in a variety of ways, such as:

- Per person or per room
- As a flat-rate fee or a percentage of the room charge
- For all nights spent in the hotel or capped at a certain number of nights

Tourist taxes are not currently permitted by law anywhere in the UK. However, there are some parts of the country that have implemented or are planning to introduce a form of tourist tax.

Some city councils have introduced a tourism-based Business Improvement District (BID) as of April 1, 2023. This is a legal workaround, using existing legal powers, to establish a form of tourist tax.

For example, 73 hotels and serviced apartments in Manchester have signed up to its BID scheme - its £1 per room, per night fee is estimated to have raised about £2.8m in its first year.

Visitors to Dorset (Bournemouth, Christchurch and Poole) have had to pay an extra £2 levy per room, per night from July 1 2024 - which is expected to raise £12 million.

Elsewhere, the Visitor Levy (Scotland) Bill will allow local authorities in Scotland to add a charge to overnight accommodation such as hotels, B&Bs and holiday lets, and the Welsh Government is also planning to introduce similar laws.

Westminster City Council urged the Government in September 2023 to enable local authorities to tax tourists on stays. Under its proposals, a levy would be placed on hotel, B&B and short-term let rooms, collected by accommodation providers and paid to the Council. Its 'fundamental argument' for the tax is that visitors benefit from but do not pay for local infrastructure, such as additional cleansing and waste collection.

d) Contactless charging for toilets

According to Westminster City Council (WCC) committee reports in September and December

2023, public conveniences had been generating much lower income than anticipated, primarily because the entrance barriers were still coin-operated and in the post-Covid world, fewer people now carry cash/coins.

Since the conversion of WCC's toilet facilities to contactless charging, however, there has been an uptick of 60-70% in revenue generated, according to one toilet provider we spoke to - although they also highlighted the difficulty of making a meaningful comparison with pre-Covid figures.

Service costs have also increased to cover expanded temporary toilet provision in the West End, security staff to deter criminal activity/ASB, and essential compliance works.

Approximately 40-50% of Council PC revenue is believed to be lost due to 'tailgating' (two people squeezing through the barrier together) or users jumping the barrier altogether, although such activity is normally confined to the busiest periods.

Whilst it is generally accepted that most paid-for public toilets are unlikely to turn a profit - or even to fully cover their maintenance costs - the revenues from contactless charging for the non-urinal units proposed in this document are expected to offset the cost of their upkeep considerably.

e) Parking fees

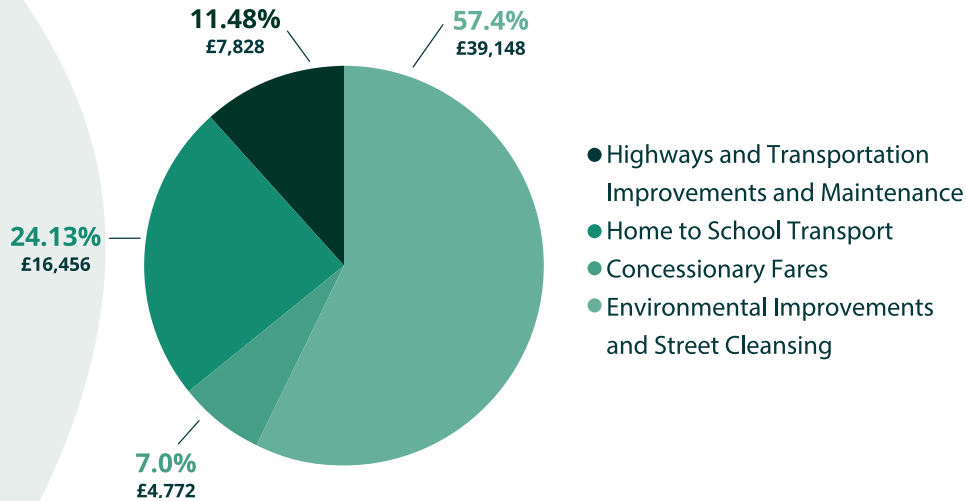
Westminster City Council (WCC) netted £72m in profit from motorists parking in 2022 to 2023 - the most of any local authority in the country.

WCC is bound by legislation to reinvest any surplus made from parking services in prescribed transport related activities only. This is recorded through a memorandum statement, the Parking Places Reserve Account (PPRA), which details the Parking surplus and how it has been reinvested.

In 2022/23 the four main areas of funding were Highways & Transportation Improvements/ Maintenance (£39.15m), Environmental Improvements & Street Cleansing (£16.46m), Concessionary Fares (£7.83m) and Home to School transport (£4.77m).

As long as toilet facilities are included as environmental improvements and street cleansing, they should be eligible for funding from parking and licensing income of the Council.

What the PPRA Contributed to in 2022/23 (£,000)



f) Table & Chairs Licence fees

Until 2020, Table & Chairs (T&C) licences were administered under the 1999 Act. The Council was able to set this fee to recover its costs administering the regime.

However, since the introduction of the Business & Planning Act 2020 ("B&PA 2020") the fee for applying for T&C licences has been set by the Legislation. The B&PA 2020 has now been extended to September 2024.

The Levelling Up and Regeneration Act 2023 makes the provisions of the B&PA permanent and will introduce an increase in the fee, but it is set by statute and the Council has no control over the maximum amount.

Even if the fee is set at the highest level, we understand it will not cover the cost of administration and thus would not provide extra money for toilets. For this to be a viable funding option, the national Government would need to increase the maximum fee or allow the Mayor or Local Authorities, like WCC, to set the level locally.

g) Business Improvement Districts (BIDs)

Business Improvement District (BID) is a defined area within which businesses elect to pay an additional fee (or assessment) in order to fund projects within the district's boundaries - including street cleaning activities - and this could potentially be used for public toilets.

As per the map below, most of the West End is covered by BIDs but not Soho - sometimes referred to as the 'West Berlin' of BIDs. However, there does not seem to be an appetite from local businesses and property companies to form a BID at present.

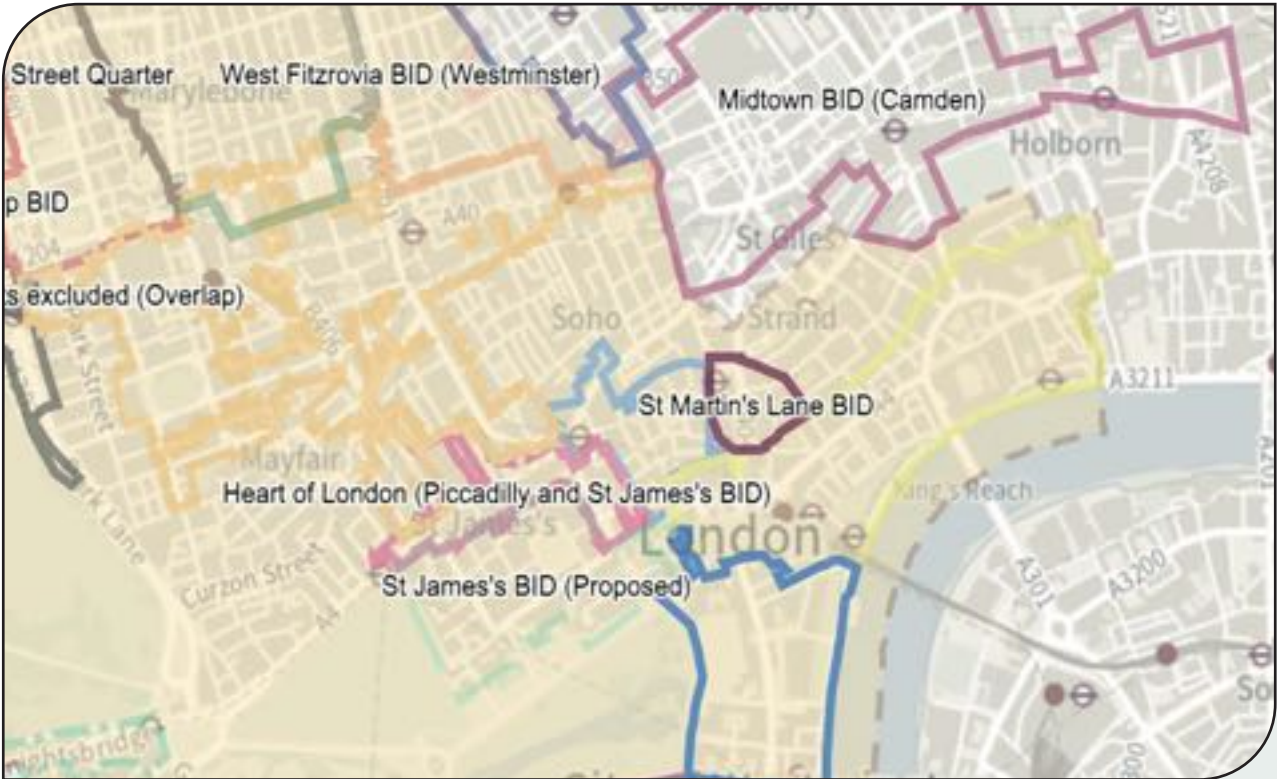


Fig. Map of BIDs around Soho, with the City of Westminster in yellow

h) Willingness to Pay (WTP)

Our Visitors Survey showed that domestic visitors are willing to pay to use a toilet when they need one. This could make a contribution to the running costs of facilities provided.

- 16.5% of respondents would be willing to pay 50p
- 14.1% would be willing to pay £1
- 20.9% would be willing to pay £1.50
- 16.9% of respondents would be willing to pay £2
- 18.6% of respondents indicated that they would be willing to pay £2.50

i) Spend to Save

Under Section 93 of the Local Government Act 2003, Westminster City Council has the power to charge for discretionary services like public conveniences and other ancillary facilities. Discretionary services are those services that an authority has the power but not the duty to provide, where the authority may charge the person who receives the services and has agreed to their provision.

Spending on further public toilet facilities can thus be provided based on the savings made on public resources in terms of the policing of crime and dealing with the public nuisance of street urination and defecation, in compliance with the Green Book on Appraisal and Evaluation in Central Government.

3.6 What do stakeholders think?

During the course of the study we surveyed visitors, businesses, residents and experts. This is summarised below.

a) What do visitors think?

As part of this study we carried out an online survey of 474 visitors. An overview can be found below, with the survey detail in Appendix 9.

A few key findings:

- Almost 47% of respondents reported experiencing difficulty finding a toilet in Soho.
- 27% of visitors surveyed indicated that they try to avoid trips to the West End because of public toilet provision.
- 52% of visitors report that they have witnessed someone urinating or defecating in the street in Soho, a number that increases to almost 64% amongst people who visit Soho at least once per week.
- 19% of visitors stated that they require frequent use of a toilet due to medical needs, age, or other factors, and 13% of respondents reported that they need an accessible toilet.
- 7% of respondents admitted that they had urinated on the street in Soho in the past, with the vast majority of these (over 90%) saying that they did so because they were unable to find a toilet.
- 60% reported that provision was better in the other city or cities they had visited.
- Visitors with special needs are more severely affected than others.

- Temporary toilet facilities are generally accepted as a means of reducing the impact of public urination.
- Most visitors are willing to pay to use a toilet when they need one.
- Economic activity in Soho could be increased if issues related to toilet provision were addressed.
- 73% of respondents reported that they have used a toilet in an establishment (such as a pub or restaurant) where they were not a customer.

London & Partners, the capital's business growth and destination agency, also provided the project team with the following headlines from its own research data, ranking Westminster against other London boroughs, the London average and 10 competitor global cities, based on aggregated customer review scores from sources including TripAdvisor, Google Maps and Booking.com.

Toilets: Westminster ranks 20th out of 33 London boroughs, with an average score of 6.3/10, compared to the London average of 6.6 and competitor city average of 7.8

Overall satisfaction: Westminster ranks 15th out of 33, with an average score of 8.4/10, compared to the London average of 8.4 and competitor city average of 8.7

Spend for Soho: Soho ranks #2 in London for both leisure and retail spend, according to Mastercard spend data

b) What do businesses think?

As part of this study we carried out a door-to-door survey of 151 businesses across Soho. This represents a sample of 15% of the 1019 Businesses with shopfronts in the Soho area, a figure calculated by analysing Experian ShopPoint data. An overview can be found below with the survey detail in Appendix 10.

A few key findings:

- Businesses feel the impact of the toilet provision issue in Soho.
- Most businesses are open to engaging with potential solutions, though they don't want it to become their responsibility to resolve the problem.
- On average, businesses spend around 3 hours per week cleaning outside their premises due to urination and defecation, at an estimated cost for staff time of over £300,000 p.a.
- 80% of businesses think the lack of toilet provision in Soho damages Soho's reputation.
- 40% of business customers have complained about experiencing urination/defecation on the streets of Soho.
- 56% of businesses would allow non-customers to use their toilets at least occasionally.
- Over 30% of businesses ranked general security as the top reason for not allowing non-customers to use their toilets, followed by cleanliness (24%), potential drug-taking (23%) and shortage of facilities (22%).
- 65% of businesses would be in favour of a "Night Levy" on premises with late licences, to contribute to new toilet facilities and their cleaning and maintenance, as well as additional police.
- 85% of businesses would be okay with a public toilet within 100m of their business.

c) What do residents think?

As part of this study we sought the views of Soho’s residents. An overview can be found below, with more detailed feedback in Appendix 11.

Methodology

We conducted two focus groups with residents, asking for their opinions on the nature of the problem, how it affects their lives, and their thoughts on existing and potential future solutions.

A few key findings:

Unsurprisingly, residents were very concerned about the scale of the problems caused by a lack of proper toilet provision in Soho.

“WCC shouldn’t be granting any new licences, as Soho is saturated and many streets have virtually no retail, only F&B.”
- Resident

“The Portaloos are disgusting - I would rather go in the street.”
- Resident

d) What do the experts think?

During the course of the study we held in-depth interviews with over 70 experts. This included 12 manufacturers, operators and design specialists, 9 Westminster City Council Councillors/Cabinet members and officers, 7 Business Improvement Districts and community and business associations, 7 Special Interest Groups and charities, 2 Parliamentary candidates and 2 London Assembly members plus London’s Night Czar, and representatives from Transport for London and the Metropolitan Police. We also joined relevant events, such as that hosted by The London Society on 21 November 2023.

A few key findings:

The in-depth interviews brought about an abundance of intelligence which has been processed and used to guide our recommendations. Key findings from this part of the research include:

- Manufacturers/suppliers:** Several of the manufacturers are already active in Soho and the surrounding areas and have existing agreements with Westminster City Council and those of neighbouring boroughs. Using one or more of these companies would therefore simplify both the procurement, planning and installation processes, given their familiarity with the local environment and council procedures.
- Construction costs:** According to the manufacturers we spoke to, the cost of installing new, above-ground public toilets in Soho ranges from around £40,000 for a single ‘flip-up’ urinal to approximately £153,000 for a modular unit comprising 1 accessible cubicle, 3 standard cubicles and 1 (free to use) urinal, with a number of other options available, subject to space

constraints and other considerations (Note: provision of contingency budget should be borne in mind in case of difficulty in connecting to the necessary utilities due to Soho’s crowded subsurface).

- Cleaning and maintenance costs:** According to the British Toilet Association (BTA) and several manufacturers we spoke to, each PC costs between £5000 and £15,000 per year to clean and maintain, depending on location, type and other factors.
- Attendant costs:** The BTA works with a guideline cost of £36,000 per full-time toilet attendant per year (£20k for part-time), including salary, taxes, pension, equipment and relief cover. Allowing for the London Living Wage, a seven-day week, and extended opening hours, however, we estimate that a figure of nearer £60,000 per year is more realistic in the Soho context.
- Security implications:** During the course of our expert interviews, we spoke to two Metropolitan Police Design-Out Crime Officers (DOCOs), who took a keen interest in the project and highlighted a number of considerations to be taken into account in terms of the design and location of any proposed new facilities, particularly given the correlation between the concentration of licensed premises and incidences of crime. Among their recommendations was that a UrliLift Triple telescopic urinal would be preferable to the proposed above-ground APC above the Carnaby/Great Marlborough Street underground toilets, although this alone would not address the serious lack of accessible and female provision in the area.
- Health and wellbeing implications:** A number of our expert interviewees and focus group participants highlighted the dangers posed by street fouling in an area of high concentration of food and beverage premises, and the impact of a lack of available toilet provision on vulnerable groups, such as older people, the homeless and those suffering from medical conditions such as prostate cancer, Irritable Bowel Syndrome (IBS) and Crohn’s and Colitis. The economic ‘hit’ of excluding such groups from participating in the Soho economy should also be weighed against the cost of installing accessible or Changing Places units to cater for their needs.
- WCC’s Public Toilet upgrade programme:** As mentioned earlier in this report, £6.5 million is currently being spent on the refurbishment and improvement of 8 facilities across Westminster, and recent indications suggest that the final budget may be considerably higher.

Expected Completion	Location	Comment
2024/25	Victoria Embankment	Currently closed, completion expected late October
2024/25	Parliament Street	Currently closed for refurb, public directed to Westminster Pier. Completion expected January '25
2024/25	Piccadilly Circus	Now with contactless charging. Set to close mid-October for refurb
2024/25	Green Park	Refurb expected February '25
2025/26	Covent Garden	Dates not known, refurb expected summer '25
2025/26	Carnaby / Great Marlborough Street	Current plans (subject to planning applications): Carnaby Street - Spring '25 Westminster Pier - Autumn '25 Leicester Square - early '26
2025/26	Westminster Pier	
2025/26	Leicester Square	

The only facility on the list within Soho, Carnaby/Great Marlborough Street, was the subject of a feasibility study looking into three potential options. Of these, two (the basic refurbishment and conversion to unisex) have now reportedly been dismissed, with the high-quality/aspirational option (potentially including including a new, 24-hour, accessible APC at ground level) currently the favourite, although the APC may encounter resistance from neighbouring businesses and Met Police DOCOs (who favour a pop-up/UriLift option instead).

A separate tender to replace three APCs and four urinals across the borough, including the 'butterfly' urinal in Soho Square, was won in May 2024 by WCC's incumbent maintenance contractor, DANFO (UK) Ltd.

- **TfL's Station Toilet Retrofit Programme:** Green Party Greater London Assembly (GLA) Member Caroline Russell has been campaigning for better public toilet provision in London for a number of years. Her November 2021 report *The Toilet Paper: Improving London's Loos*, was instrumental in drawing attention to the issue, and led to the Mayor's announcement of £3 million of additional funding per year for toilets over the course of his current term, on winning reelection in May.

The report advocated a three-pronged strategy, comprising Duty, Directions and Data. Its recommendations can be found in Appendix 15.

The Mayor's response to the report in January 2022 was as follows:

"Public toilets are a vital facility for everyone, giving Londoners and visitors to our city the confidence to move around and spend time in public spaces. A lack of easy access to suitable toilet facilities is more than just an inconvenience - it can have serious implications for health and can limit people's ability to go about their daily lives as they would choose. No one should be worried about whether or not they can find a toilet that meets their needs when they are out and about in London.

I will continue to promote the provision of free, publicly accessible toilets in our city, and I would like to reassure the Committee of my commitment to doing everything within my power to support this."

A particular focus of Ms Russell's campaigning has been the lack of adequate toilet provision on London's transport network. "The mayor talks of a lack of resources, but the more we invest in the accessibility of the transport network for all, the more revenues will be returned to TfL," she told us in October last year, before the Mayor's announcement of additional funding in May.

Indeed, one of the recurring themes throughout our investigation was the "scandal" of no public toilets being included on trains or in many stations on the Elizabeth Line, despite its £25 billion cost, although the lack of PCs at key junction points and termini of the tube network was also repeatedly raised. "TfL stations are the worst toilet deserts!" Ms Russell exclaimed, adding that "TfL needs to ensure that no more big stations are built without public toilets."

Working on the principle that it is cheaper and easier (in most cases) to reopen closed toilets than it is to build new ones, in August 2023 TfL embarked on a major feasibility study into the possibility of reopening the tube network's 'ghost toilets' - and retrofitting new ones.

Phase 2 of the study was completed in February 2024, with Phase 3 underway at the time of writing, which comprises high-level proposals for new facilities, including detailed technical feasibility assessment.

The date of publication of the feasibility report and the allocation of the £3 million annual investment is still to be determined at the time of writing. Whether or not Tottenham Court Road tube station, the most important of Soho's ingress and egress nodes, will be included in these plans, only time will tell.

3.7 International Benchmarks and Spotlights

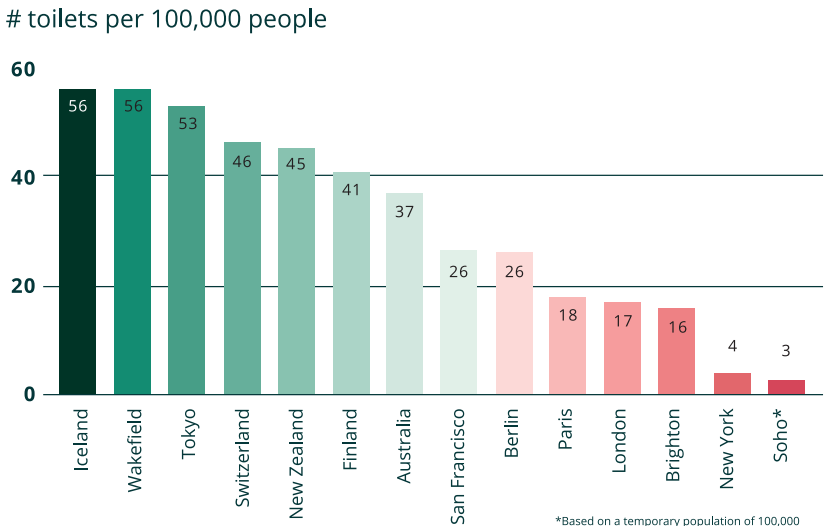
Benchmarks

A key endeavour of the project was to try to identify criteria for gauging how many toilets is the right number of toilets. As has already been alluded to earlier in the report, this is not so straightforward. Nevertheless, one such criterion is the number of public toilets per 100,000 people of population. Another is the number of public toilets per 100 square kilometres in cities and counties.

The table below - based on research highlighted in The Gate - provides a ranking of cities and countries, with Iceland and Wakefield - rather surprisingly - joint top. Wakefield has 38 toilets for its population of 107,546 and 130 public conveniences per 100 square kilometres. The city's success is said to be as a result of locals "being vocal" about its lack of facilities.

The data only includes countries with a minimum population of 300,000 people; cities of the United States with a minimum population of 250,000 people; and cities in the United Kingdom with a minimum population of 100, 000 people. Only cities with a minimum of ten public toilets were included in the dataset.

Benchmark - public toilets by city district / city / country



Source: [Public Toilets: Which Countries and Cities Have the Most – and Which Ones Have the Fewest? - The Gate \(thegatewithbriancohen.com\)](#)

In order to include Soho in the ranking we have assumed a temporary population of 100,000 which would put Soho at the bottom, with only 3 toilets.

Spotlights

A key deliverable for the project was to identify and spotlight international examples which could potentially provide inspiration for public toilet provision in Soho. This was achieved through a mix of desktop research, in-depth interviews and international site visits.

The following detailed examples from Paris, Amsterdam, Tokyo and China show what can be done with clear leadership, targeted policy and adequate funding. The section on London shows the wider issue amplified in Soho.

a) Paris, France: the largest network of public toilets worldwide

With 15 million users every year, the 435 toilets in Paris are the most visited places in Europe and France's capital has the world's largest network of automatic public conveniences (APCs). According to a ranking released in January 2023 by QS Supplies, a UK-based bathroom fittings and accessories retailer, Paris boasts the highest number of public loos per square kilometre in the world.

Of the 435 toilets all around Paris, those on main roads and near key monuments are usually open 24/7; others tend to be 6am-10pm.

435 new-generation automatic toilets will be rolled out between 2024 and the beginning of 2025. The all-new model will operate faster, with hands-free interfaces and equipped with a second urinal cabin. The capacity of the automatic public toilets in the capital will be doubled to accommodate 870 users simultaneously, while the availability of the service will be multiplied by four, making it the largest network of public toilets in any city worldwide.

Paris's public toilets have come a long way from les pissoirs of decades past. Now they're private, gender-inclusive, and high-tech: an automated washing and disinfecting system activates after each session to ensure that using a toilet or sanisette is a hygienic and stress-free process.

Said to be the most glamorous toilet in Paris, the lavatory of the Madeleine Church, a stunning Belle Époque public convenience (below right), dates from 1905. It was relaunched after closing in 2011, when it was officially listed as a historic site. The space was lovingly restored - woodwork polished to a high shine, chipped Art Nouveau tiles replaced - and a visit here costs €2 (covering the attendant and cleaning costs). It is open from 10am-6pm every day and operated by the Dutch firm 2theloo ([link](#)).



b) Amsterdam, Netherlands: building new women-friendly toilets

In April 2024, Amsterdam announced plans to build more public toilets, with an emphasis on the needs of women, at a cost of €4 million. The first new women-friendly toilet will be installed in the Oosterpark in October.

This is in addition to an investment to install a number of high-tech, self-cleaning toilets and UriLift Combis (comprising two male urinals and one female) in areas of high footfall in the city.

The discussion around public toilets in Amsterdam started with student Geerte Piening. In 2015, she was fined for public urination. She challenged the fine in court, arguing that she had no choice but to pee in public because there were too few public toilets for women in Amsterdam's city centre.

The court ruled that the fine was justified because Piening could also have gone to a male urinal, but the ruling caused outrage among women in the city, who protested by urinating in public en masse and demonstrating in urinals.

In June 2020, a study by the Amsterdam Court of Audit found that:

- Amsterdam had 112 public toilets, less than half of which may be easily used by women or people with an ambulatory disability.
- More than half of Amsterdam's busy pedestrian areas do not meet the standard of having a wheelchair-accessible public toilet located within 500 metres.
- The 112 public toilets in Amsterdam consist of 56 which are suitable for men and women and 50 which are suitable for people who depend on a wheelchair.
- 34 of the 56 toilets are free; the others require a small amount to be paid, ranging from €0.20 to €1.00.
- Only a handful of toilets are open during daytime and nighttime hours.
- The location of most public toilets is not indicated on the street.
- The main cause of the lack of public toilets is their cost.
- Amsterdam will need to build 25 to 30 additional public toilets in order to meet the city council's standard.
- These will cost approximately €4 million, and another €300,000 per year in management costs.

Despite three of our six recommended providers hailing from the Netherlands, the country has a chequered record when it comes to its own domestic provision, which ranges from the state-of-the-art to the extremely basic.

At the lower end of the scale, it has the traditional krullen (curls), the historic, cast-iron pissoirs which line the banks of the city's canals - and presumably drain straight into them. These provide minimal privacy, allowing users to make eye contact with passing pedestrians as they go about their business, and have no flushing mechanism, meaning that you really can find one by following your nose, particularly in summer. One possible solution proposed by the Court of Audit would be to replace these krul urinals with gender-neutral alternatives.

The city also boasts a number of 24-hour-style 'toilet shops' on popular shopping streets, and a destination 'Sexy Loo' in its red light district (more on which can be found elsewhere in this report), while mobile apps such as HogeNood ([link](#)) give the location of nearby public toilets, as well as information about the toilet, such as price per use and how well it is rated by other users.



c) Tokyo, Japan: the pinnacle of toilet design

Key facts about Tokyo and its toilets:

- In 2021, the contribution of the tourism industry to the gross domestic product (GDP) in Japan amounted to 3.4 trillion Japanese yen - close to £18 billion.
- Based on Navitime, Japan's popular navigation app, there are 186 public toilets in the city of Shibuya, giving us an average of 12.3 bathrooms per square kilometre.
- If we broaden the search to Tokyo's 23 wards, we still have a solid score of 8. This compares with Paris which has 6.72.

Possible toilet solution - iconic toilets



As mentioned earlier in this report, Japan's toilets and Tokyo's in particular, have long been regarded as the summit of sanitary sophistication to which all other countries aspire. But why should this be so? And might there be aspects of the Japanese approach to PC provision that could be applied to the Soho context?

To find out, we spoke to Dr Junko Kobayashi, then chair of the Japan Toilet Association (JTA) and CEO of the Gondola Design Office in Tokyo, excerpts of which conversation can be found below.

Over the course of her distinguished 36-year career, Dr Kobayashi has designed numerous inclusive public toilets in over 250 locations. Her designs are built on the principle that the toilets must be safe, clean, and easy to use for everyone, while providing users with a sense of comfort.

Gondola's work spans public toilet designs for various types of spaces, including shopping centres, train stations, parks, schools, and hospitals. In recent years, the company's activities have expanded from solely toilet design to the design of whole facilities, town planning and similar projects.

The Japan Toilet Association - Founded in 1985, the JTA is a not-for-profit organisation whose members include researchers, doctors, toilet installation companies, designers, creators, manufacturers, maintenance workers and cleaners, as well as private individuals interested in the subject. A regular symposium is held once a year, and seminars once a month, in addition to various study groups, committees, etc. The association has three main goals: 1) To "create a toilet culture", 2) To create a comfortable toilet environment, and 3) To improve social issues related to toilets.

Socio-cultural factors - According to Kobayashi-san, the most important factor is Japanese people's "fondness for a cleansed atmosphere", which informs the basic design principles to create facilities and spaces that allow all users to enjoy toilets that are easy to use, safe, clean and comfortable. In December 2022, Dr Kobayashi's own design company, Gondola Inc conducted a survey of around 1,000 people, which found that 30% of people go to retail/commercial facilities just to use their toilets, without shopping, principally due to the comfort of these facilities. With this in mind, the owners of these retail outlets put a lot of emphasis on improving the quality of their toilets, in order to attract more customers. Consequently, the number of clean and comfortable toilets in Japan has increased over the years.

The Tokyo Toilet Project (TTT) - Conceived and implemented by the Nippon Foundation, a private, non-profit, grant-making organisation, and funded by the billionaire founder and CEO of

the Uniqlo clothing retail chain, Tadashi Yanai, TTT has garnered headlines and plaudits around the world for the high standard and aesthetic appeal of its facilities. Whilst it is generally accepted that there are many clean toilets in Japan, there is a great disparity between the high standard of corporate and commercial facilities and their counterparts found on street corners or in parks, which can be dirty, dark, smelly and scary, particularly for women, who hate to use them. TTT was conceived to change this preconception and create a “modern urban town”, with cosy public toilets that allow users to perform their natural functions without undue stress. To achieve this, the Foundation invited 16 globally renowned designers and creators, including Kobayashi-san, to each design a “toilet temple” to be sited at 17 locations in Tokyo’s Shibuya district. The three basic requirements were cleanliness, safety and ease of use, with the architectural design and technical features of each determined by its relationship to its surrounding environment, so each one is distinctive, with its own “priority proposal”. The toilets provided the setting and subject matter for Wim Wenders’ acclaimed 2023 film, Perfect Days, which was also partly funded by the Nippon Foundation.

Vandalism and poor maintenance - According to Dr Kobayashi, this is the most difficult issue surrounding public toilet design. Even if it is designed and completed with the utmost care during the manufacturing and construction phase, it can still be vandalised or poorly maintained, resulting in a lack of comfort soon after completion. Even in Japan’s well-ordered, polite society, there are some people who intentionally vandalise toilets - including TTT ones - although the reasons for it remain obscure, as there is no investigative data into the occurrence. There is only one case of a TTT toilet being rendered inoperable by the deliberate actions of a user. Kobayashi-san believes that the best way to design public toilets to discourage vandalism is to “have an open facade, using glass and wooden lattices”. She also strives to create designs that will make users, especially children, fans of the facilities, so they will want to look after them.

Costs - Although the construction costs of public toilets in Japan are not generally publicly available, Dr Kobayashi’s own designs vary between 2 million yen (about £11,000) and 1 million yen (about £5,500) per square metre, with annual maintenance costs of between 1.5 million yen (about £8,250) and 18 million yen (£99,000).

Charging - As Japan has many clean, free toilets for public use, the number of pay-to-use toilets is relatively low, and these attract few users. Even the paid toilet designed by Kobayashi-san in Tokyo’s Akihabara station gets only 250 users a day, despite 190,000 passengers passing through the station daily. She surveyed the country’s paid toilets for 19 years, from 1994-2013, during which time she identified 37 such facilities, with 24 being removed or converted to free-to-use. The current situation is unclear, as she no longer conducts ongoing surveys. Japan’s paid toilets are closed at night, resulting in some people defecating outside them and causing a health hazard. However, this occurs much more rarely now, as many people use the toilets in the country’s convenience stores, which are open around the clock.

Adequate provision - Although there are formulas for calculating the numbers of toilets needed for buildings in Japan, there is no formula for calculating the number required in cities. In order to determine the appropriate number of toilets required, Dr Kobayashi’s design office would need to survey the numbers of people using existing facilities, to determine peak times of day, which will be used as a reference for the design. She believes that she could conduct a survey at a location in Tokyo with similar footfall to Soho to establish this.

Design considerations for a Soho toilet - Kobayashi-san believes that the most important considerations are maintaining safety and cleanliness, but also making the toilet as attractive as possible, to encourage the greatest number of users. It should therefore have an open facade, combined with a cosy cafe, an information centre, etc, so that the resulting “eyes” and footfall will ensure its safety. Also, it is important to take into consideration the views of maintenance staff and cleaners, as they will “feed” it, once it is built.

Value of toilet provision - Sadly, there is no formula for calculating the economic value of toilet provision in Japan, as people there regard free toilet provision as a given, and expect public companies to provide them as a matter of course.

A ‘Japanese toilet embassy’ for Soho? - As Dr Kobayashi has expressed her interest in “helping to design” a Soho toilet, and Uniqlo has a substantial presence in London, including six outlets around the edges of Soho, perhaps there might be some mileage in exploring the possibility of designing and installing a “showcase” Japanese toilet in a high-profile location with an evident need, such as Soho.

d) China: the Toilet Revolution

In 2015, President Xi Jinping launched a nationwide ‘toilet revolution’ to improve the sanitary conditions of public conveniences in mainland China, including at tourist attractions, about which foreign travellers had long complained.

By 2020, city councils had added 68,000 more public toilets; by the end of 2022, 73% of rural residents reportedly had access to flush toilets.

Official data show that China now has 370,000 government-built public toilets in cities and towns, not including those in parks, scenic spots, or operated by private companies.

Beijing tops the ranking among Chinese cities, boasting 20,000 public toilets. Many even claim that Beijing has the highest number of public toilets in the world.

No matter where you are in the Chinese capital, the urban area map on your smartphone will show a public toilet within 500 metres.

These toilets are well maintained and classified into five categories, according to certain criteria including sanitaryware, sanitary condition and upkeep - and at least one cleaner is employed in each toilet to ensure that it is kept dry and clean around the clock.

In some cities and towns, government organisations and public service institutions are required to allow the public to use their toilets, and many commercial organisations have been asked to do the same.

The public can use these toilets for free. So spoiled are the Chinese people by these public facilities that many of them, after returning from an overseas tour, reportedly complain about how difficult it is to find a toilet in the foreign countries they have just visited - and how much they have to pay to use one if they find it.

President Xi has been praised for his leading role in the campaign.

Nevertheless, some residents in older, poorer urban areas are said to continue to rely on chamber pots and neighbourhood waste collection services. And not all newer areas are connected to the municipal sewage network yet, and depend on septic tanks that have to be emptied frequently.



“We’ve got vast swathes of public space given over to bicycle parking. If we can make that much space for bicycles, can we not take some space for a toilet block?”

- Resident

4. NEW LOCATIONS/SOLUTIONS FOR SOHO

Due to the unique nature of Soho and the many competing elements and challenges, it is almost impossible to find the perfect solution. As one interviewee suggested, “It is about finding the least worst option.”

Taking this approach, we have attempted to balance the many competing needs of stakeholders, whether it be residents, businesses and visitors (both daytime and nighttime), people with specific needs, the police and the Council.

During the course of the study we have identified eight potential locations as shown superimposed on the ‘wild toileting hotspot’ map below:

1. Soho Square - North
2. Soho Square - South
3. Charing Cross Road / Moor Street
4. Wardour Street, by St Anne’s Gardens
- 5a. Little Marlborough Street OR
- 5b. Carnaby Street / Gt Marlborough Street
6. Ramillies Street / Gt Marlborough Street
7. Noel Street



Details on each of the locations and solution options identified can be found in the remainder of this section, although firstly we summarise the costs and the associated business case.

4.1 Summary of costs and the business case

A summary of the proposed solutions and indicative associated costs (excluding VAT) from two of the providers, DANFO and the Pop-Up Toilet Company, are shown in the table below.

More detail and alternative options for each location are shown later in this section.

Details on these two companies and other leading providers can be found in Appendix 12.

#	Locations	Solutions (proposed options)	#cubicles	#urinals	Capex + Installation	Service p.a.
1	Soho Square North	Modular unit with 1 x DDA, 3 cubicles + 1 (free) Urinal	4	1	£197,000	£35,106
2	Soho Square South	Modular unit with 1 x DDA, 3 cubicles + 1 (free) Urinal	4	1	£197,000	£35,106
3	Charing Cross Road / Moor Street	1 x UriLift Triple	0	3	£51,000	£5,000
4	Wardour Street, by St Anne’s Gardens	UriLift Double (flip-up) urinal	0	2	£46,000	£5,000
5a	Little Marlborough Street	1 x UriLift Triple	3	0	£51,000	£5,000
5b	Carnaby Street / Great Marlborough Street					
6	Ramillies Street / Great Marlborough Street	UriLift Double (flip-up) urinal	0	2	£46,000	£5,000
7	Noel Street	UriLift Double (flip-up) urinal	0	2	£46,000	£5,000
TOTAL			8	14	£634,000	£95,212

The business case

Service and maintenance

As shown above, the indicative cost of servicing and maintenance for the 7 new permanent facilities would be £95,212.

This cost could be more than offset by the reduction of temporary toilets. Based on the estimated cost of £12,840 per temporary toilet unit, a reduction of 8 chemical toilets and at least 3 of the urinal units, would bring a potential annual saving of £141,240 and thus an annual contribution of over £46,000.

Capex and Installation

As shown above, the indicative capital investment and installation for the 7 new permanent facilities would be £634,000.

This investment could be funded in a number of ways. Based on the categories listed below - including conservative estimates for additional revenues from tourists and the 'purple' and 'grey' pounds - this would provide at least £856,000, enough to fund at least one more toilet facility.

All while improving Soho's public realm and improving the visitor experience.

Budget for Soho Square North upgrade	£30,000
Saving on temporary provision	£46,000
Contribution from CIL	£50,000
Charge for use of Soho Square North toilets (50p x 500 users / day x 365 days)	£91,250
Additional revenues: tourists (£75 x 10 visitors / day x 365 days)	£273,750
Additional revenues: 'purple' pound (£50 x 10 visitors / day x 365 days) - 0.0000739% of £274 billion UK annual spend	£182,500
Additional revenues: 'grey' pound (£50 x 10 visitors / day x 365 days) - 0.0000570% of £320 billion UK annual spend	£182,500
TOTAL	£856,000

4.2 Proposed locations/solutions

This section provides an overview of the various options for the initial 7 locations identified.

a) Soho Square - North

Today the provision at the North of Soho Square is the butterfly urinal with only one functioning 'wing'.

“There is only one bit of green space in the whole of (East) Soho and you can hardly get into it. It stinks, and you have to walk over a load of fallen scooters and then squeeze past a urinal - it's horrible.”
- Housing officer



There has been mixed feedback regarding the existing facility from people interviewed and businesses surveyed during the course of the project. Negative feedback has highlighted the significant odour - particularly during the hot summer days, the open nature of the urinal and the fact it is only suitable for men. Positive feedback is that it is available and thus well used.

We have identified four options for the replacement of this urinal, summarised in the table and detailed below:

Option	Solutions	Footprint	Depth	# cubicles	#urinals	Capex	Installation	Service p.a.
#1	Replace butterfly urinal with single urinal	2.2m x 2.6m	N/A	0	1	£22,000 - £30,800	£5,000	TBC
#2	Replace butterfly urinal with double urinal	2.2m x 2.6m	N/A	0	2	TBC	£7,000	TBC
#3	Replace with a modular toilet block with one DDA, three standard cubicles and one (free) urinal	7 x 2.4m	80cm	4	1	£144,000 - £167,000	£23,000 - £30,000	£35,106
#4	Replace with a 5 STAR self-cleaning toilet with one DDA and one standard cubicle	4.5 x 2m	37cm	2	0	£143,955	£5,000 - £6,000	£5,000

Notes:
Costs are indicative and exclusive of VAT.

Option 1: Replace butterfly urinal with single urinal

Westminster City Council issued a tender for the replacement of its urinals in April and DANFO was the successful bidder. The budget made available for this £22,000 (£30,800 including contingency for increased costs) and the proposed solution is similar to that on Adelaide Street, by Charing Cross station.

However, the view of the project team is that this would be a lost opportunity to provide better quality provision and more capacity.

Option 2: Replace butterfly urinal with double urinal

We understand that WCC has no objection in principle to the replacement of the existing unit with a like-for-like double facility - although it remains to be seen whether the additional cost of doing so would be met from the Council's existing budget or would need to come from alternative funding sources.

Option 3: Replace butterfly urinal with a modular toilet block with one DDA cubicle, three standard cubicles and one (free to use) urinal

An alternative, from DANFO, would be to locate a modular unit just next to where the butterfly urinal is currently situated, taking up some of the Santander, Lime, and other bike spaces.

The unit consists of 1 DDA (accessible) cubicle, 3 standard cubicles and 1 (free to use) urinal. Indicative costs are shown in the table above.

A mock-up image is provided below, showing what a 4 cubicle Modular Toilet would look like in situ. It is pictured in a green, cabbie hut-style finish to match the backdrop of the gardens and features contactless charging as the preferred entry system of the Council. The unit can also feature cladding in other motifs, with the door colours and lighting fixtures modified accordingly. The facility is shown sitting in the bike bays but could also be set into the gardens, as per the image for the south side.

This is our preferred option for this location, as it provides additional much-needed safe and clean provision for women and others, and is sympathetically designed to blend in with its historic setting.



Option 4: Replace butterfly urinal with a 5 STAR DDA accessible self-cleaning toilet and a UriLift Triple

An alternative solution in the same location at the north of Soho Square could be based on the 5 STAR self-cleaning toilet by the Pop-Up Toilet Company. However, this is unlikely, as DANFO has won the contract to replace the existing urinal.

The Pop-Up proposal consists of one 5 STAR DDA accessible self-cleaning toilet and one UriLift Triple. Indicative costs are shown in the table above.

Renderings of the 5 STAR (by day and night) and an image of a UriLift Triple in its open and closed positions are shown below.



b) Soho Square - South

Today, the provision at the south of Soho Square consists of two temporary plastic urinals, normally positioned either side of the entrance to the gardens from Thursday evening to Monday morning.



We have identified two options for the Soho Square South location, summarised in the table and detailed below:

Option	Solutions	Footprint	Depth	#cubicles	#urinals	Capex	Installation	Service p.a.
#1	Install a modular toilet block with one DDA, three standard cubicles and one (free) urinal	7m x 2.4m	80cm	4	1	£144,000 - £167,000	£23,000 - £30,000	£35,106
#2	Install one 5 STAR self-cleaning toilet with one DDA and one standard cubicle	4.5m x 2m	37cm	2	0	£78,000	£5,000 - £6,000	£15,000 - £18,000
#3	Install a UriLift Triple	150cm circle	140cm	0	3	£45,000	£5,000 - £6,000	£5,000

Option 1: Install a modular unit with one DDA, three standard cubicles and one (free) urinal

An alternative to the temporary toilets would be to locate a facility set into the gardens. The unit consists of 1 DDA (accessible), 3 standard cubicles and 1 (free to use) urinal. Indicative costs are shown in the table above. A mock-up image is provided below. Again, the montage shows what a 4 cubicle Modular Toilet would look like in a green ‘cabbie hut’ style finish, to blend with the backdrop of the gardens, and shows contactless as the only payment option. This can be clad to order and door colours can be different. The unit is shown sitting within the gardens, on the edge of the pavement, but it can also be sat about 1 metre back, depending on tree roots, etc, so that the unit sits and opens completely within the perimeter of the gardens.



Option 2: Install a 5 STAR self-cleaning toilet with one DDA accessible and one standard cubicle

An alternative, from the Pop-Up Toilet Company, in the same location at the south of Soho Square Gardens, consists of one 5 STAR self-cleaning toilet with one DDA accessible and one standard cubicle.

Indicative costs are shown in the table above, as is a rendering of the 5 STAR, by day and night.

Option 3: Install one UriLift Triple

We were told that this option would be preferred by the Met Police’s Design Out Crime Officers, due to its flexibility to lower the unit in case of anti-social behaviour. Indicative costs are shown in the table above.

An image of the UriLift Triple is shown in Section 4.3 above.

c) Charing Cross Road / Moor Street

Cambridge Circus was the site of a pop-up urinal which tragically crushed a maintenance worker in January 2023. The unit had been in situ for around 20 years.

The urinal was removed for examination following the accident, and current provision is provided by a temporary plastic urinal and a chemical toilet cubicle from Thursday evening to Monday morning.



We have identified three options for the area around Charing Cross Road / Moor Street to replace these temporary toilets as summarised in the table and detailed below:

Option	Solutions	Footprint	Depth	# cubicles	# urinals	Capex	Installation	Service p.a.
#1	Install a modular toilet with one DDA and one standard cubicle	4.5m x2.4m	80cm	2	0	£113,000 - £123,000	£15,000 - £20,000	£16,053
#2	Install a 5 STAR self-cleaning toilet with one DDA and one standard cubicle	3m x2m	37cm	2	0	£78,000	£5,000 - £6,000	£5,000
#3	Install a UriLift Triple	150cm circle	140cm	0	3	£45,000	£5,000 - £6,000	£5,000

Option 1: Install a modular unit with one DDA and one standard cubicle

A 2-cubicle Modular Toilet, provided by DANFO, could be made to fit in with the surrounding buildings and would feature contactless charging as the only payment option.

The unit consists of 1 DDA (accessible) and 1 standard cubicle. Indicative costs are shown in the table above.

Option 2: Install a combined 5 STAR DDA and standard cubicle self-cleaning toilet

One alternative solution, from the Pop-Up Toilet Company, consists of a 5 STAR DDA and standard cubicle self-cleaning toilet. Indicative costs are shown in the table above.

Due to the sensitivities of this location, it may not be a feasible option, but it is still more fitting than the temporary provision.

A rendering of the 5 STAR is shown in Section 4.3 above.

Option 3: Install one UriLift Triple

Due to the sensitivities in this location it may not be a feasible option but is the best option from a capacity and versatility perspective, and more fitting than the current temporary provision. Indicative costs are shown in the table above.

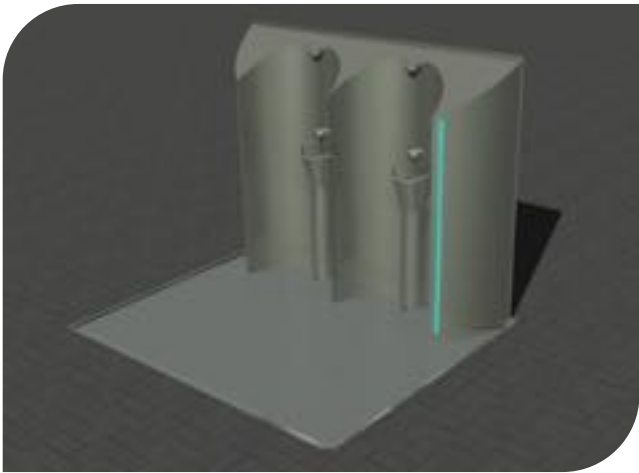
An image of the UriLift is shown in Section 4.3 above.

d) Wardour Street, by St Anne's Gardens

Option	Solutions	Footprint	Depth	#cubicles	# urinals	Capex	Installation	Service p.a.
#1	Install a UriLift Double (flip-up) urinal	164cm x 266cm	60cm	0	2	£40,000	£5,000 - £6,000	£5,000

An option for Wardour Street is the UriLift Double shown below along with the Single in its open and closed positions. Features of the UriLift Double include:

- Can be installed anywhere, thanks to the folding system, with a shallow 'drop'
- The round shape of the urinal gives extra privacy
- The urinals are flushed 6 times hourly and are very hygienic
- The stainless steel is easily cleaned, does not absorb odours and is vandalism-resistant
- A proven effective solution for indiscriminate urination
- Can be closed in the event of antisocial behaviour
- The cost of a UriLift Double is only marginally higher than a UriLift Single





e) Carnaby Street / Great Marlborough Street or Little Marlborough Street

Option	Solutions	Footprint	Depth	#cubicles	#urinals	Capex	Installation	Service p.a.
#1	Install a new APC	TBC	TBC	1	0	TBC	TBC	TBC
#2	Install a UriLift Triple	150cm circle	140cm	0	3	£45,000	£5,000 - £6,000	£5,000
#3	Install a UriLift Double (flip-up) urinal	164cm x 266cm	60cm	0	2	£40,000	£5,000 - £6,000	£5,000

There is currently a proposal by WCC for a new APC to sit on top of and supplement the refurbished underground facilities. Budget to be confirmed.

If planning permission for the APC is not granted, a UriLift Triple is proposed as an alternative for the site (the preferred option of the Met's Design Out Crime Officers). Should planning permission for the APC be granted, a UriLift Double (flip-up urinal) is proposed for Little Marlborough Street, to supplement the APC and address the existing urination hotspot there.

f) Ramillies Street / Great Marlborough Street

A UriLift Double (flip-up) urinal is also proposed for Ramillies Street / Great Marlborough Street. Details as per above.

g) Noel Street

A UriLift Double (flip-up) urinal is also proposed for Noel Street. Details as per above.

4.3 Other solutions to enhance capacity

Seven other recommendations for solutions/locations identified during the course of the study, as detailed below, are:

- Introduce at least one 'destination toilet' facility in Soho - following a design competition
- Ensure new public toilets are included as part of the Oxford Street Programme
- Introduce 'toilet stores' in Soho
- Add toilets in or adjacent to nearby TfL stations such as Tottenham Court Road
- Add Changing Places (or other accessible) provision
- Upgrade the toilets at Brewer Street car park
- Further investigate the benefits of a Community Toilet Scheme for Soho

a) Destination toilets

One solution (or set of solutions) to enhance capacity while building on Soho's brand could be so-called 'destination' toilets, as per some ideas and examples below and in Appendix 14.

A design competition

Organise a competition to design a 'signature Soho toilet', with the participation of local artists, designers, cultural historians and students, to include architectural, visual and potentially audio elements referencing the rich history and cultural heritage of the area.

Not only would this encourage a greater sense of community ownership and drive usage, it is also generally accepted that a more appealing toilet environment encourages better behaviour and treatment of the facility.

A number of London's restaurants and bars have made their toilets a destination in themselves. These include Nopi, Park Chinois, The View from the Shard and Sketch.



Fig. The toilets at Sketch restaurant in Mayfair

A Japanese toilet 'embassy'

Investigate the possibility of installing a showcase Japanese-designed toilet 'embassy' in Soho (location TBC), potentially in cooperation with the Nippon Foundation ([link](#)), which implemented the Tokyo Toilet Project ([link](#)) and was involved in the award-winning Wim Wenders film Perfect Days ([link](#)), in which the project's toilets are heavily featured.

b) Oxford Street Programme

The £100 million+ Oxford Street Programme (OSP) does not currently include any public toilet provision in its plans. However, the issue was repeatedly raised during the consultation process, and accessibility and comfort are considerations of the scheme.

In economic terms, the value placed on high-quality toilet provision is evident in the award-winning facilities of many of the UK's most successful retail and food and beverage (F&B) outlets, including retail giant Westfield - seen as a competitor to the West End - and pub/restaurant chain Wetherspoons.

Wetherspoons chairman Tim Martin estimates that around one-third of the company's profits - i.e. £12 million (of the total which were £36 million before tax in 2023-24) - are directly attributable to the firm's lavishly appointed lavatories.

Given the recent announcement by the Mayor of London regarding the full pedestrianisation of Oxford Street, we would expect the subject of new toilet facilities to be firmly back on the agenda.

"Hopefully, Soho can look forward to new toilets as part of the [OSP] scheme, provided we can identify suitable locations."
- WCC Councillor

c) Introduce 'Toilet Stores'

Westminster City Council, property owners and other key stakeholders to explore setting up 'toilet stores', such as the 2theloo branch in Covent Garden.

'Toilet stores' to be prioritised in currently vacant retail units in Soho and on Oxford Street, where they would make a welcome alternative to the many "American candy stores" currently blighting London's premier retail district.

d) Adding toilets to TfL stations

Westminster City Council, property owners and other key stakeholders to work with TfL to prioritise new toilets in or around Tottenham Court Road station - the most heavily used transport node for visitors to Soho. (see Appendix 7 for TfL footfall analysis)

e) Changing Places Toilets

The Council should explore installing Soho's first Changing Places Toilet (CPT), to cater for the needs of severely disabled people and their carers.

A possible location is in the WCC office building at 55 Broadwick Street, on the corner with Dufours Place.

As of July 2020 there were more than 1,400 CPTs in the UK, up from just 140 in 2007, but more are needed to support more than a quarter of a million people who need them in the UK.

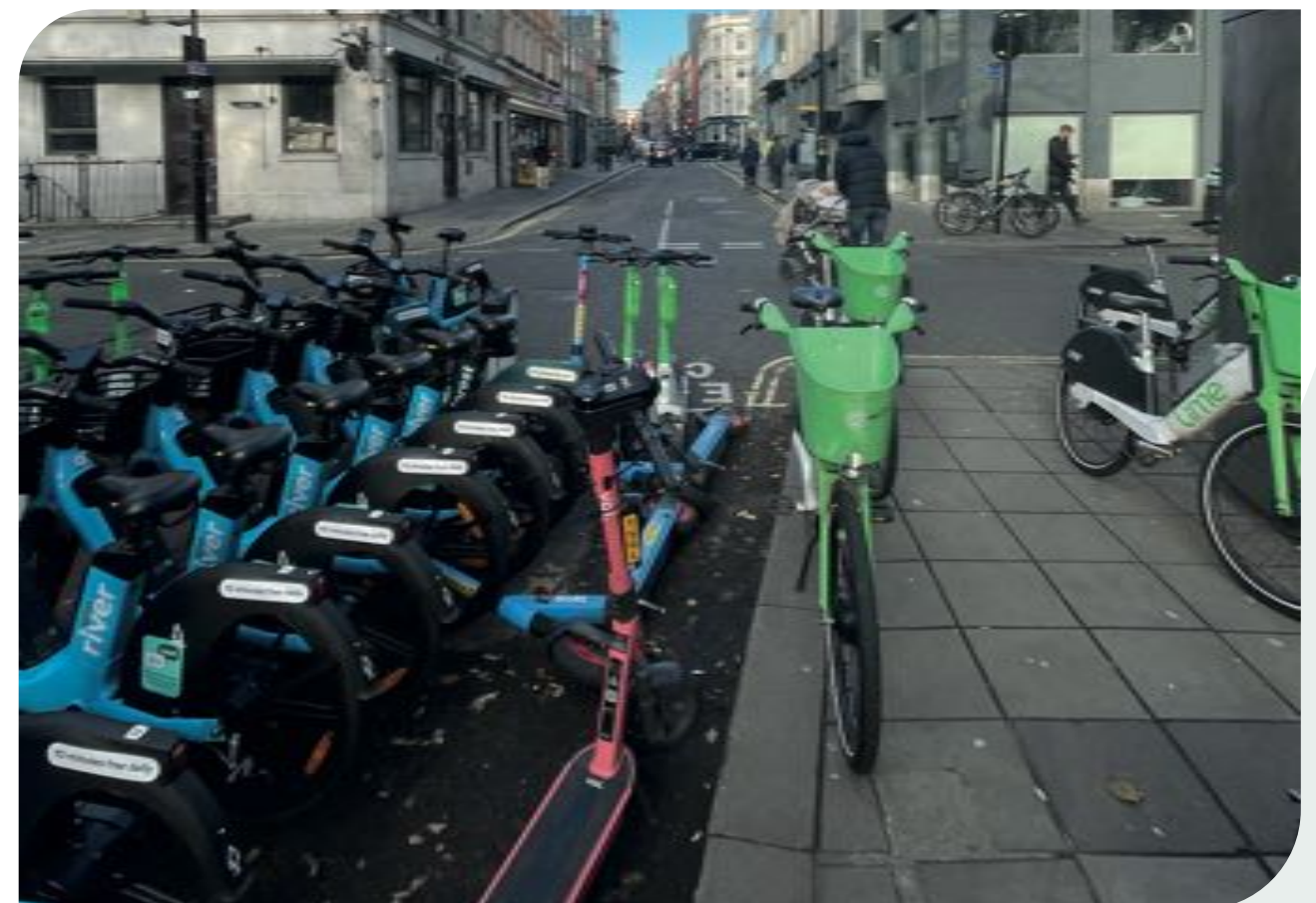
To use a toilet in safety and comfort, these people need to be able to access a CPT, which has more space and the right equipment, including a height-adjustable changing bench, a peninsular toilet and a ceiling hoist.

f) Upgrade toilets at Brewer Street car park

Examine the possibility of restoring the (currently dilapidated but still functional) public toilets on the ground floor of Brewer Street car park and similar facilities in the area (e.g. Poland Street).

g) Resident car parking / bicycle storage:

Carry out a survey of the utilisation of car parking spaces and areas currently used for bicycle storage to identify other possible locations to site public toilets and other amenities.



h) Community Toilet Scheme

The findings of our report suggest a Community Toilet Scheme may not be so relevant for Soho, given the average size of retail spaces in the neighbourhood and the general feedback we received in the business survey.

Nevertheless, a scheme for Soho should not be completely ruled out, and some of the larger chains approached. The additional element of a discount card along the lines of the 'Lewisham Local' scheme, to encourage users to spend more than a penny in members' premises, could also boost uptake in the Soho context.

We would also support Recommendations 2 and 3 of the London Assembly's *The Toilet Paper* namely:

- **Recommendation 2** - The Mayor and London Councils should provide an opportunity for local authorities to share best practice on their community toilet schemes, including how to run them successfully and how to ensure that information and directions about such schemes are clear, consistent and accessible.
- **Recommendation 3** - The Mayor should engage with large businesses and retail chains on the high street, to encourage them to open their toilets to the public and advertise that they are doing so.



“The lack of public toilet provision is a massive excluder for women, at all stages of life, due to periods, pregnancy, parenthood, etc. It’s a ‘common ground’ issue that cuts across all demographics, so I think everyone should be supportive of better provision.”

– Council officer

5. OTHER RECOMMENDATIONS

5.1 Existing provision

a) Ensure that the current public toilet provision in Soho is adequately maintained (or improved) and available for use, including the currently closed underground toilets at Broadwick Street (with the introduction of attendants and/or other suitable anti-ASB measures).

b) If, as mentioned elsewhere in this report, the permanent closure and leasing of this site to the LIFT Coffee company ([link](#)) is indeed a fait accompli, then an agreement should be struck between the Council and the new leaseholders to allow non-customers to use their toilet facilities free of charge, and/or a portion of the proceeds of the commercial arrangement agreed with WCC should be ring-fenced to provide for alternative provision.

c) Extend the opening hours of the Carnaby/Great Marlborough Street underground toilets, with the cost of attendants potentially co-funded by private sector sponsorship.

d) Employ a 'roving' attendant (or attendants) to monitor the existing and new facilities, ensuring adherence to cleaning and maintenance standards and discouraging antisocial behaviour.

5.2 Signage/maps

Improve signage to all facilities, specifying the distance/walking time to each and indicating the nature of the facilities provided. Almost 47% of respondents to our visitors' survey reported experiencing difficulty finding a toilet in Soho.

Ensure that all are listed and accurately described on apps and websites such as Toilets4London and the Great British Toilet Map. In *The Toilet Paper*, 64% of Londoners said that they would like to see a website with all toilets listed.

Improve public information about provision (signs, maps, awareness raising, hard copy materials). Also in *The Toilet Paper*, 62% of Londoners said that they would like to see more maps at key location points. Specifically:

- Ensure the Westminster Toilet Map is up-to-date
- Provide better signage and lighting to direct users to existing provision
- Raise awareness among businesses as to the location of the nearest public toilets

5.3 Funding

If funding is presented as a barrier to the upgrade/installation of new provision, Westminster City Council to explore the following options, some of which are already being considered:

- Night Levy on businesses serving alcohol after midnight
- Overnight Levy / Tourist Tax on hotel stays
- Parking fee (and fine?) receipts levied in the area
- Sponsorship from leading companies with a presence in the area
- Share of the proceeds of any divestment of existing provision (e.g. Broadwick Street underground toilets)
- Share of licensing fees for tables and chairs on Soho's pavements
- Income from contactless charging for existing and proposed new facilities

5.4 Install LED lighting

Install LED lighting in persistent 'wild toileting' hotspots.

A number of participants in our residents' focus groups spoke of dark corners and recesses being magnets for street urination and defecation. LED lighting should therefore be installed in such hotspots to deter such behaviour

5.5 Install CCTV

Install cost-effective, fibre-optic connected CCTV at key hotspots, with clear, impactful signage informing offenders that they are being recorded and that the footage will be shared with the police and local authorities.

"The threat of prosecution or an on-the-spot fine will only become effective once there is alternative provision. The sooner we get better provision, the less entrenched this habit is going to become, and the less we are going to find people breaking the law."
– Parliamentary Candidate

5.6 Design-out street urination hotspots

Use behavioural 'nudges', such as stencilled/cutout silhouettes of 'observers' (e.g. of famous/historic Soho residents) on walls and in windows to discourage potential street uriners, and fill-in dark corners used by persistent offenders.

"There used to be a lot of faeces in that area [Ingestre Place], because it's dark, behind the tower block, a lot of drug dealing going on, dealers hiding their drugs and knives in the planters ... hiding in the shadows, so to speak."
– Resident



6. IN CONCLUSION

Our research and extensive engagement with stakeholders over the past year has highlighted and reinforced the following:

6.1 The Problem for Soho

- The permanent public toilet provision in and around Soho is totally inadequate and is only going to get worse if the sell-off of Broadwick Street's underground toilets goes ahead.
- The temporary provision - which is actually on the streets for over three days each week - is unsightly, not fit for purpose, expensive and deeply unpopular.
- Visitors - in particular women and those with medical conditions - are being discriminated against and actively staying away due to the lack of adequate and acceptable provision.
- As well as a clear reputational, equality, inclusion and moral impact, this situation has an economic impact of around £5 million pounds every year.

6.2 The Solution

- Invest in the seven new locations identified, including provision for women and those with disabilities - it makes clear moral and business sense.
- Ensure that Broadwick Street has adequate public toilet provision going forward.
- Collaborate with Transport for London on new provision in/around stations including the Elizabeth Line at Dean Street and Tottenham Court Road Underground.
- Hold a design competition for a destination toilet, to be launched on World Toilet Day, 19th November.

"It's the council that brings together residents, businesses and tourists, and it's the one entity that can bring all of those views together. They're the only ones that can enforce anything, impose anything, or lobby for anything. So, it would be unfair to put it on businesses, it would be unfair to put it on tourists, it would be unfair to put it on the police."

- Councillor

7. CREDITS

We would like to thank all those organisations and individuals who took the time to be either interviewed, surveyed or join a focus group, without whom this report would not have been possible.

We are especially grateful to the many Westminster City Council officers and councillors for their candour and cooperation.

7.1 Expert Interviewees

Chris Meijers, 2theloo
Esther Peralta, 2theloo
Koen Theeuwes, 2theloo
John McGeachy, AgeUK London
Robin Smith, Berwick Street Market Traders Society
Michelle Barkley, BS 6465 committee
John Griggs, BS 6465 committee
Susan Cunningham, BS 6465 committee
Raymond Martin, British Toilet Association (BTA)
Jamie Akinola, Camden Council
Adam Harrison, Camden Council
David Quigley, Camden Council
Mark Blake, Carlton Limited (former SANIFAIR franchise)
Edward Lucas, Cities of London & Westminster - parliamentary candidate
Rachel Blake, Cities of London & Westminster MP
Pam Orchard, Connection at St Martin-in-the-Fields
Sarah Sleet, Crohn's & Colitis UK
Roger Berry, DANFO (UK) Ltd
Mal Holt, DANFO (UK) Ltd
Andy Davies, DANFO (UK) Ltd
Martha Silcott, FabLittleBag
Amy Lamé, Greater London Authority
Piers Dibben, Healthmatic Ltd
Jim Young, Healthmatic Ltd
Robin Hibbert, Heart of London Business Association
Dr Junko Kobayashi, Japan Toilet Association (JTA)
Andrew Jordan, JCDecaux
Simon McCaugherty, London & Partners
Tony Devenish, London Assembly
Caroline Russell, London Assembly
Becky Wall, Loo of the Year Awards

Councillor Stephen Mercer, Merton Council
Julie Harty, Metropolitan Police - Design Out Crime Unit
Dan Street, Metropolitan Police - Design Out Crime Unit
Jo Williams, Motionspot
Bruna Silva, New West End Company (NVEC)
Hazel McShane, PEEQUAL
Amber Probyn, PEEQUAL
Patrick Horst, Pop-Up Toilet Company
Sarah Milne, Prostate Cancer UK - Men Need Bins Campaign
Claire Delmar, Prostate Care Limited / London Society
Prof Jo-Anne Bichard, TINKLE / Royal College of Art
Daryll Groenhuijzen, Sanitronics
Scott Marshall, Shaftesbury Capital
Louise Garrett, Shoreditch Community Association
Barbara Brownlee, Soho Housing Association
Fredrik Korallus, Soho Business Alliance
Rupert Power, Soho Business Alliance
Clare Lynch, Soho Radio
Revd Dr Adam Scott, Soho Square Frontages Committee
Rev Simon Buckley, St Anne's Soho
Alison Reid, The IBS Network
Jenny Travassos, The Passage
Tim Lord, The Soho Society
Marina Tempia, The Soho Society
Natalie Bryan, Transport for London
Mark Evers, Transport for London
Shimisa Santhirasanen, Transport for London
Amy Whitehead, Transport for London
Dr Clara Greed, University of the West of England (UWE Bristol)
Jack Sim, World Toilet Organisation

7.2 Businesses surveyed

64 Old Compton St	Cofighter
A Day's March	Crosstown
Acai berry	Dean Street Studios Ltd
Admiral Duncan	Dolby Europe
Amathus Drinks	Duke's Cupboard
Ami Paris	Dunmo
Antics	Eatalia
Arts Theatre Club	EL&N
Avestan	Eyes on Soho
Axel Arigato	Farah
B&J	Fat Hippo
Balans No 60	Ffern
Banana Tree Soho	Firmdale Group / Ham Yard Hotel
Bar Bruno	Fitzrovia Barbers
Big Bite	Fora
Borovick Fabrics	Freedom Bar
Brindisa Tapas Soho	Frith St Tattoo
Broadwick Soho	Gail's
Capital Shop Ltd	Game Nation - Soho
CDPQ London LLP	Garlic & Shots
Chicken shop	G-A-Y
Chris Kerr Ltd	Gerry's Wines & Spirits
Circa Soho	Good News
Clarks Originals	Gosh Comics
Clone Zone	Gravity Media
Compton News	Greater London Properties
Comptons	Hazlitt's Hotel
Copper Consultancy Ltd	Hobson's (Fish & Chips) Soho Ltd
Nellie Dean of Soho	Simmons Soho
Nightjar	Singapulah London
Nudie Jeans	Smiths Salon
Oliver Spencer	Snappy Snaps
Paul Smith	So High Soho Ltd
Pix Pintxos	Socius
Pizza Express	Soho Business Alliance
Poan	Soho Estates
Poppies Fish & Chips Soho	Soho Maintenance Ltd
Private Eye Pressdram	Soho Old Heaven Ltd (trading as Bistro #1)
Prosecco Cafe	Soho Theatre
Prowler Red	Sounds of the Universe
Randall and Aubin	St Moritz Restaurant
Rapha	Stine Goya
Red Wing Shoe Storestore	Studio 12
Regulation	Sunspel
Ronnie Scott's Jazz Club	Suvlaki Soho
Runway East	Swatch
Rupert Supermarket	The Crown and Two Chairmen
Sadie Coles HQ	The Dog & Duck
Scribbler	The French House
Shoryu Carnaby Street	The George pub

Hoppers
I Camisa & Son
Inamo
ISKCON (Radha Krishna Temple)
Italian bear chocolate
Izakaya Soho Limited
John Snow
Karma Sanctum Soho
Kiln
Kricket
Laxsa
Leanne Flowers Ltd
Leon
l'Escargot
LFDY
Little Italy
Little Ku
Live true london
Lobos meat and tapas
Malin+Goetz
Manzi's
Milk Beach
MinaLima
Mix Max
MOSCOT
Mr Fogg's Hat Tavern and Gin Club
Mukbang Pocha
Muphoria Gallery
The Great Frog
The Groucho Club
The Hummingbird Bakery
The Japanese Knife Company
The Life Goddess
The Resident
The Ship
The Soho Hotel
The Toucan
The Vintage House
Tongue and brisket
Tonkotsu
Tortilla Mexican Grill PLC
Troubador
Truffle Burger
Union Soho (Club) Ltd
Venchi
Walk-in Backrub
We Are Cuts Soho
William Curley
Yamaha Music London
Zebrano

8. APPENDICES

Appendix 1 - Soho's current provision

	Broadwick Street APC (1)	Carnaby / Great Marlborough Street, underground	Soho Square
Opening times:	24 hours	10:00 - 18:00	24 hours
# toilets	1	Gents: 4 cubicles, 5 urinals Ladies: 6 cubicles	2 urinals (1 closed)
of which: accessible	1	0	0
Daily usage	~600 (1)	~433 (2/3 men)	-
Built	c2000	Believed to be Victorian	-
Last refurbished	2023	1993-95	-
Serviced by	DANFO (on behalf of WCC)	Carlisle Support Services (on behalf of WCC)	DANFO (on behalf of WCC)
Future plans	Maintained as is	To be upgraded (potentially with overground APC, although according to WCC, this now looks increasingly unlikely) Q4 '25 / Q1 '26	Current plan: to be replaced with a single urinal, similar to the one in Adelaide Street, although replacement with a double urinal looks increasingly likely

Notes

- 1. APC = Automated Public Convenience
- 2. 641 paying users / day in April '24, 556 in May '24. These usage figures do not include RADAR key users, such as Berwick Street market traders and those with disabilities.
- 3. The underground toilets at Broadwick Street have been closed since the end of 2022 due to anti-social behaviour. They consist of 2 cubicles and 4 urinals in the Gents, and 4 cubicles in the Ladies. They were being serviced by DANFO and were last refurbished in 1993-95. LIFT Coffee has submitted a proposal to turn the underground loos in Broadwick Street, Soho, into a café and events space. The operator secured a 25-year lease (subject to planning permission) two years ago and could spend as much as £2 million on creating a coffee-themed workspace, according to WCC documents.

Appendix 2 - Temporary toilets in Soho

The locations of the temporary toilets from Thursday to Monday each week are as listed below. Although locations may vary from week to week, this is based on the Westminster City Council website and visual inspection.

LOCATIONS	Urinals	Chemical Toilets
Broadwick Street, junction with Poland Street (1)	0	1
Carnaby Street (2)	0	1
Charing Cross Road, junction with Moor Street (Cambridge Circus)	2	1
Great Marlborough Street, junction with Kingly Street (3)	2	1
Great Windmill Street	1	1
Soho Square, by Bateman's Buildings	2	0
Soho Square, junction with Soho Street	0	3
Wardour Street, junction with Old Compton Street	2	2
TOTAL	9	10

Notes

1. Urinals removed and one chemical toilet removed and site moved further up due to complaints
2. Due to the toilet closing early
3. Moved from Carnaby Street
4. The WCC website ([link](#)) also refers to chemical toilets on Broadwick Street, junction with Berwick Street and Dean Street, junction with Carlisle Street but not included in the latest list received from the Council officer responsible for toilets.

Appendix 3 - Existing provision around Soho

Provision outside of Soho includes:

- Leicester Square (due for refurbishment/upgrade in early 2026)
- Piccadilly Circus (due to close for refurbishment/upgrade in October 2025)
- Princes Street (closed, due to be reopened for the exclusive use of TfL drivers)
- Adelaide Street (urinal, due for replacement)
- Charing Cross Station (managed by Network Rail)

	Piccadilly Circus Underground Station	Leicester Square, underground	Adelaide Street
Opening times:	07.30 - 23:00	08:00 - 24:00	24 hours
# toilets	Gents: 4 cubicles, 8 urinals Ladies: 13 cubicles + 1 DDA	Gents: 10 cubicles, 11 urinals Lades; 18 cubicles	1 urinal
of which: accessible	1	0	0
Daily usage	248 (Gents), 138 (Ladies)	800 (Gents), 310 (Ladies) 1)	Not known
Last refurbished	2010-12	2010-12	?
Serviced by	Carlisle Support Services (on behalf of WCC)	Carlisle Support Services (on behalf of WCC)	DANFO UK Ltd (on behalf of WCC)
Future plans	Upgrade expected Q4 '24 / Q1 '25	Upgrade expected Q1 '26	Upgrade expected in 2025

Notes

1. Gents: 759 uses/ day in April '24, 857 in May '24; Ladies: 295 in April, 323 in May

Appendix 4 - Provision across London

This table shows the current number of Local Authority run public toilet facilities - based on the respective borough websites - compared to the numbers published in the London Assembly 'Public toilets in London' report issued July 2011. [\(link\)](#)

Borough	LA facilities Change 2024	LA facilities 2011	
1 Southwark	33	9	267%
2 Haringey 23	8	188%	
3 Royal Borough of Kensington and Chelsea	22	12	83%
4 Redbridge	22	16	38%
5 Richmond upon Thames	21	0	
6 Wandsworth	20	9	122%
7 Merton	19	0	
8 City of Westminster	17	25	-32%
9 Lewisham	16	21	-24%
10 Hackney	15	13	15%
11 Barnet	15	-	
12 Royal Borough of Kingston upon Thames	14	20	-30%
13 Camden	12	27	-56
14 Royal Borough of Greenwich	12	24	-50%
15 Hammersmith and Fulham	12	16	-25%
16 Bromley	11	16	-31%
17 Brent	10	13	-23%
18 Bexley	9	16	-44%
19 Havering	6	8	-25%
20 Newham	6	10	-40%
21 Tower Hamlets	5	16	-69%
22 City of London	3	19	-84%
23 Croydon	3	20	-85%
24 Islington	2	10	-80%
25 Ealing	2	11	-82%
26 Harrow	2	10	-80%
27 Lambeth	1	12	-92%
28 Hillingdon	1	11	-91%
29 Barking and Dagenham	0	8	-100%
30 Enfield	0	24	-100%
31 Hounslow	-		
32 Sutton	0	0	
33 Waltham Forest	0		
TOTAL London	334	404	17%

Appendix 5 - Community Toilet Schemes

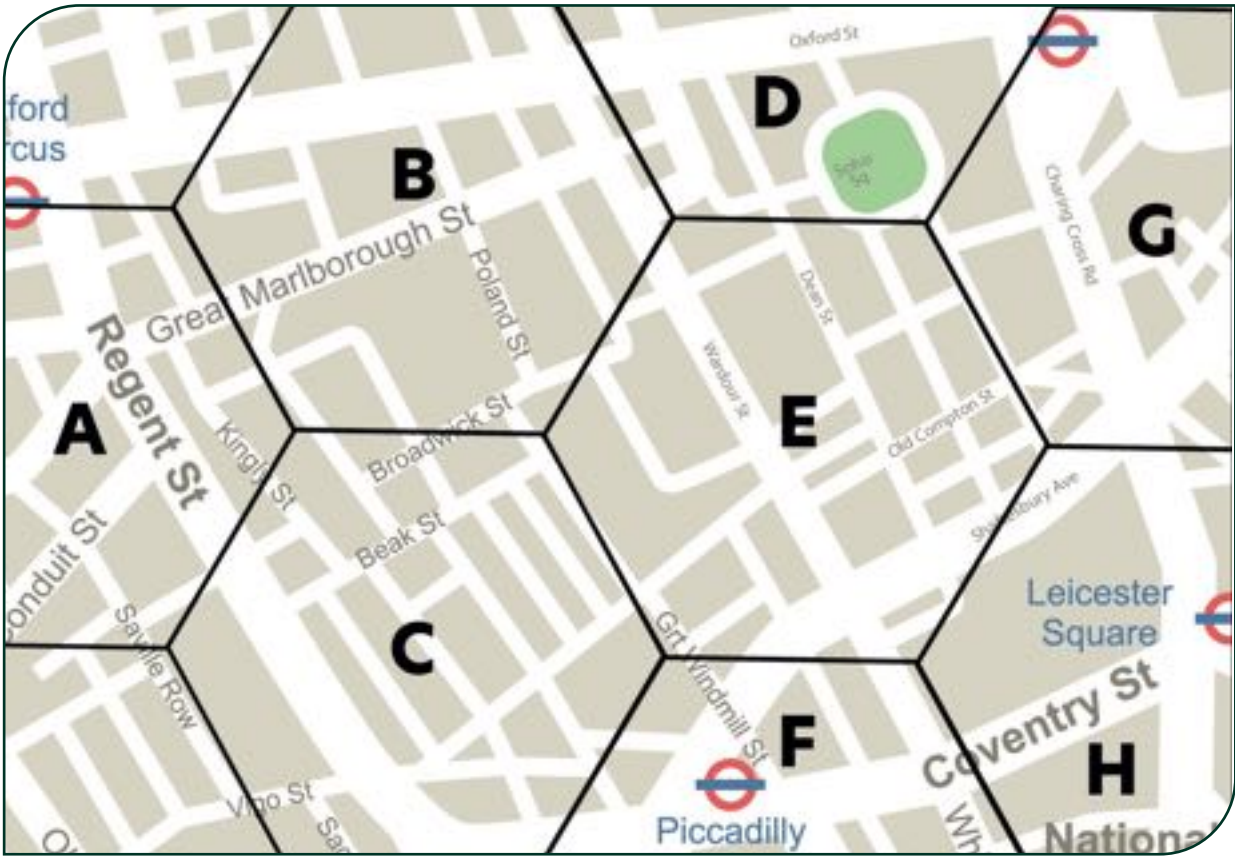
Our analysis of the current Community Toilet Schemes across London builds on that published by Age UK London in September 2022.

Borough	#CTS members 2024	#CTS members 2022	
Barnet	12	12	https://www.barnet.gov.uk/directories/public-toilets?page=2
Bromley	24	40	https://www.bromley.gov.uk/directory/10/community-and-public-toilets/category/528
Camden	12	7	https://news.camden.gov.uk/camdens-community-toilet-scheme-is-live/
City of London	75	65	https://www.fis.cityoflondon.gov.uk/directory/community-toilets-scheme
Ealing	6	6	https://www.ealing.gov.uk/info/201153/street_care_and_cleaning/200/public_toilets/4
Enfield	25	19	https://www.enfield.gov.uk/services/leisure-and-culture/community-toilet-scheme
Haringey	11	-	https://new.haringey.gov.uk/streets-roads-travel/travel/map-public-toilets
Hounslow	127	-	https://chiswickherald.co.uk/hounslow-council-promotes-public-toilet-locations-across-the-borough-p7685-95.htm
Lambeth	No figures available	No figures available	https://www.lambeth.gov.uk/streets-roads-and-transport/community-initiatives-your-street/community-toilet-scheme-find-public
Lewisham	50	51	https://www.lewishamlocal.com/communitytoilets/
Merton	19	6	https://www.merton.gov.uk/streets-parking-transport/community-toilet-scheme
Newham	14	14	https://www.newham.gov.uk/community-parks-leisure/public-toilets-newham
Richmond upon Thames	50	70	https://www.richmond.gov.uk/services/roads_and_transport/public_conveniences/community_toilet_scheme
Sutton	14	-	https://www.sutton.gov.uk/documents/20124/448650/AccessibleToilets.pdf/d2afe0a8-14ee-4c9f-d363-bfbefd43497c?t=1635525630042
Waltham Forest	37	38	https://www.walthamforest.gov.uk/neighbourhoods/public-toilets
TOTAL	476	328	

Appendix 6 - Footfall analysis

Footfall data was downloaded from the London Datastore, which divides London into hexagons as indicated in the image below.

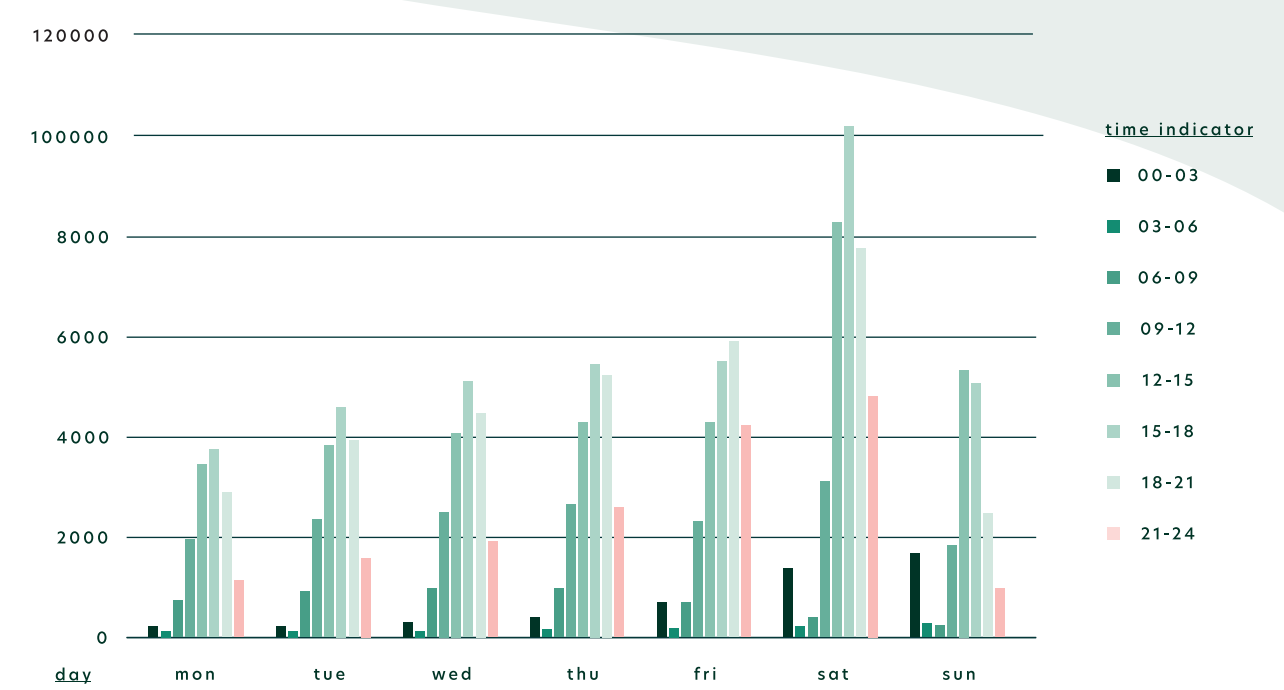
Unfortunately, the hexagons do not correspond precisely with Soho's borders, as shown in the image below, and some hexagons also include surrounding areas, including other busy areas such as Leicester Square.



In order to estimate the footfall just within Soho, therefore, we assigned weighting factor for those hexagons that include area outside Soho - see the table below.

SOHO HEXAGONS (FULL AND PARTIAL)	% Factor
HEXAGON A	30
HEXAGON B	70
HEXAGON C	90
HEXAGON D	30
HEXAGON E	98
HEXAGON F	25
HEXAGON G	25
HEXAGON H	10

The analysis found the peak times were Saturday 15:00-18:00, with over 100,000 visitors.



Time/Day	00-03	03-06	06-09	09-12	12-15	15-18	18-21	21-24
mon		2505	1396	7349	19533	34267	37553	29064
tue		2244	1393	9321	23658	38375	45926	39120
wed		3286	1546	9799	25016	40750	51017	44630
thu		4195	1701	9982	26592	42703	54299	52096
fri		7125	1945	7230	23252	42700	54783	58881
sat		13856	2469	4071	31079	82327	101565	77382
sun		16789	3036	2646	18304	53209	50432	24742

Appendix 7 - TfL footfall analysis

Using the period 03/06/2024 to 30/06/2024, the data below provides the typical daily demand numbers experienced at Tottenham Court Road, Oxford Circus, Piccadilly Circus and Leicester Square, the four stations closest to Soho.

Please note that the Elizabeth Line gateline demand is included in the London Underground gateline demand at Tottenham Court Road station.

Peak period usage is 7-10am and 4-7pm Monday to Friday (outside of bank holidays). The highest count level during the week is highlighted in green and in orange if at the weekend.

Tottenham Court Road (TCR)

TCR	Typical daily tap count (Entry)	Typical AM PEAK tap count (Entry)	Typical PM PEAK tap count (Entry)	Typical daily tap count (Exit)	Typical AM PEAK tap count (Exit)	Typical PM PEAK tap count (Exit)
MON	72,413	3,200	26,243	73,997	21,334	15,811
TUE	85,714	3,649	30,700	87,096	26,755	20,359
WED	90,164	3,701	31,064	92,014	26,578	21,782
THU	93,756	3,898	30,074	95,958	26,012	23,029
FRI	87,437	2,997	23,864	90,371	16,757	22,919
SAT	99,084	-	-	98,291	-	-
SUN	54,787	-	-	55,817	-	-

Oxford Circus (OC)

OC	Typical daily tap count (Entry)	Typical AM PEAK tap count (Entry)	Typical PM PEAK tap count (Entry)	Typical daily tap count (Exit)	Typical AM PEAK tap count (Exit)	Typical PM PEAK tap count (Exit)
MON	59,749	1,759	23,747	67,653	22,333	12,370
TUE	71,128	2,086	28,025	79,087	27,690	15,397
WED	71,851	2,056	26,600	78,875	25,686	15,825
THU	72,508	2,120	24,758	83,651	27,610	16,241
FRI	66,971	1,814	21,522	75,243	16,657	16,491
SAT	68,066	-	-	80,432	-	-
SUN	41,338	-	-	45,876	-	-

Leicester Square (LS)

LS	Typical daily tap count (Entry)	Typical AM PEAK tap count (Entry)	Typical PM PEAK tap count (Entry)	Typical daily tap count (Exit)	Typical AM PEAK tap count (Exit)	Typical PM PEAK tap count (Exit)
MON	31,437	738	4,879	28,390	8,747	7,678
TUE	34,527	805	5,885	30,809	9,351	8,637
WED	37,161	823	5,632	33,261	10,042	9,185
THU	39,259	849	5,726	34,788	10,073	9,678
FRI	43,465	772	3,787	38,114	9,105	11,321
SAT	61,205	-	-	51,025	-	-
SUN	33,194	-	-	29,439	-	-

Piccadilly Circus (PC)

PC	Typical daily tap count (Entry)	Typical AM PEAK tap count (Entry)	Typical PM PEAK tap count (Entry)	Typical daily tap count (Exit)	Typical AM PEAK tap count (Exit)	Typical PM PEAK tap count (Exit)
MON	30,798	757	7,164	29,401	9,867	7,063
TUE	34,595	778	8,366	32,457	10,871	8,238
WED	36,982	825	8,411	34,792	11,357	8,639
THU	39,466	869	8,178	37,076	11,743	9,217
FRI	37,713	834	5,278	36,357	9,340	9,732
SAT	40,451	-	-	41,799	-	-
SUN	26,165	-	-	24,590	-	-

Appendix 8 - Calculating increased revenue for Soho businesses from improved toilet provision

Description of the calculations and assumptions for the £4.9m figure.

1. We assumed that people who visit Soho multiple times per week are not going to visit more, regardless of whether there are new toilets or not. Those people are already visiting as regularly as possible.
2. We calculated the number of visitors who visit Soho MULTIPLE TIMES PER WEEK by calculating a mean average of visitors who are in soho between 3 and 6 pm Monday-Friday and Sunday. This provided a figure of approx 49,000 people.
3. We calculated an estimated number of visitors who visit ONCE PER WEEK OR LESS by subtracting that 49k from the Saturday 3-6pm total (101,565), which leaves 53,000 people. We call this the “excess” - i.e. the excess over daily/multiple times per week visitors.
4. We divided the excess visitor count proportionally according to a distribution derived from the survey results. This involves taking the percentages for each of the frequency categories in the visitor survey (every 1-2 weeks / once per month / every few months), and dividing the excess accordingly. This provided excess counts for each frequency category.
5. Amongst the survey respondents who are in those categories, the average expenditure per visit is 93.31 GBP.
6. We then calculated the proportion of people in those categories who said that they avoided going to the west end because of issues related to toilet provision - 22.7%.
7. Then we assumed that if we eliminate the problem of toilet provision, the people who currently go less frequently than every week might go to Soho 50% more per year. So, for example, people who currently go every 1-2 weeks would go 13 times more per year, monthly visitors would go 6 times more per year, and “every few months” visitors would go 1.5 times more per year.
8. We then calculated the count of excess visitors who avoid going to the West End because they are worried about toilets, in each frequency category.
9. Then we calculated the number of additional visits per year by multiplying the figures from point 7 by the counts in point 8 (both for each frequency category), and summing up.
10. Then multiply the average visit expenditure by excess visitors by the number of additional visits. **The final figure is 4.9m GBP.**

Appendix 9 - Survey results: What do visitors think?

Methodology

The data outlined in this report were collected in a survey conducted online between April 23rd and April 30th 2024. Participants were recruited via a third-party marketplace for online survey respondents, which performs identity verification of respondents before they can participate. Participants were financially compensated for the time taken to complete the survey, which is standard industry practice.

Respondent Recruitment And Data Quality Assurance

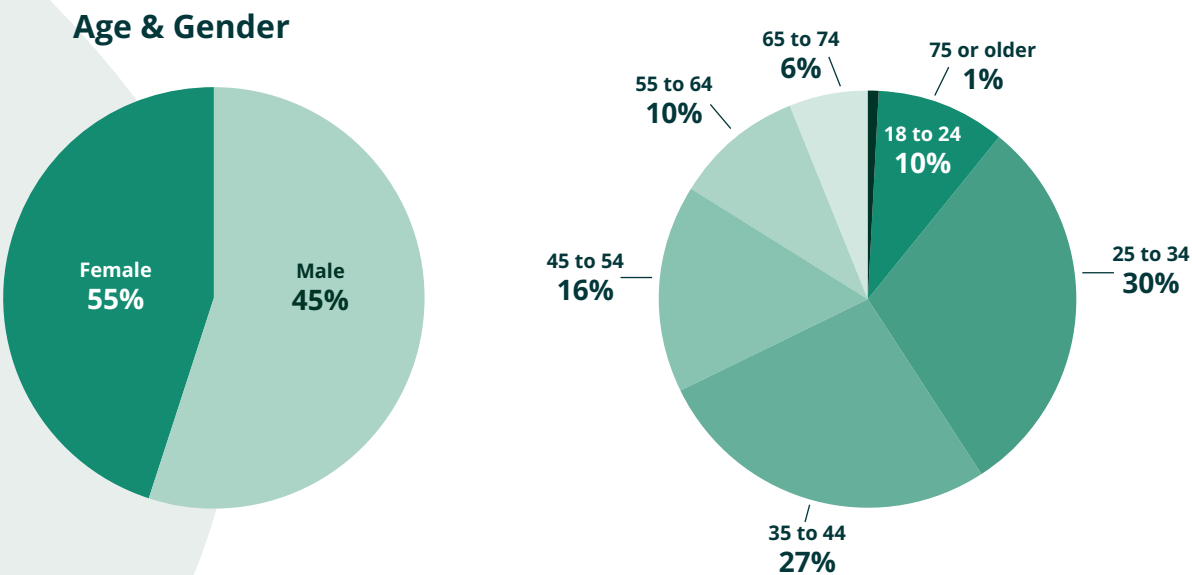
The survey focused on domestic visitors to Soho, with respondents drawn from London and the South East based on the fact that these are the most frequent visitors and the greatest contributors to the local economy. Invitations were distributed to residents of London and the South East via third-party recruiters, and the primary criteria used to qualify respondents for the survey was that they must have visited Soho in the preceding 12 months. To prevent fraud, potential respondents were initially asked to choose which from a list of London neighbourhoods they had visited in the last 12 months, with only those who indicated they had visited Soho allowed to participate.

Before analysing results, all complete responses were checked and responses eliminated from consideration if they met either of the following criteria:

- 1. Respondents who completed the survey in an unrealistically fast time (set at 3:30)
 - 2. Respondents who failed to follow instructions, as measured by an attention screener question
- Following the removal of these responses, the final sample consists of 474 complete and validated responses.

Sample Profiling

The following figures illustrate key demographic and behavioural characteristics of the total sample of 474:



Which of the following have you done in Soho in the last 12 months?

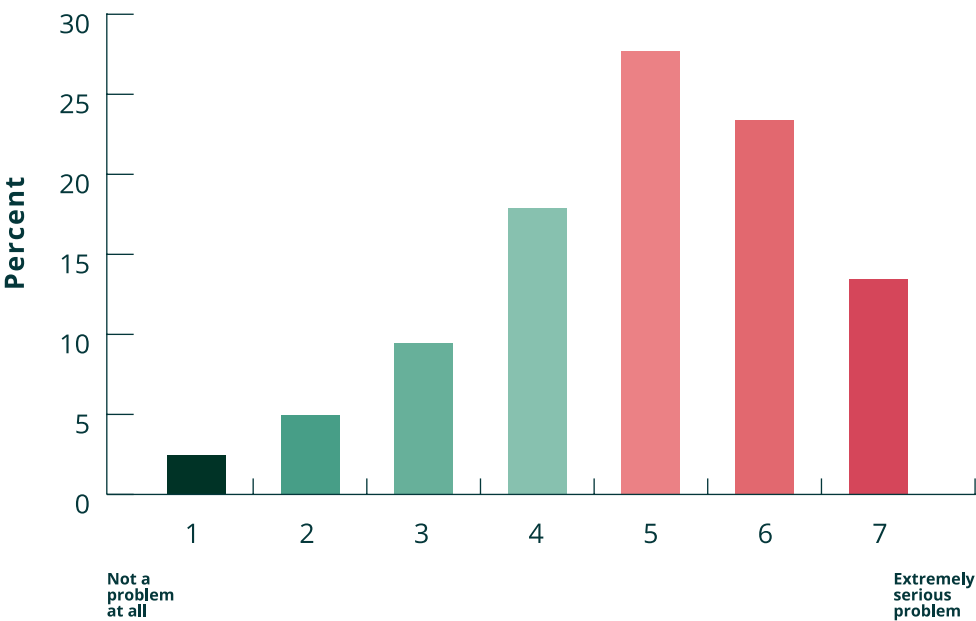
None of the above	0.6%
I have only been in Soho for work reasons	1.1%
Other - Write In	3.8%
Visited a nightclub	25.5%
Attended a theatre performance, concert or cinema	39.7%
Purchased goods in a shop	62.9%
Eaten in a restaurant	81.9%

The Nature Of The Problem

Several key statistics illustrate the nature and scale of the problem in Soho:

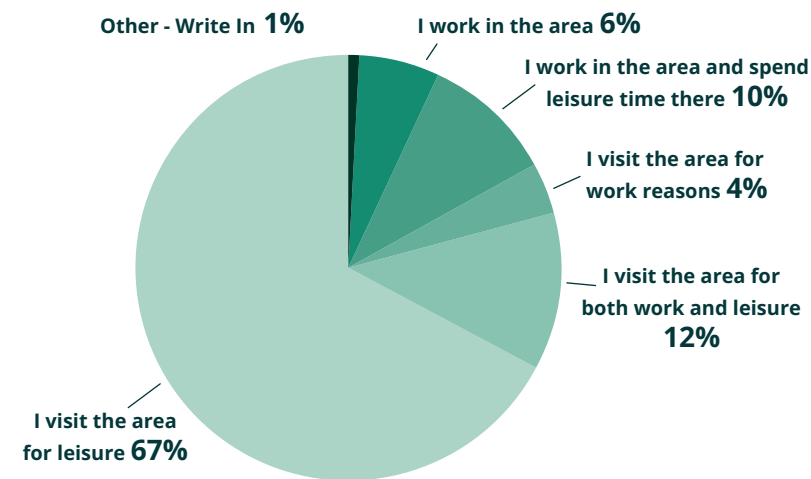
- Almost 47% of respondents reported experiencing difficulty finding a toilet in Soho
- 73% of respondents reported that they have used a toilet in an establishment (such as a pub or restaurant) where they were not a customer
- 52% of visitors report that they have witnessed someone urinating or defecating in the street in Soho, a number that increases to almost 64% amongst people who visit Soho at least once per week
- 7% of respondents admitted that they had urinated on the street in Soho in the past, with the vast majority of these (over 90%) saying that they did so because they were unable to find a toilet

When asked to indicate how serious they felt the problem of public urination and defecation is in Soho on a scale of 1 to 7 (with 1 meaning “Not a problem at all” and 7 meaning “Extremely serious problem”), there is a clear trend towards recognising the problem as serious:

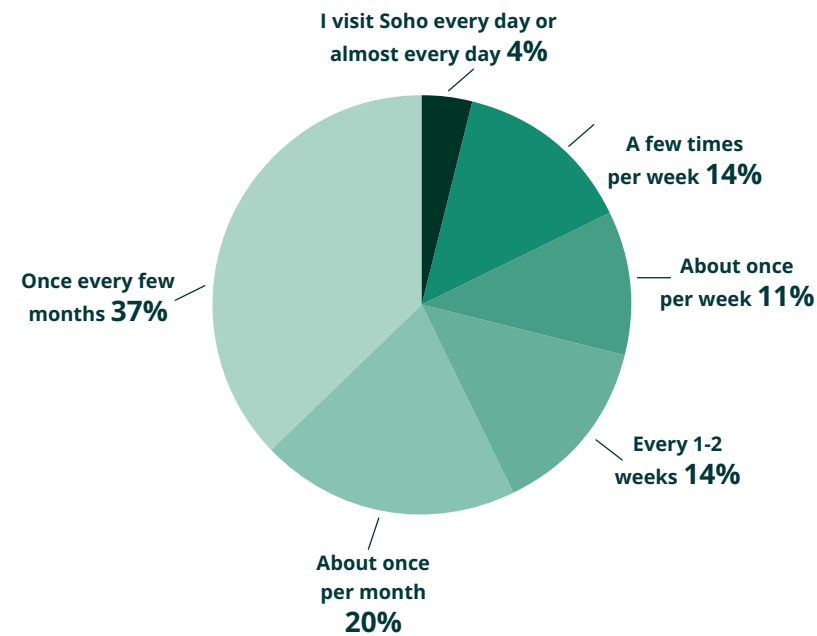


When asked whether they felt that Soho was less welcoming (and a less pleasant place to visit) because of the lack of public toilets, most respondents agreed or strongly agreed:

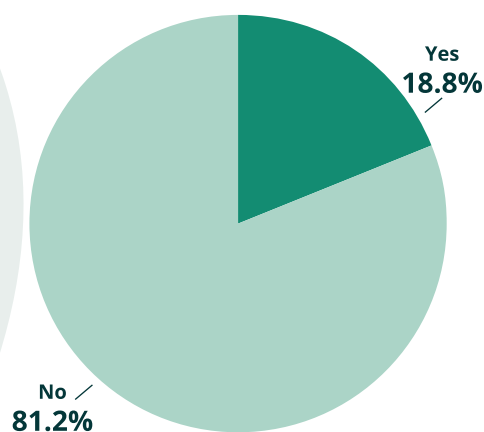
What is the primary reason you spend time in Soho?



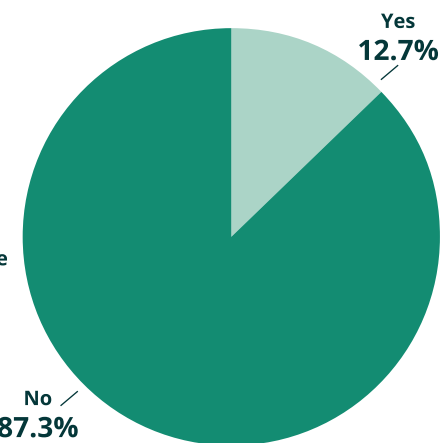
How often have you visited Soho in the last 12 months?



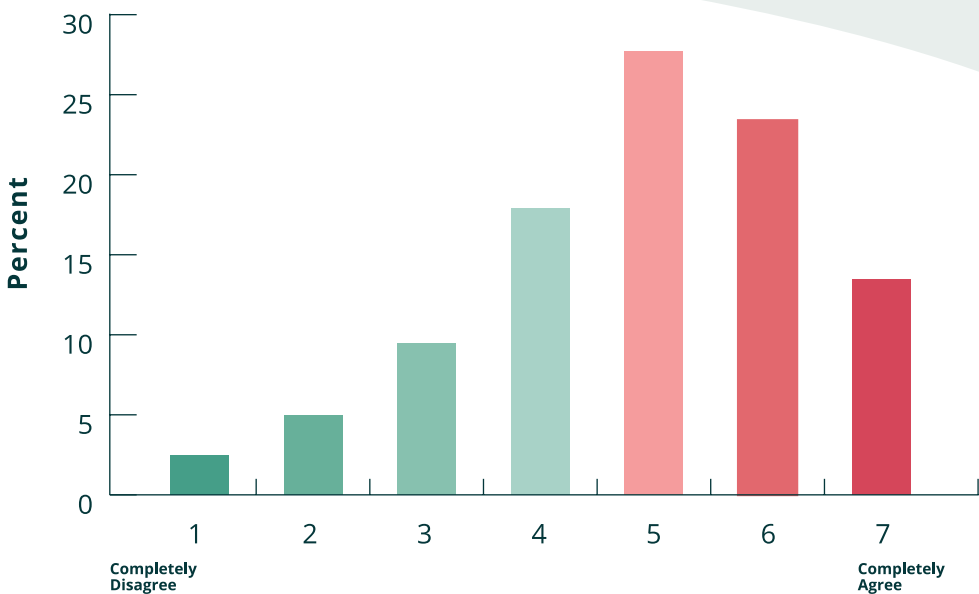
Do you need frequent access to a toilet due to a medical condition, your age, or for any other reason? Please respond based your own feeling/opinion. Any medical condition or other consideration does not necessarily need to have been diagnosed.



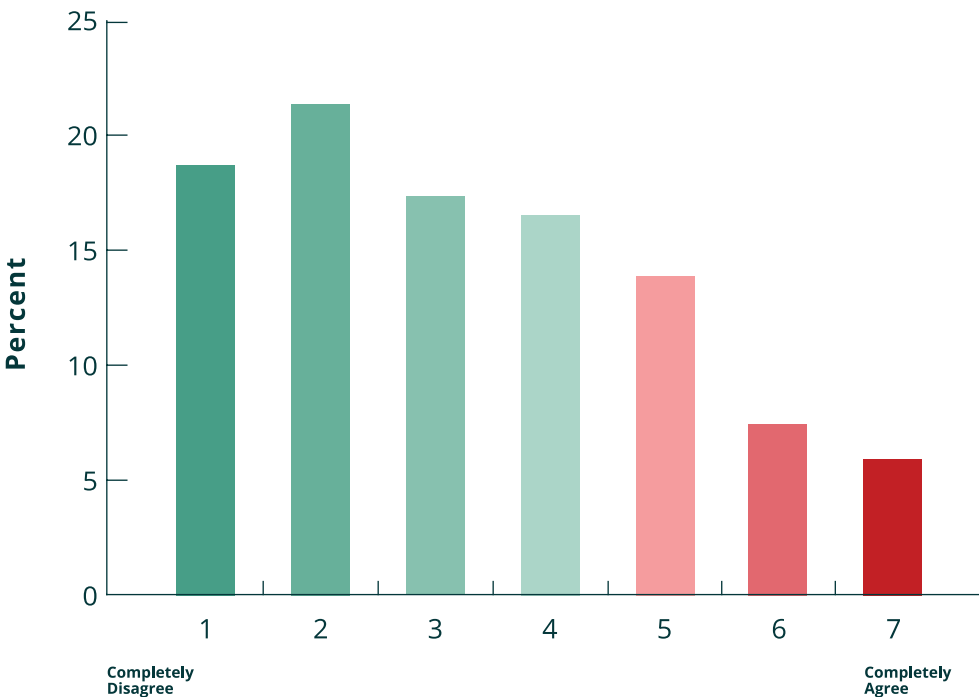
Do you need to use an accessible toilet?



On a scale of 1 to 7, with 1 meaning “Completely Disagree” and 7 meaning “Completely Agree”, how much do you agree with the following statement: I think that the lack of public toilets in Soho makes the area less welcoming and as such it is a less pleasant place to visit.



How much do you agree with the following statement: I avoid going out in London’s West End because there are not enough public toilets.



Most respondents did not, however, feel that the lack of toilet provision prevented them from going out in London’s West End. This should be expected in a sample that focuses on people who have visited the West End in the last 12 months, but it is interesting to note that a sizeable proportion (approximately 27%) indicated that they try to avoid trips to the West End because of public toilet provision.

Respondents were also asked how they would compare the provision of public toilets in Soho with their experiences in other European cities, and amongst respondents who said they had

visited another European city in the last 2 years (approximately 91% of the sample) almost 60% reported that provision was better in the other city or cities they had visited.

Less than 11% of respondents who had visited another European city in the last 2 years reported that public toilet provision was worse in the city or cities they had visited, with approximately 30% describing it as “about the same”.

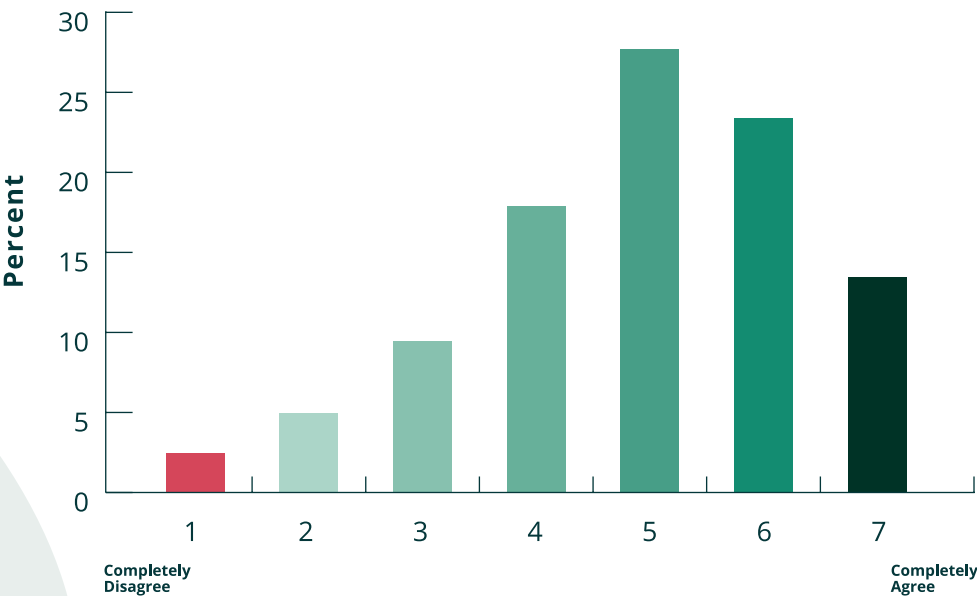
Which of the following permanent public toilet facilities have you used?

Value	Percentage
Broadwick Street (paid) Automatic Public Convenience (APC) at ground level	21.0%
Carnaby Street/Great Marlborough Street (free) underground public toilets	44.1%
Soho Square (free) ‘butterfly’ urinal	52.8%
Piccadilly Circus Underground Station (paid) public toilets	53.7%

NB: The table above illustrates responses only amongst those who indicated they had used a fixed public toilet. 53% of visitors have used a fixed public toilet, with the butterfly urinal in Soho the most frequently used.

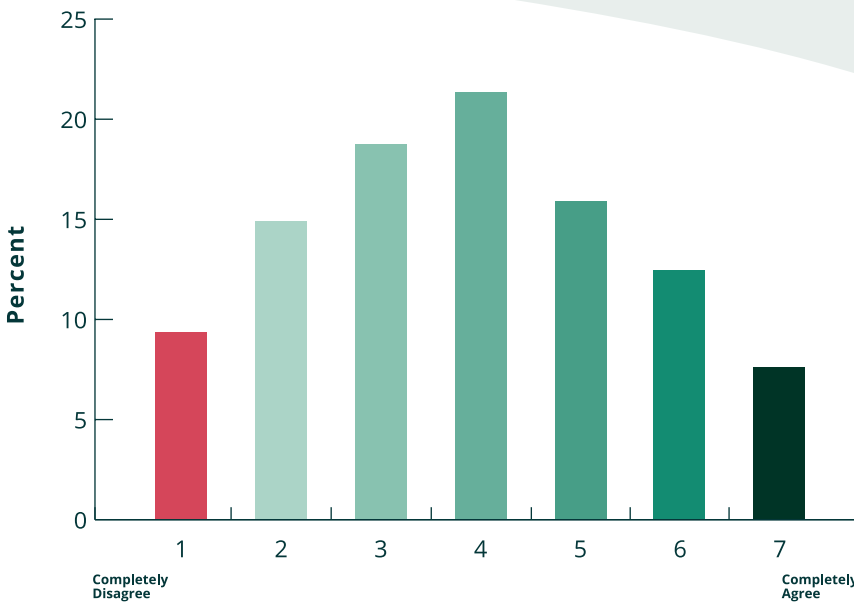
Opinions On Temporary Toilet Facilities

How much do you agree with the following statement: Soho’s temporary urinals and toilets are ok on weekends as a long-term solution, because they solve the problem of public urination.



Despite a relatively small proportion of respondents indicating that they had made use of a temporary public toilet facility (approximately 24%), visitors were generally accepting of temporary toilet facilities as an effective means for reducing public urination in Soho.

How much do you agree with the following statement: Temporary urinals and toilets in Soho are damaging to the area, so they should be removed even if that would have an impact on toilet provision.



Opinions were more mixed, however, when respondents were asked to consider whether they felt that the temporary public toilets in Soho were “damaging to the area”.

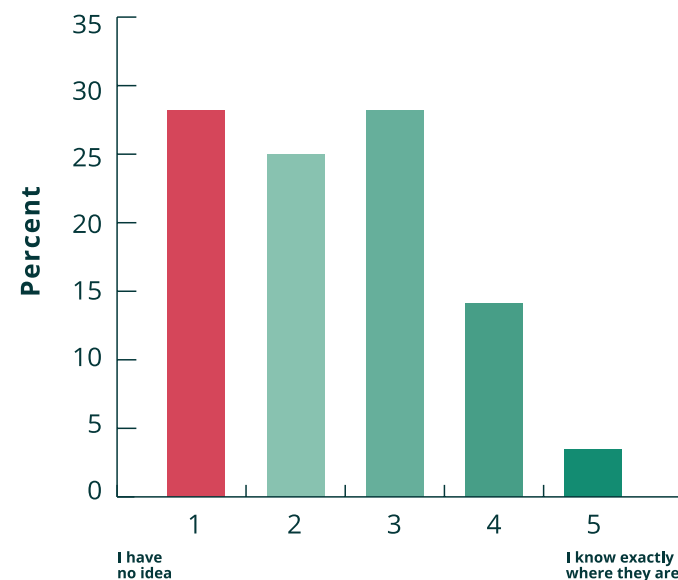
Public Toilet Signage

One issue that was frequently discussed during qualitative research and expert interviews was signage, and responses received to the visitor survey indicated fairly clearly that the current signage is insufficient:

- Almost 72% of respondents were unable to recall ever seeing any signage for public toilets in Soho
- Even amongst those who reported visiting Soho at least once per week in the last 12 months, over 60% do not recall seeing any signs for public toilets
- Amongst visitors who followed a sign, 25% were either unable to find the toilet or found that it was closed or otherwise unavailable

“[You need] good signage, because a lot of people don’t know where these temporary toilets are.”
- Resident

On a scale of 1 to 5, how aware do you think you are of where public toilets are located in Soho?

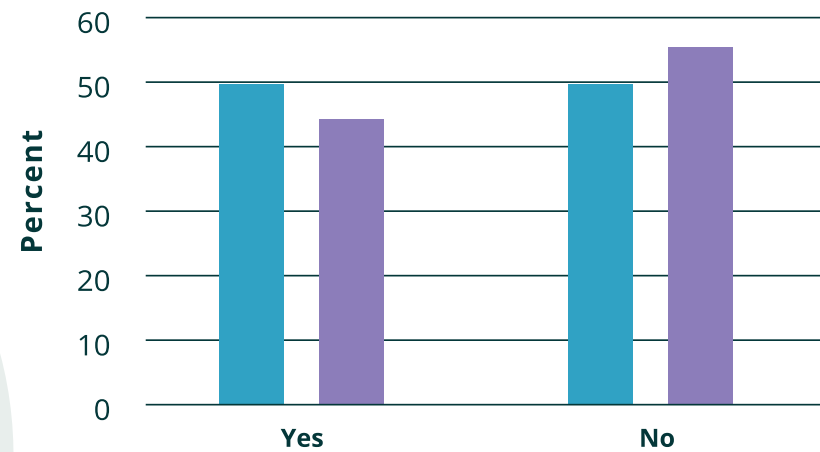


Generally speaking, visitors to Soho are unaware of where public toilets are located, and this is potentially an area that should be addressed.

How Gender Affects Visitors' Experiences With Toilets In Soho

During initial discussions with the Soho Neighbourhood Forum, as well as during qualitative research, the issue of how gender affects toilet access was frequently raised. While it is certainly true that women and men require different types of toilet facilities, the results of the visitors survey did not indicate that women experience significantly more problems than men.

Have you ever experienced difficulty finding an available toilet in Soho?



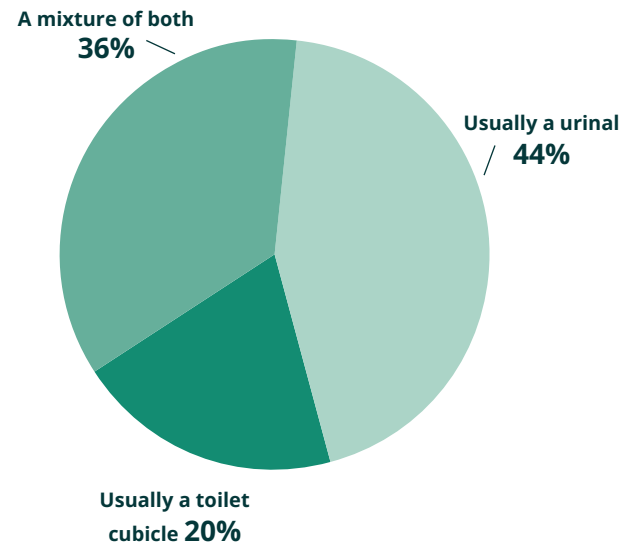
NB: The blue columns are male respondents, whereas the purple columns are female.

When asked whether they had experienced difficulties finding a toilet in Soho, for example, men were in fact slightly more likely to indicate that they had found it difficult.

Men were significantly more likely to have urinated in the street, however, and also more likely to have used a public toilet (either temporary or fixed).

Perhaps unsurprisingly, women place a greater importance on security considerations when deciding to use a public toilet.

MEN: When in Soho, do you typically use a urinal or toilet cubicle when going to the toilet?



Male respondents were asked whether they typically used urinals, toilet cubicles, or a mixture of both when visiting Soho, with most reporting that they make frequent use of urinals.

"[Soho needs] spaces for females and ... people that need baby care facilities."
- Housing association manager

Visitors With Special Needs

Public toilet provision affects people with special needs (people with medical conditions, disabled people, and older people) differently from the population as a whole, and this was probed in the survey.

19% of visitors stated that they require frequent use of a toilet due to medical needs, age, or other factors, and 13% of respondents reported that they need an accessible toilet.

When we consider groups with special needs as a distinct population, it is clear that they are indeed affected more seriously by issues related to toilet provision than the sample as a whole:

- 62% of visitors who reported needing frequent use of a toilet stated that they had experienced difficulties locating an available toilet, and almost 54% of that group had used a fixed public toilet, both of which are higher than the sample group as a whole
- Visitors who need frequent use of a toilet were also much more likely to report that they would spend more time in Soho if public toilet provision was better

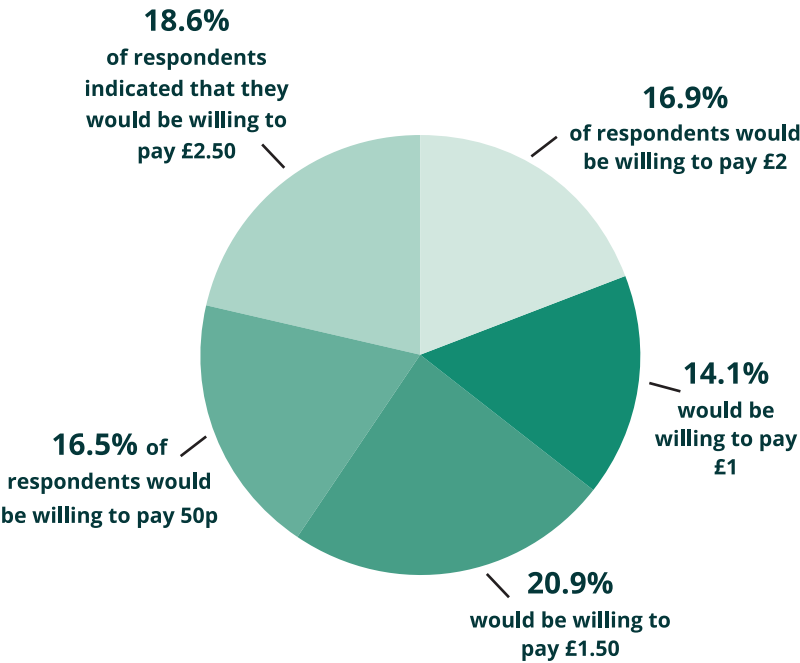
- Interestingly, older visitors did not report experiencing greater difficulty locating a toilet, but this is potentially a reflection of the fact that they participate in different activities in the area than the sample population as a whole

"How is a disabled person going to use one of [the temporary toilet facilities], just leave their wheelchair outside? They're not really a proper solution."
- Florist

Toilet Price Sensitivity

The willingness of respondents to pay for a toilet was tested using a simplified Gabor-Granger method, which showed an initial price and asked respondents whether they would be willing to pay that much to use a toilet that was "secure, as well as professionally maintained and cleaned". If they answered "Yes", they would be shown a higher price, whereas they would be shown a lower price if answering "No".

Measuring price sensitivity in surveys is complex, primarily because people are not good at predicting future action even when the situation they would be experiencing is described to them. That said, it is clear from the survey that respondents are willing to pay for toilets:



Which of the following is most important to you in determining whether you would use a public toilet? Please rank the options below.

The relatively low price sensitivity of visitors is also indicated by responses to a different question in the survey, which involved ranking the most important factors that inform their decisions to use a public toilet:

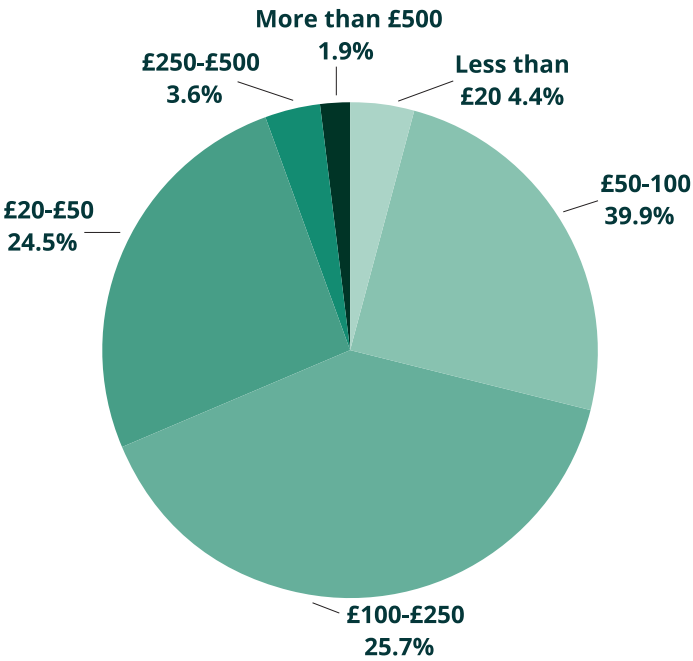
Item	Overall Rank	Rank Distribution
Cleanliness	1	<div><div></div><div></div><div></div><div></div><div></div></div>
Proximity to where I am when I need the toilet	2	<div><div></div><div></div><div></div><div></div><div></div></div>
Security	3	<div><div></div><div></div><div></div><div></div><div></div></div>
Accessibility	4	<div><div></div><div></div><div></div><div></div><div></div></div>
Cost	5	<div><div></div><div></div><div></div><div></div><div></div></div>

Lowest Rank ■ Highest Rank ■

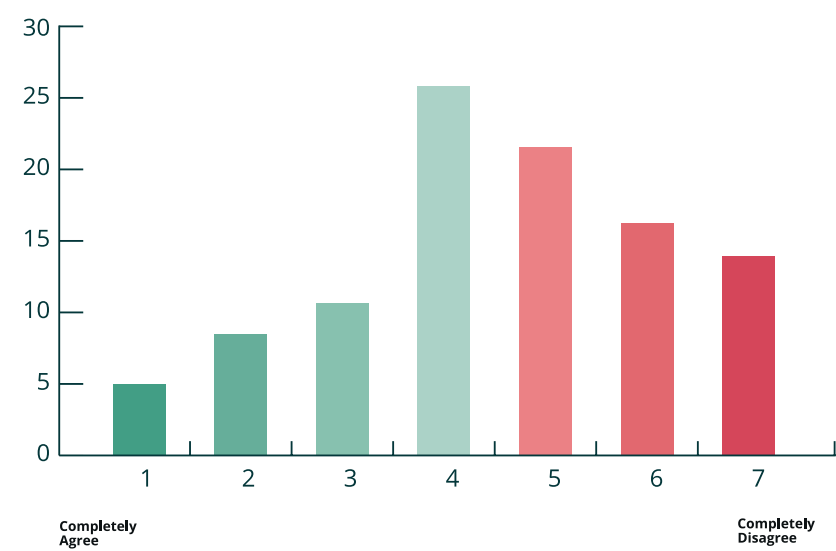
The Commercial Impact of Toilet Provision In Soho

Visitors to Soho are obviously an important part of the local economy, and our survey asked respondents how much they typically spend on a visit to Soho (excluding transport and accommodation):

How much do you typically spend during a visit to Soho? This would include all expenditure on drinks, food, theatre tickets, and other expenses for you and/or your group, but not overnight accommodation or transport to/from the area.

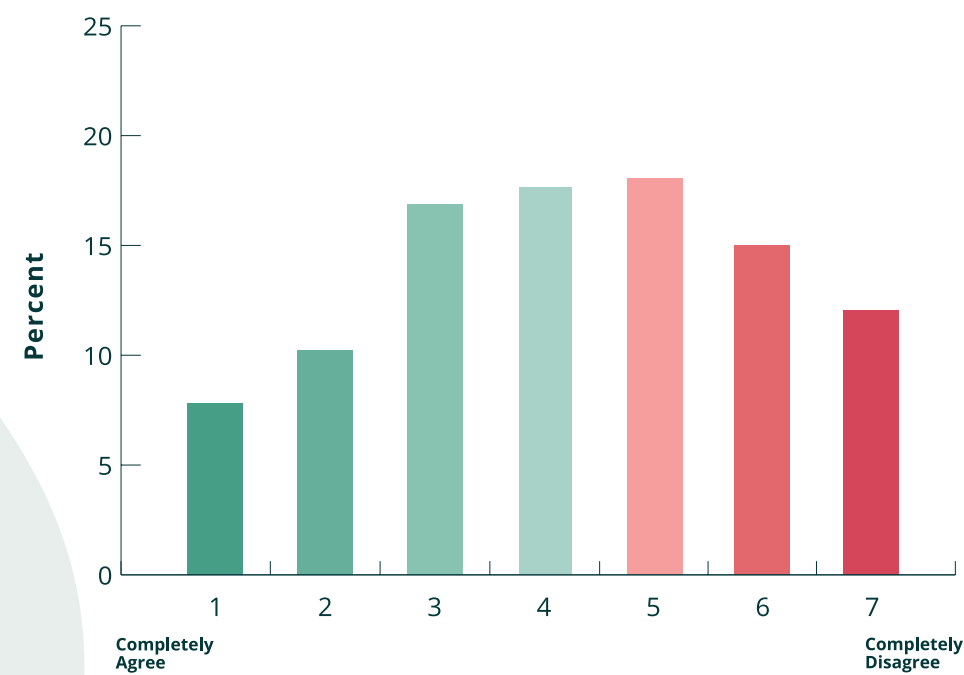


How much do you agree with the following statement: *If Soho had better public toilet provision, I would spend more time there.*



Respondents were also asked whether they would spend more time in Soho if public toilet provision was better, with a majority saying that they would:

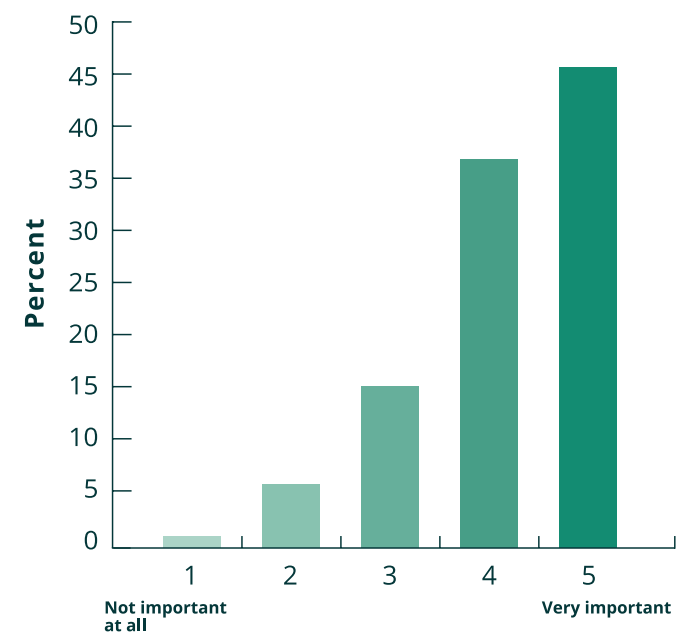
How much do you agree with the following statement: *It is a problem for me that I can't always find a toilet in Soho, and I would spend more time in Soho if toilets were more easily available.*



Views On Investment In New Public Toilets On Oxford Street

In light of current plans by Westminster City Council [WCC] to invest significant sums in improvements to public amenities Oxford Street that do not currently include any provision for additional public toilets, respondents were asked whether they believe that it is important for WCC to include funding for new public toilets in their plans:

How important do you think it is for Westminster to create new public toilets on Oxford Street?



Respondents also strongly indicated that they believe local governments should be prioritising better public toilet provision in general

Which of the following do you think is more important for local authorities to spend money on? Please rank items in order from most important to least important.

Item	Overall Rank
More clean and safe public toilets	1
More space for pedestrians	2
More trees	3
More outdoor seating	4

Appendix 10 - Survey results: What do businesses think?

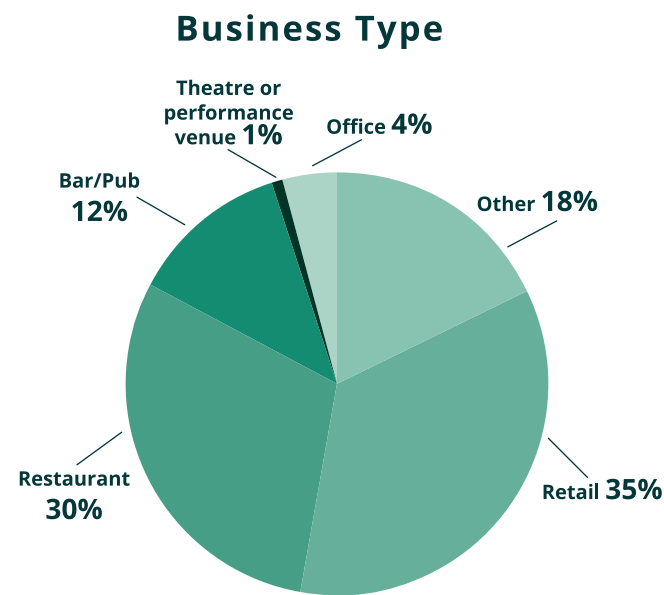
Methodology

The data outlined in this report were collected primarily via face-to-face interviews with staff of businesses in Soho between December 2023 and April 2024. In a small number of cases, the survey was filled out independently by staff online by their choice.

Staff were offered no direct financial incentive to participate, but members of staff who agreed to take part will be entered into a random draw to potentially win a small prize consisting of a meal donated by one of the respondent businesses.

151 responses were collected in total over the course of the study.

Sample Profiling

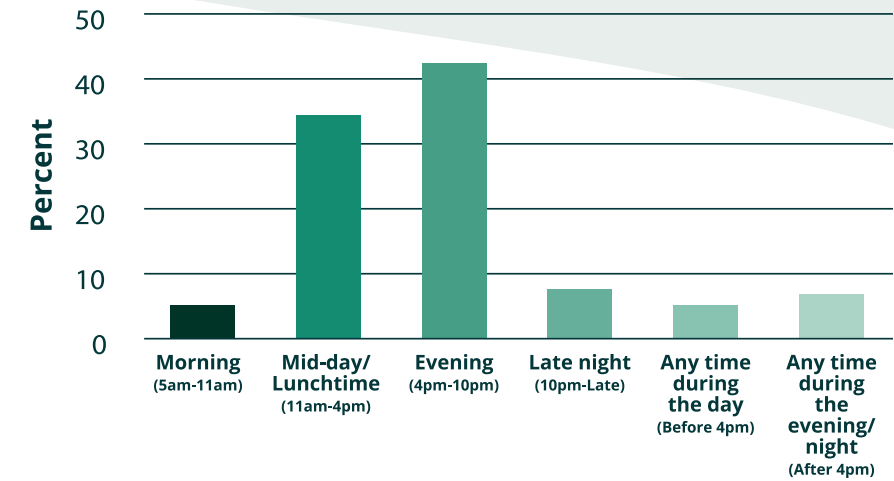


The following figures illustrate key characteristics of the businesses that participated in the sample:

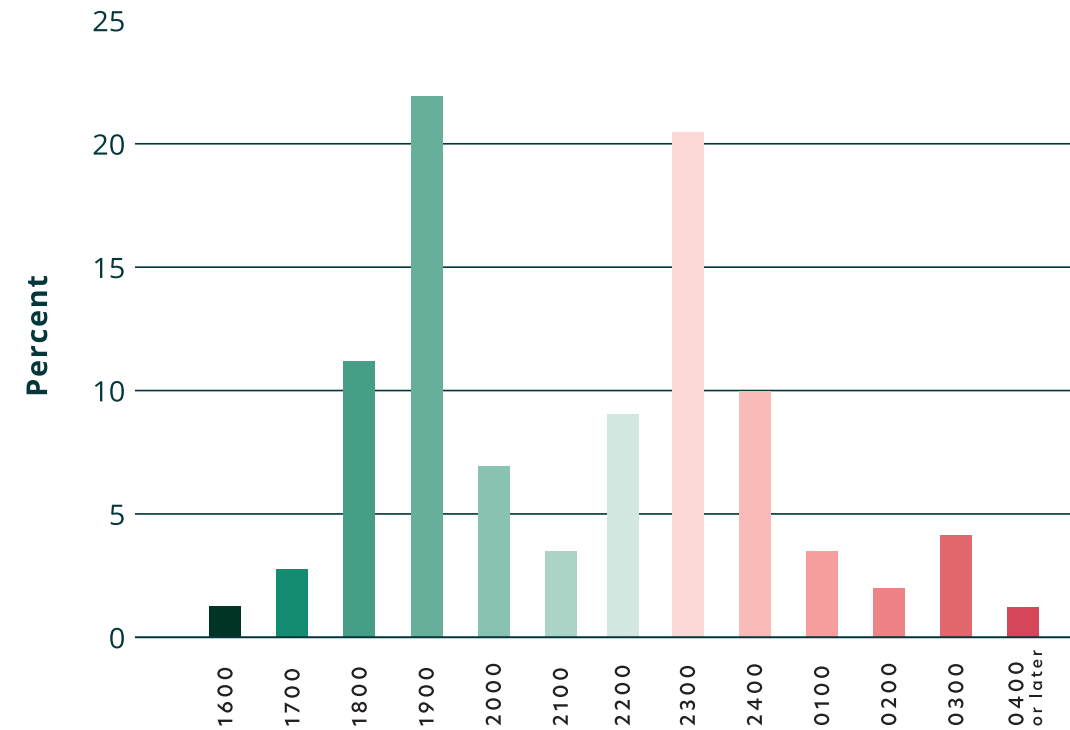
Approximately how many customers do you serve on an average day?

Ranges (Aggregated During Analysis)	Percentage
35 or fewer	20.5%
36-100	29.1%
101-200	22.5%
201+	27.8%

Please select an option from the list that best describes your peak/busiest period of the day:



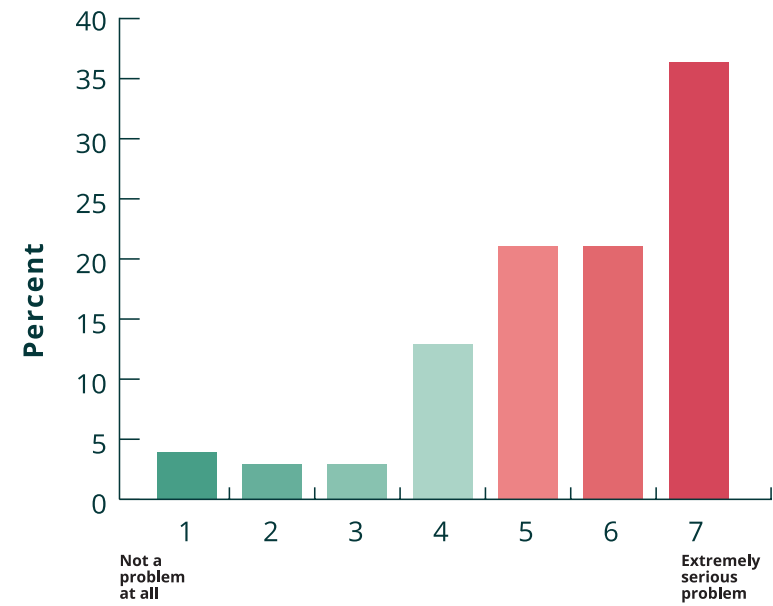
What time does your business close? Select the closest hour.



The Nature Of The Problem

The provision of toilet facilities in Soho (or lack thereof) is something that businesses believe causes problems in the area, and something that affects both customers and staff. Businesses overwhelmingly reported that the problem is serious:

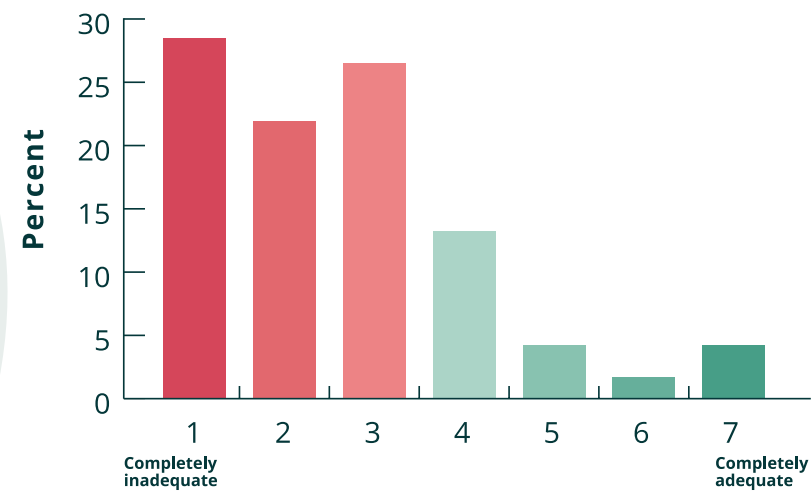
How serious do you think the problem of public urination and defecation is in Soho?



Businesses also indicated that they believe that current provision of public toilets in Soho is seriously inadequate, which likely constitutes at least part of the cause of the problem of public fouling.

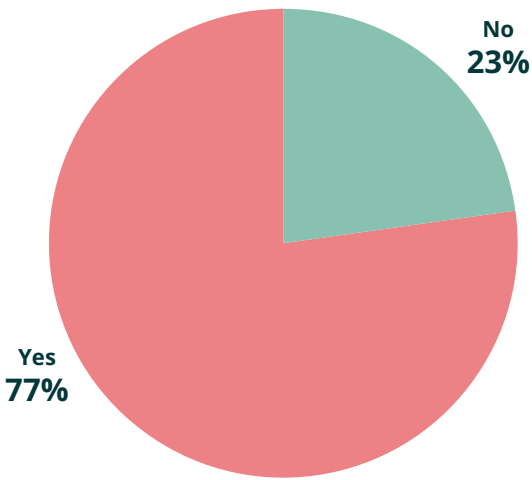
In your opinion, how adequate is the current provision of public toilets in Soho?

Please indicate on a scale of 1 to 7, with 1 meaning “Completely inadequate” and 7 meaning “Completely adequate”.



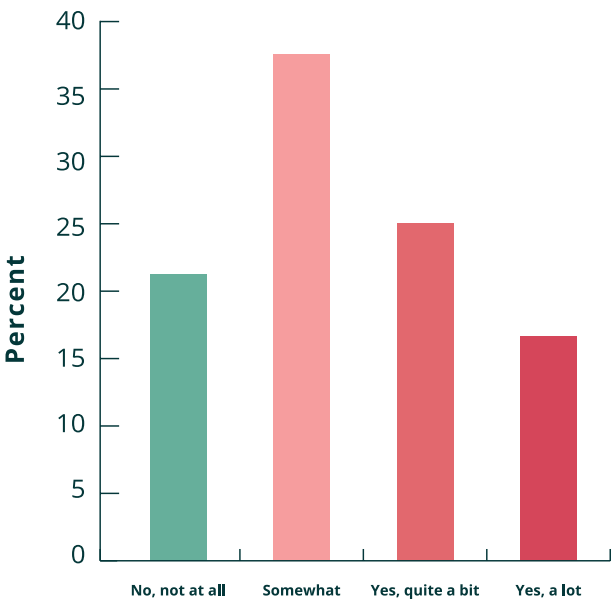
When keeping with the results of our survey of visitors to Soho, the majority of staff at businesses have witnessed public urination or defecation:

Have you ever witnessed anyone urinating or defecating in the street in Soho?



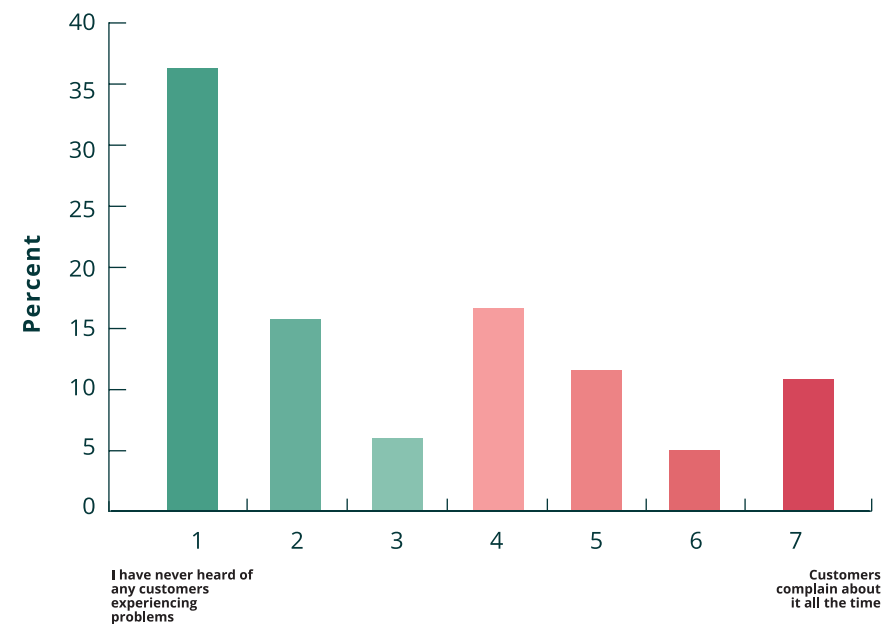
Businesses also believe that the problem has an impact on the area’s reputation, and many report that it has had a negative impact on their customers:

Do you think that the lack of public toilet provision damages Soho's reputation as a destination for visitors?



How often have you been aware of your customers experiencing issues related to public urination and defecation in Soho? For example, you could hear complaints from customers about issues related to public urination.

Please indicate on a scale of 1 to 7, with 1 meaning “I have never heard of any customers experiencing problems” and 7 meaning “Customers complain about it all the time”



Provision Of Toilets By Businesses

Businesses were asked in the survey to estimate the number of different types of toilet facilities they provide to customers, as well as the average number of customers they serve on a daily basis:

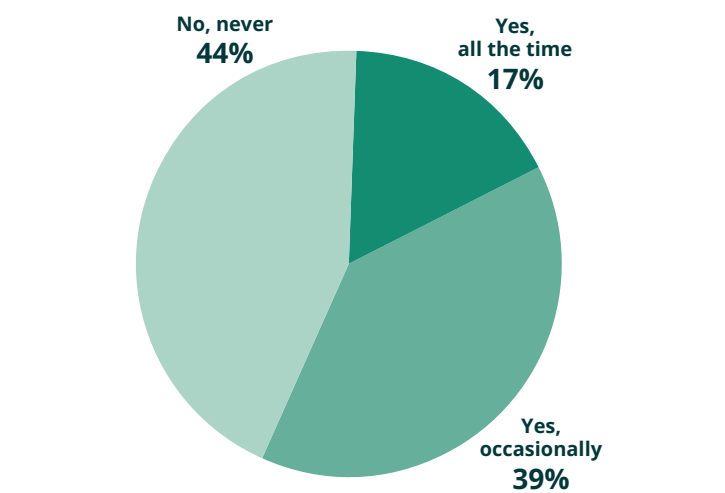
Business Type	Average number of male toilet cubicles	Average number of female toilet cubicles	Average number of unisex toilet cubicles	Average number of urinal spaces	Estimated average number of customers (daily)
Bar/Pub	1.6	2.1	1.4	3.1	418.9
Restaurant	1	1.5	1.09	1.02	189.2
Retail	0.09	0.04	0.34	0.02	133.7
Theatre or performance venue	7	9	3	5	320

As illustrated by the table above, many businesses (especially in the hospitality sector) have a relatively small provision of toilets for customers. In many cases this is likely due to constraints on space and other factors, such as the difficulty in adding new plumbing facilities to older buildings.

Whatever the cause, this is likely to have a knock-on effect on the incidence of public urination and defecation in the neighbourhood.

Interestingly enough, a majority of businesses in Soho allow non-customers to use their toilets at least occasionally:

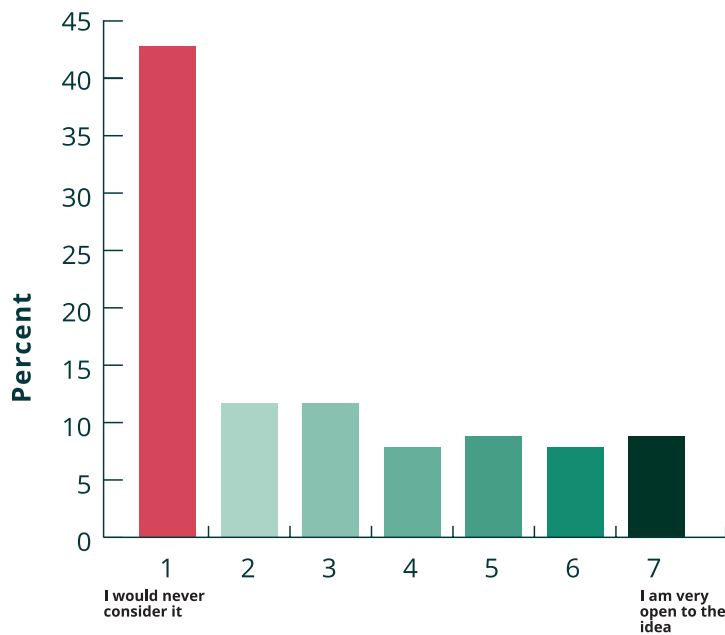
Do you allow members of the public who are not customers to use your toilets?



Amongst businesses who said that they do not allow non-customers to use their toilets, just over 25% would be willing to consider it:

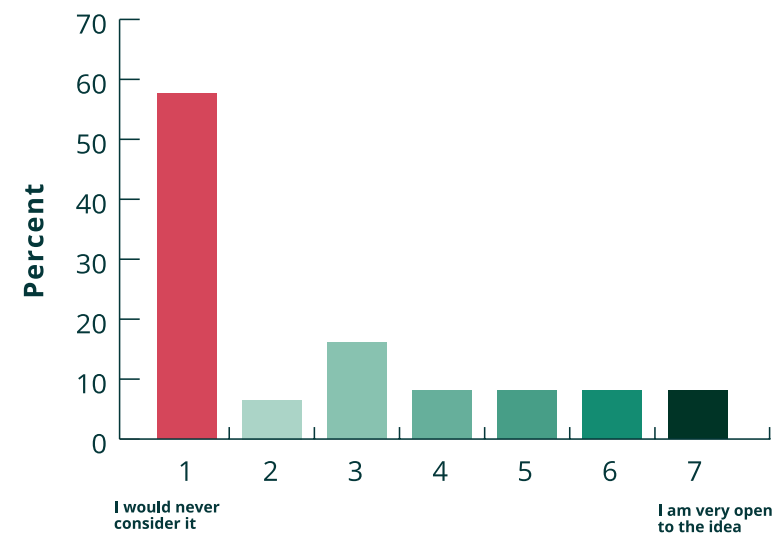
How likely would you be to consider allowing members of the public to use your toilets free of charge?

Please answer on a scale of 1 to 7, with 1 meaning “I would never consider it” and 7 meaning “I am very open to the idea”



There was also no meaningful increase in support for the idea of allowing non-customers to use toilets if the users would be charged a small fee.

How likely would you be to consider allowing members of the public to use your toilets if they were willing to pay a small amount - for example £1?



NB: Although a slightly higher proportion of businesses said that they would not be interested in public use of their toilets for a fee, as illustrated by the chart above, the difference is too small to be considered significant.

The main issue for businesses that prevents them allowing members of the public to use their toilets is security:

Which of the following potential concerns is most serious for you, when you consider why you might not want non-customers to use your toilets?

Item	Overall Rank	Rank Distribution
General security	1	<div><div></div><div></div><div></div></div>
Cleanliness of toilets	2	<div><div></div><div></div><div></div></div>
Potential drug-taking	3	<div><div></div><div></div><div></div></div>
Shortage of facilities and impact on customer use	4	<div><div></div><div></div><div></div></div>

Lowest Rank

Highest Rank

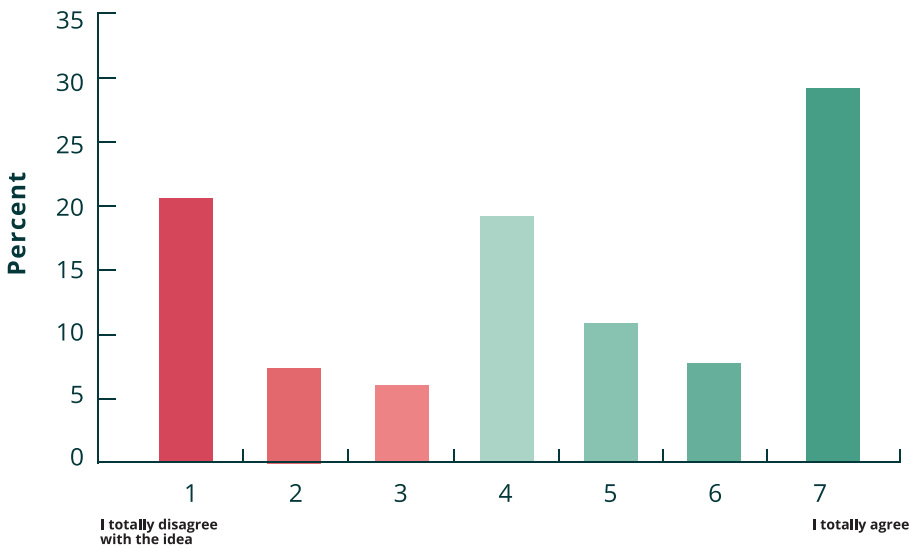
Businesses' Views On Potential Solutions

Businesses were asked several questions about potential government-led solutions to the toilet issue in Soho, including a “Night Levy” on licensed premises, portable/temporary toilets, and the potential for Westminster City Council [WCC] to fund new toilets as part of redevelopment plans for Oxford Street.

When asked about the “Night Levy”, businesses were fairly evenly split with a small majority in favour:

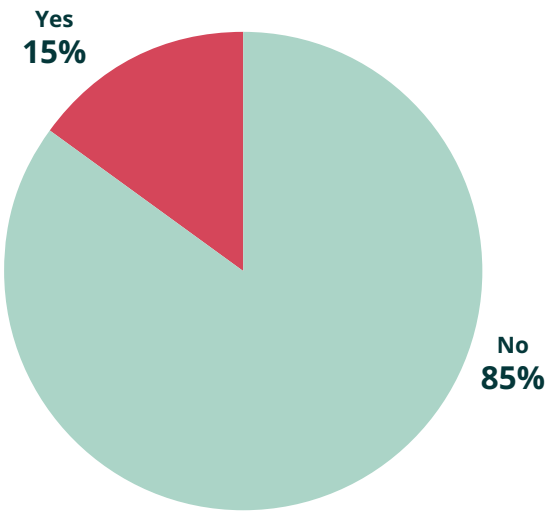
In some other parts of London such as Camden Town, late night businesses pay a levy to fund additional police and other services required to deal with anti-social behaviour and waste. This levy is imposed on businesses with licenses that allow them to serve alcohol between midnight and 6am, and is calculated based on business rates. Do you think that businesses that are open late should be obliged to make a financial contribution towards helping prevent issues like public urination in Soho?

Please indicate on a scale of 1 to 7, with 1 meaning “I totally disagree with the idea” and 7 meaning “I totally agree”



Since temporary toilets were raised frequently in focus groups with businesses, respondents were asked about whether they have had negative experiences with the current system of temporary toilets in Soho. The majority reported that they had not:

Do you experience issues at your business related to temporary toilets, such as the urinals and portable toilets placed around the area on weekends? Issues could include smells, antisocial behaviour, unsightly facilities in front of your business, or other problems.

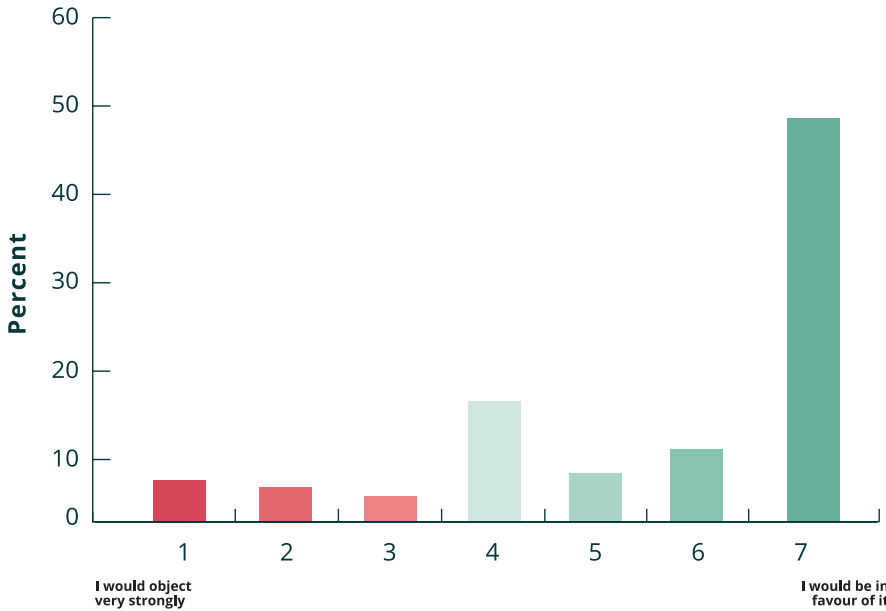


Amongst businesses who have experienced problems with temporary toilets the most-cited issues related to smells and the behaviour of individuals using them, as well as issues (such as leakage) related to the toilet equipment.

*“Whenever the wind passes we can’t even sit in front of our restaurant, it’s just horrible.”
– Restaurant manager*

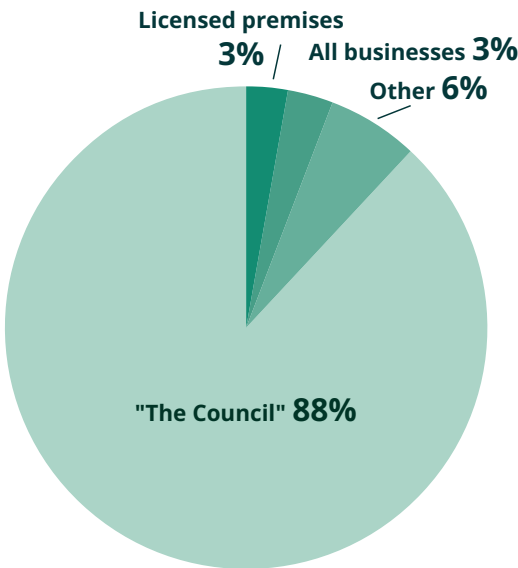
When asked whether they would be willing to have a properly maintained public toilet near their business, however, a majority of respondent businesses said that they would be supportive:

How likely would you feel about the potential placement of a public toilet in the vicinity (within 100m) of your business, if it was regularly cleaned and maintained?



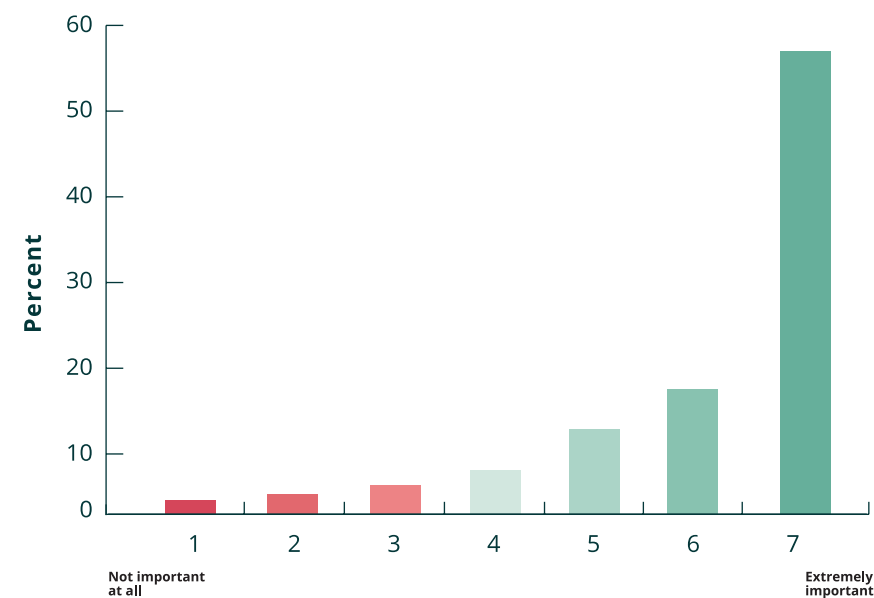
The vast majority of businesses believe that the responsibility for providing public toilets in Soho rests with WCC, echoing sentiments expressed in focus groups:

Who do you think should be responsible for paying costs associated with providing public toilets in Soho?



Businesses would also strongly support the inclusion of new public toilets in redevelopment plans for Oxford Street.

Westminster Council is currently planning on spending £45m on improvements to Oxford Street, which will include trees, wider pavements and additional seating. The plans currently do not include any provision for additional public toilets. How important do you think it is that the Council considers creating more public toilets on Oxford Street? Please indicate on a scale of 1 to 7, with 1 meaning “Not important at all” and 7 meaning “Extremely important”.



Direct Costs To Businesses

In addition to indirect costs that result from the issue of toilet provision in Soho, which could include phenomena that are difficult to measure such as a loss of prestige for the area and reduced footfall, businesses also experience direct costs, such as staff time:

Business Type	Average weekly hours of staff time spent cleaning urine and/or faeces outside the business	Average weekly hours of staff time spent cleaning toilets inside the business
Bar/Pub	3.6	9.2
Restaurant	4.3	9.4
Retail	5.05	2
Theatre or performance venue	0	15
Office	1.1	11.96
Other	3.9	16.7
AVERAGE	2.92	10.71

“I see the cafes and restaurants around me every morning having to clean the streets. That’s costing them...”
-Resident

Appendix 11 - What do residents think?

In the Focus Groups, residents were very concerned about the scale of the problems caused by a lack of proper toilet provision in Soho.

Here are some key quotes:

“On an evening you get sick of it, there’s just people urinating everywhere.”

“I go down daily in the summer with bleach and water ... and they say, ring the Council. And I said, look, when there’s turds there ... it’s still you that got to clean it... I don’t want to wait two days for the Council to come and clean it up.”

“Soho [is] perceived as being a nightlife centre therefore we should expect it... [but] there are residents as well.”

“I see people pissing at the side of the house, I remonstrate... And of course, it gets aggressive, you know, and I stand there and say, well, ‘come on’... but of course, I’m shaking.”

One theme which emerged strongly in consultations with residents was the impact of the built environment on the choices made by individuals who urinate or defecate in public. Several participants noted that there are serious hotspots in areas where offenders can be shielded from view:

“There’s a building abutting ours which protrudes alongside it by about a foot, creating a shelter for anybody who walks up to wee behind there without anybody seeing them... there’s been so much urination there that it’s actually corroded the brickwork and mice go in now and I’ve had to block it myself.”

“It happens where there is a degree of privacy.”

“It’s an L-shaped street with a tower block, with a wall around the tower block. So everybody congregates on the wall, drinking... In the summer, you’ve got your windows open and you say, ‘Excuse me, my kids are in here.’”

When discussing who is responsible for creating and solving the problems, residents spoke about the responsibility of hospitality businesses, local government authorities, and other businesses in the area:

“It’s not just ... the late night bars that open until four o’clock. It’s places like Supreme that have queues all day long... and of course when people are in a queue for like 10 to 12 hours or whatever, they go everywhere.”

“[In lots of pubs] the toilets are miles upstairs or miles downstairs... so people go, ‘I can’t be arsed going up there... I’m going to piss around the corner ... a little alleyway.’”

“You’ve got the idiots [causing issues], then you’ve got the people who are, for one reason or the other, taken short and they don’t really know what the rules are.”

Participants in the residents' focus groups were generally negative about most of the solutions that have been tried already by local government authorities, though most acknowledged that the problem is complex and that pragmatism may be necessary:

"[Anti-urination paint] doesn't work, it's paint that is meant to spray back the urine when you wee on it. It doesn't work, I can tell you."

"And during Pride they put these pissoirs out and they overflowed. And there were rivers of urine everywhere."

"[Hospitality businesses] need to have friendly signs, 'Have you had a pee before you leave?' sort of thing, because there's no toilets."

"I think [temporary toilets] are disgusting, but they're less disgusting, as you've said, than the alternatives. So they're the least worst alternatives."

"[Temporary toilets] only provide for men, so what about women?"

Almost all participants expressed that they felt a lack of enforcement of existing rules emboldened offenders, and wanted more patrols and stricter enforcement.

"I think neighbourhood enforcement officers have got other challenges to deal with."
- Housing association manager

"I don't think I have seen even one person getting prosecuted."
- Restaurant manager and resident

Appendix 12 - Leading providers

During the course of the project we spoke to various providers of toilets to understand the different types of solutions available on the market and to gauge an estimate of the cost to install, refurbish and operate.

An overview of seven leading providers, most of which already have some level of presence in the UK, and our discussions with them, are detailed below:

- 2theloo
- DANFO
- Healthmatic
- JCDecaux
- PEEQUAL
- Pop-Up Toilet Company
- Sanitronics

2theloo

Company Name	2theloo
HQ Location	Amsterdam, The Netherlands
Overview of experience	<ul style="list-style-type: none">• Incorporated in 2011.• Opened its first 'toilet store' in Amsterdam in 2012.• Today the company receives over 40 million visitors per year to its 175+ locations.• EU market leader and also one of the thought leaders in the public toilet market.• The company believes that "everyone deserves a surprisingly fun and comfortable toilet break, every time they need it".• 2theloo opened its award-winning Covent Garden market store in Jubilee Market Hall on 1 September 2015. Operates seven days a week for around twelve hours a day.• The cost to use its toilets is £1.50 (compared to 50p to use WCC's underground public toilets on the other side of the piazza) and the shop is always busy, in our experience.
Footprint	Currently operates around 175 locations in 8 different countries, including: Belgium, France, Germany, Hungary, the Netherlands, Spain and the UK (Covent Garden).
Sectors	Motorway service stations, railway stations, shopping centres
Solutions	Concept Toilets, Paid access solutions, Standalone units
Pros	<ul style="list-style-type: none">• 2theloo has been operating successfully in London for almost 9 years.• Due to its Covent Garden 'store', 2theloo has a long-standing relationship with Shaftesbury Capital, one of the two main property owners in Soho.• Has expressed interest in taking over the renovation and management of the underground toilet facilities at Broadwick Street on a commercial basis.
Cons	Financial viability criteria of at least 500-1,000 users per day (plus subsidised/offset rent) may limit some locations.

Additional points

- We first spoke to 2theloo’s Business Development Director in December 2023 and have had continuous dialogue since then, as with the other providers.
- We made site visits to two of their locations in the Netherlands, one in a motorway service station, the other on a busy shopping street.
- We subsequently visited the company’s Covent Garden ‘store’ and also carried out a walkaround with 2theloo’s Chief Executive to identify possible locations.
- We suggested that the company explore siting a ‘store’ in the Soho area, specifically on Berwick Street.
- On the walkabout, the Chief Executive identified Berwick Street as having potential to meet the company’s financial viability criteria of at least 500-1,000 users per day, though the ideal would be over 2,000. Although only a relatively small contribution, revenues could be supplemented by selling accessories such as nappies and sanitary pads.
- 2theloo’s “number one” consideration is the safety of its staff, which would be a key factor in assessing any location, including the opening hours.
- Following a meeting between 2theloo’s Business Development Director and SNF in July, the company confirmed its interest in the underground site on Broadwick Street and has since submitted a proposal for consideration by WCC.
- We would encourage any holders of vacant retail outlets in Soho to consider a ‘toilet store’ as a viable option to supplement toilet provision in the area.



DANFO

Company Name	DANFO
HQ Location	Nora, Sweden
UK locations	<ul style="list-style-type: none">• UK headquarters in Blackpool• Satellite offices in Hounslow and Warrington• UK manufacturing in Knighton, on the Powys/Herefordshire border.
Overview of experience	<ul style="list-style-type: none">• Founded in 1969, in the Swedish city of Nora• DANFO has grown to become one of the two main providers of public toilets in the UK (alongside Healthmatic).• A certified provider of Changing Places toilets• DANFO prides itself on developing “safe, clean, durable toilets with a focus on both people and the environment.”• DANFO’s other main local authority client in London is Hackney, where it recently refurbished the council’s public toilets in the borough’s high street and parks.
Footprint	<ul style="list-style-type: none">• DANFO also has offices in Norway and the United Arab Emirates
Sectors	<ul style="list-style-type: none">• Town centres, parks, transport hubs, tourism hotspots
Solutions	<ul style="list-style-type: none">• The company’s Tetragon model is designed for both urban and landscape environments, and is flexible in both size and design, with advanced anti-vandalism features.• In addition to building and installing public toilets, DANFO also maintains and operates them.
Pros	<ul style="list-style-type: none">• DANFO is WCC’s incumbent contractor for the cleaning and maintenance of all APCs in the borough.• DANFO recently won the tender for the supply and installation of four new urinals and three APCs across Westminster.• DANFO is very familiar with Soho and well-positioned to expedite the planning and approvals process associated with any new facilities to be built in the area.
Cons	<ul style="list-style-type: none">• Units are not self-cleaning, and lack some of the more sophisticated technological features of some competitors’.

Additional points

- Given the space constraints in Soho, the company recommends using single units, although if a suitable location can be found, it would be more economical to site multiple units in a single building. For a modest additional cost (£1000-2000), the exterior and/or interior can be customised to reflect the local environment. An example of a modular unit designed to resemble a traditional London “cabbies’ hut” can be found elsewhere in this report.
- The base of the building is prefabricated concrete, including cellular plastic insulation with an incorporated floor drainage system. The robust concrete base with eyebolts for lifting purposes makes the building very easy to install and remove. In addition, the concrete base provides a very stable foundation for the building and facilitates the foundation work. The floor can be finished in either tiled or vinyl or flooring.
- Other standard design features include non-slip flooring, shower-down (anti-graffiti) walls, built-in toilet roll holders/bins/sharps chutes, Wallgate composite pans, and integrated hand washer/dryers.
- According to DANFO, many councils now request additional dual-use features such as defibrillators and electric vehicle charging points, which can easily be included, as can solar panels to power lighting and other functions (although not hand-driers).

Healthmatic

Company Name	Healthmatic
HQ Location	Calne, Wiltshire, UK
Overview of experience	<ul style="list-style-type: none">Founded in 1986One of the 'Big Two', along with DANFO, in the UKHealthmatic has worked with BIDs around Soho, including the New West End Company (NVEC) and South Bank Employers' Group (SBEG), installing and running PCs in Westminster (on and off) for 24 years, and has also installed UriLifts and maintained APCs".Specialising in large, high-volume facilities in sensitive locations (the company's facilities in Covent Garden get around 3000 uses a day, and the Tower of London 5000)Healthmatic's most significant contract in London at present is the design (Phase 1) and upgrade (Phase 2) of eight WCC-owned PCs, including Carnaby/Great Marlborough St, Piccadilly Circus, Leicester Square, Covent Garden, Embankment, Westminster Bridge and Green Park.
Footprint	<ul style="list-style-type: none">Healthmatic has designed and installed over 600 toilets across the UK and Ireland.It provides maintenance and cleaning services to over 165 public authorities across the British Isles.
Sectors	<ul style="list-style-type: none">Town centres, parks, transport hubs, tourism hotspots
Solutions	<ul style="list-style-type: none">Healthmatic's core business is the design and build of modular public toilet buildings, including such London landmarks as The Jubiloo, sited on London's South Bank, close to the London Eye.It is also a significant provider of Changing Places Toilets.In addition to providing and managing public toilets and their access systems, the company also offers offsite/online systems for footfall counting and other data capture, as well as other associated services.
Indicative costs	<ul style="list-style-type: none">Ballpark figures: circa £115,000 for a single unit or £150,000 for a double, with each additional cubicle adding £40-50k to the cost.Plus circa £20,000 due to the cost of surveying, permitting, etc.
Pros	<ul style="list-style-type: none">Most of Healthmatic's toilets have no lobby and are at ground level, helping to mitigate both cleaning and loitering issues, which are a concern voiced by the Design Out Crime Officers.Healthmatic also provides an audit and control system, HM Control, which provides the contract manager with full information about activity at the toilet, enabling them to better understand the usage, as well as giving them the ability to manage the open and close timings of the toilet over the internet.
Cons	<ul style="list-style-type: none">Units are not self-cleaning, and lack some of the more sophisticated technological features of some competitors'.

JCDecaux

Company Name	JCDecaux
HQ Location	Paris, France
UK Location	Borehamwood, UK
Overview of experience	<ul style="list-style-type: none">Founded in 1964In 1964, Jean-Claude Decaux invented advertising street furniture. Ever since, JCDecaux - now the global industry leader - has been the only international player focused exclusively on outdoor advertising, developing three areas of business: street furniture, transport advertising and billboard advertising.JCDecaux also provides public toilets and has been doing so for over 40 years.JCDecaux designs and delivers public toilets to cities free of charge. They provide service and operation of the toilets, which thanks to their technology are always kept clean and fresh with automatic cleaning after each visit. They are able to do this by offsetting the cost through advertising revenue.
Footprint	<ul style="list-style-type: none">JCDecaux runs over 2,500 toilets in 28 countries (including Belgium, Brazil, Canada, Denmark, Germany, Ivory Coast, Qatar, Sweden, USA and Uruguay), with a total of 31 million users every year and 721 million users between 2001 and 2021.Across the UK, JCDecaux still services around 400 toilets, although none currently in Westminster
Sectors	<ul style="list-style-type: none">Town centres, parks, transport hubs, tourism hotspots
Solutions	<ul style="list-style-type: none">JCDecaux has supplied and maintained two types of toilets in Stockholm since 2015, custom designed to the location. Its Midi model is a 12 square metre accessible toilet and is available in around 40 locations across the city. Its Jumbo model is 18 sqm and has one accessible toilet, two regular toilets and one urinal.
Indicative costs	<ul style="list-style-type: none">A ballpark figure for servicing and consumables is £45,000 per annum. And the return becomes more attractive if it can be combined with advertising revenue.
Pros	<ul style="list-style-type: none">In addition to providing a spacious cabin that enables universal access, the new street furniture facilities in Paris will also be equipped with a second urinal cabin, complete with a door and roof to ensure user privacy. The waiting time between each visit to the main cabin will be reduced by a third, with the time between a customer leaving the toilet and it being available for the next customer reduced to just 30 seconds. During this time, the toilet cabin will be cleaned and disinfected for the comfort of the next user. The urinal cabin will be disinfected immediately after each user visit and available immediately with no waiting time.
Cons	<ul style="list-style-type: none">Toilets do not seem to be a major focus for JCDecaux in the UK.Changes to UK legislation in 2007 and 2009, have made the business case more challenging. As raised by other providers, the more toilets a supplier can service, economies of scale help to reduce the overall cost.

Additional points

- We came across JCDecaux's toilet activities while on a site visit in Stockholm.
- As a result, we made contact with JCDecaux's Head of Partnerships, who we spoke to in January.
- Due to the limited options for funding additional toilets in Soho through advertising, we have not progressed discussions further with JCDecaux as yet. However, we would recommend keeping an eye on the roll-out of the new and improved toilet network in Paris. It may then be worthwhile visiting JCDecaux's site in Borehamwood to view examples of their range of toilets suitable for UK locations such as Soho.

PEEQUAL

Company Name	PEEQUAL
HQ Locations	Birmingham and Bristol, UK
Overview of experience	<ul style="list-style-type: none">PEEQUAL began life as the final year project of Hazel McShane and Amber Probyn, studying at the University of Bristol's Centre for Innovation and Entrepreneurship.The product (temporary female urinals) was developed as a means of reducing the amount of time that women and girls have to spend queuing at festivals compared to their male counterparts - and thereby missing much of the action onstage.The two co-founders have so far raised £500,000 in investment and £50,000 in grants.Remarkably for a young start-up, they have already won eight awards, including two at the recent Event Production Show.PEEQUAL's solutions were deployed at 15 large-scale events last year, including the London Marathon and music festivals including Glastonbury, Wilderness and WOMAD.2024 has seen the company expand its presence to 30 events across the UK, including Pride (Brighton and Bristol) and festivals including Green Man, Download, and the (appropriately named) We Out Here.
Footprint	<ul style="list-style-type: none">UK-wide, with international trials planned for 2025
Sectors	<ul style="list-style-type: none">Music and cultural festivals, sporting events
Solutions	<ul style="list-style-type: none">PEEQUAL offers a single but extremely flexible solution: its colourful, individual 'cheese wedge'-shaped female urinals can be arranged in different configurations - including full circle, semi-circle and linear - to suit the available space and local environment
Pros	<ul style="list-style-type: none">Queue busting: gets the 90% of women who just want to pee out of the lengthy queues for sit-down cubiclesAddresses the gender inequality issue around the current temporary provisionWomen will actually use their facilities, unlike the current chemical toilet cubicles (according to our interviews and focus groups)Facilities are attended, and can therefore also act as safe spaces for women in distressSustainable: the company's urinals are made in the UK from recycled ocean plastic waste, with a tank capacity of 700 litres (requiring less frequent emptying than chemical toilets), and flat-pack (requiring less storage space and transport)Touch Free & Open Air: removing the number of touchpoints to minimise the transfer of germs and allow safe airflow and ventilation that eliminates bad smells and the need for chemicals
Cons	<ul style="list-style-type: none">Unlike other providers, PEEQUAL does not (currently) offer permanent/fixed facilitiesAs a young start-up, with a lengthy list of existing clients/events, available capacity may be an issue

Pop-Up Toilet Company

Company Name	Pop-Up Toilet Company
HQ Location	Apeldoorn, Netherlands
Overview of experience	<ul style="list-style-type: none">Founded in 1989Currently around 40 units installed across London, thousands in continental Europe and tens of thousands worldwide
Footprint	<ul style="list-style-type: none">Europe, Africa, Middle East, Asia, Americas
Sectors	<ul style="list-style-type: none">Town centres, parks, transport hubs, tourism hotspots
Solutions	<ul style="list-style-type: none">The company's flagship models, the UriLift Triple (a retractable urinal with a capacity of 180 visits per hour) and the 5 STAR Self-Cleaning Toilet (the most hygienic and safe self-cleaning toilet available on the European market, according to the company) both offer significant advantages in the Soho context.The former has a footprint of just 120-130cm and requires just 100-120cm 'drop' below ground. Its stainless-steel design is highly vandalism-resistant and being flushed six times hourly, it is extremely hygienic.The latter features a number of sophisticated technical solutions to combat improper use, including weight sensors that can differentiate between able-bodied and disabled users (to allow disabled people and their carers or parents and children to use the toilet, but not two or more able-bodied adults) and flashing lights and alarms to discourage rough sleepers. Being self-cleaning, it also minimises the need for human intervention, and its predictive maintenance systems allow for replacement of parts and supplies before problems occur, minimising downtime.
Pros	<ul style="list-style-type: none">The Pop-Up Toilet Company prides itself on offering the most high-tech solutions available on the market. It has maintenance crews permanently based in the UK, with a guaranteed response time of 24 hours or less.
Cons	<ul style="list-style-type: none">The company does not currently have any contractual relationship with WCC.Although the Health and Safety Executive has issued safety guidance regarding the installation and maintenance of retractable telescopic urinals, and no liability for the accident at Cambridge Circus has been apportioned to the company, political and PR sensitivities surrounding the incident persist.

Company Name	<ul style="list-style-type: none">Sanitronics
HQ Location	<ul style="list-style-type: none">Rotterdam, Netherlands
Overview of experience	<ul style="list-style-type: none">Founded in 2014The youngest of our recommended providers, at ten years old and one of the smallest, at around 50 employees.
Footprint	<ul style="list-style-type: none">At the time of our meeting in December 2023, the company had some 235 units installed worldwide, comprising 400 toilets in total, with 86 units sold in the Netherlands alone last year.
Sectors	<ul style="list-style-type: none">Town centres, parks, transport hubs, tourism hotspots
Solutions	<ul style="list-style-type: none">As the name suggests, the revolving toilet system consists of two back-to-back toilet bowls which rotate after use into a sealed compartment, where the used bowl is cleaned under high pressure, ensuring that even difficult to reach parts such as under the toilet seat are left spotless, and then dried with an air blade. Hence Sanitronics prides itself on being “the only company to provide a completely clean and dry toilet.”
Pros	<ul style="list-style-type: none">Sanitronics punches above its weight in terms of technical sophistication, particularly in terms of cleanliness.Its patented revolving toilet system shortens the turnaround time between users to around 20 seconds and provides the most intensive cleaning and drying of any of the manufacturers we spoke to. According to the company, it was for this reason that it was chosen by the city governments of Amsterdam and Stuttgart in their latest PC procurement rounds.All units are monitored for improper use, with infrared and breathing sensors connected via 4G link to Sanitronics’ control centre.
Cons	<ul style="list-style-type: none">Sanitronics currently has only one unit in the UK - installed in Poole, Dorset in 2023 - and no permanent UK servicing and maintenance presence. According to the company, it would need a minimum of four units in order to justify an in-country team.It also has a relatively small manufacturing facility - and thus longer procurement timelines than the other providers mentioned above - although it is due to move to a larger site later this year, increasing monthly production from 2 units per month to 20.

Appendix 13 - Destination Toilets

a) Sexy Loo, Amsterdam, The Netherlands



One of the more unusual sites visited by the project team, Amsterdam’s ‘Sexy Loo’ is a genuine destination toilet and a thriving business to boot - one that offers a potential tongue-in-cheek solution to Soho’s toilet troubles.

Located on Oudezijds Achterburgwal, next to the last remaining peep show in the heart of the city’s historic Red-Light District, the facility opened in 2020 and has since become a regular rest-and-selfie stop for tourists and other visitors to the area.

As mentioned elsewhere in this report, the Netherlands’ public toilet provision is good in parts, but many facilities cater only for men and are no more aesthetically pleasing than the festival-style ‘portaloo’s’ currently blighting Soho’s streets and squares. Not so Sexy Loo...

Opened in 2020, the attraction recreates the red-light district in miniature, with its narrow alleyways, (real) trees, vintage street lamps and famous brothel windows - the latter being screens that indicate when a cubicle is available, with videos of male and female sex workers beckoning customers inside, and a red curtain being drawn to indicate when a unit is occupied.

For male users in a hurry, there are also urinals that bear more than a passing resemblance to the Rolling Stones ‘lips’ logo, whilst a spacious, wheelchair-accessible cubicle and comfortable baby-changing room make the facility as well-equipped and inclusive as any in the city.

At €2.50 a visit, Sexy Loo is no cheap thrill, although its tickets do offer a €2.00 discount at neighbouring attractions including the Erotic Museum, Casa Rosso, and the aforementioned Sex Palace Peep Show, thereby spreading the love to the local economy.

Furthermore, over 35% of respondents to our visitor survey would be prepared to pay £2.00 (EUR 2.33) or more to use a toilet.

b) New Zealand public toilet competition

In September 2023, New Zealand's Breakfast TV programme ran a competition for the best public toilet which could provide ideas for Sohos' destination toilet. Two of the three nominees were:

- Waiuku Town Centre: this rural Auckland town has refurbished public loos painted to reflect the town's history and catch the eye of its tourists.
- Awanui Public Toilet: the toilets were designed as part of a revitalisation project for Awanui, in the Far North, and were painted and pieced together by members of the community.

Earlier in the year, Hundertwasser Toilets in Kawakawa were declared a Category 1 historic place, ranking the loos alongside the likes of Christchurch Cathedral and Auckland's War Memorial Museum. Transformed by Austrian visual artist Friedensreich Hundertwasser from a prosaic 1960s public toilet block into a unique yet functional work of art and Northland icon, it attracts an estimated 250,000 visitors a year.



Appendix 14 - London's loos through the ages

This sub-section outlines a brief history of London's public conveniences.

a) From the Romans to today

The human need to go to the loo is not a new thing. The following is a potted history.

Roman toilets (2 BCE)

The Romans built public toilets from as early as 2 BCE so they wouldn't have to walk knee-deep in excrement in the cities springing up across the ancient Roman empire. The Roman toilets typically consisted of dark rooms lined with benches dotted with 20-30 key-shaped holes placed rather closely together, often funded with donations from upper-class citizens.

Whittington's Longhouse (1423 - 1851)

Another benefactor, four-time Lord Mayor and folk tale inspiration, Richard Whittington, financed a public toilet called Whittington's Longhouse at Cheapside. It was the first public toilet in the capital with separate provision - this 128-seat toilet had 64 seats for men and 64 for women. The "house of easement" operated from 1423 until the seventeenth century when it was destroyed in the Great Fire of London. The replacement building was rather more modest with six male and six female seats, and was in use until around 1851.

Great Exhibition (1851)

That same year, the Great Exhibition was held at Crystal Palace. Plumber, George Jennings, installed flushing toilets he called "monkey closets" - inspired by the shape of some of the plumbing. By the time the exhibition closed, more than 800,000 visitors had used the facilities. Jennings persuaded the organisers to keep the toilets open, charging one penny per use - the origin of the term "to spend a penny". At the time, one penny was also the average cost of a postage stamp or loaf of bread - over £1 today.

Camden ladies' convenience (1905)

By the end of the 19th Century, "public waiting rooms" were more widespread - but were overwhelmingly for men. The so-called "urinary leash" continued to impede women's access to public spaces. Eventually, in December 1905, the Irish playwright George Bernard Shaw championed the cause and Camden agreed to a public ladies' convenience in Park Street. Inequality continued, though, as women had to pay to use the "water closet", as it took up much more room and required more maintenance than the simple system for men. "Urinettes" were introduced - they were similar to water closets but smaller and had curtains instead of doors - but were soon removed, partly due to complaints they were being used "in an uncleanly manner".

b) A brief history of Soho

Henry VIII's happy hunting grounds (1536)

If there is one constant in Soho's 500 years of history, it is change. Originally farmland until the Middle Ages, in 1536 it was designated a Royal Park by Henry VIII - the name "Soho" being derived from a hunting cry used during this period - and sold off piecemeal by his descendents over the following century or so.

Soho Square (1680)

The 17th century saw extensive development of the area, with Soho Square being laid out in the 1680s. Although intended as an upper-class estate, it never evolved as such, instead becoming a haven for successive waves of immigrants, from French Huguenots in the 1680s to Greeks and Italians in the 19th century, laying the foundations of the area's burgeoning reputation as a centre of gastronomy and entertainment.

Cholera (1854)

As the remaining aristocracy migrated from Soho to the likes of Mayfair during the 19th century, the area became increasingly densely populated, with brothels, theatres and music halls proliferating. The accompanying deterioration of sanitary conditions culminated in the cholera outbreak of 1854, which led to one of the most important discoveries in the history of epidemiology.

By mapping the addresses of the outbreak's victims, physician and scientist John Snow identified the source of the epidemic as the public water pump on what is now Broadwick Street, the spring below which was found to have been contaminated with sewage. By removing the handle of the pump, Snow halted the spread of the outbreak, advancing the acceptance of the germ theory of disease and inspiring fundamental changes to London's water and waste systems.

A creative centre (1900s - present)

The 20th century witnessed the rise of the Soho we know today, from the boom in the food and beverage sector to the cementing in the public imagination of the area as a centre of creativity and modernism: from the art of Francis Bacon and Lucian Freud to the technological innovation of John Logie Baird, and the musical invention of The Beatles, Jimi Hendrix and David Bowie.

Sex industry (1780s - 1980s)

With its tradition of alternative thinking and lifestyles, exemplified by former residents such as "Empress of Pleasure" Teresa Cornelys, William Blake and Karl Marx, Soho became the natural home of London's LGBTQ+ community, which in turn added to the area's bohemian reputation. Iconic erotic entertainment venues such as the Windmill Theatre and Raymond Revuebar brought a splash of glamour and semi-respectability to the area's established sex industry, before the relaxation of censorship, a crackdown on corruption in the police and tighter licensing controls precipitated its decline in the 1980s.

As the numbers of strip clubs and peep shows dwindled, the neighbourhood's residential

population began to increase again, with organisations such as the Soho Housing Association contributing to the mix of high-end and social housing that exists today. As the image of the area has improved, so the retail and food and beverage (F&B) industries in particular have grown exponentially, to the point where Soho has the highest concentration of licensed premises in the UK (695, according to The Soho Society).

It is this complex, multilayered character of Soho, with its residents and revellers, and its 96 narrow streets and alleyways, which lies at the heart of the issue that this report seeks to address.

c) The impact of COVID

The advent of COVID-19 put public toilet provision - or the lack of it - at the top of the political agenda, for the first time in decades. Unprepared for such a large-scale public health emergency, the government turned to specialist organisations including the BTA and British Cleaning Council (BCC, of which the BTA is a member), to better understand what did and didn't work during the pandemic, and how to prepare for the next one. The resulting paper Embedding Effective Hygiene for a Resilient UK ([link](#)) is currently being considered by the (still ongoing) enquiry.

"When Covid hit, almost all public toilets were closed," explains BTA managing director Raymond Martin. "The only ones that councils were forced to keep open were the accessible/disabled facilities. The downside of that is that Radar Keys became freely available on the likes of Ebay for a couple of pounds, so now the system needs to be reexamined, to prevent drug users, rough sleepers and others taking advantage."

The result was an epidemic of 'wild toileting' following the lifting of the first lockdown - which, in the case of the Royal Parks, necessitated an unprecedented clean-up operation using specialist 'hazmat' teams, at a reported cost to the taxpayer of around £230,000.

The effect was also felt particularly heavily in Soho, where the incidence of street fouling skyrocketed, particularly in the streets and alleyways around Berwick Street, as market trader and Soho Dairy owner Robin Smith explained to us: "Tyler's Court was the number one toilet in the area, with ladies at one end and gents at the other. It was the epicentre of excrement. Peter Street was covered in s***. Traders had to wash it down every day with buckets of disinfectant. There was s*** all over the ramp to the storage unit, puddles of p*** everywhere ... the smell was unbelievable."

The temporary closure of bars and nightclubs to minimise transmission of the virus also led to a massive spike in reported incidence of 'cottaging', particularly in the underground toilets at Carnaby/GreatMarlborough Street and Broadwick Street - leading to the temporary suspension of public access to the former and the closure and sell-off of the latter, as referenced elsewhere in this report.

The Met's former District Ward Officer (DWO) for Soho, PC Steve Muldoon described a typical scene thus: "Broadwick Street was the worst. On occasions this small toilet, built to accommodate a maximum of 10 or so people, would often have 30 men loitering inside. The toilets were rarely used by people that actually wanted to use the toilet and were instead used primarily for men to engage in sexual activity. They would often have people keeping watch, who would give warnings when members of the public were coming down. The final straw for Carnaby Street was when a man called to report that a child had witnessed this sort of behaviour."

d) Al fresco

Few subjects divide opinion in Soho as dramatically as WCC's Al Fresco Dining Scheme, launched in July 2020 after the end of the first Spring lockdown. Originally intended to last for a few months, it ended up being extended until September 2021.

For the neighbourhood's hard-pressed food and beverage business owners it was a vital lifeline, pulling them back from the brink of bankruptcy, while for visitors it cemented Soho's reputation as the go-to place to let off steam after months of enforced isolation.

For the area's residents, however, it was an unmitigated disaster, the repercussions of which continue to be felt four years later. "Al Fresco was f***ing awful for residents," one market trader told us. "There was s*** and p*** everywhere. You had 20,000 people coming into a place with no toilets - it was like a seaside town in the middle of the West End, with people p***ing through your letterbox and s***ting on your doorstep."



Appendix 15 - The Toilet Paper: Improving London's Loos

Here are the recommendations from The Toilet Paper produced by the London Assembly in 2021.

Principle 1: Duty

Recommendation 1 - The government should make the provision of public toilets a statutory duty for local authorities, and the Mayor should be leading on this issue for London, lobbying with London Councils for the provision of ring fenced funding to enable this to be achieved.

Recommendation 2 - The Mayor and London Councils should provide an opportunity for local authorities to share best practice on their community toilet schemes, including how to run them successfully and how to ensure that information and directions about such schemes are clear, consistent and accessible.

Recommendation 3 - The Mayor should engage with large businesses and retail chains on the high street, to encourage them to open their toilets to the public and advertise that they are doing so.

Recommendation 4 - To make current public toilets more financially viable, and to stimulate provision of new public toilets, the Mayor should convene local authorities and prospective commercial partners to explore innovative practice with regards to advertising and broader commercial opportunities in public toilets.

Recommendation 5 - TfL should share, in a public forum, the results of their current review of toilet provision across the network and any actions that will be taken as a result of the findings.

Recommendation 6 - TfL should create an action plan for how they will enable the wider public, not just paying passengers, to access toilets situated behind the barrier in stations.

Principle 2: Directions

Recommendation 7 - The Mayor, local authorities and TfL should all improve the quantity and quality of information on how to find the types of publicly accessible toilets that Londoners require, with the information provided in a range of formats that suit the diverse needs of Londoners.

Recommendation 8 - TfL should add an easy-to-find toilet map on their TfL Go app, ensure it is available in accessible formats and contains accurate data on facilities and opening times.

Recommendation 9 - TfL should meet with disability charities including Crohn's and Colitis UK, and Changing Places, to review their provision for people with disabilities and people with long-term health conditions and join the "not every disability is visible" campaign.

Principle 3: Data

Recommendation 10 - Each local authority should produce a toilet strategy based on population need and current provision.

Recommendation 11 - Using the principles of the Health Inequalities Strategy, the Mayor should review the health inequalities implications of current public toilet provision in London, and use that analysis to help drive improvements in provision with partner organisations.

Recommendation 12 - The Mayor and London Councils should work with local authorities to review the quality of accessible toilets to ensure they are genuinely accessible for Londoners with all disabilities.

Appendix 16 - Key legislation

Key legislation relevant to public toilets is listed in the table below:

2024 Toilet accommodation: Approved Document T	<ul style="list-style-type: none">Building regulation in England from DLUHC to provide guidance on the design and layout of universal toilets, ambulant toilets and toilet cubicles.	link
2023 edition; Annex E - Draft Approved Document T: Toilets	<ul style="list-style-type: none">This draft guidance covers toilet provision in buildings other than dwellings. Key points include:Urinals should be provided in line with BS6465-1.Toilet cubicles or rooms containing toilets should not be located in a way that compromises the safety, privacy or dignity of users.Preferably, all doors to toilets should open outwards	link
2010 Equality and Diversity Act	<ul style="list-style-type: none">Under the Equality Act (2010) older people, people with disabilities such as bladder and bowel problems, and pregnant women are recognised as protected groups. Public bodies, like the local council, must have due regard for their obligations under the Public Sector Equality Duty (PSED – Section 149 of the Equality Act).	link
2010: British Standards (BS) 6465 Part 4	<ul style="list-style-type: none">'Sanitary installations. Code of practice for the provision of public toilets'	link
2006 British Standard (BS) 6465 Part 1:2006+A1:2009	<ul style="list-style-type: none">The "Code of practice for the design of sanitary facilities and scales of provision of sanitary and associated appliances" - sets out recommendations for the level of provision by gender.	link
2008 Sex Discrimination (amendment to regulation)	<ul style="list-style-type: none">Allows Councils to charge for the use of Urinals.	link
2008 Government committee paper 'The Provision of Public Toilets'	<ul style="list-style-type: none">Report by the Communities and Local Government Committee which outlines to Councils good practice approach to Public Toilets.	link
2008 Government Paper "Improving Public Access to Better Quality Toilets - A Strategic Guide"	<ul style="list-style-type: none">A guide by the Department for Communities and Local Government. This strategic guide reviews the evidence and sets out ways in which local authorities and their partners can secure improvements to public toilets. By arguing the case for public toilets, removing barriers to provision, and sharing good approaches and practice, it aims to encourage local authorities and the business community to review the importance of provision.	link
Building 'M' Regulations	<ul style="list-style-type: none">Outline the dimensions and layout requirements for a toilet to be compliant with the DDA Act. The regulations are slightly flexible and are subject to some local interpretation.	link
2003 Sexual Offences Act 2003 (Section 71)	<ul style="list-style-type: none">Makes sexual activity in a public toilet a criminal offence.	link
1995 Disabled Discrimination Act (DDA)	<ul style="list-style-type: none">1995 Disability Discrimination Act (DDA) aims to end the discrimination that many disabled people face. Amongst other things, it outlines the requirements for all bodies to offer equal access to toilets, in terms of locations and accessibility.	link
1990 Environmental Protection Act	<ul style="list-style-type: none">A system of integrated pollution control for the disposal of wastes to land, water and air.	link
1963 Public Lavatories (Turnstiles) Act	<ul style="list-style-type: none">Outlaws the use of turnstiles to enter Public Toilets.	link
1936 Public Health Act	<ul style="list-style-type: none">Allows Local Authorities to charge for Toilets. (The urinals exclusion was changed recently - see 2008 Sex Discrimination Act).	link

Appendix 17 - Reading list

The following is a list of some of the other key papers reviewed by the project team:

DATE	TITLE / SOURCE	LINK
05/24	Access to Toilets Scrutiny Review Report, Health and Social Care Scrutiny Commission, Southwark Council	link
6/12/23	Climate Action, Environment and Highways Policy and Scrutiny Committee, City of Westminster Council	link
10/23	Loos for Southwark	link
08/23	The London Loo League Table, London Assembly	link
16/09/23	Public Conveniences Update, City of Westminster Council	link
06/23	Public Toilet Provision in Merton	link
09/22	London Loos - Public Toilets in London - The views of older Londoners, Age UK London	link
19/11/21	The Toilet Paper: Improving London's loos, London Assembly	link
19/11/20	The Toilet Manifesto for London Group	link
05/19	'Taking the P***', Royal Society for Public Health	link
11/19	London at night: An evidence base for a 24-hour city	link
21/03/18	How inclusion can exclude: The case of public toilet provision for women, UWE Bristol	link
07/11	Public toilets in London - update report, London Assembly Health & Public Services Committee	link

Appendix 18 - Key Organisations and Online Resources

AgeUK - www.ageuk.org.uk

Bladder and Bowel Foundation - www.bladderandbowelfoundation.org

Bowel Cancer UK - www.bowelcanceruk.org.uk

British Cleaning Council - <https://britishcleaningcouncil.org/>

British Institute of Cleaning Science - <https://www.bics.org.uk/>

British Standards Institution - www.bsigroup.org

British Toilet Association - www.btalooos.co.uk

Centre for Accessible Environments - www.cae.org.uk

Changing Places Campaign - <https://www.changing-places.org/>

Colostomy Association - www.colostomyassociation.org.uk

Crohn's and Colitis UK - www.Crohn'sandcolitis.org.uk

Disability Rights UK - www.disabilityrightsuk.org

Great British Public Toilet Map - <https://www.toiletmap.org.uk>

IBS (Irritable Bowel Syndrome) Network - www.theibsnetwork.org

Licensing SAVI (Security and Vulnerability Initiative) - <https://www.licensingsavi.com/>

Loo of the Year Awards - www.loo.co.uk

Public Toilets Research Unit - <https://www.rca.ac.uk/research-innovation/research-centres/helen-hamlyn-centre/public-toilets-research-unit/>

Radar Keys - <https://news.motability.co.uk/everyday-tips/radar-keys-explained-what-are-they-where-can-i-use-them-and-how-do-i-get-one/>

Royal Society for Public Health - <https://www.rsph.org.uk/>

TINKLE Toilets Innovation and New Knowledge Exchange

<https://tinkle.rca.ac.uk>

Toilets 4 London (app) - <https://www.toilets4london.com/>

UK Paruresis (Shy Bladder Syndrome) Trust - www.ukpt.org.uk

Westminster Public Toilets - <https://www.westminster.gov.uk/leisure-libraries-and-community/public-toilets>

World Toilet Organization - <https://worldtoilet.org/>

Appendix 19 - News stories and articles

The following is a list of key news stories and articles:

DATE	TITLE / SOURCE	LINK
28/05/24	What is the tourist tax and how much will it cost?	link
23/05/24	Paris modernizes its 435 public toilets	link
16/05/24	Which UK holiday spots will start taxing tourists?	link
20/04/24	Accessible toilets: How aware are public buildings of their legal obligations?, London Society	link
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12/04/24	London Society calls on mayoral candidates to commit to the provision and maintenance of public toilets, London Society	link
21/11/23	We need to talk about toilets, London Society	link
16/10/23	In Praise of Public Toilets, Disegno	link
20/09/23	London council calls for power to impose overnight levy	link
	'Spending a Penny: A Photographic Exploration of England's Public Toilets', Historic England	link
19/01/23	London takes aim at public peeing with splash-back paint	link
11/10/22	Around London In 13 Remarkable Toilets, Londonist	link
17/01/22	London's long-term lav affair: A history of public toilets in the capital, BBC	link
19/11/21	London's public toilets a serious concern, report finds, BBC	link
15/08/18	Reality Check: Public toilets mapped, BBC	link



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A PUBLIC TOILET STRATEGY FOR SOHO

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