How do planners perceive their role in providing public toilets in London

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Being a dissertation submitted to the faculty of The Built Environment as part of the requirements for the award of the MSc Spatial Planning at University College London:
I declare that this dissertation is entirely my own work and that ideas, data and images, as well as direct quotations, drawn from elsewhere are identified and referenced.

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Abstract

Public toilets are an increasingly rare feature in London, with many social and health consequences. Planning's role in managing the built environment in Britain has its origins in public health concerns in the late nineteenth and early twentieth centuries, the same time that many of London's historic public toilets were being constructed out of concerns for public health, seemingly tying public toilets and planning together. Yet planning has had very little to do with the provision of public toilets in recent decades, which have seen the closure of most of London's public toilets. This dissertation sets out to uncover why there has been this apparent decoupling between public toilet provision and planning as well as looking at the role there might be for planning to aid in future public toilet provision in London.

Six practicing planners were interviewed for this dissertation in order to discover their perspectives of the past, present and future role of planning in public toilet provision. The historic role of municipalities is reflected upon and public health is shown to be the vital concept linking planning and public toilets, both historically and for any future role. The new public toilet policy introduced in the emerging London Plan, Policy S6, is the fulcrum of this research, around which the role of planning for public toilets is investigated.

1. Introduction

1.1 Context

The urban landscape is inaccessible when there are not adequate sanitary facilities provided nearby that are usable by a given individual for their needs (Greed, 2003). Yet, so many public toilets have closed in London, and the rest of the UK, in the past decades (Health and Public Services Committee, 2011, p. 17; BBC News, 2018). A 2018 survey found over half of all respondents restrict their fluid intake before going out in order to reduce their need for a toilet (The Royal Society for Public Health (RSPH), 2019), a practice which can result in long term health issues. Much literature of all kinds suggests that urban planning is key in ensuring sufficient provision of public toilets, see Stanwell-Smith (2010) or the aforementioned RSPH (2019) report, yet the responsibility for all aspects of public toilets are often left to more operationally minded local government departments like street cleaning or parks and leisure departments (Greed, 2016). This appears to present a gap between academia and practice, begging the question: what is the role of planning, or the planner, in ensuring provision of public toilets and how do planners themselves view their responsibility?

Public attention has been growing around public toilet closures in the UK in recent years. Examples of this can be seen in the House of Lords debate about excluding public toilets from business rates (HL Deb, 2019), reports from the House of Commons (Communities and Local Government, 2008) and the London Assembly (Health and Public Services Committee, 2011) on top of the aforementioned RSPH (2019) report. Likewise attention to this issue has been shown in many news reports over the past few years, for example Jones (2019), Ellson (2019) and BBC News (2018) to sample just a few. Yet very little seems to be done to improve this situation. As municipal budgets get cut and there is no statutory requirement for any local authorities or public agencies to provide public toilets (Greed, 2016) they are an ever easy target to close for cost cutting reasons.

The public health implications of toilet provision, the spatial expertise of planners and the power granted to the planning system that allows for planning obligations suggest there is a role for planners to play in toilet provision, even in the current situation where there is no statutory obligation for development plans to consider public toilets or for development

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management officers to give thought to how they might be provided. Perhaps it is because the absence of public toilets from the planning process was becoming increasingly evident that the emerging London Plan is the first to dedicate a specific policy to public toilets: Policy S6 (Greater London Authority, 2017, p. 218). This policy has been adapted to specify it applies to even more sorts of developments that it did in the initial draft (Greater London Authority, 2019, p. 227) and stipulates that toilets built under this policy should be free to use.

This new policy, the first of its kind to be applied at such a scale in the UK, can be used to narrow down and focus the question raised earlier to: in London, how do planners perceive their role in providing public toilets and how do they think this new policy will change how they see their role in ensuring adequate provision of public toilets? This dissertation aims to answer this question.

1.2 Outline of Dissertation

The nature of this question means this dissertation will necessarily touch on the history of both planning and public toilets in London, as well as whether planning has the ability or responsibility to deal with issues such as these. With reference to the existing literature, this is what is set out in Chapter 2. How public toilets are provided elsewhere is also covered in Chapter 2, so as to allow for comparisons to be drawn that can be useful to shed light on how the system in London might be able to work better.

Six practicing planners, mostly from London, were interviewed to draw on their experiences as planners and elicit their thoughts and understandings of the history and role of planning in public toilet provision, as well as to look forward and see what they think the causes and implications are of the introduction of a policy like Policy S6 in the emerging London Plan. Chapter 3 sets out the reasons for this choice of research method, as well as separating the research question out into realistic objectives, then gives thought to the ethics of this research.

The responses from the interviews are then analysed and presented in Chapter 4. Reflections on how interviewee responses relate to the literature examined in Chapter 2 are presented

alongside the analysis here. Finally, this dissertation ends with Chapter 5 which brings together the themes elicited in the previous chapters to draw conclusions about how planners perceive their role in providing public toilets in London.

1.3 A Note on Terminology

Before moving on to the literature review, a note on terminology. The term "public toilets" can be misleading, given that many "public" toilets used by the public are not publicly owned or managed. They might be in a train station or a shopping centre, for example, and hence not the responsibility of a public body. As Knight & Bichard (2011, p. 4) identify, when we talk about public toilets in their present context we are actually talking about "publicly accessible toilets", meaning: "all toilets that the public can access without having to buy anything" as this more accurately describes how people use toilets when away from home or their place of work. For the purposes of this dissertation I will refer to "publicly accessible toilets" as "public toilets" both for brevity and because it is a more commonly used phrase. However, I do not want this to mean the importance of the accessibility of public toilets is forgotten.

2. Literature Review

2.1 The Public Health Origins of Planning

Town planning as a practice in Britain originated in the late nineteenth century out of concerns for public health (Cherry, 1979). However, the designing of cities to engender a healthy life for its residents goes back far further than that. For example, see Vitruvius's concern for ensuring adequate ventilation in Roman cities due to concerns about the health impacts of bad air (Hebbert, 1999). While mentioning Roman city design it is worth noting that Romans built public toilets of sorts, but of a much more communal sort than would be recognised today (Greed, 2003, p. 32).

Concern for the wellbeing of the poor in the late Victorian era led to many reform movements, such as the housing, social, land reformers, who all pointed to a vague concept of urban planning as a means of improving the conditions of the poor in London (Cherry, 1979). Public health reform was also having an impact on the spatial texture of British cities as the 1875 Public Health Act introduced stringent standards on the layout of streets and design of buildings and so consequently can be seen as one of the first town planning acts (Greed, 2003, p. 40; Hebbert, 1999, p. 437). The main reason for these street standards was to enable air to flow freely through the streets, based upon the principles taken from Vitruvius. At the same time local government, as we would now recognise it, was emerging in London with district boards and vestries slowly being empowered to provide public services, especially after the London County Council replaced the unaccountable but public health oriented Metropolitan Board of Works (MBW), whose main purpose was to construct the sewer system and improve drainage across inner London (Davis, 2001). The changes the MBW made to the fabric of London would probably be linked to town planning and urban design if they were to be done in the present day and the sewers built under Bazalgette and the MBW laid the infrastructure necessary for the underground public toilets that were later constructed across London.

The first statutory planning act in Britain, the 1909 Housing and Town Planning etc. Act had the objective of "securing proper sanitary conditions, amenity and convenience in connection with laying out and use of the land" (Hebbert, 1999). This is a clear statement of town

planning being an agent through which to deliver better public health. The specific mention of "sanitary conditions" implies the need for sanitary facilities like public toilets, the kind of which were proliferating in London, and in many other cities across the world, at the time and were seen as having a civilising effect, although provision was very much skewed in favour of men (Penner, 2001; McCabe, 2012; Stanwell-Smith, 2010).

To summarise, the origins of town planning are in public health, especially the early legislation that regulated and intervened in the built environment. Public toilets are a part of the built environment and have a major impact on public health outcomes and this was reflected in legislation at the time, such as the 1891 Public Health (London) Act which permitted local authorities to construct public toilets under their streets (Greed, 2003, p. 43)

2.2 Municipalism and its Downfall

Many public services from libraries and housing through to public toilets were delivered in the second half of the nineteenth and first half of the twentieth century, sometimes thanks to the socialist instincts of many of the municipal leaders of industrialising cities at the time (Dogliani, 2002) and sometimes because of the philanthropy of wealthy capitalists (Hall & Tewdwr-Jones, 2010, pp. 28-30). Either way, it seems delivering public services was seen as an unquestionably good thing to do during this period and it is when we see many of London's public toilets be built (McCabe, 2012). All previous laws regarding public toilets were consolidated in the 1936 Public Health Act (Greed, 2019), which gave municipalities permissive rights to build public toilets, but did not mandate them. The vestries and boroughs of London, and municipalities elsewhere, were constructing public toilets apace with no legal requirement to do so. They were doing it as a matter of civic pride in being able to provide for the public health needs of their residents (Stanwell-Smith, 2010) and this pride is often reflected in the architecture of the facilities (Greed, 2003, p. 44).

Greed (2003, p. 54) discusses the audit of toilets in London conducted by Graham Don in 1961 in which 53% of public toilets in London at the time were pre-1918, 34% were inter-war and only 13% since 1940 (after the 1936 act) showing the peak of enthusiasm for construction of public toilets was in the late Victorian and early Edwardian era, the era of the reform

movements. Such a comprehensive audit of public toilets in London has not been attempted since, although in 2006 and 2011 the London Assembly attempted to create very precise estimates of availability, showing the decline in public toilet facilities that had occurred in the decades since Don's audit, (Health and Public Services Committee, 2006; Health and Public Services Committee, 2011). There is not much literature specifically discussing why public toilets began to close after the 1960s, however Greed (2003) reasonably assess that the government cutbacks of the New Right Thatcher government starting in 1979 mixed with there being no statutory obligation for local authorities to provide public toilets made public toilets an easy target for closure.

Over this same stretch of time, from the start of the twentieth century to the 1980s, what was meant by urban or town planning in Britain had changed substantially. Although there were other Planning Acts after the 1909 Act, it is the 1947 Town and Country Planning Act that is the origin of the planning system we recognise in Britain today (Hall & Tewdwr-Jones, 2010). As you can see from above, this Act came about after the bulk of public toilets had already been built in London and addressing the sanitary needs of the population became less prominent a role for urban planners as the welfare state was introduced and planning found itself to be a more regulatory than pioneering activity, as it had been before its role was more precisely defined in law (Griffiths, 1986, p. 4).

This more restricted, regulatory role of the planning system only became stronger and under the economic logic of the Thatcher government. Although the system itself did not dramatically change under Thatcher (Griffiths, 1986), that would come later with the 1991 and 2004 Planning Acts (Allmendinger & Tewdwr-Jones, 2002; Shaw & Lord, 2009), much around the system did change thanks to the introduction of Urban Development Corporations and Enterprise Zones, along with development that was much more dominated by the private sector (Hall & Tewdwr-Jones, 2010). This has left a system where planning and public toilet delivery are more or less separate functions of local government, with public toilets often being the responsibility of the parks or street cleaning departments (Greed, 2016).

2.3 The Present Situation

The importance of public toilet provision in public health is growing ever stronger in recent years. This can be seen in the RSPH (2019) report and Stanwell-Smith (2010), both mentioned earlier, and the requirement for Welsh local authorities to produce public toilet strategies that was introduced in the 2017 Public Health (Wales) Act (Welsh Assembly, 2017). This Act is important in mainstreaming public toilets into public health again and the toilet strategies it requires each local authority to produce are a tool which can enable planners to identify possible areas in need of greater toilet provision that can be taken into account when deciding on planning applications for developments of sufficient size. The public toilet strategies required by the Act are clearly based on the public toilet strategies described as best practice in BS 6465-4:2010 (BSI, 2010) and follows the recommendations of the House of Commons report from a decade earlier, requesting that the government "imposes a duty on each local authority to develop a strategy on the provision of public toilets in their areas" (Communities and Local Government, 2008, p. 36).

Not long after the Public Health (Wales) Act 2017 was approved by the Welsh Assembly the first draft of the emerging London Plan was released (Greater London Authority, 2017) which included Policy S6, introducing public toilets into strategic planning in London[1]. How both the toilet strategies in Wales and the London Plan policy will affect how provision of public toilets is conducted is a question that cannot be answered yet as they are too recent to have had an effect.

Another recent development bringing greater attention to public toilets in England and Wales is the proposal in the 2018 Budget to relieve all public toilets from business rates (Sandford, 2018, p. 34). This will have the effect of reducing one expense for local authorities and hopefully slow the rate of local authority run public toilet closures. Also, in the first half of

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[1] The City of London has had a public toilet specific development management policy since at least 2015 (City of London Corporation, 2015, p. 188) but its scope, both in terms of its requirements and the small territory which it covers, are not comparable to Policy S6 in the emerging London Plan. Other boroughs make mention of public toilets in their Local Plans, notably Camden (London Borough of Camden, 2017), but not in so coherent a way as is found in the emerging London Plan.

2019 Network Rail decided to remove fees from the toilets in all of their main stations (Network Rail, 2019). This has definitely drawn a lot of attention to the issue of public toilets in Britain (Benyoucef, 2019; Jones, 2019).

In 2012 the coalition government moved responsibility for public health and social care from the NHS to local authorities in England (The King's Fund, 2015). This now means that London boroughs have an overview of public health as well as responsibilities for planning. This, along with a greater push for "healthy places" and planning's role in delivering them (Public Health England, 2017), is meant to lead to public health needs - including better provision of toilet facilities - being a greater consideration in both developing planning policies and in development management.

There is also much recent discussion of the "New Municipalism" (Russel, 2019) and "the Preston Model" (Sheffield, 2017), emerging trends in how local governments view themselves and their role in provision of public services. Some even looking back to the "gas and water socialism" of the late nineteenth and early twentieth centuries (Gehrke, 2016), the era when public toilet construction was at its greatest. A new municipal focus of this kind could, maybe, lead to more funding for public toilets, as awareness is raised of public toilets being a social infrastructure and aid to local economic growth. This new framing of local government could also maybe see planning emboldened to act in more socially and environmentally minded ways, when the focus is more on the municipality rather than trying to draw in investment from further afield.

2.4 Global Alternatives

Although this dissertation sets out to cover planning and toilet provision in London in particular, in order to make suggestions about how planning for public toilets could be made better in London it is worthwhile to look elsewhere. For example, China has undergone a public toilet "revolution" in the past decade. Cheng et al. (2017) describe how primary concern for this was tourism as the poor state and quality of public toilets in China had been putting off many foreign tourists from visiting beyond the major Chinese cities. Interestingly Cheng et al. (2017, p. 348) mention how President Xi of China describes drastic improvements

to public toilets as necessary to bring "civilised tourism", again showing a link between perceived civilisation and sanitation, like how the Victorians and Edwardians who built most of London's public toilet's did, see Chapter 2.1. Similarly to London, Cheng et al. (2017, p. 354) mention how "insufficient funding and policy support" are big challenges facing China's toilet revolution, showing how London, or the UK, is not alone in facing these problems.

The planning system in the UK and London is fairly unique and so drawing comparisons between the minutiae of how urban planning systems deliver public toilet provision elsewhere is likely to be unhelpful. However, we can still discuss strategies and policy levers that are adjacent to urban planning. For example, in Singapore, a global city with former British influence, the National Environment Agency produces a Code of Practice on Environmental Health (Environmental Public Health Division, 2017) which contains prescriptive, but well considered, requirements for how many of each kind of toilet each new development requires. The list is exhaustive and prescriptive in a way that would be incompatible with the planning policy in the UK. Although BS 6465-1:2009 (BSI, 2009) has a similar format in its recommendations, it is a standard and not an enforceable code. The calculations BS 6465-4:2010 (BSI, 2010, pp. 20-24) provides are a much more flexible approach. The inclusion of public toilet provision in the Code of Environmental Health points to the Singapore government acknowledging that public toilets are a public health issue which needs to be addressed by built environment professionals (Environmental Public Health Division, 2017, p. i), showing again how public toilets are a place where management of the built environment and public health collide.

The city of Zurich is notable for its proactive approach to public toilet provision (Greed, 2016). Zurich has the ZüriWC Master Plan, introduced in 2002 and renewed, with investment, every 5 years since (UGZ & IMMO, 2015). It takes a strategic approach to public toilets and is similar to the public toilet strategies required by the Public Health (Wales) Act 2017 but has funding behind it, which is lacking in the British context. This means they can fund the construction and maintenance of new public toilets - and even the reopening of former ones - as a part of the strategy. The Master Plan is also not afraid to say where toilets ought to be shut. The ZüriWC Master Plan is spatial in its approach, making it useful for planning purposes, but given the funding available and the ability for the city government to provide the services itself it

would be hard to wholescale import this model to London or anywhere else in the UK without a dramatic change in how public toilets are treated economically and politically.

2.5 Social Justice in the London Plan

There is much academic literature about the social injustice current toilet provision creates, especially for women. This is a particular focus for Greed (2019), Ramster et al. (2018) and Penner (2001). The evidence for this injustice is clear and irrefutable as toilet provision historically ignored the fact that women on average take twice as long to use the facilities as men do (Greed, 2019) and there is a sense that provision of Gender Neutral Toilets (GNTs), a necessary option for some members of society, are being introduced faster than the equal toilet provision for women is being delivered (Ramster, et al., 2018). This tension can be seen in the wording of the revised draft of the emerging London Plan (Greater London Authority, 2019, pp. 227-228) as the supporting text to policy S6 has to clarify that developments must take precautions to minimise waiting times for women as the policy itself requires consideration for users of all gender identities.

Disabled people and the elderly are other groups for whom lack of appropriate toilet provision is a cause of social injustice (Kitchen & Law, 2001; Help the Aged, 2007). Disabled toilet access for wheelchair users has improved somewhat since the 2010 Equalities Act and associated changes to building regulations (Warner, 2016). However, there are many other kinds of disabilities that are still not adequately covered so well, such as blindness or inflammatory bowel diseases like Crohn's and Colitis, where the toilet requirements are not necessarily identical to wheelchair users or what is included in a standard accessible toilet (Crohn's & Colitis UK, 2019; Warner, 2016). The emerging London Plan has considered the needs of more types of disabled people by recommending new developments include Changing Places toilets (Greater London Authority, 2019; Changing Places, 2019). The policy also requires families with young children to be considered, which is important as they are an overlooked group as well (Sanders, et al., 2019). Mention of the needs of the elderly is pushed back into the supporting text, however.

Although these issues might not seem to be planning issues at first, that attempts to address them are included in the emerging London Plan policy does mean that they are now planning issues. Saying this assumes the logic that "planning is what planners do" (Vickers, 1968, as quoted in Alexander & Faludi, 1989) and, although the legislative framework in which planners operate is an obvious limit to what planners do, this logic does apply here since planners have done it and so it must be doable within the legislative framework.

2.6 A Gap in the Literature

As shown over the course of this chapter, current public toilet provision in London is inadequate and poses specific problems regarding accessibility for many groups, especially women, the elderly, children and the disabled. There are significant public health concerns raised by lack of provision too. The problem has been getting worse for decades thanks to financial pressures on municipalities and the lack of requirements for public toilets to be included in planning policy. However, a century ago municipalities were keen to build and maintain public toilets out of concerns for public health, the same concerns that were the foundations of urban planning in Britain. So, why and how did this change?

Although it is primarily a political issue that needs legislative change and funding, the arguments that public toilet provision is a planning matter are compelling, especially given the spatial nature of the decisions that need to be made (Greed, 2016), the lineage of public health that runs deep in planning (Hebbert, 1999) and the importance public toilets play in access (or even the "right") to the city (Kitchen & Law, 2001). Yet, there has been no work since Greed & Daniels (2002) that examines toilet provision in the UK and considers the providers' perspective. Even that research highlights the absence of planning in public toilets but does not speak to planners or assess their practice directly. So, we have a gap in the existing research: how do planners perceive their role in providing public toilets?

As the emerging London plan is the first to include a dedicated policy regarding public toilets, now seems like a timely moment to investigate this question regarding London in particular. Also, narrowing the scope of the research to just London is useful for practical purposes, since

a meaningful UK-wide investigation would require more travel and time than is available for this MSc level dissertation.

This is why the research question of this dissertation was chosen to be: How do planners perceive their role in providing publicly accessible toilets in London? The following chapter discusses the methods that will be employed when conducting this research.

3. Methodology

3.1 Objectives

To elaborate on the methods used to conduct this research, the research question for this dissertation was broken down into the following objectives:

Objective 1:   Understand how planners perceive their role in providing public toilets.

Objective 2:   Place planners and planning in their current position with respect to the provision of public toilets.

Objective 3:   Establish why planners think there is a shift towards including public toilet provision in planning policies.

Objective 4:   Find suggestions for how planning could lead to better public toilet provision.

The exploratory nature of Objectives 1 and 3 lend themselves to a qualitative research method. To achieve these two objectives it was necessary to discover *how* planners perceive their role and *why* they think changes are happening. This leads to a more phenomenological research method; hence conducting interviews with practicing planners in the London area, with one exception to provide a counterpoint to the London perspectives, was the chosen research method.

A research interview is often defined as "a conversation that has a structure and a purpose" (Kvale & Brinkmann, 2014, p. 5) and the interview process is, as Cloke et al. (2004, pp. 148-150) describe, a qualitative exercise aimed at teasing out the deeper well-springs of meaning with which attributes, attitudes and behaviour are endowed. To give the interviews their structure and purpose, but also allow an element of freedom in the interviews, a semi-structured style of interview was conducted, with six relevant questions (see Appendix 1) to guide the conversation and learn what the interviewee really felt about the role of planning in public toilets both professionally and, where appropriate, personally.

All interviewee responses were anonymised and then coded based on the themes that emerged across the different interviewees' thoughts, following the practices set out in Gläser & Laudel (2013). The coding was not conducted in specialist software as the average interview

length was only 2000 words once transcribed, so Microsoft Office software was sufficient. The themes drawn out through coding are presented and discussed in the next chapter.

Objectives 2 and 4 have, to an extent, already been covered in the literature review since much about planners' roles and better solutions to providing for public toilet needs can be found in academic and grey literature. That said, in an interview context, much can also be learned about what planners themselves think about where their role sits and alternative ways of planning for public toilets they might have considered. Therefore, when conducting the interviews, it was left open for the interviewees to discuss thoughts that could help address Objectives 2 and 4 in any way they saw fit.

3.2 Summary of Interviewees

Six planners were interviewed for this research, all at different stages of their career. For anonymity and brevity, they will be identified by a letter as shown in Table 1, which also includes their current role to give a frame of reference for their perspective on the issues relating to public toilets and planning.

A	Environmental Planner at a planning authority bordering London.
B	Planning consultant based in London.
C	Head of Planning at a Midlands city.
D	Planning Policy Manager at an outer London borough.
E	Principal Planning Policy Officer at an outer London borough.
F	Senior Strategic Planner in London.

Table 1. Summary of interviewee roles and their identifying letter.

Four of the interviewees work directly in London, three at planning authorities and one in the private sector. Interviewee A is employed outside of London but works closely with London boroughs and Interviewee C is far removed from the London context but has much planning experience and provides a view of what is happening outside of London which is useful to provide a comparison and a context.

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3.3 Ethics

Although toilets and sanitation can be a sensitive topic for some, there is not much ethically contentious about the methodology that was employed for this research. However, due concern has been taken to maintain interviewees' anonymity and keeping their data private. This is especially important since the interviewees have been asked to talk openly about their professional work. Any recordings were immediately anonymised and stored on just one password protected computer. All participants data is stored on a password protected computer or email account, has not been shared and will be deleted after this dissertation is complete. All interviewees consented for their responses to the interview questions to be used for this research and the Information Sheet shared with interviewees before the interview and the Consent Form all interviewees agreed to can be found in Appendices 2 and 3 respectively.

4. Findings and Discussion

Themes about the inadequate current provision of public toilets, funding and strategy, the role of planning, the historic role of municipalities, public health and why a policy like Policy S6 has only appeared in the London Plan now all emerged from the interviews. I will discuss each of these topics in turn in this chapter and then, in the next chapter, I will draw all these together to arrive at some conclusions about the role of planning in public toilet provision.

4.1 Inadequate Current Provision

Most interviewees mentioned current public toilets being unpleasant, unsafe and sparse. Interviewee A described the average public toilet as "usually a bit grim, wouldn't want to go into them unless you were really, really desperate." Interviewee E, when describing a set of public toilets they pass regularly, said: "I don't feel safe." There were many concerns about the antisocial behaviour that occurs in public toilets, with drug taking and vandalism being the main kinds of antisocial behaviour the interviewees were concerned with. Interviewee B noted that it is the negative connotations that public toilets have that leads them to being maligned by many people.

Interviewees D and E were both concerned about the inadequacy and awkwardness of Community Toilet Schemes, which have often been introduced by local authorities to try to make up for lack of provision due to the closure of council run facilities (Knight & Bichard, 2011, p. 12). Both were concerned about these toilets' opening times being tied to a business's opening hours, a large disadvantage to the scheme. Interviewee E said, "I don't think the Community Toilet Scheme is working… I feel like I have to sneak into a pub even if it's got that sticker [for the Scheme]." Similarly, Interviewee D suggests that most people don't pay much attention to Community Toilet Schemes anyhow: "I don't know if I have ever actually seen a symbol on the door… I've just taken my chances at the nearest café probably, which is what people tend to do anyway." This shows how normal the experience of not being able to access a public toilet is, as people are so used to sneaking or taking their chances in places that have no obligation to assist them.

This attitude even suggests that the tipping point of public toilet closures might have been passed, whereby few people expect public toilets anymore and hence few people demand them. This same, almost fatalistic, attitude is evident when Interviewee D hypothesises that:

> *"by the time it occurred to the council, from a planning perspective, to consider whether or not we needed a policy… the wider corporate decision had been taken to close [the public toilets]."*

This mirrors a truism that Interviewee A pointed out about how once local authorities have shut their public toilets then there is no need to prioritise them, unless pressure is being put on the local authority by residents.

Interviewees A and B both commented on one of the more important places for public toilet provision: major train stations. Interviewee A was pleased to see that Network Raid had removed fees on the toilets in all the stations they managed and felt "the toilets have got much better" since then due to passive surveillance as more people use the facilities. Interviewee B commented that, "I'm always amazed that you have to pay [to] go use the toilet… I know people who refuse." Whether or not paying to use the toilet is right or not is not in the scope of this dissertation. However, it is worth noting that the publicity around Network Rail removing their fees to use the toilets has raised the profile of public toilets among some planners and Policy S6 of the emerging London Plan does stipulate that toilet facilities ought to be free when built in developments that meet the conditions of the policy. So, whether or not public toilets should be free is a key question that could be asked in future research.

Only Interviewee E mentioned a public toilet in London that they would recommend, which also happens to be at a major train station. The qualities that make it worth recommending are that "there's loads of [toilet blocks] and they are well looked after, well maintained, and seem to be 24 hour." This highlights the key qualities of toilets that are deemed necessary in all literature discussing them (Lowe, 2018): that they are plentiful, clean, well maintained and accessible.

4.2 Public Toilets Abroad

Interviewee E was also the only interviewee to relate the London experience of public toilets to experiences from abroad, in this case Paris. Interviewee E described how the Automatic Public Conveniences (APCs) that Paris adopted enthusiastically in the 1980s and 90s (Greed, 2003, p. 80) are now "completely free" and also commented how plentiful they were compared to public toilet provision in London. Interviewee E wasn't wholly positive about them, however, commenting: "they were all metal. I hate metal ones." APCs have been unpopular in Britain since their introduction due to their vandalproof and hostile design (Greed, 2003) as well as fears of being trapped in them that Interviewees A and B had also raised.

Interviewee C was fairly confident that APCs are more often being removed than installed in their region and the turn away from APCs can be seen in some London boroughs too (London Borough of Camden, 2016). So, it is interesting that Paris has embraced the APC, or sanissette as it is called in French, to the point where there are now 435 across the city, most of which are usable 24 hours a-day (Ville de Paris, 2019). Possible reasons for this are because Paris does not have the same historic network of public toilet provision that was had in London - it mostly only had urinals, or vespasiennes, with few if any places for women to go – so any new provision at all might have been seen as good. Also, the fact Paris is a city with a much denser fabric than London means that fewer installations can still satisfactorily make one feel they are always close to a toilet facility. That the toilets are provided for free is an incentive to use them as well.

The Paris model of toilet provision is similar to the Zürich model from Chapter 2.4 but seemingly less strategic and without the pure public funding as the APCs are mostly provided by outdoor advertising and street furniture company JCDecaux (Ville de Paris, 2019). Considering Objective 4 of this dissertation, the Paris model probably isn't transferable to London as there seems to be a distrust of APCs compared to the fuller toilet facilities that were historically provided in London. Also, the less dense nature of London would probably require far more facilities need to be installed in order to feel as if provision was equal to Paris. Something more strategic like the Zürich model would be necessary to identify unmet need first. Also, the Paris model, like much current public toilet provision in London, has little

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room for planning or management of the built environment as it is seen purely as a street cleaning operation.

4.3 Funding and Strategy

All interviewees identified lack of public funding as the main reason for the current inadequate provision of public toilets. In this there is an implicit understanding that public toilets should be delivered primarily by the public sector, with Interviewees B, C and F explicitly saying so. However, when asked about how they saw future of public toilet provision being delivered all suggested strengthening policy levers to ensure provision from private developers. Only Interviewees E, F had a positive outlook for public sector delivery of public toilets, even if funding should return. This suggests an interesting mismatch as there is an understanding that toilets were and should still be provided by municipalities but that the future delivery of them will likely not come from local authorities. An outlook like this aligns with the role of the planner as a mediator and regulator discussed in Chapter 2.2.

Planners, understandably, do not have direct control over funding, even though the Community Infrastructure Levy (CIL) is a tool that could be used to cover the capital expenses of building social infrastructure such as public toilets, as Interviewees B and E pointed to. However, as E notes: "planning can't pay for revenue". Addressing Objective 1 of this research, all the planners perceived there could be a greater role for planning to aid provision of public toilets than there currently is. Interviewees B and C thought of it more of a development management priority whereas all the others saw the potential for a more strategic policy approach and room for planning policies like Policy S6 in the draft London Plan.

Strategy and funding were often mentioned together since if there was funding available many interviewees would like to see strategies produced, much like in the Zürich example from Chapter 2.4. Interviewee A called for local authorities to "have an idea of where [public toilets] exist across their geographic area of responsibility and understand where provision might be required." Interviewee A had no knowledge of the 2017 Public Health (Wales) Act

or BS6465-4, which call for just such an audit and strategy to be produced by local authorities, suggesting this kind of strategy feels intuitively necessary to some in the planning world.

4.4 The Changing Role of Planning and Local Government

When questioned about how they viewed the role of planning in delivering better public toilet provision all interviewees gave mixed answers then reflected on the wider role of planning and how it has changed over time. For example, Interviewee D related that planning "in the 80s, it had really got back to being very much development control was the whole process and now it's sort of opened up a bit more." This matches up to what Interviewees B and F said about the opening up of the planning system that is happening, allowing it to include new policy levers to affect change in more areas of the urban environment, with B suggesting the London Plan in particular has perhaps become too prescriptive in its ambition to open up the aspects of what planning policy can dictate. This follows the arc of how planning has changed in the last 40 years that was described in Chapter 2.2.

All interviewees discussed the role of working with private developers in delivering public goods either through planning gain, such as CIL or Section 106 agreements, or in instances where councils work with private developers directly when they have a property interest. For example, Interviewee C noted that in:

> …some of the bigger city authorities, quite a lot of the shopping malls, the councils generally quite often have a property interest… there is actually sort of property control where they are tied into leases and stuff like [public toilets] are contractual requirements. So, it's not maybe delivered through planning control…

This shows a more networked governance approach to delivering public goods that exists outside of the planning system. Although Interviewee C's experience is outside of London, there are examples of this type of dealing happening in London too (Lanktree, 2018).

Interviewee E highlights how the role of planning is restrained within an economic logic that often stops it from achieving any social and environmental ambitions: "So, there's this fundamental flaw that sits outside of planning which is cost-benefit analysis and the fact that

it doesn't consider all views." This cost-benefit analysis leads to decision makers saying, "fine, it saves money," (Interviewee E's words) without considering impacts on the disabled or women, for example. The way that all interviewees mentioned funding and the cost of maintenance so prominently shows how powerful the logic of social infrastructure needing to demonstrate some sort of financial benefit in order to be viable is. Compare this to the unquestioning construction of public toilets in London in the late Victorian and early Edwardian periods, as mentioned in Chapter 2.2, and one can see the very real change in how municipalities think and operate.

Interviewee D reflected on the provision of public goods during the golden age of municipalism when commenting that public toilets "say something about the nature of public service and public Britain at the time." This shows that what planning is in the present day is not comparable to the municipalism of a century ago and the creation of the planning system might have limited planning's ambitions with respect to public provision of public goods. This also addresses Objective 2 and places planners in their current position relative to what the municipalities were able to achieve historically.

Focussing on London in particular, Interviewee B thought planning is changing because of the GLA's strategic level of governance and the London Plan's increasingly important role: "local authorities now in their UDP basically say, 'refer to the London Plan.'"

A limitation of planning policy raised by Interviewees A and F is that it cannot be seen to be too unwieldly and detailed, else it would become unusable and may not pass its examination by a Planning Inspector. Also, these interviewees commented that it would be undesirable for a layperson not to be able to understand what a planning policy was intending to achieve. This is a limit on how wide and deep the scope any Local Plan or Spatial Development Strategy can have, even as what planning seeks to achieve is opening up, as mentioned above.

4.5 Why Provide Public Toilets?

The main reasons suggested for providing public toilets were tourism and taking care of an aging population. Interviewees C and D were particularly focused on situations where these two reasons combine, with Interviewee C suggesting:

> *…places like Bournemouth, on the south coast, or places where you've got*
> *a lot of very elderly people during the holiday, I bet the toilet provision there*
> *is probably aimed at the demographic of people who visit the place.*

Interview D offered an identical example. The focus on tourism is enlightening as it shows the way in which planning has framed itself in terms of economic regulation, much like Griffiths (1986) discussed, since tourism brings revenue to a location and there is a desire to ensure visitors want to stay in a particular place and spend money there. However, the concern for the elderly does also suggest an acknowledgment of planning's social functions.

As discussed in Chapter 2.4, tourism was the main driver behind the push for more public toilets in China, and perhaps a desire to improve the economy of a place by bolstering tourism will lead to development management planners needing to consider public toilet provision more without the need for any additional policy levers. Although, this is not of much benefit for areas with little prospect of attracting tourists.

The needs of the disabled as well as providing toilets for non-gender conforming individuals were also raised as other important reasons, with requiring provision of Changing Places toilets being mentioned by all as important and something that the planning system can intervene in. Having policies that promote provision of gender-neutral toilets was considered desirable to A, E and F.

Interviewee E was the most vocal about the inequities of current provision for women and children, and in fact the only interviewee to view the issue of toilet provision through a gendered lens like that which can be seen in Greed (2016), for example. Discussing how outside toilet facilities such as urinals or UriLifts benefit only men, Interviewee E noted that "there's a real gender issue, that only deals with men… a woman's not going to want to go pee outside anyway." Talking about how to make child friendly cities E also notes that:

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There aren't enough changing facilities for the amount of children that are currently part of the growth that is expected… There is a big push in London to provide for younger people and child-friendly cities… but child friendly cities would be where a child could go to the toilet as well as being able to play.

This is a compelling point to ensure that future provision of toilets does consider gender and children. Childcare itself is imbued with gender issues since most childcare in the UK is still undertaken by women (Sanders, et al., 2019). In light of this, that Policy S6 includes reference to the needs of families with young children makes it seem very alert to the more frequent users of public toilets.

Homeless people's need for public toilets was not considered too highly, although Interviewees A and D did mention them when prompted. The homeless are a marginalised group who are more likely to urinate and defecate on the street than others when there isn't true public toilet access nearby (Lowe, 2018), as many cafes and restaurants will refuse homeless people when they might otherwise tacitly permit others to use their toilets without paying for a service. Therefore, ensuring access to public toilets for the homeless is of importance for street cleanliness and general sanitation purposes.

Overall it appears that, when made to think about the social implications of poor public toilet provision, all planners are capable of reaching similar conclusions about the social and health reasons to provide public toilets that is found in academic works such as Slater & Jones (2018). However, planners' abilities to improve the current situation of public toilet provision is limited by the reasons outlined in the above sections. The public health reasons for public toilet provision have not overtly been discussed because they are implicit in all the above reasons and also because the discussion on public health in local government warrants its own subchapter.

4.6 Public Health in Local Government

The changes that led to local authorities taking on the responsibility for public health and social care in 2012, mentioned in Chapter 2.3, were raised by many of the interviewees.

Interviewee D went into detail about how the Joint Strategic Needs Assessments (JSNAs) that local authorities are now required to produce should have the effect of drawing cross disciplinary expertise into considering public health needs. These JSNAs are also designed to feed into Local Plan policy, thus mainstreaming public health into planning policy. Interviewee D had no knowledge of public toilet need being incorporated into these and, after examining the JSNAs of six London boroughs, it appears that this lacuna is widespread. Perhaps this shows that, although public toilets are growing in importance in the field of public health, they are still a relatively fringe topic.

Interviewee C considered these changes to the delivery of public health and social care as an opportunity to fund the ongoing costs associated with public toilets since these new responsibilities for local authorities come with some funding. Interviewee E had a similar proposition:

> *I think to get it changed it needs to be seen as a public health issue. And from there that's how it should be funded in some way. You probably need Public Health England to say it's a public health issue with the NHS…*

This suggestion is novel but probably the best-case scenario for future provision from the public sector, given the difficulties of funding discussed above.

Interviewees A and F felt that the public health implications of a lack of public toilet provision were so obvious they didn't need saying. Interviewee F said, when asked their opinion about why the London Plan policy wasn't explicit on health benefits of toilet provision, said, "it's importance is sort of a given." Interviewee A echoed that thought.

4.7 Public Toilets as a Heritage Asset

Chapter 2.2 mentioned how civic pride was evident in the architectural style of the late Victorian and Edwardian era public toilets in London, and this was recognised by many of the interviewees. Interviewees B,C, D and E all highlighted the importance of old public toilets as architectural and heritage assets. When discussing the trend of mothballed old public toilets in London being converted into bars Interviewee E said:

some of them are historically and architecturally quite beautiful with lots of tiles and I think that you need them to be something like [a bar] so you don't lose the architecture and history of it.

Interviewee E also acknowledged that it would be preferable that the closed public toilets were reopened as toilets, however.

There was much admiration from interviewees C and D for conversions of shuttered public toilets in Manchester - showing this trend is not just a London phenomenon - and south London respectively. This attitude towards disused historic public toilets being a heritage asset more than a lapsed social infrastructure is evidenced in many planning applications regarding change of use of former public toilets, see Islington Council (2016) for example.

It certainly seems beneficial to find a use for a historic building so as to stop it falling into disrepair, however raising the importance of its historic value over its possible social and public health value shows how unimportant public toilets are seen as a facility compared to a building that needs to be commercialised in order to be preserved. Interviewee D also implied that so many historic toilets have been closed for so long that people no longer miss their former use.

There is huge potential to investigate how historic public toilets are being maintained, be they still operating, mothballed or converted into another use. However, that research is outside the scope of this dissertation.

4.8 Why a Policy for Public Toilets Now?

Objective 3 was to find out why planners think there has been a shift towards including public toilet provision in planning policy, like with Policy S6 of the emerging London Plan. As mentioned above when discussing the changing role of planning, Interviewee B felt that the London Plan has "become much more prescriptive" which opens up the door for more innovative policies to be introduced into the plan.

The main driver for why these policies are being introduced now seems to be political, with all interviewees, except Interviewees C and D, pointing to Sadiq Khan's mayoralty seeking to be distinct from his predecessor's and taking on board the growing realisation of the importance of sanitary facilities in the built environment. Interviewee A saw the trend towards awareness of public toilet needs as being a function of growing "public consciousness" and media coverage in general while Interviewee F pointed directly to the London Assembly and House of Commons reports mentioned in Chapter 1 as influences on the public toilet policy, as all those reports highlight the need in London and recommend greater policy interventions to ensure public toilet provision.

No one suggested there was just one reason for why a policy like this would be emerging now rather than before. There seems to be a consensus among the interviewees that, as is often the case, multiple factors have all interacted recently in a way that happens to have been met with political will by the current Mayor of London.

5. Conclusions

Following on from the discussion and analysis of the interviewees responses there are some clear conclusion to be drawn. Firstly, it is clear that everything in the current context, not just planning or public toilets, comes down to funding. Funding is political and so without political will there will be very little change to public toilet provision despite the best efforts of even the most enlightened planners, or other built environment professionals. The current economic focus of planning is politically created by the legislative framework and economic history in which it has existed for the past half century and, although many interviewees highlight how the role of planning is slowly changing to be ever more expansive, any change will be gradual. Policy S6 of the emerging London Plan could be emblematic of this slow change, however.

Another conclusion to be drawn is that good examples of public toilet provision exist around the world from which lessons can be learned, see China, Singapore and Zürich. Even within Britain there are examples of legislative instruments, standards and planning policies that could promote better public toilet provision; for example, the 2017 Public Health (Wales) Act, BS 6455 and Policy S6. If all of these kinds of tools were to be used together in the same place there would be a really strong foundation for public toilet provision to be based on.

Public toilets, and sanitation more generally, exist precisely at the point where the built environment meets public health and so the relative absence of public toilets from both fields until very recently is curious. Looking back to the historic provision of public sanitation by municipalities shows how much the role of planning and local government has changed over the past century. It would be impossible to go back to that type of provision in the current environment, but for built environment professionals and politicians it would still be worth reflecting on how and why the municipalities of the past provided so many sanitary facilities, and other public goods, to try and see what could be applied to contemporary needs.

Over the course of this dissertation a couple of points for further investigation have been highlighted. Firstly, there is the question of whether public toilets facilities should be free or whether charging a small fee is acceptable. This is a moral and economic question that is only

tangentially linked to planning by virtue of the way that people use public toilet facilities, and hence the wider built environment, might be affected by their willingness to pay a fee or not. Secondly there is the topic of how best to conserve London's historic and architecturally significant toilet facilities since some are still operating as public toilets, some have been converted into other uses and some remain unused and falling into disrepair. As public toilets have been closed, an architectural legacy might be being lost as well as a vital social infrastructure.

To conclude, most people still see the role of providing public toilets as coming from local authorities despite the reality of increasing private sector provision of public toilets. Public toilet provision from local authorities is not the responsibility of planning, more realistically it should be the responsibility of public health and social care departments to develop strategies, which might include new local authority provision, and work with planners to ensure adequate private sector provision, given the existing tools of planning gain available to planners, which can be strengthened with policies like Policy S6 in the emerging London Plan. The introduction of Policy S6 will likely change the way public toilet provision is viewed by planners and developers in London, although the outcomes will take years to emerge and in a decade's time it might be worthwhile revisiting what changes it has had to the provision of public toilets in London.

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Appendix 1 – Interview Questions

Interview questions:

1. Tell me what you understand about how planning and public toilets are linked, historically and in the present?

2. What are your thoughts on the role of local government versus private developers to deliver new publicly accessible toilets and is there any role for planning in this process?

3. What are your thoughts about historic public toilets across London being converted into bars and other services? How did planning play a part in this?

4. Why do you think a policy like the Public Toilet (S6) policy in the London Plan has been introduced now? (Provide policy if needed.)

5. Why do you think there is a disparity in how different local planning authorities treat public toilet policies?

6. How do you think planning and planners could better improve access to public toilets for all?

Information sheet – Planning and Public Toilets Research

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What is this research?

This research is for a MSc dissertation at the Bartlett School of Planning investigating what role planners and the planning system have played in public toilet provision and the role that planning could play in providing better public toilets in the future.

Background to research

Town planning and public toilets share their origins in the late nineteenth century concerns about public health and they both went on to have a shared history as duties of local governments throughout the first half of the twentieth century. The role of town planners changed in the latter half of the twentieth century and public toilets began to be neglected and shut down thanks to budget cuts and changes in attitudes. The public was pushed more towards using accessible yet privately owned and operated toilets, for example in shopping centres, or changing the way they moved about the city.

Thirty years of public toilet closures has led to a situation where many (the elderly and disabled in particular) are unable to travel freely around the city and visitors are discouraged from lingering and spending money in some areas as they do not know where to go to use the facilities. Over this time, since they are not a statutory consideration, public toilets have lost their historic link to planning.

Yet public toilets, or the lack thereof, remains a land use issue as how people can use space is, in part, determined by their sanitary needs and providing good quality publicly accessible toilets has been shown to improve local economies, the environment (by encouraging active and public modes of transport) and has health benefits, which can all combine to make public space more inclusive. Due to the spatial and land use skills town planners have it seems there ought to be at least a small consideration for public toilet provision in planning policy, as there is in many East Asian and Central European cities.

The attitude of the past thirty years slowly appears to be changing, with the draft London Plan (and some boroughs) including public toilet specific policies for the first time. This research is looking at what role planners and the planning system have played and could play in ensuring better public toilet provision in the future.

Why have I been chosen for this research?

To understand how the planning system interacts with public toilet provision in more depth than what is publicly available in planning documentation I need to have detailed conversations with planners. You have been chosen to be a part of this research as you are a practising planner.

Do I have to take part?

It is up to you to decide whether or not to take part. If you do decide to take part, you will be given this information sheet to keep and be asked to sign a consent form. You can withdraw at any time without giving a reason. If you decide to withdraw you will be asked what you wish to happen to the data you have provided up that point.

What does taking part involve?

Taking part in this research involves one semi-structured interview that will take the form of a conversation and will last a maximum of thirty minutes. If you consent, I will record the audio from this conversation. The recording will only be used for the purposes of this research and will be anonymised, stored on a password protected computer and deleted once this work has been marked. You will not be identified in the final report and any quotes used will not be directly attributable to you.

What will happen to the results of the research project?

The results of this research will be written up as a dissertation to be submitted to the Bartlett School of Planning at UCL in September 2019. Please let me know if you would like a digital copy of the final dissertation.

If you do agree to take part, thank you very much for your time! Please keep a copy of this information sheet and you will need so sign a consent form as well. If you need to get in touch at a later point please contact me on my email address given above.

Appendix 3 – Consent Form for Interviewees

CONSENT FORM FOR INTERVIEWEES

Please complete this form after you have read the Information Sheet and/or listened to an explanation about the research.

Title of Study: How do planners perceive their role in providing publicly accessible toilets in London?
Department: UCL Bartlett School of Planning
Name and Contact Details of the Researcher(s): Max Leonardo,
maximillian.leonardo.18@ucl.ac.uk
Name of the Supervisor: Ann Skippers, *ann@charismaspatialplanning.com*
Contact Details of the UCL Data Protection Officer: data-protection@ucl.ac.uk

Thank you for considering taking part in this research. The person organising the research must explain the project to you before you agree to take part. If you have any questions arising from the Information Sheet or explanation already given to you, please ask the researcher before you decide whether to join in. You will be given a copy of this Consent Form to keep and refer to at any time.

I confirm that I understand that by ticking/initialling each box below I am consenting to this element of the study. I understand that it will be assumed that unticked/initialled boxes means that I DO NOT consent to that part of the study. I understand that by not giving consent for any one element that I may be deemed ineligible for the study.

		Tick Box
1.	*I confirm that I have read and understood the Information Sheet for the above study. I have had an opportunity to consider the information and what will be expected of me. I have also had the opportunity to ask questions which have been answered to my satisfaction and would like to take part in an individual interview.	
2.	*I understand that I will be able to withdraw my data up to 16 August 2019.	
3.	*I consent to participate in the study. I understand that my personal information will be used for the purposes explained to me. I understand that according to data protection legislation, 'public task' will be the lawful basis for processing.	
4.	*I understand that all personal information will remain confidential and that all efforts will be made to ensure I cannot be identified. I understand that my data gathered in this study will be stored anonymously and securely. It will not be possible to identify me in any publications.	
5.	*I understand that my information may be subject to review by responsible individuals from the University for monitoring and audit purposes.	
6.	*I understand that my participation is voluntary and that I am free to withdraw at any time without giving a reason. I understand that if I decide to withdraw, any personal data I have provided up to that point will be deleted unless I agree otherwise.	
7.	I understand the potential risks of participating and the support that will be available to me should I become distressed during the course of the research.	
8.	I understand no promise or guarantee of benefits have been made to encourage me to participate.	

9.	I understand that the data will not be made available to any commercial organisations but is solely the responsibility of the researcher(s) undertaking this study.	
10.	I understand that I will not benefit financially from this study or from any possible outcome it may result in in the future.	
11.	I agree that my anonymised research data may be used by others for future research. [No one will be able to identify you when this data is shared.]	
12.	I understand that the information I have submitted will be published as a report and I wish to receive a copy of it. Yes/No	
13.	I consent to my interview being audio/video recorded and understand that the recordings will be stored anonymously, using password-protected software and will be used for specific research purposes. To note: If you do not want your participation recorded you can still take part in the study.	
14.	I hereby confirm that I understand the inclusion criteria as detailed in the Information Sheet and explained to me by the researcher.	
15.	I hereby confirm that: (a) I understand the exclusion criteria as detailed in the Information Sheet and explained to me by the researcher; and (b) I do not fall under the exclusion criteria.	
16.	I have informed the researcher of any other research in which I am currently involved or have been involved in during the past 12 months.	
17.	I am aware of who I should contact if I wish to lodge a complaint.	
18.	I voluntarily agree to take part in this study.	

_____   _____   _____
Name of participant   Date   Signature

_____   _____   _____
Researcher   Date   Signature
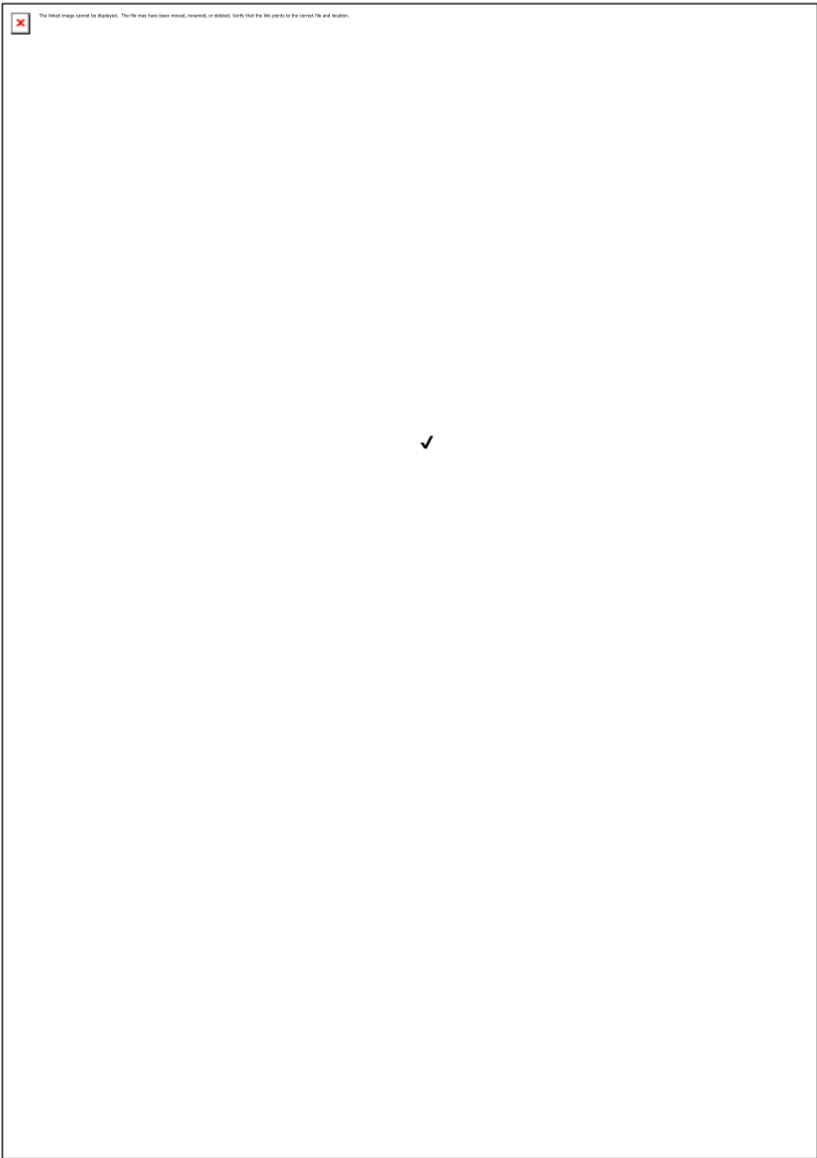
Appendix 4 – Risk Assessment

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