

INQUIRY INTO PUBLIC TOILETS

Name: Lynda Newnam
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NSW Legislative Council Inquiry PUBLIC TOILETS 30 October 2024

Lynda Newnam

Thank you for the opportunity to make this submission. I will address Terms of Reference (a), (b), (c), and very briefly (d)ⁱ as they relate to public spaces. I confine my observations and comments to a geographical area of South-East Sydney, the La Perouse Headland.

This area is primarily open space with the majority landholder of public space being the NSW National Parks and Wildlife Service (NPWS). A smaller area is managed by Randwick City Council (RCC) which through a lease agreement with NPWS in 2017 is also responsible for assets such as the La Perouse Museum.

RCC is responsible for the only public toilets although one of the two blocks is on NPWS land and primarily services visitors to the National Park beaches, bush and heritage including Bare Island.

The area attracts hundreds of thousands of visitors annually. This is a blatant example of cost shifting from the NPWS to Randwick ratepayers.

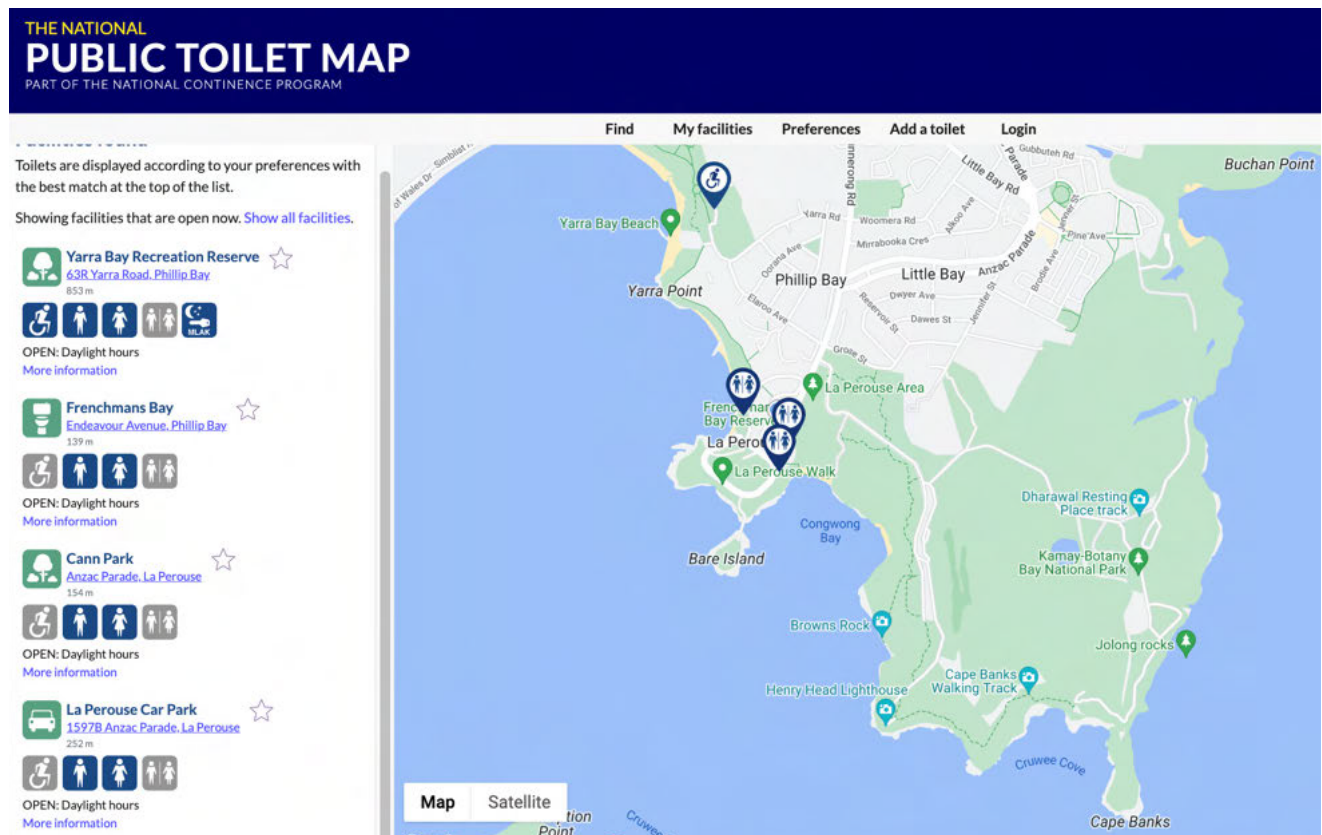
La Perouse is part of a network of coastal national parks in the Eastern Suburbs of Sydney, from Nielsen Park and Watson's Bay (both part of Sydney Harbour NP) to nearby Malabar Headland NP. Malabar Headland has RCC managed toilets near the entry and exit points of the relatively short coastal walks - in Byrne and Pioneers reserves. By contrast NPWS manage toilets for visitors to both Nielsen Park and Watson's Bay located in Woollahra LGA. In the southern section of Kamay Botany Bay National Park across the heads at Kurnell there are toilets.ⁱⁱ

The following is a National Parks map of the area and the link here provides a brief overview of some of the attractions. <https://www.walkmyworld.com/posts/la-perouse-walk-cape-banks>



The Federal Government's Toilet Map – <https://toiletmap.gov.au/> - as at today shows 3 public toilets blocks available on the La Perouse Headland.

I can assure you there are only 2, one servicing visitors to Frenchman's Beach and surrounds and the other at the entry to the La Perouse Loop (labelled La Perouse Car Park).

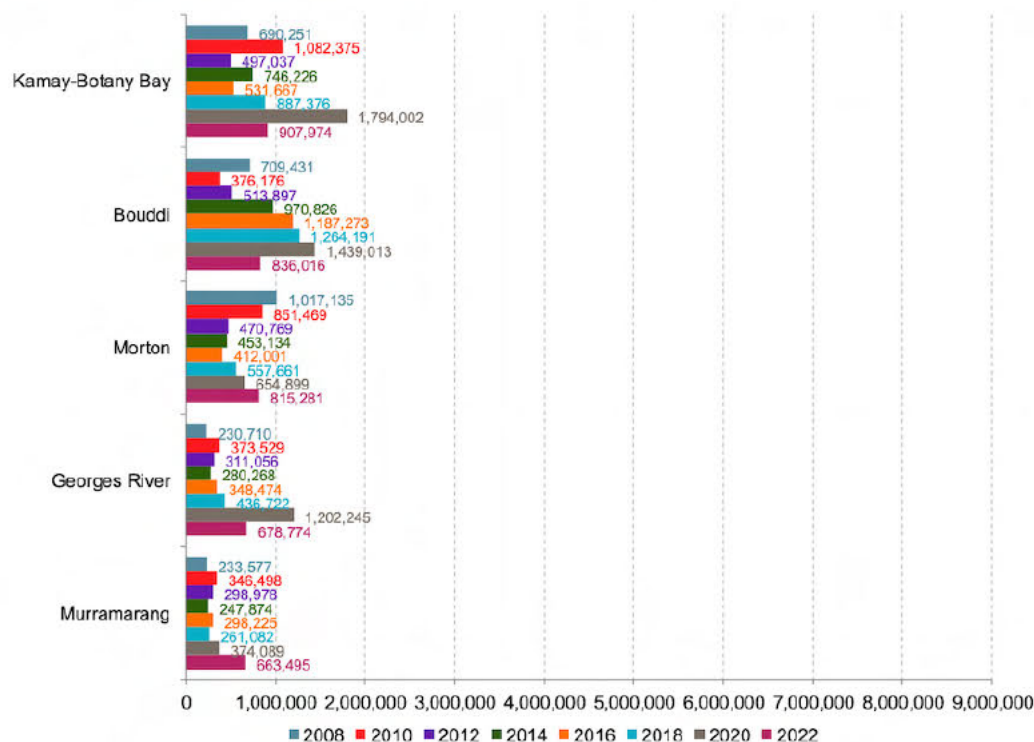


In 2022 when I made a submission to Randwick City Council's Have Your Say on the Disability Inclusion Action Plan, I included a screenshot from the Toilet Map and there was nothing in Cann Park. I commented at that time there was no point advertising an 'inclusive' children's playground if the nearby toilets were not inclusive.ⁱⁱⁱ

Aside from the mythical Cannelot you can see that there are no toilets anywhere near the main bush walking, heritage viewing and whale watching areas in the Park.

The table below is an extract from the latest NPWS visitor survey with Kamay Botany Bay grouped with Bouddi, Morton, Georges River and Murramarang.^{iv} According to information provided on the NPWS website Bouddi has 5 toilet areas, Morton 5, Georges River 4, and Murramarang 5.

Chart 20: Annual Visitation for Selected Parks—Parks 11-15



Caution: Small sample sizes for Kamay- Bay, Bouddi and Georges River (n<30)

Source: NPWS Parks Visitor Surveys 2008 - 2022

Base: 2008 n=1,563; 2010 n=1,468; 2012 n=1,457; 2014 n=1,667; 2016 n=1,728; 2018 n=1,739; 2020 n= 1,178; 2022 n=1,382

At La Perouse the toilets listed by NPWS are at the La Perouse Museum.

<https://www.nationalparks.nsw.gov.au/visit-a-park/parks/kamay-botany-bay-national-park/visitor-info>

Facilities

Toilets

- La Perouse Museum

Picnic tables

- Muru and Yena tracks


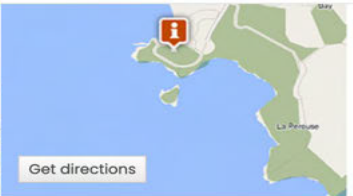
Drinking water

- Henry Head walking track

As mentioned earlier the Museum since 2017 has been managed and funded by RCC. There are 2 toilets in the enclosed courtyard and 2 toilets which are accessed from outside the Museum courtyard. As you can read on the sign these are for patrons of the museum. They are kept locked most of the time as the Museum is only open Wednesday and Friday 10am-2pm and Saturday and Sunday 10am-4pm. Also note the raised step and the out of order sign. The Museum has been closed since mid- September and may open again in November.



Visitations to Botany Bay National Park(northside) were recorded at around 400,000 annually in the Plan of Management, written in 2000 and enacted 2002. In a traffic study conducted for the Energy Australia Botany Bay Cable Environmental Assessment 2006-7, vehicle movements peaked at around 7400 per day at La Perouse on summer weekends. ^v There has been a considerable increase in visitor numbers since then. On peak visitor days Anzac Parade is sometimes closed near the road entry turnoff to the national park with residents required to show identification to drive home.

[View full screen](#)
[Pause](#)
[Play](#)

Housed in a heritage building at La Perouse in Sydney's south, the La Perouse Museum documents the expedition of French explorer the Comte de Laperouse.

Type	Visitor centres
Where	1542 Anzac Parade, La Perouse, NSW, 2036 - in La Perouse area in Kamay Botany Bay National Park in Sydney and surrounds
Accessibility	Hard
Opening times	Wednesdays and Fridays, 10am to 2pm. Saturdays and Sundays, 10am to 4pm. Closed Christmas Day and New Year's Day.
Please note	For more information visit the Randwick City Council website

Operated by

Randwick City Council

02 9093 6190

lpm@randwick.nsw.gov.au

The Old Cable Station, 1542 Anzac Parade, La Perouse NSW 2036

Park info

in the [La Perouse area](#) of [Kamay Botany Bay National Park](#) in the [Sydney and surrounds](#) region

7am–8.30pm November to March.
7am–7.30pm April to October.
La Perouse park entry gate closed to vehicles between 7pm and 5am all year.
Areas may have to close at times

As can be seen from the map above and the short description of places of significance within the park, visitors can spend many hours. During May until late July and again from August until November Cape Banks draws visitors for whale watching. The viewing area which is a short walk from the Helicopter Base carpark and opposite the Pistol Club could be made wheelchair 'friendly'.



The toilet block, below used to be available to the public. This is what I wrote in my Disability Inclusion Action Plan submission August 2022^{vi}

“The same applies regarding co-operative action at Cape Banks:

There is a toilet block built in the 1980s by scouting families but it has not been available since the Scout Ground was excised from the National Park in 2004

<https://www.parliament.nsw.gov.au/bill/files/427/C2704.pdf> ^{vii} It is an excellent area for whale watching. While considerable money has been spent by RCC upgrading a section of the walking track around the golf course nothing was done to connect the carpark, where a disabled person would land, to that section of walking track. Nor was there anything done to make the military heritage, that has been significant to those who served at Cape Banks (and their families/carers), accessible. This was in Council’s sphere of influence where they could demonstrate their commitment. If the problem was National Parks then call it out. The toilets should be available for disabled, and everyone else.”



Since I wrote that submission in 2022, NPWS have demolished this toilet block.

To illustrate the educational and recreational value of the area this is an account of a scouting day out at Cape Banks in 2011 <https://laperousecoastcare.wordpress.com/2011/09/18/scouts-and-cubs-cape-banks-environment-day/> It included presentations from Fishcare, a researcher on Whales, another on invasive species and included the bitou moth nursery at Cape Banks, a walk around the Coast Hospital Cemetery and Military establishment. This day was only possible because one of NPWS field officers, as a favour, made the toilets available for us.

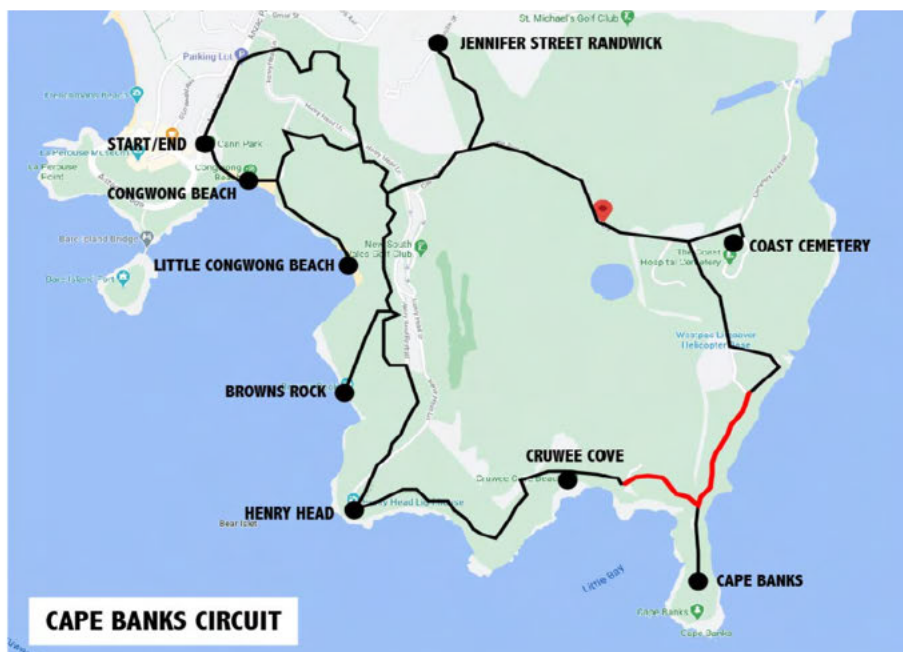


Photos below were taken in 2003 when scouts and cubs had access to both the Scout ground and the toilets.



This is from Woolacotts, the engineers who constructed the section of the coastal walkway which I referred to above in my Disability Inclusion Action Plan submission: *“Woolacotts were recently engaged by architect [Thompson Berrill Landscape Design \(TBLD\)](#) to provide structural engineering services for a section of the existing Coastal Walkway at Cape Banks, La Perouse. Located less than 20km from Sydney city, this coastal walkway boasts beautiful views across Sydney’s Botany Bay, from Bare Island in La Perouse to Cape Solander in Kurnell. In addition to a scenic experience, locals and visitors alike gain insight into Sydney’s rich history as this*

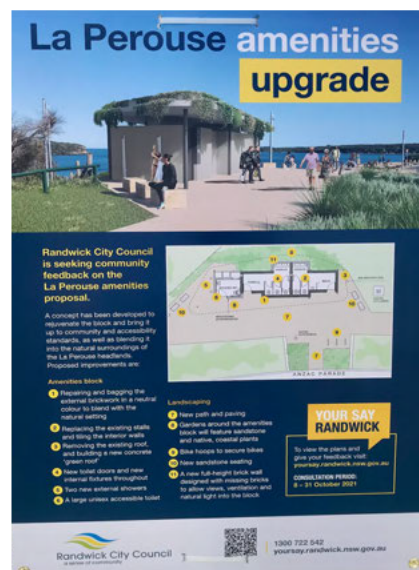
walking track offers glimpses into the fortifications required during both World Wars.”^{viii}



Below are photographs of the toilet block which services Frenchman's Beach and reserve. Further below is Frenchman's Beach, and just behind that beach is a well-used children's playground plus BBQs and picnic tables and outdoor gym.



Below is a photo of the Toilets marked on the Toilet Map as La Perouse Car Park and beside is one taken of the Have Your Say on the upgrade, notice. This toilet is one of the NPWS assets that RCC manages.



Three years ago, Randwick residents and visitors had their say and Council approved the recommended upgrade. <https://www.yoursay.randwick.nsw.gov.au/la-perouse-ammenties-block-upgrade> - see Appendix 1 for Frequently Asked Questions and Answers.^{ix}

This example is not from the La Perouse Headland but is related because it concerns public transport toilet amenity and how that has been diminished.



In Appendix 2, I have included correspondence I sent to elected council representatives in 2021 about the public toilet situation around the area and I mentioned the lack of toilets at the transport hub, the Kingsford Light Rail terminus. Transport signalled in their 2013 CESLR Environmental Impact Statement that direct buses would be cut when the Light Rail became operational. There was nothing done to ensure

there would be facilities available for people changing modes at the Kingsford. There is a big difference particularly late at night between waiting for a direct bus at Circular Quay where there are facilities to the current situation where passengers have to wait for a connecting 390X at Kingsford terminus to visit or return them home to areas south of Maroubra Junction along Anzac Parade.

FINALLY

This is a snapshot of one area of Sydney where visitations have increased significantly but public toilet amenity has been reduced. The key problems I see are:

Cost-shifting by the State Government's agency NPWS, and

Principles of access not embedded in the fabric of the responsible organisations, particularly the NPWS.

As I wrote in my submission to Council on their Disability Inclusion Action Plan: If you genuinely seek to change general public perceptions first start within Council. Every single project in the public space, including maintenance, should start with accessibility questions on the proposed work flowchart, eg: 'will this action improve access', 'will this action add to barriers', 'is this the best action possible to improve access given context and budget', 'is there a better project to improve access and meet other objectives.' Add biodiversity to the questions to boost wellbeing.

I suggest to the Committee that they recommend feedback systems. Perhaps SNAP, SEND, SOLVE could be used <https://www.snapsendsolve.com/> along with regular reporting on solutions. The Toilet Map functions could be expanded. Questions to cover could be: 'is there a toilet', 'is it accessible for all, 'is it safe and clean', is it easily maintained/cleaned (i.e. good design).

Please don't hesitate to contact me should I need to clarify, amplify or correct anything raised.

APPENDIX 1 Frequently Asked Questions for La Perouse Carpark Toilets

FAQs

Why not build a new amenities block?

Why don't you rebuild the amenities block in a different location?

Why not build a bigger amenities block?

Where is the project up to?

Why not build a new amenities block?

The structure of the existing building is generally good and a revamp of the facility is both a financially and environmentally sustainable approach – it renews the existing community asset without the cost and materials associated with a new build.

The block revamp will also add a unisex accessible toilet ensuring that all visitors to the area are catered for.

Why don't you rebuild the amenities block in a different location?

The amenities block is conveniently located adjacent to the Anzac Pde approach and is easily identified for first-time visitors to La Perouse. The block is in direct sight of the public bus stop, making it easily found, and is conveniently located for recreational users of the beach and Bare Island.

The block is conveniently located on the coastal walk, and is in close proximity to the Mobility Parking space.

Why not build a bigger amenities block?

As one of several facilities in the La Perouse recreational area – including Frenchman's Bay, and Yarra Bay – the number of toilets provided are generally sufficient for most times of the year. Also, the planned future upgrade of the nearby La Perouse Museum will add additional toilet facilities available in the area.

Its headland site is of State Heritage significance and its visual impact on the landscape needs to be carefully managed. The minor addition of the accessible toilet and 'green roof', blending the block into the natural bushland, is considered a modest response in the sensitive heritage area.

This site's heritage significance also comes with the potential for archaeological impacts. In this proposal, excavation of the sensitive headland area is minimised.

Where is the project up to?

The initial concept designs were endorsed by Council at the [March 2021 meeting\(External link\)](#). The project also has in-principle support from NSW National Parks and Wildlife Service.

Following the public exhibition of the proposal and consideration of feedback received, the finalised plans will be submitted for planning approval.

APPENDIX 2: Correspondence with elected Council representatives over lack of toilets

Date: 12 May 2021 at 3:42 AM +1000

To: xxxxxxxx

Dear South Ward representatives. copied South Ward email list

Dear xxxx xxxx xxxx

I write regarding access to public toilets in South Ward.

Toilets are essential for ensuring residents and visitors can move about freely - see basics listed theconversation.com/caught-short-we-need-to-talk-about-public-toilets-60450

When toilets are not available/don't cater for disabilities/closed it becomes difficult or impossible for some to participate.

And then it is a barrier to access and inclusion.

When I checked the Federal Government's Toilet Map today I found it does not include any toilets at Little Bay. I checked Council's website for Parks as well as playgrounds and although Prince Henry has 3 parks listed there are no toilet facilities. I know there is a beach toilet but that is useless for anyone in a wheelchair or on walkers or challenged by stairs. It is also inadequate to meet demand by swimmers at peak.

The Prince Henry Centre was supposed to be a community centre with access to toilets but access is not advertised.

Further, along with toilets there that appear unavailable those at La Perouse and Phillip Bay are advertised as available during 'daylight hours'.

We are supposed to be supporting a night- time economy yet something as basic as a public toilet is not available. Activity at night will not be normalised (apart from particular demographics) unless people feel safe and comfortable going out. That means providing the basic infrastructure like seating lighting and toilets. This understanding is not new, there is ample research to support and when I participated in an Economic Development workshop on the night-time economy the group of mostly commercial operators echoed this.

Not everyone on every occasion is going to spend money at a venue that has toilets. Normalising night-time activity requires an understanding of this.

It's appalling that Council did not get toilet facilities at the Kingsford and Randwick Tram Terminuses. Councillors and bureaucrats 10 years ago were made aware of the bus cuts. It doesn't take much imagination to understand that not providing facilities would become an access barrier for some when direct buses were discontinued particularly at night. But the woeful lack of concern for access to toilet facilities goes much further. I've given you one example which is the Prince Henry site a wonderful area to walk and motor and push a stroller around. However, there are no toilets unless cafes are open and the family/individuals are willing to eat there because Council can't expect cafes to carry the costs of running public toilets.

Could you please request an audit of public toilet availability and suitability and where there are shortfalls also ask for a plan to remedy them. In addition, the toilets with accessibility rating and opening times should be on Council's website and on the Toilet Map and on signs at the entry to parks and/other Council public space eg bus stops.

regards Lynda Newnam Resident South Ward

Date: 20 Sep 2021 at 1:43 PM +1000

To: Lynda Newnam

To: SOUTH WARD REPRESENTATIVES

Copied South Ward email list

Dear xxxx xxxx xxxx

I write regarding Randwick's Public Toilets, which I raised 4 months ago.

Could you please update me on public access at the Prince Henry (Community) Centre.

Could you also consider access in other areas of South Ward eg. Matraville Town Centre (raised on recent Council Facebook post) as well as the La Perouse Headland. In the Ferry Wharf EIS SSI-100049 there was a comment that the public toilets at the La Perouse Museum would not be available even though a large percentage of visitors to La Perouse are Randwick residents and ratepayers.

In addition to what I wrote previously about facilities and access I would commend the work that Monash Council in Victoria is undertaking shape.monash.vic.gov.au/public-toilet-strategy

With regards, Lynda Newnam

APPENDIX 3: TERMS OF REFERENCE

That Portfolio Committee No. 8 – Customer Service inquire into and report on public toilets, and in particular:

- (a) the provision, design, accessibility and inclusivity of public toilets across New South Wales, including toilets provided in public places and toilets provided for the use of members of the public in private premises accessed by the public,
- (b) state, national and international best practice for the provision and maintenance of public toilets,
- (c) the regulation of, and funding for, public toilets in New South Wales and whether new standards, guidelines, funding models, legislation or other forms of regulation are warranted,
- (d) the employment arrangements and conditions of cleaners who clean public toilets in both public and private premises; and
- (e) any other related matters. The terms of reference for the inquiry were self-referred by the committee on 15 August 2024.

Committee: Greens: Chair Dr Amanda Cohn & Abigail Boyd; LNP: D/Chair Aileen MacDonald & Natasha Maclaren-Jones; ALP: Anthony D'Adam, Stephen Lawrence, Peter Primrose

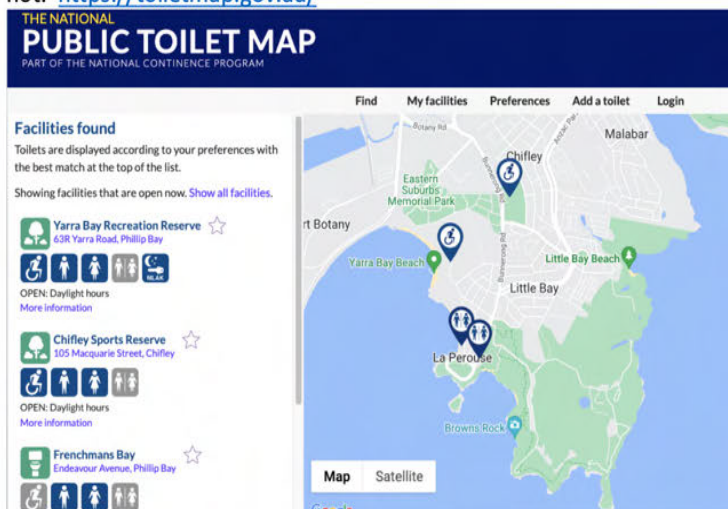
ⁱ Could people who design public toilets respectfully consult and learn from people who clean and maintain them to ensure that materials, fixtures and design are appropriate.

ⁱⁱ It should be noted that they weren't provided as part of the recent upgrade of the Cape Solander whale watching platform which is also the entry point to the Cape Baily walk.

ⁱⁱⁱ

1. The focus should be on Council's direct sphere of influence and responsibilities, eg. public toilets, paths, parks, beaches and connections. Every example of access is a statement that people with disabilities/access challenges matter. That's how to make positive changes in general perceptions, not with proclamations that don't translate. eg

There is no point proclaiming Frenchman's Bay playground is accessible (page 20) when toilets are not. <https://toiletmap.gov.au/>



Submission RCC Disability Inclusion Action Plan August 2022

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^{iv} <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Research/Our-science-and-research/annual-visits-npws-managed-parks-nsw-2022.pdf>

^v <https://www.parliament.nsw.gov.au/lcdocs/submissions/49175/0035%20Lynda%20Newnam.pdf>

^{vi} <https://www.yoursay.randwick.nsw.gov.au/79678/widgets/384456/documents/242260> pages 24-35

^{vii} <https://www.parliament.nsw.gov.au/lcdocs/submissions/55699/0293%20Ms%20Lynda%20Newman.pdf>

The Helicopter Base at Cape Banks was built on the former Scout Ground in the National Park. It was excised from the National Parks estate in 2004 to become Crown Land. At the time a NSW Health review of fixed and rotary wing aircraft recommended against Cape Banks as a helicopter base site because of road access constraints. Surf Life Saving was granted a 99 year no fee lease. Landcom funded the base as part of the redevelopment of Prince Henry. There has not been a contract with NSW Health for the Cape Banks Base though there are contracts in other parts of NSW with Surf Life Saving and there were contracts when the operation was at Prince Henry.



– Our Sydney Base facilities include

An operations room where the duty crew are based while on shift. This room includes a large communications hub to monitor radio communications from NSW Police, surf lifesaving services, council lifeguards, Marine Radio, the Government Radio Network and the Ambulance Service of NSW.

A 'ready room' where the various rescue and emergency care equipment is stored in readiness for the next rescue.

A Briefing Room that allows operations crews to prepare and plan for missions or training flights.

Living and accommodation facilities including kitchen, a lounge and ten bedrooms.

Maintenance and engineering facilities where we carry out maintenance and engineering services on our aircraft onsite.

Hangar space for at least two large rescue helicopters.

Office facilities, training room, board room and a large open area for group presentations.

Outside the building is a large landing apron and to the south is an expansive grassed area for taxiing helicopters.

^{viii} <https://www.woolacotts.com.au/news/coastal-walkway-extension-at-cape-banks/>

^{ix} After having gone through consultation and approvals 3 years ago, the General Manager announced at a local precinct committee in August that the toilet block would be demolished, and another one would be built next to the bus shelter on the opposite side of the road. It would be less accessible to the majority of users as covered in the FAQ. But apparently, appearance trumps functionality.