

# Diversity impact assessment

## APPENDIX 3

<b>TITLE</b>
Property Review: Operational Properties. Results Of The Consultation Regarding The Future Of The Public Toilets At Rainham Shopping Centre.
<b>DATE</b>
29 July 2025
<b>LEAD OFFICER.</b>
David England: Head of Valuation & Asset Management.
<b>1 Summary description of the proposed change</b>
What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?
<p>The review of the Council's operational property portfolio has been completed and Cabinet at its meeting on 11 March 2025 requested that officers undertake consultation concerning the future of the properties listed in the table contained in paragraph 4.7 to the report, including discussions with the relevant Parish Councils and adjoining stakeholders concerning the public toilets with the aim of these facilities remaining available for use. The results of this consultation would be brought to a future Cabinet meeting, so that Cabinet could then decide the way forward. The properties listed for consultation were:</p> <ul style="list-style-type: none"> <li>• Upnor Castle, High Street Upnor (this is not Council owned.) The results of the consultation in respect of the future of this property will be taken to a future Cabinet meeting.</li> <li>• Public Toilets, Cooling Village Hall (not Council owned.) The results of the consultation in respect of this property will be taken to a future Cabinet meeting.</li> <li>• Public Toilets, The Street, High Halstow (Leasehold.) The results of the consultation in respect of this property will be taken to a future Cabinet meeting.</li> <li>• Public Toilets, Rainham Shopping Centre.</li> </ul>
<b>2 Summary of evidence used to support this assessment.</b>
<p>E.g. Feedback from consultation, performance information, service user. E.g. Comparison of service user profile with Medway Community Profile</p> <p>The Council needs to make financial savings and the Chartered Institute of Public Finance and Accountancy (CIPFA) in its report dated January 2024, amongst other things recommended that the Council should carry out a property review to identify surplus non-operational property assets, which can be disposed of to reduce debt, and that the Council should also identify other property assets, including operational properties, which are attractive to the market and where their sale could contribute to Medway's longer-term financial sustainability. The aim of this review is to generate £20M from capital receipts over the next 5 years.</p>

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The head tenant of the adjoining Rainham shopping centre has confirmed that they would be happy to include the ownership and maintenance of the public toilets as part of the freehold acquisition of the shopping centre.

## 3 What is the likely impact of the proposed change?

Is it likely to:

Adversely impact on one or more of the protected characteristic groups

Advance equality of opportunity for one or more of the protected characteristic groups

Foster good relations between people who share a protected characteristic and those who do not.

(insert Yes when there is an impact or No when there is not)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	Possibly if the toilets are closed.	N/A	N/A
Disability	Possibly if the toilets are closed.	N/A	N/A
Gender reassignment	N/A	N/A	N/A
Marriage/civil partnership	N/A	N/A	N/A
Pregnancy/maternity	Possibly if the toilets are closed.	N/A	N/A
Race	N/A	N/A	N/A
Religion/belief	N/A	N/A	N/A
Sex	N/A	N/A	N/A
Sexual orientation	N/A	N/A	N/A
Care experience	N/A	N/A	N/A
Other (e.g. low-income groups)	N/A	N/A	N/A

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## 4 Summary of the likely impacts

Who will be affected?

How will they be affected?

As requested by Cabinet at its meeting on 11 March 2025, consultation has now taken place about the toilet block at Rainham shopping centre and whether another party would be prepared to run the facility and what the impact could be of closing it.

There will be no adverse impacts from the closure of the toilets at Rainham Shopping Centre, as the Council would only dispose of the toilets to the head tenant or owner of Rainham Shopping Centre on the basis that they would be prepared to continue to run the toilets or relocate the facility elsewhere in the shopping centre.

## 5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

The toilets could be kept open by the owner of the adjacent shopping centre or relocated to another location within the shopping centre.

## 6 Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
If the Council closes and disposes of the toilets at Rainham Shopping Centre, it will be on the basis that the purchaser will be required to keep the toilets open or provide alternative facilities elsewhere within the shopping centre.	Cabinet	Review 30 June 2026.

## 7 Recommendation

### It is recommended that Cabinet:

Declares surplus the toilet block at Rainham Shopping Centre, so that it can be disposed of by the Director of Place, in consultation with the Council's Corporate Landlord Board (CLB) on the basis that the purchaser will be required to keep the toilets open or provide alternative facilities elsewhere within the shopping centre.

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<b>7 Recommendation</b>
<b>8 Authorisation</b> The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained, and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored
<b>Assistant Director: Sunny Ee</b>
<b>Date of authorisation</b>
17.07.2025