

Diversity impact assessment

APPENDIX 3

TITLE
PROPERTY REVIEW: OPERATIONAL PROPERTIES. RESULTS OF CONSULTATIONS.
DATE
16 December 2025
LEAD OFFICER.
David England: Head of Valuation & Asset Management.
1 Summary description of the proposed change
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"> • Upnor Castle, High Street Upnor (this is not Council owned.) The results of the consultation in respect of the future of Upnor Castle will be considered by Cabinet separately. • Public Toilets, Rainham Shopping Centre. Cabinet at its meeting on 29 July 2025, (decision number 102/2025) agreed to declare surplus, the toilet block at Rainham Shopping Centre, so that it could be disposed of by the Director of Place, in consultation with the Council's Corporate Landlord Board (CLB) on the basis that the purchaser would be required to keep the toilets open or to provide alternative arrangements including the provision of disabled toilets within Rainham Shopping Centre. <p>So, the two properties which Cabinet is being asked to decide the future of are:</p> <ul style="list-style-type: none"> • Public Toilets, Cooling Village Hall (Medway Council has no legal interest in these.) • Public Toilets, The Street, High Halstow (The Council has a lease of these toilets.)
2 Summary of evidence used to support this assessment.
<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</p>

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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.

- Public Toilets at Main Road, Cooling (Medway Council has no legal interest in these): Cooling Parish Council (CPC) has objected to the closure of the these and the owners of the toilets, Cooling Village Hall Charity, (CVHC) has also objected to the closure of them.
- Public Toilets, The Street, High Halstow (Leasehold.) High Halstow Parish Council (HHPC) which also owns the toilets and is Medway Council's landlord, would like the toilets to remain open and is prepared to take a surrender of the lease of the toilets and run them itself.

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. Although neither property includes disabled facilities.	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

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Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
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

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 two public toilets and whether other parties are prepared to run them and what the impact could be of closing them.

CPC has objected to any closure and stated that it is not prepared to not take on the running of the toilets at Cooling and that their closure could have an impact on various groups including some with Protected Characteristics.

CVHC, the owner of the toilets at Cooling has objected to any closure and has stated that their closure could have an impact on various groups including some with Protected Characteristics.

HHPC has stated that it would like the toilets to remain open and is prepared to take a surrender of the lease of the toilets and run them itself.

It should be noted that the toilets at Cooling and High Halstow do not include accessible/disabled facilities and that there are other public toilets available in the peninsula area including Stoke, Hoo and Cliffe. The public toilets at Hoo include an accessible/disabled toilet and are adjacent to a car park and bus route. These are 4.3 miles away from Cooling and 2.4 miles away from High Halstow.

It should also be noted that of the fifteen public toilets that the Council provides, other than the five which are located in the peninsula area (Cooling, High Halstow, Stoke, Cliffe and Hoo) none are in rural areas, and they are all located in parks, urban or suburban locations.

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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 in Parished areas could be run by Parish Councils or other third parties, however, currently CPC is not prepared to do this as it states that the impact on its Council tax payers will be unfair and disproportionate.

HHPC has stated that it would like the toilets to remain open and is prepared to take a surrender of the lease of the toilets and run them itself.

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
<ul style="list-style-type: none"> If the Council decides to declare close and declare surplus the toilets at Cooling, it could be on the basis that other parties will be given the opportunity to run the toilets before they are closed. If the Council decides to declare close and declare surplus the toilets at High Halstow, it could be on the basis that HHPC will be given the opportunity to run the toilets before they are closed. In this case, HHPC has agreed to take a surrender of Medway Council's lease of the toilets and run them itself. 	Cabinet	Review 30 November 2026.

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7 Recommendation	
It is recommended that Cabinet:	
1.1	Declares surplus, the public toilets at Cooling, and unless Cooling Parish Council (CPC), Cooling Village Hall Committee (CVHC)(the owner of the toilets) or a third party is prepared to run the toilets, so that they can be passed over to the relevant party using the Head of Valuation & Asset Management's delegated powers as set out in the Constitution, then Medway Council is to close the toilets during 2026.
1.2	Declares surplus, the leasehold toilet block at High Halstow, so unless High Halstow Parish Council (HHPC) is prepared to run the toilets, and the lease of the toilets can be surrendered back to HHPC using the Head of Valuation & Asset Management's delegated powers as set out in the Constitution, then Medway Council is to close the toilets during 2026.
8 Authorisation	
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	
Assistant Director: Sunny Ee	
Date of authorisation	
3 December 2025	