

TONBRIDGE & MALLING BOROUGH COUNCIL
FINANCE, INNOVATION and PROPERTY ADVISORY BOARD

15 September 2021

Report of the Management Team

Part 1- Public

Matters for Recommendation to Cabinet - Council Decision

1 SPECIAL EXPENSES CONSULTATION

The Council launched a consultation on 22 June for a four week period regarding potential adjustments to the Special Expenses Policy.

This report provides details of the responses to the consultation and seeks Members' recommendations on whether (or not) the cost of the non-strategic Public Conveniences in Tonbridge should be included within the Special Expenses policy; and also whether (or not) the cost of Christmas lights should be included within the Special Expenses policy.

1.1 Introduction

1.1.1 The Council's current Special Expenses policy came into effect on 1 April 2017 and is attached at **[Annex 1]** for background information.

1.1.2 At the meeting of this Advisory Board in May, Members noted that a consultation exercise was to be launched to hear the public's views about the potential inclusion of (non-strategic) public conveniences and Christmas lighting in the Council's Special Expenses policy.

1.1.3 In accordance with the Advisory Board's recommendations to Cabinet following the May meeting, and Cabinet's subsequent endorsement, the public consultation opened on 22 June 2021 on the Council's website.

1.1.4 The detail of the information that appeared on the website is set out at **[Annex 2]**.

1.1.5 In simple terms the questions posed were either **Agree or Disagree** to the following statements:

- Public toilets should be paid for by the local communities where they are provided through council tax bills (**Statement 1**)
- Public toilets should be paid for by all council taxpayers in the borough (**Statement 2**)
- Christmas lights should be paid for by the local communities where they are provided through council tax bills (**Statement 3**)

- Christmas lights should be paid for by all council tax payers in the borough (**Statement 4**)

- 1.1.6 The consultation was open for 4 weeks and subsequently closed on 20 July.
- 1.1.7 Residents were encouraged to respond to the consultation via a range of publicity activities. This included messages on the website homepage, a news release which was reported by the local media and social media posts throughout June and July.
- 1.1.8 In total there were 170 responses to the questions posed via the website, plus one 'free form' written submission. The responses received are summarised at **[Annex 3]** for Members' consideration. In addition, **[Annex 4]** sets out some of the free-form comments received. It should be recognised that some of the comments relate to matters outside the scope of the consultation.
- 1.1.9 It is for Members to decide whether either, both or neither of the concurrent functions should be added to the Special Expenses policy. Each function needs to be considered on its own merits and recommendations made accordingly.
- 1.1.10 The role of this Advisory Board is to review the responses alongside the earlier 'reasoning' which led to the potential inclusion of these concurrent functions in the Special Expenses policy, and thereafter make recommendations to Cabinet.
- 1.1.11 A report will similarly be presented to the Overview and Scrutiny Committee at its meeting on 7 October 2021. The Committee will be advised of this Board's recommendations.
- 1.1.12 To assist deliberation, each function is considered separately in the following paragraphs. However, to set the 'scene', the overall **headline results** which are not broken down by area of the borough are as follows:

	AGREE number	AGREE %	DISAGREE number	DISAGREE %
Statement 1 (Pub Cons, paid by local communities)	55	32%	115	68%
Statement 2 (Pub Cons, paid by all taxpayers)	126	74%	44	26%
Statement 3 (Christmas Lights, paid by local communities)	85	50%	85	50%
Statement 4 (Christmas Lights, paid by all taxpayers)	83	49%	87	51%

1.1.13 Members will of course appreciate that the responses may vary dependent upon where in the borough a respondent resides. At Annex 2, Members will have noted that residents in Tonbridge (due to the incidence of cost for both non-strategic public conveniences and Christmas lights) and West Malling (due to the incidence of cost of Christmas lights) would have to pay slightly more through council tax and residents in other parts of the borough slightly less.

1.1.14 Of the 170 web respondents, the breakdown by area of the borough is as follows:

Aylesford	11
Borough Green	4
Burham & Eccles	2
Ditton	2
East Malling & Larkfield	22
East Peckham	1
Hadlow	9
Hildenborough	3
Ightham	1
Kings Hill	5
Leybourne	1
Mereworth	1
Offham	1
Platt	2
Plaxtol	1
Snodland	3
Tonbridge	78
Trottiscliffe	1
West Malling	14
West Peckham	1
Wouldham	5
Outside Borough	2

1.1.15 ***Members will appreciate that the number (170) of web respondents relative to the population of the borough is very small (amounting to only a fraction of a percentage). Therefore Members may wish to bear this in mind when weighing up the way forward.***

1.2 Public Conveniences

- 1.2.1 Members are reminded that at its meeting on 30 October 2019, the Street Scene and Environment Services Advisory Board recommended to Cabinet (minute SSE19/26) a pathway in respect regarding the provision of the Council's existing Public Conveniences.
- 1.2.2 The SSES Advisory Board recommended that the transfer of the public conveniences to the relevant Parish/Town Council be progressed; and in relation to the (non-strategic) public conveniences situated in the non-parished area of Tonbridge, a consultation be undertaken during 2021/22 with a view to **updating the Special Expenses Policy to reflect the new arrangements for the provision of public conveniences as a concurrent function**. Cabinet subsequently endorsed these recommendations.
- 1.2.3 In terms of the responses to the questions posed though the consultation, Members will note from paragraph 1.1.13 that overall the majority of respondents (68%) disagreed that public conveniences should be paid for by local communities; and 74% felt that they should be paid for by all taxpayers across the borough.
- 1.2.4 When breaking these responses down to the parished and non-parished (Tonbridge) areas of the borough, the results are a little more skewed:

<i>Public toilets should be paid for by the local communities where they are provided through council tax bills</i>		
	Agree	Disagree
Tonbridge	22%	78%
Other	41%	59%

<i>Public toilets should be paid for by all council taxpayers in the borough</i>		
	Agree	Disagree
Tonbridge	85%	15%
Other	65%	35%

Nevertheless, the balance of opinion from those who have responded seems to be that public conveniences should be paid for by all taxpayers, and therefore should not be included in Special Expenses.

- 1.2.5 Whilst not part of the consultation itself, Members will note from some of the free-form comments made that residents generally feel that (in no particular order):

- Public conveniences should not be closed anywhere (31 occurrences)
- Public conveniences in Tonbridge should be improved (7 occurrences)
- The effect on the bill is trivial (4 occurrences)
- Public amenities benefit visitors as well as residents (50 occurrences)
- Public conveniences should be pay to use (9 occurrences)

1.2.6 **What is not clear is whether respondents believe that the responses made to the very specific questions on this consultation will enable Members to reverse existing decisions, or make different decisions about service provision.**

1.2.7 As mentioned at paragraph 1.1.15, ***Members should also bear in mind that the number of responses is low.***

1.2.8 For the avoidance of any doubt, it has not been the purpose of this consultation to consider the above issues but instead to weigh up whether or not the non-strategic public conveniences in Tonbridge should be included in the Special Expenses policy given that earlier Member decisions have meant that facilities in parished areas have either been transferred to parish councils (for these bodies to operate and fund in future) or closed.

1.2.9 It is important to remember that from 2022/23, the public conveniences that have been transferred to 3 parish councils (East Malling & Larkfield, East Peckham and Borough Green) will be paid for through parish precepts. These costs will therefore fall firmly on those local communities. In other parished areas, decisions previously taken by Members mean that facilities have been closed. When Members of the SSES Advisory Board and subsequently Cabinet agreed the 'pathway' in respect of the provision of public conveniences, the principle of 'fairer charging' was a consideration.

1.2.10 Members of this Advisory Board are **asked** to reflect on the results of the consultation from the limited number of responses received alongside the original 'pathway' set out by SSES Advisory Board, and recommend to Cabinet whether or not the cost of the non-strategic Public Conveniences in Tonbridge should be included within the Special Expenses policy under the 'fairer charging' principle.

1.3 Christmas Lighting

1.3.1 Some Members may recall that the provision of Christmas lighting was included in the original consultation in 2016, but following feedback from residents, Council agreed that it should not be included within the Policy at that time. Instead, Cabinet recommended that a review be undertaken by the Overview and Scrutiny Committee into the future funding of Christmas Lighting.

1.3.2 Members are reminded that in Tonbridge, the Borough Council directly pays for **all** costs relating to Christmas lighting. No contributions are routinely made by other parties or traders.

1.3.3 In the parished areas of the borough, the Borough Council gives small grants to relevant trading areas as a contribution towards the lighting displays (this being based on the number of trading units etc). The remainder of the funding comes from relevant parish councils, local traders or public donations. In some areas, it is the parish council that takes responsibility for operating the lighting schemes; hence why Christmas lighting is a 'concurrent function'. West Malling receives the largest of those grants given that it is the largest trading area outside of Tonbridge.

1.3.4 For context, the direct costs Christmas lighting budget for 2021/22 is as follows:

	Budget per Book £	Direct Expenses £
Tonbridge Town Centre	32,950	23,650
Borough Christmas Lighting	13,750	12,800

Notes:

- For Tonbridge Town Centre, the difference between the 2 columns is central administration recharges. Direct expenses includes depreciation for the lights which need to be replaced periodically.
- For Borough Christmas lighting (covering all parts of the Borough excluding Tonbridge), the difference between the 2 columns is simply a small amount of central administration recharges.

1.3.5 Borough Christmas Lighting Direct Expenses included in the overall budget is based upon the Scrutiny review which was last undertaken in 2017. This review concluded the following broad allocations to the trading areas outside Tonbridge:

Parish	Maximum Award £
Aylesford	880
Borough Green	1,840
East Malling and Larkfield (Martins Sq)	1,290
East Peckham	490
Hadlow #	960
Snodland	2,460
West Malling	5,210
Wrotham	620

However, as Hadlow has not claimed for a number of years, the actual budget book provision does not include the £960 allocated by Overview & Scrutiny.

1.3.6 As alluded to in paragraph 1.3.1, the Overview and Scrutiny Committee did carry out a review into the future funding of Christmas lighting, and in January 2017 at minute OS 17/5 recommended to Cabinet that *"alternative funding options for Tonbridge Christmas lights and hanging baskets be explored for 2017/18. If these options are found not to be viable, Council, as a last resort, be recommended to review the listed functions within the Council's adopted Special Expenses Scheme with a view to including the functions within that scheme from 2018/19"*. This was endorsed by Cabinet through a decision notice on 31 January 2017 (minute CB 17/10 refers).

- 1.3.7 Workable alternative funding options had not been found for the Tonbridge Christmas lights and, therefore, in accordance with the minute from Overview and Scrutiny Committee above, the public consultation went ahead.
- 1.3.8 In terms of the responses to the questions posed through the consultation, Members will note from paragraph 1.1.13 that, **overall**, responses received from residents are split almost '50:50' as to how Christmas lighting should be paid for. This is not dissimilar to the original consultation back in 2016.
- 1.3.9 When breaking these responses down to the parished and non-parished (Tonbridge) areas of the borough, the results are more skewed:

<i>Christmas lights should be paid for by the local communities where they are provided through council tax bills</i>		
	Agree	Disagree
Tonbridge	33%	67%
Other	64%	36%

<i>Christmas lights should be paid for by all council taxpayers in the borough</i>		
	Agree	Disagree
Tonbridge	60%	40%
Other	39%	61%

- 1.3.10 Members will note from some of the **free-form comments (Annex 4)** that residents generally feel that (in no particular order):

- Christmas lights should not be paid for by Council Tax (17 occurrences)
- The effect on the bill is trivial (4 occurrences)

- 1.3.11 As mentioned at paragraph 1.1.15, **Members should also bear in mind that the number of responses is low.**

- 1.3.12 In terms of some of the parished areas, traders and residents do already make contributions towards the costs of Christmas lighting. The Overview & Scrutiny Committee has considered how this principle could be adopted in the non-parished area (Tonbridge) but no solution had been found to date. Whilst not part of this report, Members may decide they wish to revisit this again, perhaps with the Town Team, given some of the comments made.

- 1.3.13 One proposal made by West Malling Parish Council was that if the cost of Christmas lighting were to be included in Special Expenses, then the additional

cost be spread over the neighbouring Malling parishes (with the exception of those parishes which will also be funding their own Christmas lights). Members are advised that unfortunately this would not be permissible within the legislation governing Special Expenses.

- 1.3.14 Members of this Advisory Board are **asked** to reflect on the results of the consultation from the limited number of respondents from across the borough, and recommend to Cabinet whether or not the cost of Christmas lighting should be included within the Special Expenses policy under the 'fairer charging' principle.

1.4 Timetable

- 1.4.1 If the special Expenses policy is to be updated to include one or other of these functions, this will require a Full Council decision.

- 1.4.2 The timetable will be:

7 October 2021	Consideration by O&S Committee, with the committee making its own recommendations to Cabinet
13 October 2021	Consideration by Cabinet and recommendations to Full Council as appropriate
26 October 2021	If appropriate, decision to update Special Expenses policy w.e.f. 1 April 2022

- 1.4.3 Members should note that if any update to the Special Expenses Policy were to be approved, it would not take effect until 1 April 2022.

1.5 Legal Implications

- 1.5.1 Provisions relating to special expenses are contained in the Local Government Finance Act 1992 at sections 34 and 35. These sections allow different amounts of council tax to be calculated for different parts of the district, depending on what, if any, special items relate to those parts.

1.6 Financial and Value for Money Considerations

- 1.6.1 This consultation is about how the **incidence of cost** is borne by residents in different parts of the borough. It does not in itself generate savings.
- 1.6.2 As Members will recall from the original Fairer Charging consultation, the incidence of cost was shifted creating greater equity for residents across the borough. The greatest shift at that time was towards residents in Tonbridge.
- 1.6.3 If in due course it were to be agreed that public conveniences should be deemed a concurrent function for the purposes of Special Expenses, the incidence of cost would move to residents in Tonbridge given that conveniences in other parts of the borough have either been closed or taken over by a relevant parish council. Therefore the special expense levy in Tonbridge would increase.

- 1.6.4 If it were decided that public conveniences were not to be included in the Special Expenses policy, the cost of those facilities in Tonbridge would be shared across the entire borough. Members should note therefore that those residents living in the three parished areas where public conveniences have been transferred to the parish councils would effectively pay for their local facilities through parish precept, and also pay a share of the provision in Tonbridge through the Borough Council levy.
- 1.6.5 Similarly, if Christmas lighting was to be included in the Special Expenses policy, the local costs would fall on the local residents increasing any special expense levy.

1.7 Risk Assessment

- 1.7.1 The current Special Expenses policy established 'equity' across the borough in terms of council tax paid towards the cost of local services. This further consultation was designed to test the public's views about the inclusion or otherwise of additional concurrent functions.
- 1.7.2 If decisions are not made within the timescales set out, the Council may not be able to implement the changes (if any) in readiness for 2022/23.
- 1.7.3 The number of responses (170) is very small in the context of the population of the borough. Members need to bear this in mind when weighing up the options given that the vast majority of our residents have not offered an opinion either way.

1.8 Equality Impact Assessment

- 1.8.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.9 Policy Considerations

- 1.9.1 Community
- 1.9.2 Communications

1.10 Recommendations

- 1.10.1 A report will similarly be presented to the Overview and Scrutiny Committee at its meeting on 7 October 2021. The Committee will be advised of this Board's recommendations.
- 1.10.2 Members are asked to **RECOMMEND** to Cabinet whether or not the Special Expenses Policy should be updated to include
- 1) non-strategic public conveniences which are located in Tonbridge; and
 - 2) Christmas lighting.

Background papers:

Nil

contact: Sharon Shelton
Jon Steel
Francis Gahan
Paul Worden

Julie Beilby
Chief Executive

Sharon Shelton
Director of Finance
& Transformation

Adrian Stanfield
Director of Central Services
& Monitoring Officer

For Management Team

TONBRIDGE & MALLING BOROUGH COUNCIL
SPECIAL EXPENSES ('LOCAL CHARGE') SCHEME

1. Introduction

- 1.1 The Provisions relating to “special expenses” are contained in the Local Government Finance Act 1992 at sections 34 and 35. These sections allow different amounts of council tax to be calculated for different parts of the district, depending on what if any “special items” relate to those parts. The legal background is set out in the Appendix.
- 1.2 In resolving to implement a Special Expenses Scheme, the Council revokes the Financial Arrangements with Parish Councils Scheme which was effective from 1 April 1992 made under s136 Local Government Act 1972 with effect from the same date (1 April 2017).

2. Objectives of the Scheme

- 2.1 The borough consists of 27 parished areas, and one unparished area. Parish councils exercise certain functions in their respective areas, which the Borough Council must exercise directly in the unparished area. These are known as concurrent functions.
- 2.2 The Council has historically awarded grants under s136 Local Government Act 1972 to parish councils in order to contribute towards the cost of concurrent functions. Due to significant financial pressures, the Council finds that it is unable to continue providing this level of financial support and must make savings.
- 2.3 The Council has resolved to adopt a Scheme of Special Expenses in order to provide a fairer system in terms of financial equity for taxpayers across the borough.

3. Function to be included in Scheme

- 3.1 Cabinet, at its meeting on 28 July 2016, recommended that the following concurrent functions are included in the Scheme:
- Closed churchyards
 - Open spaces, parks and play areas maintained by TMBC in parished areas; excluding Leybourne Lakes Country Park (strategic site)
 - Open spaces, play areas, parks and sportsgrounds in Tonbridge; excluding Castle Grounds and Haysden Country Park (strategic sites)
 - Support given to ‘Local’ Events
 - Allotments

4. Calculation of Special Expenses

- 4.1 TMBC will calculate an average council tax across the whole of its area under section 31B of the Local Government Finance Act 1992. Included in that will be the amounts payable to parish councils under their precepts, plus the amounts TMBC will spend on performing functions which are performed in parts of its area by parish councils.
- 4.2 Under section 34 of the Local Government Finance Act 1992, TMBC must then deduct the total of any special items. For each part of its area, TMBC must then add back amounts for any relevant special items for that part of its area. The amount added back is calculated by dividing the special item (i.e. the authority's estimated cost of performing the function in that part of its area) by the tax base for the part of the area in which the authority performs the function.
- 4.3 Treating expenses as special expenses does not affect the overall amount that TMBC needs to raise through council tax, and does not, therefore, affect the average amount of council tax across the whole of the borough. It simply means that, compared with what would happen if the expenses were not treated by TMBC as special expenses, the council tax is:
- relatively lower for areas where the parish council performs the concurrent function, as it includes the parish's costs but not TMBC's costs of performing the function elsewhere; and
 - relatively higher for areas where TMBC performs the concurrent function, as all TMBC's costs of performing the concurrent function must be met by taxpayers in the area where TMBC performs it.

5. Implementation

- 5.1 This Scheme is effective from 1 April 2017, following resolution of Full Council on 1 November 2016.
- 5.2 The list of concurrent functions included within the Scheme will be reviewed from time to time and the Scheme updated as necessary.

February 2021

TONBRIDGE & MALLING BOROUGH COUNCIL
SPECIAL EXPENSES ('LOCAL CHARGE') SCHEME

LEGAL BACKGROUND

Section 34 of the Local Government Finance Act 1992, as amended by the Localism Act 2011, requires that certain items, which are referred to as 'special items', and which relate to a part only of a billing authority's area, be removed from the calculation of the overall basic amount of tax and added to that for the area concerned.

Section 35(1) defines these items as:

- Any precept issued to or anticipated by the authority which is, or is believed to be, applicable to a part of its area and was taken into account by it in making the calculation (or last calculation) in relation to the year under Section 31A(2) above (i.e. the parish precepts, as included in the calculation of the budget requirement).
- Any expenses which are its (the Council's) special expenses and were taken into account by it in making that calculation.

Section 35(2)(d) defines further 'Special Expenses' as:

“any expenses incurred by a billing authority in performing in a part of its area a function performed elsewhere in its area by the sub-treasurer of the Inner Temple, the under-treasurer of the Middle Temple, a parish or community council or the chairman of a parish meeting are the authority's special expenses unless a resolution of the authority to the contrary effect is in force”

In order for expenses incurred in performing any function of a district council to be special expenses the function must be carried out by the district in only part of its area, and the same function must be carried out in another part of the district by one or more parish councils. The detailed identification of concurrent functions is therefore essential for using this special expenses provision.

One of the reasons behind the special expenses regime is to allow a more equitable division of council expenses for council taxpayer funded services so that those receiving the benefit of certain services in a particular area are those who pay for them through their precept and do not pay twice for similar services carried out in any areas where there is not a parish or town council so as to avoid “double taxation” for the relevant services.

The power to charge special expenses is discretionary and in order for it to apply there must be a resolution of the billing authority in force. As the resolution has to refer to the matters which will be special expenses for these purposes the resolution will need to identify which function related activities will be included within the calculation.

Special Expenses must be applied consistently throughout a billing authority's area. There is no discretion to make selective application to some parts of the borough only.

Website information

Fairer charging for public toilets in Tonbridge and Christmas lights

Tonbridge and Malling Borough Council is consulting everyone in the borough on how we pay for the cost of two particular services:

- Public toilets in Tonbridge
- Christmas lighting across the borough

We want to hear your views on whether these local services should be paid for by the residents of the areas where they are provided, rather than the costs being shared across the whole borough as is the case currently. The council's overall income would not change as a result of these proposals.

This consultation closed at 5pm on 20 July 2021.

Background

Most services provided by the council are funded on a borough-wide basis through the council tax paid by residents. Since 2017, in some parts of the borough an additional sum has been added to council tax rates to pay for particular services which largely benefit those areas. These adjustments are called special expenses. They are currently used to fund things like local parks, playgrounds and allotments.

This approach is seen as fairer as residents are not asked to pay for facilities outside the areas where they live and from which they are unlikely to derive significant benefit.

The council now proposes to add public toilets in Tonbridge and Christmas lights to the list of services which are funded locally via special expenses.

The provisions relating to special expenses are contained in the Local Government Finance Act 1992 at sections 34 and 35. Our policy is reviewed annually as part of the budget setting process.

Proposals for public toilets

In 2021, the operation of public toilets in Tonbridge and Malling transferred to parish and town councils.

In future years, the parishes which have taken on this responsibility will raise funds to manage the toilets through their own part of the annual council tax bill received by residents. In those areas where the parish or town council have chosen not to take on running the local toilets, regrettably these facilities have closed.

Tonbridge is an exception as it has no parish or town council so the borough council will continue to pay for the provision of public toilets. Under current funding arrangements, this would mean that toilets in Tonbridge are paid for by all borough council tax payers.

To achieve consistency with new arrangements under which parishes meet the cost of their local public toilets, we are seeking your views as to whether the running costs of the three local public toilets in Tonbridge should be met by the council taxpayers in Tonbridge, rather than the whole borough. Toilets in our country parks and Tonbridge Cemetery would continue to be treated as a general expense paid for by all residents as these toilets are linked to more strategic land or buildings.

The running cost of the three public toilets in Tonbridge is approximately £75,300 a year. We estimate the additional cost for a band D home in Tonbridge would be approximately £4.02 per year. We estimate elsewhere, residents would see a reduction of approximately £1.47 a year as they would no longer be contributing to the cost.

Proposals for Christmas lights

Christmas lights in high streets and village centres across the borough are currently funded in a variety of ways. In Tonbridge they are paid for from the council's general budget, so everyone across the borough who pays council tax contributes to the cost.

Elsewhere, Christmas lights are paid for by a combination of retailers, local groups or charities, parish councils. The borough council provides small grants from our general budget to top up the funding. Parishes which currently receive these payments are:

- Aylesford
- Borough Green
- East Malling and Larkfield
- East Peckham
- Hadlow
- Snodland
- West Malling
- Wrotham

We currently operationally manage and pay for all the Christmas lighting costs in Tonbridge. For Christmas 2021 the overall budget is approximately £33,000. In other areas of the borough, we administer a small grants scheme instead for which the overall budget is £13,750 for Christmas 2021.

This funding arrangement is inconsistent because Tonbridge has lights paid for by all council tax payers while in other parts of the borough it is paid for via a mix of local groups and the council.

The proposal to include the costs of Christmas lights in special expenses would mean that residents meet the cost in places where the council contributes towards Christmas lighting. Residents elsewhere in the borough would no longer be asked to pay.

The cost to individual households would vary, depending on population size and the cost of the lights in that area.

In the areas where Christmas lights receive council funding, between approximately £2.40 and £4.58 could be added to the special expenses element of band D bills. Across the borough, this change would also see the main element of council tax bills reduce by approximately 91 pence.

The impact on council tax bills

The combined estimated impact on council tax bills of these increases and reductions is shown below. With the exception of Tonbridge and West Malling, the proposals would result in a slight reduction in council tax bills.

Net change in band D council tax (£)

Addington	-2.38
Aylesford	-2.18
Birling	-2.38
Borough Green	-1.29
Burham	-2.38
Ditton	-2.38
East Malling and Larkfield	-2.12
East Peckham	-2.00
Hadlow	-1.75
Hildenborough	-2.38
Ightham	-2.38
Kings Hill	-2.38
Leybourne	-2.38
Mereworth	-2.38
Offham	-2.38
Platt	-2.38
Plaxtol	-2.38
Ryarsh	-2.38
Shipbourne	-2.38
Snodland	-1.74
Stansted	-2.38
Tonbridge	+5.51
Trottiscliffe	-2.38
Wateringbury	-2.38
West Malling	+2.20
West Peckham	-2.38
Wouldham	-2.38
Wrotham	-1.73

[View detailed breakdown](#) (see below)

Respond to the consultation

We want to hear what you have to say about this proposal. In particular, we want to know whether you agree or disagree that the cost of public toilets in Tonbridge and Christmas lights where they are provided should be met by residents in those areas, rather than by all council tax payers.

The deadline for responses is 5pm on Tuesday 20 July 2021.

Respond to this consultation

To request a paper copy and response form, please call our customer services team on 01732 844522.

Data protection statement:

Your personal information will be held and used in accordance with the Data Protection Act 2018. A summary of your response to this questionnaire may be published as part of the feedback document regarding the consultation but your name will not be published. The information you provide will only be used should we need to contact you about your response and will be permanently deleted three months after the end of the consultation.

Detailed breakdown :

This table shows the estimated impact on council tax bills of including public toilets and Christmas lighting in special expenses separately and also the combined effect if both were to be included

Area of Borough	Public Conveniences			Christmas Lighting			Overall Change
	Special Expense	General Expense	Net Change	Special Expense	General Expense	Net Change	
	£	£	£	£	£	£	£
Tonbridge	5.49	-1.47	4.02	2.40	-0.91	1.49	5.51
Addington		-1.47	-1.47		-0.91	-0.91	-2.38
Aylesford		-1.47	-1.47	0.20	-0.91	-0.71	-2.18
Birling		-1.47	-1.47		-0.91	-0.91	-2.38
Borough Green		-1.47	-1.47	1.09	-0.91	0.18	-1.29
Burham		-1.47	-1.47		-0.91	-0.91	-2.38
Ditton		-1.47	-1.47		-0.91	-0.91	-2.38
E. Malling & Larkfield		-1.47	-1.47	0.26	-0.91	-0.65	-2.12
East Peckham		-1.47	-1.47	0.38	-0.91	-0.53	-2.00
Hadlow		-1.47	-1.47	0.63	-0.91	-0.28	-1.75
Hildenborough		-1.47	-1.47		-0.91	-0.91	-2.38
Ightham		-1.47	-1.47		-0.91	-0.91	-2.38
Kings Hill		-1.47	-1.47		-0.91	-0.91	-2.38
Leybourne		-1.47	-1.47		-0.91	-0.91	-2.38
Mereworth		-1.47	-1.47		-0.91	-0.91	-2.38
Offham		-1.47	-1.47		-0.91	-0.91	-2.38
Platt		-1.47	-1.47		-0.91	-0.91	-2.38
Plaxtol		-1.47	-1.47		-0.91	-0.91	-2.38
Ryarsh		-1.47	-1.47		-0.91	-0.91	-2.38
Shipbourne		-1.47	-1.47		-0.91	-0.91	-2.38
Snodland		-1.47	-1.47	0.64	-0.91	-0.27	-1.74
Stansted		-1.47	-1.47		-0.91	-0.91	-2.38
Trottiscliffe		-1.47	-1.47		-0.91	-0.91	-2.38
Wateringbury		-1.47	-1.47		-0.91	-0.91	-2.38
West Malling		-1.47	-1.47	4.58	-0.91	3.67	2.20
West Peckham		-1.47	-1.47		-0.91	-0.91	-2.38
Wouldham		-1.47	-1.47		-0.91	-0.91	-2.38
Wrotham		-1.47	-1.47	0.65	-0.91	-0.26	-1.73

Special Expenses Consultation 22 Jun 2021

Summary of responses

Response data

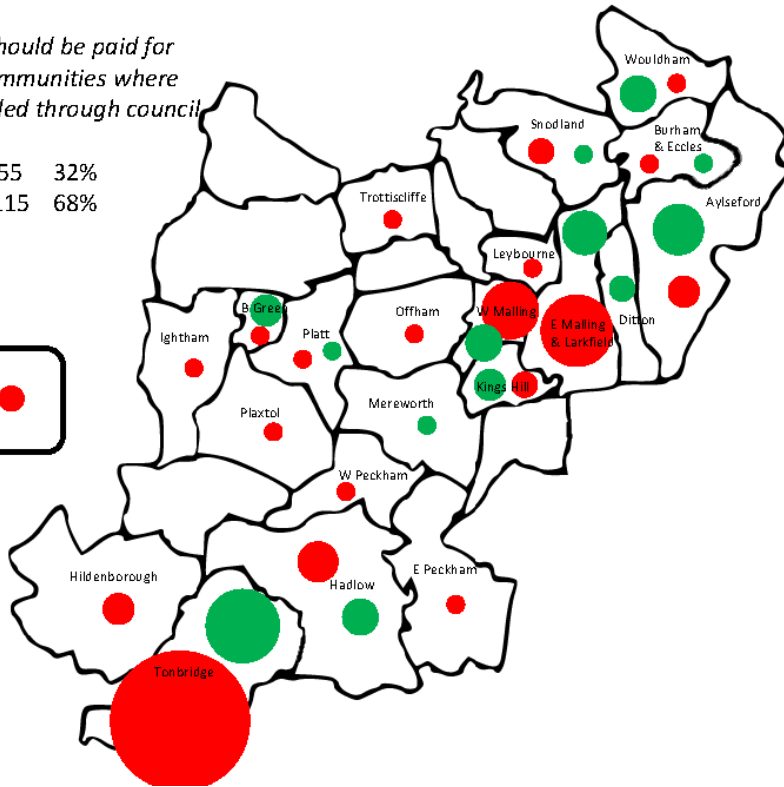
Statement 1	Public toilets should be paid for by the local communities where they are provided through council tax bills							
Statement 2	Public toilets should be paid for by all council tax payers in the borough							
Statement 3	Christmas lights should be paid for by the local communities where they are provided through council tax bills							
Statement 4	Christmas lights should be paid for by all council tax payers in the borough							
	Statement 1		Statement 2		Statement 3		Statement 4	
	Agree	Disagree	Agree	Disagree	Agree	Disagree	Agree	Disagree
Aylesford	8	3	3	8	8	3	3	8
Borough Green	3	1	2	2	3	1	2	2
Burham & Eccles	1	1	1	1	2	0	1	1
Ditton	2	0	0	2	2	0	0	2
East Malling & Larkfield	6	16	17	5	9	13	11	11
East Peckham	0	1	1	0	1	0	0	1
Hadlow	4	5	6	3	6	3	3	6
Hildenborough	0	3	3	0	2	1	1	2
Ightham	0	1	1	0	0	1	1	0
Kings Hill	3	2	2	3	4	1	1	4
Leybourne	0	1	1	0	0	1	1	0
Mereworth	1	0	0	1	1	0	0	1
Offham	0	1	1	0	0	1	1	0
Platt	1	1	1	1	2	0	0	2
Plaxtol	0	1	1	0	0	1	1	0
Snodland	1	2	2	1	3	0	0	3
Tonbridge	17	61	66	12	26	52	47	31
Trottiscliffe	0	1	1	0	1	0	0	1
West Malling	4	10	13	1	8	6	8	6
West Peckham	0	1	1	0	1	0	1	0
Wouldham	4	1	1	4	5	0	0	5
Outside Borough	0	2	2	0	1	1	1	1
Total	55	115	126	44	85	85	83	87

Statement 1

Public toilets should be paid for by the local communities where they are provided through council tax bills.

Agree ● 55 32%
Disagree ● 115 68%

Outside of
Tonbridge
and Malling



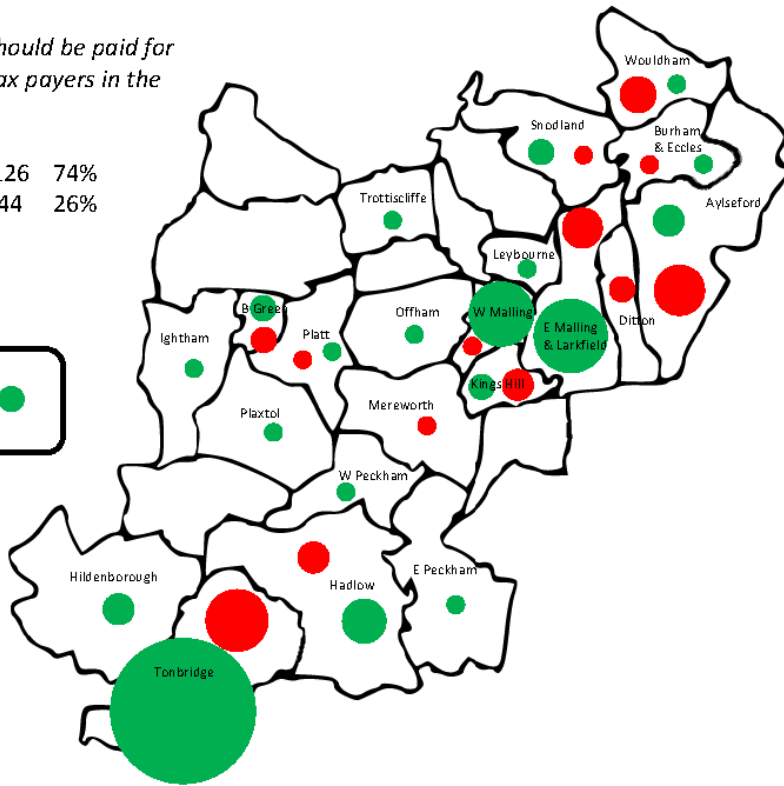
Area	Agree	Disagree
Aylesford	8	3
Borough Green	3	1
Burham & Eccles	1	1
Ditton	2	0
E Malling & Larkfield	6	16
E Peckham	0	1
Hadlow	4	5
Hildenborough	0	3
Ightham	0	1
Kings Hill	3	2
Leybourne	0	1
Mereworth	1	0
Offham	0	1
Platt	1	1
Plaxtol	0	1
Snodland	1	2
Tonbridge	17	61
Trottscliffe	0	1
West Malling	4	10
West Peckham	0	1
Wouldham	4	1
Outside the borough	0	2
Total	55	115

Statement 2

Public toilets should be paid for by all council tax payers in the borough.

Agree ● 126 74%
Disagree ● 44 26%

Outside of
Tonbridge
and Malling



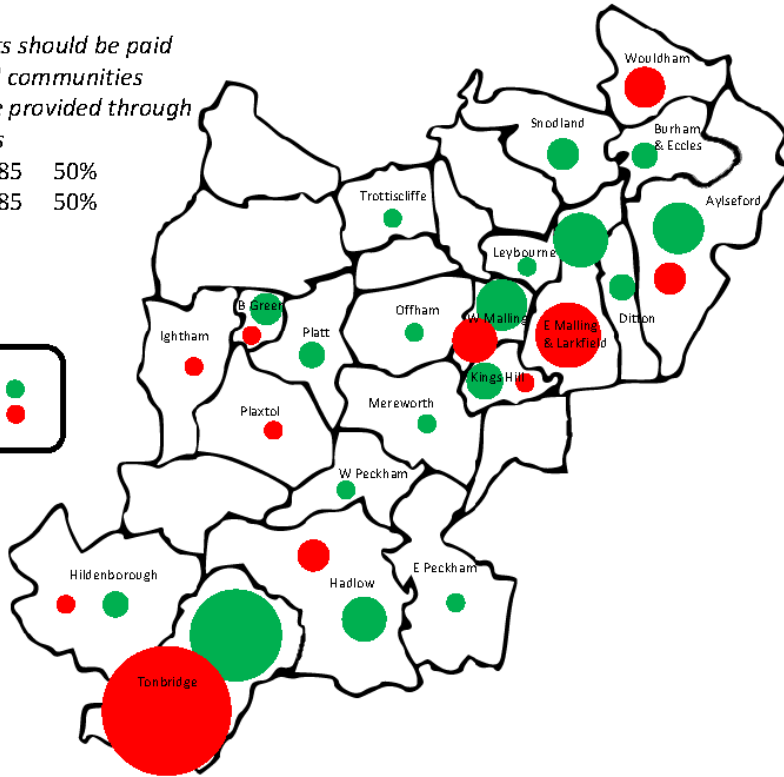
Area	Agree	Disagree
Aylesford	3	8
Borough Green	2	2
Burham & Eccles	1	1
Ditton	0	2
E Malling & Larkfield	17	5
E Peckham	1	0
Hadlow	6	3
Hildenborough	3	0
Ightham	1	0
Kings Hill	2	3
Leybourne	1	0
Mereworth	0	1
Offham	1	0
Platt	1	1
Plaxtol	1	0
Snodland	2	1
Tonbridge	66	12
Trottscliffe	1	0
West Malling	13	1
West Peckham	1	0
Wouldham	1	4
Outside the borough	2	0
Total	126	44

Statement 3

Christmas lights should be paid for by the local communities where they are provided through council tax bills

Agree ● 85 50%
Disagree ● 85 50%

Outside of
Tonbridge
and Malling ●



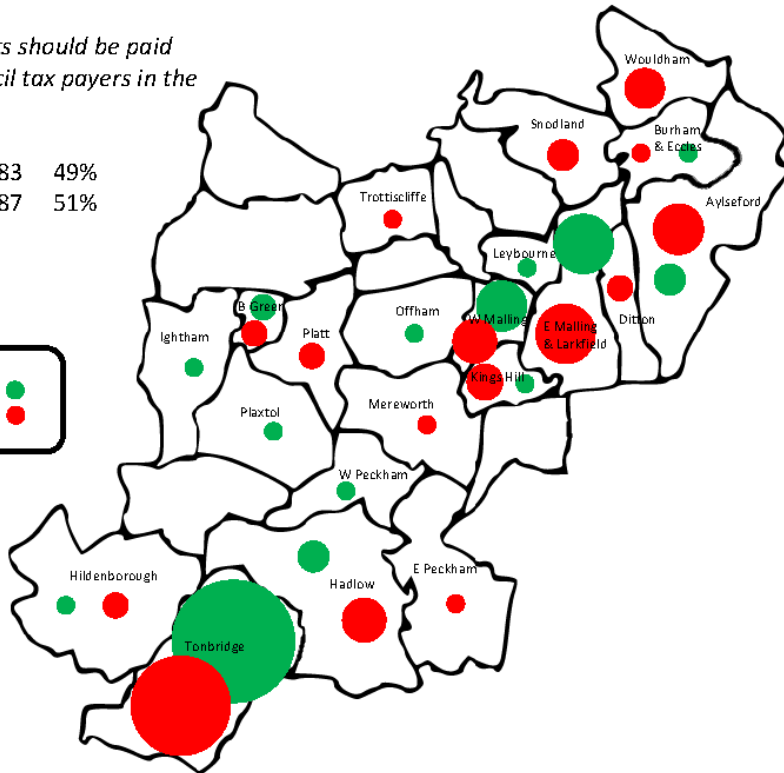
Area	Agree	Disagree
Aylesford	8	3
Borough Green	3	1
Burham & Eccles	2	0
Ditton	2	0
E Malling & Larkfield	9	13
E Peckham	1	0
Hadlow	6	3
Hildenborough	2	1
Ightham	0	1
Kings Hill	4	1
Leybourne	0	1
Mereworth	1	0
Offham	0	1
Platt	2	0
Plaxtol	0	1
Snodland	3	0
Tonbridge	26	52
Trottscliffe	1	0
West Malling	8	6
West Peckham	1	0
Wouldham	5	0
Outside the borough	1	1
Total	85	85

Statement 4

Christmas lights should be paid for by all council tax payers in the borough

Agree ● 83 49%
Disagree ● 87 51%

Outside of
Tonbridge
and Malling ●



Area	Agree	Disagree
Aylesford	3	8
Borough Green	2	2
Burham & Eccles	1	1
Ditton	0	2
E Malling & Larkfield	11	11
E Peckham	0	1
Hadlow	3	6
Hildenborough	1	2
Ightham	1	0
Kings Hill	1	4
Leybourne	1	0
Mereworth	0	1
Offham	1	0
Platt	0	2
Plaxtol	1	0
Snodland	0	3
Tonbridge	47	31
Trottscliffe	0	1
West Malling	6	8
West Peckham	1	0
Wouldham	0	5
Outside the borough	1	1
Total	83	87

Special Expenses Consultation 22 Jun 2021

Summary of free form comment responses

Sentiments expressed in comments:

Code	Sentiment	No. of comments expressing similar sentiment	
a	Special expenses should not include public conveniences	41	
b	Special expenses should include public conveniences	13	
c	Special expenses should not include Christmas lights	27	
d	Special expenses should include Christmas lights	13	
e	Public conveniences should not be closed anywhere	31	
f	Public conveniences in Tonbridge should be improved	7	
g	Christmas lights should not be paid for by Council Tax	17	
h	The effect on the bill is trivial	4	
i	Public amenities benefit visitors as well as residents	50	
j	Public conveniences should be pay to use	9	
k	Tonbridge should have a town council	4	
z	Council tax is too high	6	
o	Other individual comments (#s 48, 49, 61, 65, 77, 99, 115, 136)	8	

Full text of free form comments:

Comment		Statement				Sentiments	
Ref	Parish Or Town	1	2	3	4	Comments	
2	Tonbridge	D	A	D	A	I completely disagree with chopping up of budgets. The cost of toilets in the whole borough should be out of one pot. The result putting the cost of local toilets into more localised budgets has already led to closures. During the pandemic we have seen that councils closing toilet blocks in order to stop people travelling to popular destinations has simply led to people defecating in the streets instead. Town centres provide shared amenity for rural and urban dwellers alike and in the same way that rural services should be a shared cost with urban dwellers, so it works the other way around. I have sympathy with ongoing budget cuts from central government. How about a levy on Amazon and Online delivery vans pay for services, instead of letting these stateless companies get everything for free and off shoring their profits? Your car park revenues are about to fall off a cliff because of them.	(a)(e)(i)
6	Tonbridge	D	A	D	A	Tonbridge should provide free accessible toilets for members of the community. Paid for by the council	(a)
7	East Malling & Larkfield	D	A	A	D	I am disabled and need to use toilet facilities regularly, the closure of West Malling toilets will effect my ability to visit the town. This is an essential Public Health Service.	(e)
9	Tonbridge	D	A	D	D	Community fundraising and sponsorship by local businesses strikes me as being a fair and reasonable way to fund Christmas lights, and other seasonal decorations. Public toilets are for the use of *all*, not just Tonbridge residents, just as those in West Malling, East Peckham, or where one happens to be in the Borough. These being funded centrally by the Borough Council seems reasonable. Of course, even better would be for Tonbridge to have its own town council and budget, and thus all such matters could be determined and funded at town level, as elsewhere.	(a)(g)(i)(k)
13	Snodland	D	A	A	D	Tonbridge used to attract many shoppers. Public Toilets are a basic human right. Closing them deprives many people of the opportunity to visit anywhere. People will be using Public places as an emergency toilet stop to the detriment of everyone. Even the poorest countries provide free toilets. Why are we making the UK an exception.	(e)(i)
15	Tonbridge	D	A	D	A	Toilets are most likely to be used by those visiting the local area to visit, therefore all areas should contribute to the general running of public toilets.	(a)(i)
17	Tonbridge	D	A	D	D	Christmas lights should be paid for by the traders not by the Council Taxpayers If public conveniences are deemed necessary the cost should be borne by all Council Taxpayers in the Borough as the local community do not need them as they have toilets at home. Public conveniences are for the use of visitors.	(a)(g)(i)

18	Tonbridge	D	A	D	A	Tonbridge is an incredibly busy town, bringing in many thousands of students every day and many shoppers to the supermarkets. In addition, the parks and leisure facilities attract many people from outside the town. The residents live with the increased traffic of visitors, students and shoppers on a daily basis. Visitors also use the public toilet facilities and enjoy the Christmas lights. Therefore, they should contribute to the cost.	(a)(c)(i)
20	Tonbridge	D	A	D	A	The enjoyment of these facilities reaches further than the immediate community. It introduces the prospect of unintended competition. The sums are trivial rel to the bill (0.06% or 0.15%) so fully costed how many yrs will it take to break even?	(a)(c)(h)(i)
21	Tonbridge	D	A	D	A	Other boroughs come here to use the facilities. If you live locally you go home to go to the toilet	(a)(i)
22	East Malling & Larkfield	D	A	A	D	If we don't keep public toilets open, we will end up like a third world country with people using side streets and alleyways to urinate. It is the responsibility of the borough as a whole to stop this from happening.	(e)
24	Borough Green	A	D	A	D	There should be general consistency about how toilets and lights are paid for across the borough.	(b)(d)
26	Mereworth	A	D	A	D	In Mereworth there is no street lighting in fact no facilities so I see no reason to be the same council tax as an area with many facilities.	(b)(d)
27	West Malling	A	A	A	A	Please re- instated West Malling Public Toilets	(e)
28	Leybourne	D	A	D	A	I am happy that my taxes pay towards services that I might not often use, or use at all. This is a principle which extends across the country - I don't have children yet my taxes help pay for education. To start dividing costs down to local communities in a granular way removes an important element of shared community.	(b)(d)
29	Ditton	A	D	A	D	These are the comments from Ditton Parish Council. The Council feels it is right that the facilities are paid for by the residents that benefit from having them.	(b)(d)
30	Tonbridge	A	A	A	A	Public toilets are an important amenity. I would be very disappointed if we had to lose this in our town or introduce a paid for option (which would incur costs to maintain). It's a small cost for residents but improves the experience for visitors (both residents and not).	(e)(i)
31	Kings Hill	D	A	A	D	As someone who has medical issues and needs access to public toilets these should be funded by the Council residents as a whole. Where the council has put theses out to the local parish councils many of them are being closed which as a resident of TMBC causes me much distress and these toilets have been a god send during the pandemic when other businesses have been closed. Why does the council also set up a scheme where local businesses coffee shops allow toilets to be used for a 50p donation as they do in other European countries. The public need access to public toilets	(a)(e)
32	East Peckham	D	A	A	D	Public toilets are a necessary public convenience and should be run and supported by the borough. Closing the public toilets leads to public urination as evidenced in Hadlow recently by cyclists. Christmas lights are a nice to have, should be paid for by the parish councils.	(e)(g)

33	Tonbridge	D	A	D	A	Both toilets and Christmas lights are communal facilities which are enjoyed by ALL residents of the Borough, not just those living in the town. Tonbridge town is the local centre where residents of surrounding villages come to shop, eat, etc. Common benefit should be paid centrally	(a)(c)(i)
37	Hadlow	D	A	A	D	The closure of hadlow toilets is a blow. The public toilets provide relief for shoppers, travellers, cyclists and all manor of passers by - fewer people will stop in the village to use the shops. I'm sure local business will be keen to keep these facilities open. As a cyclist, I rely on being able to use public toilets - thcounty wide closures will have an impact on cyclists and other outsideactivity people like walkers etc..	(e)
39	Snodland	A	D	A	D	Costs should only be borne by people who benefit from these facilities. I do not want to pay for facilities and benefits which are in Tonbridge when I never go there.	(b)(d)
40	Tonbridge	D	A	D	A	Toilets are used by people visiting towns and villages and Christmas lights are provided in larger borough towns. These are both used / admired by people from surrounding villages and towns who are visiting for shopping, health, leisure or cultural purposes, as well as the local people that live there. The cost should therefore be shared across the borough.	(a)(c)(i)
43	Tonbridge	D	A	A	D	The big issue I have here is the assumption that those who don't live in Tonbridge don't benefit from the facilities in Tonbridge which in 2021 and the age of the car is simply not the case.	(a)(c)(i)
46	Tonbridge	A	A	D	A	Tonbridge is such a large town and people visit from all over kent benefiting from the local amenities.	(i)
47	Tonbridge	D	A	A	D	Firstly we have been asking for a Town council for years, we need one. Everything goes through TMBC and decided by people who don't live in the area. A good example has been the recent mess made of the cycle path on Quarry Hill and various other traffic calming measures. I would be more than happy to pay through my Town council, as I would have a better say on it. The toilet facilities in Tonbridge are woefully inadequate and are also unpleasant to use.	(f)(k)
48	Hadlow	A	D	A	D	CCTV monitoring should be paid for by the communities that claim to have benefit from this expensive service.	(o)
49	West Malling	D	A	D	A	Public toilets are for the public therefore it makes sense the public pay for them. Christmas lights a feel good factor which encourages people to go to the area and spend. Take the money needed from the taxes taken from the businesses in that area. If Council senior officials were less and remunerated according to their real value and not paid such over inflated and exorbitant salaries then there would be more money in the kitty to provide much needed services such as Public Toilets and Christmas Lights.	(a)(c)(g) (o)
50	Tonbridge	D	A	D	D	I might live in Tonbridge but I very rarely go into town as I have to pay to park so why should I pay for toilets and lights I won't use or see. I haven't seen the Christmas lights for many years as I certainly don't go into Tonbridge at night.	(a)(c)(g)

51	West Malling	D	A	D	A	In West Malling we have a Farmers Market, where are visitors supposed to go to the toilet, some people have said already that they will no longer come to it. We have already got some areas that are being used as a toilet, which is disgusting. Bus drivers, taxi drivers, and bin men all used the public toilets, where are they to go now?	(e)(i)
53	Tonbridge	D	A	D	A	Although I appreciate the attempt at fairer charging, the Public Toilets and Christmas lights are not exclusively for the benefit of the residents where they are located. Those living in outlying communities may visit the town centre and make use of the loos or enjoy the lights. I also feel it could set a precedent for other services, with residents being able to select those they believe would benefit them.	(a)(c)(i)
54	East Malling & Larkfield	A	D	D	D	Don't waste money on Christmas lights a way to save a little bit	(g)
55	East Malling & Larkfield	D	A	D	D	Local Christmas lights should not be paid for from Council Tax. They could be paid for by local business and or communities who wish to do so.	(g)
56	Tonbridge	D	A	A	D	Considering the amount of people that live in Tonbridge paying council tax which also pays for the smaller communities then keeping open the Public Toilets should be included in the overall council tax. With regards to Christmas lights etc that is inconsequential and should not even be included in this discussion also do object that there is only an ethnicity for white other !!	(a)(h)
59	East Malling & Larkfield	D	A	D	A	Public toilets should be available to everyone in every borough. As a relative of a person with bladder issues, lack of public toilets can cause a major problem and incur considerable stress. The proposed changes to the council tax bills due to these proposed changes are minimal. If you have to prioritise, we should all have access to public toilets which benefits everyone all year than have Christmas lights.	(a)(e)(g)(h)
60	Burham & Eccles	D	A	A	A	With regards public toilets....these are not just used by local residents but mostly visitors to an area so I don't believe they should be funded by locals. Christmas lights should be paid for through business sponsorship and the parish councils but with assistance from the borough council Yes locals enjoy them the most but so do all the people travelling through or visiting an area. Make it a mix ture of the 2.	(a)(c)(i)
61	East Malling & Larkfield	D	D	D	D	Public toilets should be paid for at point of use by those who wish to use them. Christmas lights should be paid for voluntarily by residents and or local businesses. They celebrate a Christian festival which not everyone celebrates.	(g)(j)(o)
63	East Malling & Larkfield	D	A	A	D	I dont care how you raise the funds .I dont even mind paying in a coin slot to go to the toilet. I just want our toilet back in west malling	(e)(j)
64	Tonbridge	D	A	D	D	I don't agree with closing public toilets and feel these facilities should be funded nationally. When travelling around the county and indeed the country we should all be able to access a public toilet. I would be happy to "pay to use" as we did years ago.	(e)(i)(j)

65	Kings Hill	A	D	A	D	Many Kings Hill residents pay a fee to Prologis for playgrounds, communal areas & other amenities. Will they get a reduction in council tax? West Malling raised funds privately in 2020 for Xmas lights. Is this private funding taken into account.	(o)
66	Platt	D	A	A	D	Public toilets should be made available across all Boroughs. Many people will not be able to visit towns, villages, & spend their money in these communities if there is not accessibility to toilets. It is a basic human need,& there are many with medical issues that would not be able to spend any length of time travelling to,& within our boroughs/towns, if toilets are not freely available.	(e)(i)
67	East Malling & Larkfield	A	A	A	A	The pandemic has shown the necessity for public conveniences as all other locations (cafes and shops etc.) were forced to close, and we were all encouraged to exercise. Being in an older age group I cannot walk too far with out toilet facilities at some point. So I am happy to pay for this service. Christmas lights make everyone whatever their age feel good.	(e)
68	Tunbridge Wells	D	A	D	A	Using a toilet is a basic human need: it is not a commodity. The whole borough should have some public toilet provision. You can't just go into a pub or supermarket to use their facilities. <i>(some abusive comments have been redacted)</i>	(e)
69	Aylesford & Walderslade	A	D	A	D	Ratepayers should only be charged for services they receive and those provided by government legislation. Council tax is already too high and gives poor value for money. Residents of this parish rarely benefit it seems Tonbridge and West Malling do very well.	(b)(d)(z)
72	East Malling & Larkfield	D	A	A	D	Toilets are a Health and Safety issue so should be paid by Borough. Parish Councils should not have had to take over. Local shopkeepers benefit from Lights so parish responsibility	(e)(g)
73	West Malling	D	A	D	A	There's no justification of why different areas have different increases of lights. Why do West Malling need to pay more than any other area in your proposals? Further, Tonbridge should have no free toilets after you refused to have any other toilets paid for by our already ridiculously high council tax. How can you cut services without cutting council tax bills? Finally, stop subsidising Tonbridge by making everyone else in the borough pay for that dump.	(b)(c)(j)(z)
75	Snodland	D	A	A	D	Lights are generally enjoyed by the local community, there they should pay, toilets are generally used by people from outside the local community, therefor the costs should be spread.	(i)
76	Tonbridge	A	A	D	A	"Tonbridge is an exception as it has no parish or town council " that there use part of the problem. Why does Tonbridge still not have a town council? Also Christmas lights are normally in business areas and businesses pay rates, why don't these fund the Christmas lights and they are a benefit to business.	(g)(k)
77	Tonbridge	D	A	D	A	You don't seek to apply other income only to the area it is received - property proceeds; rates etc are not spent only where they are generated.	(o)

78	Tonbridge	D	A	D	A	It doesn't matter where people live. All members of the borough benefit from travelling to the main town (Tonbridge), use the facilities there and enjoy the Christmas lights. We need to support our local town. It benefits everyone in the borough.	(a)(c)(i)
79	Tonbridge	A	D	D	A	Public toilets are necessary and should be provided for. Christmas lights are a luxury item and should either be cancelled or scaled down to an affordable level. Council tax bills are very high already.	(e)(g)(z)
81	Tonbridge	D	A	D	A	The proposal that only residents of the areas where these 'services' are provided should pay for them is completely ridiculous. Christmas lights are an amenity for anyone visiting the town during the Christmas season, not just the people living there. Indeed, the people living in the immediate vicinity may object to, or just not care about Christmas lights, so to charge only these people for their provision is absurd. Regarding the public toilets, surely people living in the immediate vicinity are the least likely to want to use them, with the vast majority of people preferring to use their own toilet facilities at home. One would imagine that the majority of users of public toilets are people visiting from outside the area. Having lived in Tonbridge for eight years, I have never used the public toilets - why would I?	(a)(c)(i)
82	Hildenborough	D	A	D	A	I may live in Hildenborough but Tonbridge is our closest Town so i feel i & the residents of Hildenborough still benefit, albeit in a small way, from the provision of Christmas lights & public toilets therefore i have no issue with contributing to the cost via my council tax bill.	(a)(c)(i)
84	Tonbridge	D	A	D	A	These facilities can be used by all residents so they should be paid out of the TMBC budget. Tonbridge is visited by residents across the borough - unlike the smaller villages which get a grant. If Tonbridge had a Town Council then that may trigger a different decision from me but this consultation is effectively asking those TMBC residents outside Tonbridge if they like a reduction to their Council Tax!	(i)(k)
85	Plaxtol	D	A	D	A	We shop in Tonbridge and use the toilets in Tonbridge. We visit Tonbridge to shop because the Christmas lights are an additional attraction. It makes sense that all in the TMBC area pay for the facilities of the town.	(a)(c)(i)
88	Hadlow	D	A	D	A	I firmly believe that the cost should be spread amongst the many. Not sure how you can differentiate between who will use and see.	(a)(c)
89	Tonbridge	D	D	D	D	Public toilets should be paid for from the existing council tax payments and not an addition. Christmas lights should be paid for by the principle beneficiaries - shop keepers etc.	(a)(g)
91	Tonbridge	D	A	D	A	The benefits of toilets tend to be an advantage to people outside the area they are paid for and so should be paid for by all in the borough. Christmas lights and the festival associated with the turning on in Tonbridge benefit the borough as a whole, along with people from outside visiting the town for this occasion.	(a)(c)(i)

92	Tonbridge	D	A	D	A	If you want to charge for public toilets, more should be provided and they should be better maintained. The facilities aren't just used by Tonbridge residents especially those in the park. The Christmas lights again enjoyed by and attract people to the area, other than those in the local borough. Consider sponsorship as per the castle lawn.	(a)(c)(f)(i)
93	Tonbridge	D	A	D	A	Everyone in the borough enjoy the lights and the toilets, not just those living in the town, so the cost should be spread fairly amongst all.	(a)(c)(i)
94	East Malling & Larkfield	D	A	A	D	Public toilets are an essential service and should be improved not closed. They should be available for local residents and visitors throughout the year. I will not go to West Malling because the toilets are now closed. I am quite happy to pay for this as a Borough public service.	(b)(e)
96	Tonbridge	D	A	D	A	A visit to Hastings and their public toilet facilities puts Tonbridge to shame our facilities are grim and disgusting only fit to be used in a dire emergency.	(f)
98	Tonbridge	D	A	A	D	Public toilets should be uniformly provided and funded. By separating this out you end up with the closures you have described, which is a poor outcome.	(a)(e)
99	Wouldham	A	D	A	D	I'm not sure why Wouldham would even need public toilets so why does anyone need to pay for these? I would say that the toilets wouldn't be used by residents as we all live in the area so seems unfair that we would pay for these when it's unlikely we would use. The area is so small it doesn't seem worth the cost.	(o)
102	Hadlow	A	A	A	D	Public toilets are a basic need and as such be provided to all, in Hadlow we have many walkers, cyclists and people passing though the village in need of a public toilets, many of them due to medical conditions need to use a toilet at short notice. As a result of them being closed people are peeing and worst anywhere they can alleyways , on private land behind shops.	(e)
103	Tonbridge	D	A	D	A	Charge a small fee for using the toilets - there would less vandalism as well.	(j)
104	Tonbridge	A	D	A	D	My opinion regarding public toilets is that they are a necessary expense and, if parishes are bearing the cost of running them, then Tonbridge residents should also bear the cost of ones in the town although they may well be used by visitors as much as residents. And, we do want to encourage visitors! I am less concerned about the Christmas lights as I feel they are not such an important item.	(b)
105	East Malling & Larkfield	A	A	A	A	Keep the toilets and lights in West Malling. Divided by all is next to nothing.	(e)
106	Tonbridge	D	A	A	D	People who live in Tonbridge are less likely to use local public toilets as they are nearer home, surely? Has there been a survey of where toilet users come from?	(i)
107	Tonbridge	D	A	D	A	In this modern age people do not use public toilets close to their house, they have their own! This is a facility used when visiting the area for tourism or shopping etc, therefore something which should be shared across the wider area.	(a)(i)
108	East Malling & Larkfield	D	A	D	A	ALL CLOSURES OF PUBLIC TOILETS SHOULD BE REVERSED, THIS IS A HEALTH AND HYGIENE CONCERN.	(e)

110	Tonbridge	A	A	A	A	Both toilets and Christmas lights add a tourism benefit to the general area. Most users of public toilets in Tonbridge are likely to be by visitors to the town and in that respect provide a benefit to the whole borough.	(i)
112	West Malling	D	A	A	D	Public loos will n all towns and villages benefit all business all residents and all visitors and should be paid for via borough council tax bills, not specifically Parish councils.	(i)
113	Hadlow	D	A	D	A	<p>I think ALL public toilets should be paid for and provided in all towns and villages by the main Council Tax, or better still central government. We all travel to different places and the facility is a basic function of life. Hadlow toilets closed 1st April 2021, yet I still have to pay a high council tax bill (Much higher than Medway that provided so much more). The population in Hadlow is elderly and young who need the facility more. In addition the number of trades people stopping to use them and buying their lunch at the same time in the village has decreased. Next the bakers and newsagents will close due to a drop in earnings. Why was "Pay-as-You-go" not considered. The "old spend a penny" always worked. These days I am sure there is a way that an app for payment could be created, or a pre-paid card that opens the door like in a hotel. An opportunity was missed, and us as residents had no say in the matter! You transferred the running to the Parish, they didn't have the money, so they closed! "Disgusted of TMBC and Hadlow!" doesn't even come close! In addition surely when we want people to shop local, use their High Streets and encourage tourism at home in the UK (and from abroad once safe), having public toilets is a God send! There are only ever benefits from having decent public toilets. You don't need a large number of them, but a few in key areas that are easy to clean, so all steel or moulded composite construction that can be jet washed. I still remember the wonderful free toilets that were at Castleton, Derbyshire with it's carpark. People came from miles around for the town the loos and to buy lunch before continuing their journey round Mam Tor and Ladybower Reservoir. They knew their priorities Up North! TMBC does not!</p>	(e)(i)(j)(z)
115	Tonbridge	D	A	D	D	<p>The public toilets in Tonbridge that I know of are frankly disgusting and even in a moment of total desperation I would probably either go home or use shop facilities ie Sainsbury's or one of the many coffee shops. I can't for the life of me figure out how they can possibly cost that much to maintain when the majority of people I know of wouldn't use under any circumstances. Christmas lights are lovely and very much appreciated. However I feel there is more that could be done to tempt retailers and shoppers back to the high street like free limited time parking ie half hour. I currently travel outside Tonbridge high street to buy essentials as I resent the parking charges. This has worked extremely well in Paddock Wood as an example. Something so daft would tempt many more shoppers and retailers back to the high street and potentially mean a bigger contribution from retailers towards such expenses</p>	(f)(o)

116	Tonbridge	D	A	D	A	Christmas lights are travelled to and enjoyed by all within the borough	(i)
118	Aylesford & Walderslade	D	A	D	A	Everyone who visits or passes through enjoys both things so should be paid for by all.	
119	Tonbridge	D	A	D	A	I don't think public toilets should be provided at all. I would rather they're closed as the cost doesn't justify the need. Most places no longer have public toilets.	(i)
120	Tonbridge	D	A	D	D	Xmas lights are not a necessity. They should be fund raised for or alternatively funded . The lower I come in Tonbridge should not have to pay. Toilets benefit all, not just residents, but allow people to visit an area safely and are a necessity for disabled and young children. They are not a privalige to be paid for by Tonbridge residents only but something needed to help the whole area. As a very low income resident the idea of my bill going up by a fiver a month is staggeringly worrying. Public loos seem better funded in other areas without this additional cost and many non Tonbridge residents view the lights and they are not a necessity. Extra bulls for either seem unfair, and core council tax money paid by app residents should allow for public toilets in the whole county.	(a)(g)(i)(z)
121	Hadlow	D	A	A	D	The closure of our public toilet is one of huge loss probably very few parish residents would use them but always used by people with driving jobs who are on the road all day as there are very little in the way of an alternative. Access to a toilet in 2021 in my opinion is just the right thing a basic human function which people require somewhere to put there bodily waste and on the streets up alleys is not the right place, it's not like you can bring your own like a packed lunch!!	(e)
123	Tonbridge	A	D	A	D	As we are not charged a District/Town Council Precept in Tonbridge, unlike other parts of borough, it seems reasonable we should pay a little bit extra CT each year to cover things local toilets and Xmas lights.	(b)(d)
124	Tonbridge	D	D	D	D	Have the council investigated making the toilets 'cost neutral' by making a charge for their use (as for car parks). I can't believe that only Tonbridge residents use the. As for the Christmas lights. Again these are no solely enjoyed by Tonbridge residents. There would be a case to ask local businesses to contribute where they stand to benefit. Smaller businesses that have suffered in the pandemic may not have the resources to contribute, but larger food stores have not suffered in the same way. Has the council considered this as an option?	(g)(i)(j)
125	Tonbridge	D	A	A	D	Tonbridge is a hub town for many surrounding areas. The town centre is not just used by Tonbridge residents, but will surely be used by residents of local towns, villages and hamlets. Therefore it would stand to reason that all borough residents would benefit from them. Christmas lights are a show of local culture/engagement and therefore should stay locally funded.	(d)(i)

126	West Malling	A	A	A	A	Public toilets are essential in a town like West Malling if we want to attract visitors to the town, farmers' market, shops and restaurants. The upkeep of public toilets cannot be funded by local parish councils or local businesses. It is not acceptable, either to expect local businesses to provide public toilet facilities on their premises as was suggested! The funding should come out of borough council tax payments. Christmas lights are a benefit to everyone in the town and also helps to attract visitors. These, too, should be paid for out of borough council tax payments.	(a)(c)(e)(i)
128	Tonbridge	D	A	D	A	These services are used by all people who visit and live in the whole borough. As someone who works around the borough I use services all around not just my home town so why shouldn't we all pay for them.	(a)(c)(i)
129	Tonbridge	D	A	D	A	These facilities are not only used/enjoyed by local people but by everyone that visits. Maybe public toilets should be pay per use Regarding the Christmas lights I have lived in Tonbridge for three years and very rarely actually visit the high street, how do you justify raising my council tax to pay for lights that I would not see	(a)(c)(i)(j)
131	West Malling	A	A	A	D	The need for public toilets in West Malling is great. We have a lot of elderly residents, we want to encourage visitors to the village to use the shops. Bus drivers, taxi drivers, walkers etc	(e)
133	Tonbridge	D	D	D	D	I live in Tonbridge and can say that I do not use the public toilets provided because they are disgusting. They are not cleaned enough and have a foul smell. Personally I would rather purchase something from Sainsbury's and use their facilities. As for the Christmas lights, they are up for 4 weeks and you put the same lights up each year, please provide a breakdown of the £33000 you estimate it costs to use them. As I live in a band D property my council tax would increase by £10 a month. This is not acceptable in my eyes. Put the toilets as pay as you use and as a gesture of good will continue to fund the Christmas lights. We pay a ridiculous amount of council tax per year, I am not prepared to pay for toilets that I will never use	(a)(c)(f)(j)(z)

I am dismayed by the disgraceful partisan, divide and conquer attitude this appalling proposal brings. I am agog at the apparent low intelligence of who possibly could have thought this was a good idea? A bit like charging local residents to park at their own local shops! So, we're not allowed to go to the toilet in Tonbridge if we happen to work or go to school there because that's the preserve of the residents?!!!!! Because believe me, if I alone was paying for something, I would do everything in my power to ensure that only I could use it. HOW DARE YOU SELFISH IDIOTS IN POWER, EVEN PROPOSE THIS FOR CONSULTATION! Let's hope The Queen never attends Tonbridge and Malling Borough Council again, because she hasn't paid to have a wee! Oh, and don't get me started on the charge for Christmas lights!!!! Arrrrrrggggghhhhhh! Talk about season of cheer and goodwill t'ward all. My gosh! That you want to limit the charge to people that live there. Thank God the Borough Councils of Regents Street and Oxford Street in London don't feel the same selfish preserve that Christmas lights must be paid for by the residents alone! So, will you put hoarding around the lights with security codes issued to residents to enjoy this beautiful spectacle, ooooooo because non residents driving through and using the shops (BUT NOT HAVING A WEE BECAUSE THEY HAVEN'T PAID FOR IT!!!!!!) cannot possibly enjoy this. Selfish, small minded, divisive. Don't come into work on Monday if this is an example of the best you can come-up with to save money. In case you didn't understand my views on these two topics, it's that toilets and Christmas lights (God who would have thought I'd be commenting on those topics in the same consultation?!!!!!), must be universally paid for in the Borough. NOT by the Parish, NOT by residents; but by all residents. God give me strength. That you are consulting on this drivel proposal. You could be consulting on achieving a quality Refuse and Recycling contract; or whether we could have a quality transport system across the Borough. But, no. You're consulting on this! Unbelievable!

134	East Malling & Larkfield	D	A	D	A	this! Unbelievable!	(a)(c)(i)
135	Offham	D	A	D	A	Let's work together rather than promoting segregation within the Borough	
136	West Malling	D	A	D	A	A bit late to undertake a consultation when the toiulets in WM have already closed!	(o)
137	Aylesford & Walderslade	A	D	A	D	We should only be paying for things that are likely to directly impact our area, I'd rather see investment in my parish than another's.	(b)(d)
138	Tonbridge	A	A	A	A	I would support paying for more facilities in Tonbridge, especially in and around the town centre and parks	(f)

139	Tonbridge	D	A	D	D	<p>The Christmas lights in Tonbridge are rubbish. They don't stretch right across the road, they look naff, and they're really expensive. Don't lumber people of Tonbridge with the costs of them. Take them away or ask local businesses to pay. Toilets: There are none in north Tonbridge at all, so if TMBC want to make local people pay for toilets, the residents of north Tonbridge should not be contributing to the upkeep of those in the south of the town. It would be like residents of Kings Hill paying for toilets in Wateringbury. £75k seems like a lot of money for 3 underused toilets. It would be better to either: (a) pay for them out of central funds, or (b) close them and invite local businesses to provide community toilets. Christmas lights: Let's be honest. The Christmas lights in Tonbridge are rubbish. They don't stretch right across the road, they look naff, and they're really expensive. Don't lumber people of Tonbridge with the costs of them. Take them away or ask local businesses to pay. Nobody visits the town to see the lights - they simply don't bring people, visitors or income in.</p>	(a)(g)
141	Tonbridge	D	A	A	D	<p>Public Toilets are an important part of the infrastructure of a town or village. They are an amenity for all residents and visitors from the surrounding communities to use. They should be funded by all council tax payers.</p>	(a)(i)
145	Tonbridge	D	A	D	A	<p>These facilities bring people into our towns and villages to spend their money and enjoy services and businesses whether or not they live here. This helps to benefit and to retain businesses and services for the wider community and should therefore be paid by all residents equally. The services do just serve the local residents in those areas.</p>	(a)(c)(i)

I think it is very important that public toilets remain open, maintained (ie that the facilities work - toilet seats, locks, running water, soap, drying provision) and are kept to a suitable clean standard. Families with young children, disabled individuals and people with medical conditions often have urgent need for toilet facilities. In large towns and cities there may well be private companies open where access to these facilities is straightforward. But this is not the case in villages and smaller towns (I count Tonbridge as a smaller town) In fact I am quite disgusted that you have transferred financial responsibility for this to small entities such as parish councils which are very unlikely have sufficient funds to be able to pay to keep these open. In addition you should have been able to benefit from economies of scale - clearly it is more expensive for individual organizations to source cleaning and maintenance for just 1 or 2 toilets. So I am slightly puzzled at the cost approx £75000 to clean 3 toilets per annum. That seems beyond excessive. I have commented that I think the cost of these should be paid for by the borough - as Tonbridge is the main town in the borough and will receive visitors from outside Tonbridge itself. Same for the Christmas lights - they hopefully bring joy to more than just the town residents. I would like someone to contact me please regarding your Diversity form on the next page. I believe that you are in breach of the Equalities Act 2010. Sex is the protected characteristic and the biology (M/F) actually affects use of toilet facilities. Women menstruate (whether they are adult born female or transmen) and men can use urinals (whether they are adult born men or transwomen). By not collecting the correct data and using the correct language your results are not accurate. Women are more likely to need safe secure cubicles. In addition your use in this survey of Ethnicity terms is also strange in that White British is not on the list. I work in the public sector and have to collect Ethnicity fields. So I am aware of current terms. White British has not been removed. You have made completion of the Diversity section compulsory so I will be answering not wish to answer to all the questions. This is not the case - I do wish to answer - but will only answer to proper questions.

147	Ightham	D	A	D	A	questions. This is not the case - I do wish to answer - but will only answer to proper questions.	(a)(c)(e)(i)
149	Kings Hill	A	D	A	D	It is unfair for all residents to pay more because Tonbridge do not have a parish council. I should not have to pay for Christmas lights twice while residents of Tonbridge don't pay for them at all - that makes no sense!	(b)(d)
150	East Malling & Larkfield	D	A	D	D	Public toilets are a blessing and they normally benefit more than just the people who live there. In my opinion, I'd rather have more public toilets around as they are all currently closing which stops people shopping local	(e)(i)
154	Tonbridge	D	A	D	A	Public toilets and Christmas lights are of benefit to all, including the many who regularly travel from surrounding villages into the town of Tonbridge. Therefore all should contribute to them. The use of the facilities or enjoyment of the displays is not exclusive to just residents of the town.	(i)

158	Aylesford	D	A	D	A	It's not only people who reside in those areas who enjoy the benefits of public access toilets or the Christmas lights. It would be wrong to think that visitors from outside of the parish do not travel to other towns and use their services. Therefore everyone should contribute.	(a)(c)(i)
159	Tonbridge	D	A	D	A	Everyone can benefit from & use these features. It is unfair to expect people who happen to live nearer to pay extra for them when they themselves may not use these features. The cost should be spread equal.	(a)(c)(i)
160	East Malling & Larkfield	D	A	D	A	Public toilets are an essential public amenity, especially for parents with small children and people with medical conditions. It is not feasible to expect shops, cafes and pubs to provide this service.	(e)
161	Borough Green	A	A	A	A	I think the best solution is we all pay council tax for lights and toilets for ALL areas. Because I worry that small areas won't sustain their facilities due to it costing proportionately more per resident. However as lots of areas currently pay their own, it's only fair that Tonbridge do too.	(b)(d)(e)
162	Tonbridge	A	A	A	D	Christmas lights are a frivolity which should only be paid for by those in the towns they live in. BUT should be opted in/out of being paid for by townsfolk, as might be considered vulgar to ask for a tax increase on something so inconsequential.	(d)
163	Hildenborough	D	A	A	D	Public toilets can be used by visitors to each parish regularly, and are a basic necessity. 2 pounds a year is a cup of tea. Christmas lights are one day a year and are really a luxury	(h)(i)
164	Tonbridge	D	A	A	D	Tonbridge residents do not need the public toilets as much as visitors to the town. Surely they are there for visitors to shops and the Castle and Racetrack Park.	
166	Tonbridge	D	A	D	A	I think in small places it makes sense for local people to pay. But Tonbridge is a town - facilities used by people across borough. Loads of people come from all over to use racecourse - for the river, football, playpark etc. They are more likely to use facilities as cant nip home	(i)
168	Tonbridge	D	A	A	A	We need more toilets all over the county. Someone needs to look at this. It's not a luxury it's a necessity.	(f)
169	West Peckham	D	A	A	A	I don't feel strongly either way as regards public toilets but as far as the Christmas lights are concerned, these lights are a benefit for those of us who use Tonbridge as our town centre even if we don't live there and so I am happy to contribute to the lighting costs.	(d)
170	Tonbridge	D	A	D	D	I can do without Christmas lights if it improves the public toilets abd bin collections!	(g)