

Equality Impact and Needs Assessment Form



NB: Use the electronic MS Word template. Add additional rows and increase box size as required. Make sure your final document is suitable for publishing.

A) Description

Name of service, function, policy (or other) being assessed

Street Lighting Policy.

Policy update for part night operation in residential areas.

Directorate or organisation responsible (and service, if it is a policy)

Environment, Economy And Culture

Date of assessment (DD/MM/YY)

Started Jan 2009, completed Jan 2010

Date next assessment due (3 years)

January 2012 to January 2013

Names and/or job titles of people carrying out the assessment

Maurizio D'Alesio

Team Leader Street Lighting

Accountable person (e.g. Head of Service)

David Whitton

Date EINA Form approved by accountable person (e.g. Head of Service)

1. What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?

- Street Lighting is a discretionary service provided to aid safe pedestrian and vehicular movements on the highway.
- Where provided, lighting is operated during the hours of darkness and the level of illumination is varied according to circumstances, which relates to road type, traffic speed and volume, pedestrian footfall and setting (e.g. rural, urban etc.)
- Devon County Council has made a commitment to Carbon Reduction including to reduce carbon emissions resulting from energy used for street lighting, which accounts for about 30% of the County Council's 62,000 tonnes of CO₂, while schools produce 29,000 tonnes and corporate property 12,500 tonnes (based on 2007/8 data). Street lighting policy reflects the County Council's value for money objective to reduce costs, by providing for energy efficient equipment and operating regimes appropriate for different locations. For instance, changing a 70 watt lamp to a 45 watt lamp reduces energy consumption and carbon emissions by 43%.

The aims of the new policy are as follows:

- Phased part-night lighting in residential areas. Meaning that the hours some street-lights are on will be changed from all-night long to lighting between dusk and 12.30am and again from 5.30am until dawn.
- Main road lighting and areas of high night-time activity such as town centres, will remain lit all night, but consideration will be given to dimming lighting where possible.
- Through switching lights off in mainly residential areas between half-past midnight and 5.30am and dimming of all other lighting, energy consumption, carbon emissions and energy costs are expected to reduce by a third at the end of the programme.
- The conversion of lighting from all-night to part-night operation will be carried out over a five year period (or shorter) from April 2009 (when local councils are first contacted to March 2014) across the county and will initially be included as part of planned maintenance operations to keep costs to a minimum.

2. Location or any other relevant information

Street lighting is provided across the county with the provision and standard of illumination varied depending on local circumstances. All areas, urban and rural will be affected by the policy, but all main road lighting will be left as all-night operation. The hours of operation of street lighting will be converted to part-night operation in residential areas.

There will be a programme of implementation which will be available on request.

3. List any key policies or procedures to be reviewed as part of this assessment.

The Street Lighting Policy

4. Who is intended to benefit from the service, function or policy?

People who want to reduce night light pollution.

Devon County Council - by meeting environmental and efficiency targets.

People in general because carbon reduction will reduce the impact of climate change.

5. Who are the stakeholders? What is their interest?

Commercial – Maintenance Contractor, Energy Supplier, Lighting Component Suppliers.

All users of the highway.

Residents in lit areas (e.g. urban areas).

Police and Safer Devon Partnership – Community Safety concerns.

Businesses/organisations operating at night time (Pubs, Clubs, Take-Aways, Care Homes, Hospitals) – concerns about travelling to and from work.

6. Are there any concerns at this stage which indicate the possibility of inequalities/negative impacts? For example: complaints, comments, research, outcomes of a scrutiny review. Please describe:

- There is an expectation that fear of an increase in late night crime in areas of part night lighting will be raised as an objection to the policy. In areas, both within the county and outside, where part-night lighting operation has been introduced, there is no evidence that crime has risen. In the event that there are issues in respect of crime following the policy implementation, these will be reviewed with

the Police and appropriate action taken. Wider community safety concerns, such as the design and maintenance of public spaces could also be reviewed by public services.

- Similar policy introductions in other local authority areas have been considered when judging the impact of introducing a part night lighting policy in residential areas, however, as these schemes are only in their second or third year, formal feedback is as yet unavailable. This policy will be impact assessed again in three years time and those reviews can be considered at that stage.

B) Relevance – Note: if not relevant, do not complete this form

Select **all** that apply:

		Scale of relevance	
7. Service or function that people use.	x	Low	Section C applies
8. Discretion is exercised, or potential for people to experience different outcomes or level of satisfaction.	x	Medium	
9. Employment policy – where discretion is not exercised.		Medium	Sections C & E apply
10. Employment policy – where discretion is exercised (e.g. recruitment or disciplinary process).		High	
11. Concerns at a local, regional or national level of discrimination/inequalities.		High	
12. Major change such as the closure, removal or transfer of a service/provision.	X	High	
13. Community and regeneration strategies, local area agreements and organisational or directorate/partnership strategies/plans.		High	

Other:

State why it is relevant:

How relevant (high, medium or low?):

Mark 'X' to confirm which strands are relevant to the review:

Age	X	Disability	X
Gender (men and women)	X	Race/ethnicity	X
Trans-gender	X	Religion/belief	
Sexual orientation	X	Other (state below)	x

Any other (such as Human Rights, people on low incomes and specific sub-strands requiring particular focus such as Travellers and Gypsies, Deaf people):

Users of the highway when street lighting switches off at 12.30 and switched back on at 5.30.

People in town centres with high late night footfall, for example near clubs, would be addressed by excluding such areas from part night lighting.

Night-workers for example – nurses, pub staff, take-away staff, hospital workers, residential care staff (on shift work). In particular Black and Minority Ethnic (BME) people may be employed in Take Away trade, BME and Women in caring industry.

C) Information

14 What information (monitoring or consultation data) have you got and what is it telling you? *Required where relevance is Medium or High.*

- A number of enquiries have been received from parish councils requesting implementation of part-night lighting operation.
- Previous media coverage regarding possible switching off, dimming and part-night operation of lighting. While there were some concerns, most queries related to implementation of measures rather than principle of reducing energy usage and carbon emissions.
- Parish Councils have been consulted as part of Community Package approach to improve street lighting, which flowed from the 2007 policy. As part of the strategy, Parish Councils were given information on energy and carbon savings for various options, which included to continue with all-night operation of lighting, or switch to dimming or part-night operation
- A number of authorities have introduced part-night lighting, Essex County Council have converted 5,000 lights since 2007, from all-night to part-night operation. Fear of crime remains but level of crime has fallen. Gloucestershire County Council have been trialling part-night lighting operation over the last 12 months in three parish areas. Over a third of lighting in each area operates part-night. 50 more part-night schemes have been requested and there has been a slight fall in the level of crime.
- Feedback provided to us by Devon Fawcett (gender equality group) indicates that 'total darkness' is better than 'patchy lighting'. A lit area followed by darkness, followed by lit, followed by darkness is ideal for attackers who can hide and assess their victim as they walk through the lit area. When there is total darkness crime levels go down, this could be because the attacker is unable to see their victim.
- Fear of crime is higher amongst women because the fear relates to sex crime, rather than crime in general.
- There have been numerous requests to remove lighting altogether, or enquire as to why lighting operates all night.
- Part-night lighting has been operating in parts of Devon for a number of years in Strete, Aveton Gifford, Stoke Fleming, Shillingford St George and Beer, either as part of an energy reduction scheme, or at the request of the parish/town council itself. There are as yet no records available of any issues at any of these locations in respect of part-night lighting.

D) Assessment

15 Describe any NEGATIVE impacts (actual or potential):

Strand/community	Impact (<i>how they may be affected</i>). Include assessment
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	of risk (likelihood and severity).
Residents and visitors to Devon who are out and about at night time (including night workers).	Possible negative impact on residential road users during the middle of the night when lighting is switched off. (Risk is low based on experience in other County Council areas. A review process will be in place to pick up on actual impacts). People can use torches to help get around and this advice is included in the literature. Those who need to use public transport and don't want to be waiting at a bus stop may access the Text for Times service which tells someone when their next bus is due.
Older people, LGBT (lesbian, gay, bisexual, trans), BME people and Women (including Night Workers)	May have a higher fear of crime which could be Hate or sex crime related. There is no evidence to suggest that such crime rises where part night lighting has been introduced and therefore this risk can be mitigated by publicity on the actual impact on crime levels based on experience in other areas of implementation. Partner organisations may also have a part to play in making public spaces feel safer through police presence and better design and maintenance (of overgrown bushes for example). We have been made aware that sporadic lighting creates a greater community safety issue than no lighting. However, we are unable to improve all street lighting in Devon due to cost and disruption (rewiring and resetting of existing lights). Where new lighting is being considered then this issue can be taken into account, but is outside the remit of this particular policy.
People in towns (compared to people in rural areas that are un/low lit and therefore less of a change)	People living in urban areas will need greater amount of information or help in coping with change. This risk will be mitigated through widespread media campaigns.

16 Describe any POSITIVE impacts:

Strand/community	Impact (<i>how</i> they may be affected)
LGBT, BME people and Women (including Night Workers), young men and other vulnerable people including the elderly.	As explained previously, it is likely that part night lighting will reduce actual levels of crime.

17 Provide any information about NEUTRAL impacts that have been identified (there is neither a positive or negative impact):

Strand/community	Why there is 'no differential impact'

Non- residential areas	No change in level of service in non-residential areas, where the policy will be implemented by night dimming and low energy equipment replacements.
People in rural areas	Probably have limited street lighting and therefore will not notice a change.
People with little sight or no sight	Are unlikely to be affected as they do not rely on street lighting (only 4% of the blind population in UK)
People with limited sight	Would not normally venture out into unfamiliar areas at night and this choice would not generally be affected by the presence or lack of street lighting.
People with visual impairments	If informed of the change to the lighting regime, could reasonably make adjustments, for example, arranging for a companion to meet and guide them.
People with other disabilities	Not likely to impact and personal adjustments may be made.

E) Consultation

18. Did you carry out any consultations? *Required where relevance is High.*

YES/

19. Who was consulted? Include your findings in 15, 16 and 17 above.

Consultation is taking place as the policy implementation progresses. Local County Councillors, Police and Parish/Town Councils are being asked to comment on the proposals for their area and give feedback, which will be considered as part of the delivery process.

There has been a countywide press release advising of the policy introduction and a leaflet has been produced, which is available at libraries and has been sent to parish/town councils as part of the consultation process.

There is also a website giving details of the programme, progress and public views. The policy was taken to Equality Strategy Group and feedback was sought from our 'external stakeholders' in the voluntary and community sector, representing interests of equality target groups (including gender, race, disability, sexual orientation and age). Living Options have been specifically consulted in respect of people with varying degrees of poor sight and Devon Fawcett (gender equality) provided in depth feedback on women's safety issues.

20. Describe other research, studies or information used to assist with the assessment and include your findings above:

Other local authorities have introduced measures to reduce carbon emissions and energy costs. There are no reports currently available, but briefly:

Powys CC faced a 50% rise in energy costs after a energy contract, starting 1 April 2008, resulted in an increase to 9p per unit. This was compounded by no additional funding for the increase and a £50,000 cut to the existing budget. An initiative was introduced to switch off of two in every three lights in non-core areas. This policy has now been revised to switch back on all lighting and convert to part-night operation.

Gloucestershire County Council has been carrying out 3 Parish trials for last 11 months. 36% of lights in those parishes are now part-night. Other parishes have

been contacted and there is support for 50 more part-night schemes. Crime appears to have fallen slightly.

Essex CC has introduced part-night lighting in its two districts and about 5,000 lights have been converted to part-night operation, between midnight and 5.00am, the Council has about 120,000 lights. While fear of crime remains, the impression is that the level of crime has fallen and there have not been any additional accidents.

The following is an extract from report to Essex County Council Policy & Scrutiny Committee, 18 September, 2009:

“Mr. J Wrigley presented information to the Committee in his capacity as a Chief Inspector in the Essex Police Force.

Chief Inspector Wrigley introduced himself to the Committee as being the District Commander of Police in the Uttlesford pilot area for the last 2 years. He was attending the Committee to give a police perspective. As District Commander, he had attended Community Forums and meetings and was familiar with the issues associated with the pilot project.

Chief Inspector Wrigley advised the Committee that there had been 2,800 reported crimes in Uttlesford in 2007/2008 and there had been 2,536 reported crimes during 2008/2009. There was a similar position in crime reduction in the other pilot project area in Maldon. He considered that there had been a reduction in crime for a number of different reasons. These included:

- The scene of every reported crime was visited by the police (this had helped to build public confidence)
- There was now better evidence gathering
- Policing had improved and there were better relationships and good communications with the public and partners
- There was better recording and bench marking
- There was better intelligence

Chief Inspector Wrigley did not consider lighting as a significant issue. The Committee was advised that most dwelling burglaries happened during daylight hours when the occupants were out and the premises are empty. Numbers of these had been falling with only 51 incidents since April 2009. A good many dwelling burglaries related to the theft of cars with burglars gaining access to properties to find the car keys. Other possessions were often not touched.

Chelmsford and Braintree, where the lights are switched on, had more crime than Maldon and Uttlesford. The bulk of violent crime occurred in town centres, which tended to be lit and were committed by known persons. It was very rare for unprovoked attacks to occur. Most violent crime involved the young, as younger people tend to be attracted to and congregate in areas where the lights were on.

Chief Inspector Wrigley advised the Committee that he considered the criteria between lit and unlit areas in the pilot area to be reasonable.

Chief Inspector Wrigley advised the Committee that he accepted the perception of the public was a big issue and it was important to reduce the fear of crime, but considered that no statistics would combat this. Chief Inspector Wrigley considered it was natural that communities would rather walk home along streets that were lit and natural for

communities to feel safer with the lights on.

In answer to questions from Members, the following responses were made:

With regard to police detection within areas that had no lights, the police were not disadvantaged as police vehicles had their own floodlighting system.

With regard to replicating the pilot across Essex, each village/town would have different demography that would need to be taken into consideration.

With regard to vulnerable groups and older people, fear of crime may be misplaced, as violent crime in Uttlesford was carried out in places where the lights were switched on and impacted mostly upon young people.

With regard to road accidents, most accidents happened on country roads which had never been lit. After dark most main routes were lit. There had been no increase in road accident numbers recently”.

Within Devon there are pockets of part-night lighting in urban areas, such as Barnado Road in Exeter and Maer Lane, Exmouth. Part-night lighting across Devon may reduce concerns relating to inconsistent lighting levels.

All the above existing part-night installations will be monitored with a view to highlighting good practice and reviewing on-going schemes as necessary.

F) Conclusions

	Action/objective/target OR Justification	Resources required	Timescale	I/R/S/O
a	Communicate changes to the public to promote understanding of climate change benefits, cost benefits and to allay fear of increase in crime rates for part-night lighting Ensure leaflets and guidance help advise people how to get around safely (e.g. use of torches)	Staff resource. Website Leaflet	Before and during implementation on the ground.	I
b	Refer to the Police and other partners (e.g. Safer Devon Partnership), any crime/safety issues that arise amongst different sections of the community		Before and during implementation on the ground.	I
c	Ensure Street Lighting team is made aware of community safety concerns where lighting is sporadic, so this can be taken into account when planning new	National lighting standards provide guidance in respect of community safety issues and		

	lighting.	lighting engineers consult with local councils and police as necessary.		
d	Continuously review implementation with a formal impact assessment carried out again after 3 years	Within existing resources.	Ongoing and 3 years time.	S

(I) Taking immediate effect.

(R) Recommended to Council/Directors through a Committee or other Report*.

(S) Added to the Service Plan.

(O) Added to the Fair for All Programme (as an organisational improvement)**

- DELETE THESE NOTES FROM YOUR FINAL DOCUMENT -

Conclusion notes:

*Summarise your findings in the report. Make the full assessment available for further information.

**The Corporate Equality Officer will extract any cross-cutting organisational improvements.

Use the table to:

- Explain what and how negative impacts have been reduced or removed and positive impacts improved or included. Mark these as having taken immediate effect (I) if this is the case.
- State final decisions or recommendations which may include making immediate changes, justifying a decision, stopping or proceeding with a new policy or adding objectives/targets to the service plan (long term changes). Provide timescales or dates and 'resources required' where appropriate.
- State what ongoing monitoring systems will be set up.

Don't forget to add actions to your service plan, where relevant.

Send your form to the person responsible for equality in your directorate for publishing on the website at: www.devon.gov.uk/equality_impact_needs_assess.