

Review of the adoption and implementation of the Street Lighting Policy and Strategy 2010

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Purpose of the review

This review has been carried out at the request of the Leader of the Council, following his discussions with the other political group leaders, all of whom have raised questions and concerns regarding the introduction and subsequent implementation of the Street Lighting Policy and Strategy 2010 (the Strategy).

The review considers the appropriateness and validity of processes and procedures adopted during both the Strategy adoption process, and its subsequent implementation. During the review, relevant officers and Members who were involved in creating and executing the Strategy were consulted, in order to evaluate not only past actions and events, but also to enable the recommendation of steps to be taken to address the lessons learnt.

The primary intended users of this review report are the political group leaders of Kent County Council.

Background

On 25 May 2010, a report entitled 'Street Lighting Policy and Strategy 2010'¹, was presented to the Environment, Highways and Waste Policy Overview and Scrutiny Committee (POSC) by Mr Nick Chard, the then Cabinet Member for Environment Highways & Waste. Amongst other activities, the report set out a process for assessing all currently lit streets in order to determine whether "the same lighting level is required for the street all night and consider if de-illumination; part night lighting; light dimming or switch off and removal of certain units is appropriate". Appendix B of the Strategy sets out criteria for assessing lighting needs of individual streets². The strategy did not set out any specific timescale for the implementation of any potential changes in street lighting arrangements, nor the costs associated with their implementation.

The minute to this meeting³ records that the POSC resolved that "the adoption of the Policy and Strategy for Street Lighting be supported and recommended to the Cabinet Member for adoption".

On 19 November 2010, Mr Chard took a Cabinet Member decision⁴ to adopt the Strategy, as recommended by POSC.

On 22 November 2011, Mr Bryan Sweetland, the then Cabinet Member for Environment Highways & Waste took a further report to POSC, entitled 'A Common Sense Plan for Safe and Sensible Street Lighting'⁵. This report outlined specific proposals to give effect to the previous Cabinet Member decision. These proposals included introducing part-night lighting on both minor (including residential) roads and high speed roads, and the permanent disconnection and removal of 5,000 streetlights on main routes. No detail concerning timescales or the cost of implementation of the proposals were set out in the report. Amongst other things, the report stated:

"Where streetlights have been dimmed or switched off, data shows that crashes and crime have not increased. There is a clear difference between perception

¹ [Street Lighting Policy and Strategy 2010](#)

² [Street Lighting Policy and Strategy 2010- Appendix B](#)

³ [Environment Highways and Waste POSC Minutes- 25th May 2010](#)

⁴ [Cabinet Member Decision- Street Lighting Policy Adoption- 19th Nov 2010](#)

⁵ [Report- 'A Common Sense Plan for Safe and Sensible Street Lighting'](#)

and actual data. It is the design of lighting schemes, rather than the number or hours of illumination that is most important. Kent County Council's aim is to target the wasted lights and energy...To overcome the negative perception, it is vital that we address this by involving residents in discussions about what makes some people feel they are less safe."

During debate Mr Sweetland stated that an exception list would be drawn up of locations, street by street, detailing lights to be switched off.

POSC resolved⁶ that:

- (a) the specific proposals outlined above, to introduce a common sense approach to safe and sensible management/operation of street lighting, be endorsed with some Members suggesting the proposals could go further; and*
- (b) the report and relevant draft minute be circulated to the next round of JTBS (Joint Transportation Boards) for discussion and feedback.*

The proposal to implement the Safe and Sensible Street Lighting Policy (the Policy) was embedded into the Divisional Business Plan for Highways and Transportation (H&T) in 2012-13 and 2013-14. These business plans were approved by the Cabinet Member following discussion by the relevant Cabinet Committee. At the time, the prevailing view across Kent County Council was that where a policy had received Cabinet Member approval, decisions associated with its implementation could be carried out under officer delegation where the relevant costs were itemised in the approved budget of the Council, and where it was a commitment set out in the approved Business Plan.

On this basis, the decisions relating to the implementation of the Safe and Sensible Street Lighting Policy were carried out under officer delegation by Mike Austerberry, the then Corporate Director for Enterprise and Environment.

Consultation & Engagement

No consultation activities are evident prior to the decision to approve the Strategy, although the Strategy document does refer to the need for full consultation with the emergency services and with community representatives prior to implementation. The report to POSC in November 2011 also highlights the need to engage local residents in dialogue concerning the community safety aspects of policy implementation.

Officers did retrospectively seek legal and other advice on the issue of consultation prior to the implementation phase of the Policy. This advice is summarised at **Appendix A (i-ii)**.

Whilst there was concern expressed about the absence of such activities prior to the policy being approved, the general thrust of expert opinion appears to have been that a robust process of consultation and equality impact assessment prior to implementation would provide significant mitigation against the risk of challenge.

Joint Transportation Boards (JTBS) exist for each of the 12 districts of Kent, and include KCC members for relevant divisions, representative members of the relevant district council, and a representative of parish and town councils. A report concerning the proposal to implement the approach set out in the POSC report of November 2011

⁶ [Environment Highways and Waste POSC Minutes- 22 Nov 2011](#)

was presented to each of these JTBs (a list of relevant dates is at **Appendix A**) and comments were invited. At the JTB meetings, assurances were given by KCC officers that a high profile PR/consultation exercise which would involve parish, town and district councils would take place in due course. At least one district council called the policy in for scrutiny following concerns raised at its JTB⁷.

Further briefings of JTBs were arranged to take place prior to implementation in each district, in order that members were fully appraised of the detailed proposals for their area and able to express any concerns. A summary of the responses received appears at **Appendix B**. The Kent Association of Local Council (KALC) was also briefed by the Director of Highways & Transportation, including at their AGM, and an article about the proposal for street lighting was distributed to over 300 parish councils.

There is strong evidence of effective engagement with the emergency services prior to the implementation phase, and in particular with Kent Police; this included a meeting of the Cabinet Member and Director of Highways & Transportation with the Chief Constable. There is also evidence of engagement with community representatives in the form of the JTBs, and a series of KCC Member briefings in the spring of 2013, although attendance was limited in some cases.

There is also clear evidence of a customer consultation process, and members of the public were encouraged to take part in this process through a range of media, including radio and press advertising. However, the nature of this consultation was a matter of significant discussion amongst officers within H&T and the Corporate Consultation Team. In particular, there were concerns expressed by the Consultation Team that the consultation process concentrated on the detailed timings of part-night lighting and the criteria for exceptions, rather than addressing the fundamental issue of whether or not the concepts of part-night lighting and some permanent disconnections had community support.

The public consultation itself was limited to an online survey, with a facility to email more narrative responses to the project team. This might be seen as a weakness, as a consideration of the target audience may have determined that other channels of consultation would be more appropriate for particular groups. There is no evidence to suggest that any process for identifying the target audience took place, nor for considering the most appropriate means of consultation. The consultation did not give any information concerning the significant financial outlay required by the implementation of the proposals.

Officers directly engaged in the implementation of the project have expressed a view that they would have preferred the consultation to be more extensive, but felt constrained by the limitations of cost and time. One former Cabinet Member felt in hindsight we had done the “bare minimum”.

There is, however, clear evidence of effective engagement with the emergency services in formulating the approach to implementation of the changes to street lighting, and engagement with Kent Police appears to have been particularly positive; this engagement continues as part of the process for reviewing the outcomes of the changes.

Comparing the KCC approach to consultation with other authorities that have introduced similar such changes to street lighting, places us broadly “mid table” in terms of good practice (see **Appendix C**). However, what is evident is that some authorities can demonstrate greater clarity around how the consultation processes

⁷ [Dartford Joint Transportation Board Minutes- 10 June 2014](#)

influenced decision making. This theme is explored in greater detail in the section on Governance below.

The output of the consultation was such that the majority (75%) of the 546 respondents supported the proposals for timings of the part-night scheme, and the criteria for exempting certain areas. Some respondents felt that the proposals did not go far enough, whilst others expressed concerns about the impact upon crime and highway safety. However, the low number of respondents overall may suggest that restricting the process to a single channel (online questionnaire) limited the level of engagement.

Unlike some other authorities, the details of the output of the public consultations are not easily accessible by residents, with only very brief details appearing on the public facing KCC website.

Equalities Issues

No equalities impact assessment activities are evident prior to the decision to approve the Strategy. Given that the decision was taken prior to the coming into force of the Equalities Act 2010 (which sets out clear requirements for consideration of the potential discrimination against persons with certain protected characteristics in the decision making process), it could be argued that it was reasonable to utilise the greater clarity provided by the Act in considering such issues prior to the implementation of the Policy. Interviews with colleagues from the Equalities, Legal Services and Consultation teams seem to concur with this view.

An Equalities Impact Assessment (EqIA) was carried out in May 2012 (**Appendix D(i)-(ii)**). However, this EqIA focusses retrospectively upon the adoption of the policy rather than its implementation in particular areas of Kent, and does not appear to be complete. For example, it is not signed by relevant senior managers, and it does not clearly set out the impacts upon the groups with protected characteristics identified as being potentially adversely affected by the implementation of the policy. It also does not attend to the equalities concerns raised by Kent Police with regard to certain faith groups.

There has also been significant correspondence and debate amongst various divisions within the council concerning the quality of the EqIA, and whether steps in mitigation of the effect on persons with protected characteristics were sufficient.

Legal advice provided to officers within the Consultation team in July 2012 highlighted inadequacies in the EqIA; it recommended that the EqIA process should be carried out in a more full and detailed manner, and that it should be put before the relevant Cabinet Member in order to inform the decision making process. Subsequent legal advice to the Consultation team in July 2013 noted that these recommended actions appeared not to have been carried out.

The legal advice of July 2013 also noted that the proposed online consultation process might exclude those protected characteristic groups that had been identified as being most likely to be impacted by the proposals. It is understood that this legal advice was provided to the project delivery team as a template for action, but much of it was not reflected in the public consultation process that was ultimately commissioned. There is no evidence that this advice was shared with either elected Members or the Corporate Director.

In mitigation of the approach to equalities adopted by the project delivery team, messages from the Equalities team appear not to have been as consistently critical of

the processes adopted. The then Interim Corporate Lead on Equalities, whilst not providing any explicit endorsement, did give the impression through email correspondence of being relatively sanguine about the approaches to equalities adopted. However, there was a consistent message that issues of equalities should be clearly embedded within the consultation process, and there is no clear evidence that this was ultimately the case.

Governance

As previously mentioned, the original Strategy decision was taken by the Cabinet Member following consideration and recommendation by POSC. The implementation of the Policy was taken under officer delegation.

One weakness of the officers acting under delegated authority at the time was the opaque nature of the records kept of the decision-making process. In particular, it is not possible to determine exactly how the outputs of the EqIA and consultation were considered in the decision-making process, and how they influenced the implementation of the scheme. This is not to say that such issues were not properly considered; it is simply impossible to demonstrate absolutely that they were fully considered as part of the delegated decision-making process.

Changes to the recording of decisions now makes the reasoning of the decision-maker more explicit, and updated guidance on Key Decisions makes it more likely that decisions of this nature and scale will be Member-led in future.

Of the other authorities contacted which have implemented similar schemes, many had similarly opaque arrangements surrounding their decision-making procedures, although some had more transparent Member-led decision making. In Buckinghamshire for example, feedback from the consultation was collated and reported to the Cabinet Member for Transportation who took a Key Decision in December 2007 to continue with a street lighting trial after the successful completion of a first phase. Following the trial, a Key Decision report was published and the final decision taken in August 2012.

A number of un-minuted oral updates were provided to the relevant Cabinet Committee during the course of the implementation phase. Whilst elements of the consultation phase were alluded to in these updates, Members were not explicitly provided with detailed information concerning feedback from the community for their consideration and comment.

Neither is it clear that Members or other consultees were provided with the detail of the police responses to the consultation processes, and in particular the fact that Kent Police expressed on more than one occasion that they could not support the scheme. They did, however, make clear that they understood the reasons for the Policy, and were prepared to cooperate in its implementation. It may have been the case that, had they been aware of such comments, some Members' opinions of the project might have been less supportive.

During the course of this review process, one former Cabinet Member also expressed concern that he had not been fully apprised of the initial capital outlay required by the scheme's implementation, and knowledge of this might have swayed his view of the scheme. Details of the anticipated capital outlay appear in neither the POSC report of April 2010, nor the POSC report of November 2011.

A report was put before Project Advisory Group (PAG) in November 2011, requesting approval to spend £2.9m of capital on the introduction of part-night lighting, and a

further £2.3m on column removal for permanent switch offs. PAG is not a public meeting, nor is it a formal decision-making body of the Council, and no other evidence of such information being discussed openly in the Member domain has been found. Given that many new Members entered the Council in May 2013, and in the seeming absence of any detailed financial information relating to this scheme after the PAG meeting in 2011, it is possible that many Members were not fully aware of the financial implications of the implementation of the policy.

Clarification concerning the nature of Key Decisions and the governance processes around them is such that it is now unlikely that a decision of this nature, with the significant issues of cost, reputation and customer impact, would be delegated to officer level. With the benefit of hindsight, the implementation phase of the Policy would have benefitted from the transparency and openness that characterise Member-led decision making. Properly minuted discussion of the issues, and recording of decisions, would have provided assurance to Members and the community alike that all relevant concerns were fully aired and taken into account.

Impact of the Scheme

The objectives of the Strategy, as reported to POSC in May 2010, were to reduce carbon consumption and to reduce the costs of street lighting. The further report to POSC in November 2011 also noted the need to gain community acceptance of the scheme and reduce negative perceptions.

There is clear evidence that the scheme has been a success in terms of reducing carbon consumption, with an associated reduction in electricity costs. Indications are that full roll-out of the scheme has enabled savings in electricity costs of circa £1m per annum.

This revenue saving needs to be offset against the capital cost of the scheme, which at circa £3.2m does necessitate a “payback” period of around four years. The substantial part of the capital outlay was in respect of changing the switching gear from simple light detecting devices, to smarter sensors that could calculate a switch-off period between 00:00hrs and 05:30hrs each night.

There is evidence to show that the project team worked closely with Kent Police to identify areas where reduced street lighting provision might negatively impact upon crime and/or highway safety. Reviews of the community safety impacts are planned to be carried out in cooperation with Kent Police in all districts. The first such review, very recently carried out in Dover district (**Appendix E**), appears to show that there is no significant direct causal link between the occurrence of accidents or crime and the street lighting scheme. Further reviews are due to be carried out over the coming months in the order of district implementation.

There is no readily available data to enable a comparison of the impact of other similar schemes on crime and safety in other parts of the country. However, there is a significant body of work that suggests that improved street lighting helps to reduce crime where crime is prevalent. Kent Police alluded to such evidence in their consultation response (**Appendix F (i)-(ii)**).

There have been circa 3,500 complaints about the scheme since implementation commenced. Of these, the project team advise that approximately half relate to faulty technology, i.e. switching taking place at inappropriate times of the day. The other 50% relate to concerns about the perceived impact of the scheme on crime, the fear of crime and general community safety.

There is no evidence that any attempt at legal challenge in respect of the policy or its implementation has been made by any person or group.

Reversal of Part-Night Lighting

Since the implementation of the policy, a number of part-night lighting schemes have been “reversed” to all-night lighting. The vast majority of these have been reversed on the basis that the exclusion criteria (**Appendix G**) had been incorrectly applied at switch over. Six reversals were enacted where the lamp column was not owned by KCC. One reversal was made at the request of Kent Police as a result of concerns about adverse impacts upon crime. A further nine reversals were made on the basis of Cabinet Member decisions by Mr Brazier in response to requests from members of the public (see **Appendix H**).

The process for Cabinet Member reversals is not clear, nor is it formally documented. When consulted, the relevant Cabinet Member advised that his key consideration was the potential impact upon crime, but this appears to have largely based upon individual interpretation and discretion, rather than evaluation against objective criteria.

However, it is understood that Kent Police were asked to comment on requests in most cases, and their comments were considered by the Cabinet Member when determining the outcome. There is only one case documented where Kent Police specifically requested a reversal on the basis of a negative impact of part-night lighting upon crime and disorder. There is no evidence that consideration of the cost impact of reversal has influenced any individual decisions.

Another Cabinet Member highlighted the lack of a clear approach to authorising reversals as a key weakness in the scheme, and felt that the relevant Cabinet Member should have access to some form of protocol to guide reversal decisions.

The exclusion criteria focus upon four key issues:

1. the nature and layout of the highway
2. the proximity to areas frequented by emergency vehicles
3. the occurrence or risk of crime
4. areas with concentrations of vulnerable people

Discretionary Cabinet Member reversals to date have given particular emphasis to issues of criminality. In such cases, there is a mechanism to test impact on crime, as Kent Police have been very cooperative in terms of providing information about the incidence or potential incidence of crime. Thus, it should be relatively straightforward to create a clear framework for determining whether or not part-night lighting in a particular street has a negative impact on crime and disorder.

The issue of vulnerability is more complex, partly because no clear definition of “vulnerable people” has been provided. The inference within the exclusion criteria is that the term refers to mainly elderly people, or those residing within a care home environment, but this is not explicit. There is no reference to any “vulnerable people” living on their own, or outside of a more regulated environment. Nor is there any specific reference to issues of disability, age, mental health, etc.

Given that there is an acceptance that “vulnerability” should be taken into account, a clear definition of vulnerability should be developed. This definition can then inform guidance to be developed by officers and provided to the Cabinet Member, setting out with clarity the circumstances whereby a reversal should be favourably considered. However, it is advised that consideration of any reversal should include an assessment

of the potential cost impact, balanced against the needs of the individual and community concerned.

What is important is that Members are able to exert a proper influence upon the mechanism for authorising such reversals. It is recommended that officers within HT&W draft a clear protocol for determining reversals, and that these are presented to the Cabinet Committee for Environment & Transport for comment prior to a decision being taken by the Cabinet Member.

Implications of LED Street Lighting

The proposed introduction of LED street lighting from early 2016 holds out the prospect of a more flexible and responsive approach to illuminating the highway, including full-night lighting, dimming, alternate lamp columns, etc.

LED street lighting will enable a substantial reduction in electricity consumption, although ironically its likely proximity to the implementation of part-night lighting may mean that the required four year payback period is not achieved.

It appears to be the case that some neighbourhoods in Kent have shown greater concern about part-night lighting than others. There is an opportunity, through a rigorous process of consultations and equalities impact assessments, to ensure that any implementation plan for LED lighting actively targets areas within the county where the greatest community concern about the current arrangements exist. This should be borne in mind as the project plan is developed.

Summary

In many ways the implementation of the Street Lighting Policy and Strategy can be considered a significant success. It has enabled reductions in electricity consumption and cost. In addition, given the scale of the project, which touches the majority of communities within Kent, the overall level of complaints is relatively small given the impact across the whole of Kent. There has not been any formal legal challenge to either the adoption of the Strategy or its implementation.

However, it would be difficult to argue that the implementation of the Policy has entirely demonstrated best practice in governance, equalities or community engagement terms. The EqIA process should have been more detailed, and should have more clearly considered the ways in which groups with protected characteristics might have been impacted by the policy.

The consultation process does have the feel of a “tick-box” exercise rather than a genuine and multi-channel approach to understanding both the extent to which communities supported the policy, and their concerns about its implementation.

However, even if the equalities and consultation processes were exemplary, the absence of an open and transparent governance process during implementation would still leave questions concerning how these processes influence the decision making process.

It is therefore strongly recommended that KCC learns the lessons from this project. Officers and Members must demonstrate a genuine commitment to the equalities agenda, and show best practice in a targeted and multi-channel consultation process. In particular, the process will be much stronger for having Member-led decision

making, where considerations of the factors influencing decisions are discussed openly, properly recorded, and made available for public scrutiny.

There are positive signs that these lessons have already been taken on board; proposals for the introduction of LED street lighting have been through a number of Member panels, including Cabinet Committee, Transformation Advisory Group and Commissioning Advisory Board prior to a formal decision being taken by the Cabinet Member. This allows for much greater confidence about the rigour, transparency and openness of the governance process.

If the right processes of governance are rigorously applied, these will undoubtedly mitigate against the risk of having an otherwise effective and beneficial project being tarnished by the appearance of poor practice.

Appendix A - Key JTB dates at Policy implementation phase

Ashford – 12/3/13

Canterbury – 19/2/13

Dartford – 5/3/13

Dover 28/2/13

Gravesham – 20/3/13

Maidstone 17/4/13

Sevenoaks – 13/3/13

Shepway – 18/3/13

Swale – 11/3/13

Thanet – 14/3/13

T&M – 18/3/13

Tunbridge Wells – 15/3/13

Appendix B - Joint Transportation Boards- Summary of Comments

Ashford

375 A Common Sense Plan for Safe and Sensible Street Lighting

Mr Burr introduced the report which provided details of KCC's plan for safe and sensible street lighting and requested Members' views on the proposals.

.....

In response to questions from Members, Mr Burr explained that the ongoing consultation was about the hours rather than the individual lights. They would be flexible on this where they could. He accepted it was one of those projects that would divide opinion but he hoped the report made the rationale clear and dispelled many of the initial fears. One of the main fears was a perception that crime may increase and that there would be more accidents, but there was no evidence of this in areas where the switch off had taken place. Both solar and LED lighting had been examined but the pay back period was often astronomical not economic. As with all emerging technologies, the costs were coming down, so it may be a longer term solution, but at the moment it would not be a cost effective option.

Resolved:

That

- (i) the sites selected for the trial switching off of surplus lights be supported.**
- (ii) the exclusion criteria used for part-night lighting initiative be supported.**
- (iii) the hours of switch off for part-night lighting be supported.**

Canterbury

They made points including the following:

1. The night time switch off should not create difficulties.
2. Lots of young people cross the Rheims way without using the underpass. Could the lighting here be changed to the night-time switch off instead of being switched off altogether?
3. Street lighting was a contentious issue in rural areas which suffer from light pollution from Canterbury.
4. Excess street lighting was wasting money.
5. In reference to the A291 at the junction with Canterbury Fields, could two lights be left on to light the junction?
6. At Rheims Way young people cross throughout the night, was there are way to reduce the lighting there without switching if off altogether overnight?

The officer responded that the last suggestion would not be possible as all lights needed to be on or none, but the timings could be looked at. The other suggestions outlined above seemed acceptable.

Dartford

The Director for Kent Highways introduced the report which provided details of Kent County Council's plan for safe and sensible street lighting and requested Members' views on the proposals.....

He advised that the County Council spent nearly £6million on energy for street lighting and that there was no legal requirement for them to provide lighting except where there was a link to road safety. Kent had therefore adopted a policy to reduce street lighting in two phases.....

The Board were reassured that any accidents reported for the last 19 years had been considered and no lighting would be removed where there had been a critical crash record.

He advised that this phase would not start immediately, and it was expected that the switch off would start in June/July and welcomed Members views on the proposal.

The Chairman advised that she had received concerns from the Parish and Town Councils that they had not been consulted on the proposals.

It was clarified that this was a policy decision that had been made by Kent County Council and that local member comments were welcomed on the proposals. It could be considered by the Dartford Association of Parish and Town Councils, however they would need to understand that their view on the policy was not being sought only the identified locations for the trial.

As part of the discussion, Members raised the following questions: -

- Does the presence of street lighting indicate that it is a 30mph zone?

The Project Manager advised that the presence of street lighting in most residential streets indicated that the speed limit was 30mph. Kent were currently seeking legal advice on its position.

- When lighting is removed will unsightly stumps remain like those currently seen throughout the Borough?

The District Manager advised that the street lighting column stumps that are currently found throughout the Borough are due to a different project that is currently being undertaken. A recent audit of the lighting columns identified some columns that needed to be removed for safety reasons. These would all be replaced by the end of March and the old columns removed once the power had been diverted to the new lighting.

- What cost will there be to add devices to lighting columns so that they are turned off at different times?

The Director for Kent Highways advised that the challenge was set that there was payback period of five years or less for the project.

- The exclusion criteria listed (page 13/14) refers to areas identified by the Police as having an existing records of crime or having the potential for increased crime levels if the street lighting is changed. Can any other organisations other than the Police comment?

The Project Manager advised that this was a generic term and all organisations involved in the prevention of crime could comment as it would be a proactive trial.

Members of the Board considered each location and resolved as follows: -

RESOLVED:

(1) That Kent County Council be asked to note the Board's comments for each trial switch off location before determining on how to proceed:

Bob Dunn Way – no objection to the trial switch off

Bean Lane – no objection to the trial switch off

Leyton Cross Road – concern was raised that due to the bend in the road this was considered locally as an accident black spot. There were also numerous community facilities in the area and concern was raised how the switch off would affect their use. Members resolved that Part Night Lighting should be implemented and not the Trial Switch off

Birchwood Road – no objection to the trial switch off

Watling Street – no objection to the trial switch off, although Members requested that consideration be given to nightworkers at the hospital who were unable to park at the hospital.

Hawley Road – no objection to the trial switch off

Barn End Lane – no objection to the trial switch off.

Old Bexley Lane – this was identified as a route used by children to reach local schools and Members did not support the trial switch off. Members resolved that Part Night Lighting should be implemented and not the Trial Switch off

Shepherds Lane – this was identified as a route used by children to reach local schools and Members did not support the trial switch off. Members resolved that Part Night Lighting should be implemented and not the Trial Switch off.

Cotton Lane – due to the issue with horses grazing illegally escaping onto the highway, Members requested that this be given consideration before confirming as a trial location.

(2) That the exclusion criteria used for the part-night Lighting initiative be noted without amendment.

(3) That the hours of 12.00 midnight to 5.30am for switch off for Part-night Lighting for Phase Two be noted without amendment

Dover

A COMMON SENSE PLAN FOR SAFE AND SENSIBLE STREET LIGHTING

Mr Burr introduced the report which described proposals for the trial switching off of surplus lights and the switching off of other lights for part of the night. As a result of revised legal advice, the complete removal of lights had been discounted in favour of a 12-month trial switch-off. As a trial, lawyers were satisfied that the lighting columns without lighting did not represent an illegal highway obstruction. Each trial site had been risk assessed and checked against crime and road traffic accident statistics. Kent Police had also been consulted.

Several Members questioned the inclusion of Whitfield Hill which had been the site of several accidents and acted as a relief road for Jubilee Way. Although the accidents recorded were not related to lighting, Mr Hatcher undertook to review and consider part-night lighting at this location. It was also suggested that sites at Farthingloe Farm junction and the Discovery Park should not be included as the former was a potential development site and the latter was endeavouring to attract new businesses to the Enterprise Zone. Mr Hatcher suggested that lighting at Farthingloe could be switched on as and when development came forward, and part-night lighting could be considered at the Discovery Park. Members suggested that lights at the Betteshanger Business Park were unnecessary and should be switched off in the absence of any development. In respect of all sites, Mr Hatcher reassured Members that all sites underwent a safety audit and, if necessary, additional mitigation measures would be introduced, such as reflective signage, enhanced road markings and road studs. In response to concerns raised by Members, Mr Burr confirmed that accident records dating back to 1994 had been checked. Sites where a fatality had occurred due to visibility/lighting issues had been removed from the list. The programme of switch-offs would commence in the summer. Kent County Council (KCC) would work closely with Kent Police to monitor whether road accidents or crime levels were increasing as a result of the switch-offs. Immediate action would be taken if indications were that they were having a negative effect.

RESOLVED: That the proposals outlined in the report be recommended for approval, subject to appropriate amendments being made as a result of the Board's comments on Whitfield Hill; the A256 By-Pass at Eythorne; Farthingloe Farm junction, Folkestone Road and the A256 at Ramsgate Road (South) by the Discovery Park.

Gravesham

22. Proposed Street Lighting Changes

The Director of Highways & Transportation, KCC presented the Board with the proposed

street lighting changes plan: 'Trial Switch off' and 'Part-Night' lighting proposals as set out in the report.

The Director of Highways & Transportation, KCC advised the Board that consultation has

now opened on the website for the Part-Night scheme.

Four areas have been identified for the trial switch off and Members considered each site

and discussed the proposals.

Resolved that Members considered each site for the trial switch off and suggested the following for each site:

- Thames Way – No switch off;
- Rochester Road – Proceed with proposal;
- Crete Hall Road – Part Night; and
- Gravesend Road, Shorne – Proceed with proposal.

Maidstone

RESOLVED to RECOMMEND to the COUNTY COUNCIL:

1. That the sites selected for the trial switch off of surplus lights in the Borough of Maidstone, as set out in the Appendices to the report of the Head of Programmed Work, be endorsed with the exception of the B2246 Hermitage Lane where the five lights should be included in the programme for conversion to part-night lighting.
2. That the exclusion criteria to be used for the part-night lighting initiative be endorsed.
3. That the hours of switch off for part-night lighting should be 12.00 midnight to 05.30 a.m.

Sevenoaks

Members discussed and made the following points:

- Otford Road, Sevenoaks north of Sainsburys partnight lighting preferred
- B258, top of Dartford Road, row of cottages partnight lighting preferred
- Ash, removal of lighting columns that have never been switched on
- Button Street approaching Swanley Village be left
- Polehill / Orpington Bypass concern that pedestrian crossing lights do not work, a suggestion this be left for the moment

Resolved: That subject to the comments made above the proposals contained within the report, be agreed.

Shepway

A common sense plan for safe and sensible street lighting

Report JTB/12/18 provided details of the county council's plan for safe and sensible street lighting and requested Members' views on the proposals.

RESOLVED: That

(1) the proposals for the switching off of surplus street columns be supported with the following exceptions:

- Alkham Valley Road, Hawkinge to be moved to the part night category
- Dover Hill to be moved to the part night category apart from the stretch between the Valiant sailor and Capel-le-Ferne which could be included in the trial
- Sandgate Esplanade: delete from programme entirely
- Ashford Road, Cheriton: proposal to be reviewed in the light of the 24 hour nature of access requirements including pedestrian and cycle options
- Lydd Road/Romney Road/Hammonds corner: delete from programme entirely
- Royal Military Avenue: retain two street columns adjacent to bus Stop

(2) the exclusion criteria for the part night lighting initiative be supported; and
(3) the hours for part night lighting should be 11 pm - 5.30 am GMT (ie 12 midnight to 6.30 am BST) (officers to investigate technology to see whether variable switching would be possible).

(Voting on recommendation 3 was by two options:

11 pm to 5.30 am (GMT): For 6

12 midnight to 5.30 am (GMT): For 2).

Swale

RECOMMENDED:

- (1) That the sites selected for the trial switch-off of surplus lights outlined in Appendix A to the report be agreed.
- (2) That the exclusion criteria used for the part-night lighting initiative be agreed.
- (3) That the hours of switch off for part-night Lighting be agreed but consider a 11pm to 5am switch-off period.

Thanet

Some individual changes to the trial sites were noted.

Recommendation 2 – Exclusion Criteria for part-night lighting

It was AGREED that tourist areas should also be included as an exclusion criterion.

Recommendation 3 – Hours of Switch off for part-night lighting

It was AGREED that switch-off time should commence at 1.00 am in the summer.

Mr Burr undertook to inform the Town and Parish Councils of the decisions reached by the Board.

(Councillor Bayford left during this item, before any decisions were taken)

T&M

RESOLVED: That

- (1) the Trial Switch Off of Surplus Lights (Phase 1) at the sites identified in the report be amended to a Part-Night Lighting regime;
- (2) the Exclusion Criteria for the Part-Night Lighting be noted; and
- (3) the hours of Switch Off for the Part-Night Lighting be 12 midnight to 0530 hours.

TW

The Board was being asked for its views on the proposals and for members to identify to KCC any areas where local information would determine how best to proceed.

Councillor Mackonochie asked if consultation at parish level had taken place. Mr Burr advised that full agreement at local level, especially for phase one would be difficult to achieve, however, the full method of consultation on this type of issue was to approach the County's Joint Transportation Boards, which was taking place. Kent Association of Local Councils (KALC) was also being consulted with. Councillor Mackonochie urged KCC officers to seek the views of those parishes affected and he confirmed that he would forward on the report to the two parishes included in the trial switch-off.

County Councillor Scholes asked KCC to be mindful of areas where deer frequently crossed roads. He also highlighted instances where accidents had taken place on certain stretches of road that had resulted in court cases. He felt the proposals needed a degree of publicity; he also asked what the deadline was for members feeding back on the recommendations. Mr Burr advised that there was no formal requirement for consultation on phase one of the proposals and there was no direct correlation between traffic accidents and street lighting, and that the causes were generally down to other factors.

Mr Hatcher advised that decisions would not be made until all twelve JTBs in the County had been consulted with. He added that every street had been safety audited and that it was requirement of the programme that by the summer roads were no less safe than they were currently. Mr Burr added that a recommendation to KCC's Cabinet was not required as the proposals were already included within Policy.

Councillor Manning said that doing nothing was not an option and the proposals offered commonsense solutions with an environmental benefit. He was not sure what input Councillors could provide as the data had already been assessed but he was keen to see the programme rolled out to allow concerns over 'black patches' to be identified. He asked if officers would be able to react quickly to areas where there were safety issues and whether this reaction time would be hindered by bad weather. Mr Hatcher advised that KCC would react immediately where safety was an issue and that monthly meetings were held with Kent police which, going forward, could also be used as a platform for issues identified as a result of off-light time.

The Chairman referred to Church road, which was within his ward and entirely suitable for this type of programme. He was happy that the recommendations covered all the requirements.

RESOLVED

To note the report and its recommendations and that Board members are to provide feedback to Kent County Council should they be aware of local information that may help officers proceed with the trial switch-off.

Appendix C - Local Authority Consultation Approaches

Street lighting review:

Authorities that have implemented similar programmes to KCC

The legal advice prepared by Erica Ffrench for the Consultation Team in July 2012, considered details of what other Local Authorities have done in relation to implementing similar programmes to that of KCC.

The information below details Erica's findings back in 2012 and updated from a web search in March 2015.

Hertfordshire

2012 findings:

It consulted only with police, district councils and road safety experts before making final changes to its street lighting reduction policy. It provides an interactive online map showing a schedule of work. It provides a link to Police endorsement of the changes. It provides a link for service users to contact the local councillor if they have concerns about street lighting.

2015 findings:

There is a petition on Hertfordshire CC's website (with 5500+ signatures) asking the council to turn the street lights back on. In addition, one from residents to keep them off which only has 17 signatures. There is a Frequently asked questions section which states that HCC 'will not consider complaints' about the street lighting coming being turned off and only take comments from those who feel the exception criteria have been applied incorrectly.

Buckinghamshire

2012 findings:

No consultation was carried out. Frequently Asked Questions (FAQs) are provided online which answer some service user worries.

2015 findings:

This was the first switch off of its kind in the country. Publicised as a trial with 'phase 1' (300) lights being switched off in August 2007 and 'phase 2' (1400) lights being switched off by September 2008. The trial finished in September 2011.

Consultation - 'Before Phase 1, an explanatory meeting was held at which all the emergency services, representatives from interest groups and the District Councils were invited to listen to what the aims and rationale for the trial were. This also provided an opportunity for BCC to respond to any early queries or concerns expressed. Reports for information and outlining the aims of the trial were also considered by all four Local Committees.

Following comments received following implementation of Phase 1, it was clear that further detailed consultation was needed for the larger number of sites that formed Phase 2. Prior to any decisions being taken about sites to be included in the trial, consultation was undertaken to seek views from the local community or other road users.

Due to the countywide nature of this trial and the large number of Phase 2 sites, information was disseminated in several ways, including:

- A dedicated web page which included all relevant site and other information;
- Individual letters to all Parish and Town Councils;
- Individual e-mail to all County Councillors from the Cabinet Member;
- Individual letter to all organisations on the County Council's consultee list, including District Councils, emergency services etc;
- Individual letter to all neighbouring highway authorities where the proposed sites adjoined or were close to the county boundary;
- An article in the Autumn 2007 Buckinghamshire Times edition;
- Reports for information at all four Local Committees.'

Feedback from the consultation was collated and reported to the Cabinet Member for Transportation who took a key decision in December 2007 to continue with Phase 2 of the trial after the successful completion of Phase 1.

The trial finished in September 2011. Following the trial a Key Decision Report was published and the final decision taken in August 2012. Following the trial, some lights were switched back on and some were switched off permanently in line with the recommendations. Documents regarding consultation are publically available via the BCC website.

Leicestershire

2012 findings:

A consultation on specific detailed proposals for part-night/ dimmed/ switched off lighting will be carried out with the relevant parish or town council where service users are welcome to comment on the project via their parish or town council. An online comments form is also provided to allow service users to give their views with this being used to inform ongoing work. No replies would be given. FAQs are also provided online.

2015 findings:

Website states changes are a gradual programme of work to take place over a 4 year period from April 2010. Website now states lights may be part-night lighting, dimmed or switched off and that risk assessments for every area *will* be carried out in areas where changes are proposed. It says these street lights will be identified using a set of criteria and in addition, through consultation with the parish or town council and the emergency services.

Essex

2012 findings:

A consultation on part night lighting will be carried out. During the consultation period all service users will have the opportunity to make any requests for areas that should be excluded from the scheme.

2015 findings:

A consultation on part night lighting was carried out, however not with residents;

'The move to part night lighting has not been taken lightly, and views have been sought from District, Borough and Parish Councils as well as the Emergency Services when determining which lights should be switched to part night lighting...Residents were not directly consulted by Essex County Council; however, news coverage over the past few years notified the public that the part night lighting scheme would be introduced across

Essex. Where residents have fed back views, these have been considered and responded to.'

The part night lighting is now in place. Cabinet members made the decision following a trial period in 'sample' areas. There are a number of FAQs available on the website to address the main concerns. One of which suggests that Emergency Services views were sought and that their 'comments were considered' but does not suggest they were in support of the policy. A resident set up a petition, which ran for 10 months up to December 2014 to have the lights turned back on (feeling unsafe). There were 1500+ signatures received.

Suffolk

2012 findings:

A consultation was carried out with parish councils and police prior to finalising the policy. Maps of the affected areas are available online.

2015 findings:

A list of FAQs was produced and made available to residents, however no formal consultation was undertaken. A media campaign was run before the switch off to ensure residents knew it was happening. There is a facility to feedback comments. The police can request that lights are switched back on immediately if necessary.

Gloucestershire

2012 findings:

Carrying out evening public meetings in rural and urban areas so that service users can view proposed scheme and discuss any issues.

2015 findings:

A pilot scheme was run before a full 'roll-out' took place. No further information about the scheme available. However, they have just gone out to Tender for an LED contract which may affect current policy.

Hampshire

2012 findings:

There is a dedicated PFI website on street lighting where comments from service users are welcomed. Day-long meetings/roadshows were held with service users in different districts regarding proposed changes, and the details of these are published on the website.

2015 findings:

The website doesn't suggest they are turning lights off and are working towards a more energy efficient system where all lights will be dimmed (up to 50%)?. There is a set of FAQs on website.

Nottinghamshire

2012 findings:

It has published proposals online and provided a period of consultation on each through parish and district councils before any final decision is made.

2015 findings:

Can't find any information about the consultation in 2012 on the website. Originally a trial was undertaken; As of September 2013 (due to public demand and concern over safety/ vulnerable residents) streetlights in Nottinghamshire have been turned back on, with all plans to continue the 'turnoff' cancelled. Communities can now request to have their lights on or off provided the majority of the area is in agreement. Investment into LED lighting has made this possible but they are not consulting with the public about the changes to the 'new lights'.

Devon

2012 findings:

It has published FAQs online. It canvassed stakeholders at a County Council Tough Choices roadshow regarding the proposals prior to making final decisions, and invites service users to contact their local county councillor to share their comments or concerns.

2015 findings:

Devon County Council ran a public consultation with the final report produced on May 2014, alongside an Impact assessment (available to view online). The public consultation, which included Public Exhibitions and ran until 3 November 2013, was used to inform decisions about which other street lights to leave on all night, for example, on key walk home routes. A map showing which streets are included was provided. These proposals were displayed in various venues around Exeter, public meetings held, as well as people being able to comment online. Results cannot be found online although it states they will be shared.

'FAQs and links to contact your councillor are still available online, alongside policy documents. Also, positive feedback from residents are displayed'.

Oxfordshire

2012 findings:

It had intended to introduce part night lighting but in September 2011 decided not to giving the reason of energy companies decreasing charges for fuel. They considered that this meant they wouldn't make any savings financial savings by implementing the policy.

2015 findings:

Currently they do switch of some street lights at night in residential areas, this has been done 'where safe to do so, with Parish Council Approval'. However no additional information about this appears to be available.

KENT COUNTY COUNCIL
EQUALITY IMPACT ASSESSMENT

Directorate:
Enterprise and Environment.

Name of policy, procedure, project or service:
Street Lighting Policy agreed by POSC May 2010.
Project Name: Common Sense Management of Street Lighting Energy

What is being assessed?

The way the County Council can reduce Street Lighting energy costs.

The project is intended to reduce energy usage by street lights and consequently reduce the County Council's energy bill. By reducing the amount of energy consumed, the project will also help to reduce the Council's carbon footprint

The project will consider various options to achieve the above-mentioned targets, however, these will need to be balanced against the possible adverse effects of reducing the level of service.

The options that have been put forward are those that are estimated to pay back the initial investment in the shortest period. These are:

- Switching off some lights and removing them where they are no longer considered necessary
- Dimming of some lights on main roads between the hours of 10pm and 7am when traffic flows are low and a lower level of lighting will not affect road safety
- Switching off some lights between midnight GMT and 5.30am GMT in residential areas in consultation with key stakeholders and local communities (this option is referred to as part-night lighting).

What will be the affect on service users?

Switching off:

This will have little effect on service users since it will only be implemented where lighting is no longer considered necessary in rural areas and other locations where there are no houses fronting onto the roads. Site-specific risk assessments and consultations will be carried out.

Dimming:

A level of lighting appropriate to reduced traffic flows at night will be adopted and there should be no adverse effect on service users. The police and other key stakeholders will be involved in evaluating a dimming programme to establish an acceptable level of dimming.

Part-night lighting:

There is a common perception that implementing part-night lighting could lead to increases in road accidents, crime, antisocial behaviour and fear of crime.

Implementation of part night lighting by other Local Authorities, however has shown this not to be the case.

This risk will be minimised by applying exception criteria to exclude certain situations and by carrying out site-specific risk assessments and consulting the community on draft proposals.

Responsible Owner/ Senior Officer



Date of Initial Screening
1st May 2012



Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	Yes	Med	Low	The exception criteria recognise that the proposals could have a disproportionate adverse impact on elderly or vulnerable people, particularly in emergency situations such as ambulance call-out. For this reason all-night, lighting will be maintained in areas with sheltered housing and other residences accommodating vulnerable people. All-night, lighting will also be maintained in areas with 24hr operational emergency services sites including hospitals.	
Disability	Yes	Med	Low	The exception criteria recognise that the proposals could have a disproportionate adverse impact on those with a disability, particularly in emergency situations such as ambulance call-out. For this reason all-night lighting will be maintained in areas with sheltered housing and other residences accommodating vulnerable people. All-night, lighting will also be maintained in areas with 24hr operational emergency services sites including hospitals.	
Gender	No	None	None		
Gender identity	No	None	None		
Race	No	None	None		
Religion or belief	No	None	None		

Sexual orientation	No	None	None		
Pregnancy and maternity	No	None	None	Maternity: All-night, lighting will be maintained in areas with 24hr operational emergency services sites including hospitals.	
Marriage and Civil Partnerships	No	None	None		

Part 1: INITIAL SCREENING

Context

Explain how this policy, procedure, project or service relates to a wider strategy

Aims and Objectives

Provide a summary of what the policy, procedure, project or service is trying to achieve and how it will be achieved

Beneficiaries

Set out who the intended beneficiaries?

Consultation and data

Please record any data/research and/or consultation you have carried out to inform your screening

Potential Impact

Provide a summary of the results from your initial screening, highlighting where there is any potential positive or adverse impact. If there is no impact on any group or the impact is unknown please state that here.

Adverse Impact:

Positive Impact:

JUDGEMENT

Option 1 – Screening Sufficient YES/NO

Following this initial screening our judgement is that no further action is required.

Justification:

Option 2 – Internal Action Required YES/NO

There is potential for adverse impact on particular groups and we have found scope to improve the proposal

(Complete the Action Plan at the end of this document)

Option 3 – Full Impact Assessment YES/NO

A full impact assessment will need to be undertaken if:

- the policy, strategy or service is judged to be major because of high cost, or potential to affect a large number of residents of Kent

OR

- is identified as having a potential impact on any of the listed groups/ individuals with particular characteristics.

OR

- or the potential impacts of a policy, procedure, project or service on a particular group are unknown.

Equality and Diversity Team Comments

The Equality and Diversity Team to make any comments following their review.

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

Name:

Job Title:

Date:

DMT Member

Signed:

Name:

Job Title:

Date:

Part 2: FULL IMPACT ASSESSMENT

Name

Of the policy, procedure, project or service

Street Lighting Policy agreed by POSC May 2010.

Project Name: Common Sense Management of Street Lighting Energy

Responsible Owner/ Senior Officer:



Date of Full Equality Impact Assessment:

1st May 2012

Scope of the Assessment

Set out what the assessment is going to focus on, as directed by the findings from your initial screening

Process and criteria	Essential?	Barriers identified and groups affected
Communicate the positive outcomes of trials in other authorities initially, then add positive experience from sites in Kent as project rolls out. Seek support from police in monitoring and communicating outcomes	Yes	Fear of crime may increase in elderly or women.

Information and Data

State what information/data/research you have used to help you carry out your assessment

The project will be reducing the level of lighting throughout the county and this may lead to more vulnerable groups of people (such as the elderly) feeling more fearful of crime. However the evidence from other areas shows that these fears are ill-founded. Essex County Council recently finished a part-night lighting pilot involving about 6000 lights, which have been switched off from midnight to 5.30 am since April 2007. During this period, crime in the area has actually dropped slightly and traffic accidents have not increased. Fear of crime was measured by asking citizens if they felt safe after dark. The percentage of people who felt safe after dark in the pilot areas dropped after the part-night lighting was introduced (it dropped overall in Essex as well). However, it did recover a year after the pilot had been in place to a higher level than its starting point before the pilot started.

A similar story has emerged from a trial in Gloucestershire where lights in 3 parishes were successfully switched off between midnight to 5.30 am, and this approach is now being rolled out with the conversion of 7000 lights.

Monitoring of all sites in which lighting levels have been reduced will be carried out in conjunction with the emergency services, and lighting will be reinstated should this be necessary. The switch-off of lighting will be between midnight and 05.30 am when most people are indoors or in bed. As an additional measure, street lighting in areas of sheltered housing with elderly residents will remain on all night to give these residents a feeling of security.

It is hoped that positive evidence from the trials in Essex and Gloucestershire can be added to, by evidence from the sites in Leicestershire as the measures are rolled out. This will contribute to alleviating the increased fear of crime that some people may experience.

There may be slight adverse impact on disabled users (particularly partially sighted people) being able to access their properties by walking or mobility scooter in darkness. However, this is considered to be very unlikely due to the current levels of lighting being retained up to midnight.

The project will deliver significant benefits to the wider community in terms of reducing costs to taxpayers, reducing carbon emissions and reducing light pollution. These benefits outweigh the increase in fear of crime of some groups, which on the evidence available is unfounded, and is expected to reduce with time as the measures are shown to have no adverse impacts.

Involvement and Engagement

Provide details of all the involvement and engagement activity you have undertaken in carrying out this assessment and summarise the main findings

A communications strategy has been prepared aimed at achieving good two-way communications with the public, their democratic representatives, community groups and other stakeholders. As part of this plan feedback is encouraged both on the project in general and on specific draft proposals that will be published. The exception criteria, used as a basis for decision making, have been designed to minimise any disproportionate impact on protected groups. Final proposals will be determined by the project team after consideration of comments received during consultation and are confirmed by Cabinet.

Judgement

Set out below the implications you have found from your assessment for the relevant diversity groups. If any negative impacts can be justified please clearly explain why.

We have carefully considered and applied the exception criteria as part of the site-specific risk assessments.

The exception criteria are:

- On some main traffic routes.
- In town centres.
- Locations with a significant night-time traffic record between midnight and 05.30am.
- Areas identified by the Police as having an above average record of crime.
- Areas provided with CCTV local authority or Police surveillance equipment.
- Areas with sheltered housing and other residences accommodating vulnerable people.
- Areas with a 24hr operational emergency services site including hospitals and nursing homes.
- Formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night.
- Where road safety measures are in place in the highway, such as roundabouts, central carriageway islands, chicanes, speed humps, etc.

The above will ensure that the main concerns regarding part night lighting are addressed.

We will carry out consultations on draft proposals with local community groups and consider comments received before finalising proposals.

Action Plan

Provide details of how you are going to deal with the issues raised in judgement above and complete the Action plan at the end of this document

We will carry out consultations on draft proposals with local community groups and consider comments received before finalising proposals.

Monitoring and Review

Provide details of how you intend to monitor and review progress against the above actions

We will monitor impacts following implementation of energy saving measures and carry out post-implementation review after, six months.

We will be prepared to modify or fine-tune the measures taken to mitigate adverse impacts.

Equality and Diversity Team Comments

The Equality and Diversity Team to make any comments following their review.

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

Name:

Job Title:

Date:

DMT Member

Signed:

Name:

Job Title:

Date:

Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
All	Ensure that fear of crime does not increase as a result of the project	Communicate the positive outcomes regarding crime in other counties initially. Seek support from police in monitoring and communicating outcomes	Fear of crime in most vulnerable groups does not increase in future			
All	Ensure that relevant equality data & info is available to support the decision making process	Carry out detailed analysis of future customer satisfaction surveys/research	To ensure that current level of information is fully understood and any perceived inequalities are addressed			

**KENT COUNTY COUNCIL
EQUALITY IMPACT ASSESSMENT**

Please read the EqIA GUIDANCE and the EqIA flow chart available on KNet.

**Directorate:
Enterprise and Environment.**

**Name of policy, procedure, project or service:
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Project Name: Common Sense Management of Street Lighting Energy**

What is being assessed?

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The project will consider various options to achieve the above-mentioned targets, however, these will need to be balanced against the possible adverse effects of reducing the level of service.

The options that have been put forward are those that are estimated to pay back the initial investment in the shortest period. These are:

- Switching off some lights and removing them where they are no longer considered necessary
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What will be the affect on service users?

Switching off:

This will have little effect on service users since it will only be implemented where lighting is no longer considered necessary in rural areas and other locations where there are no houses fronting onto the roads. Site-specific risk assessments and consultations will be carried out.

Dimming:

A level of lighting appropriate to reduced traffic flows at night will be adopted and there should be no adverse effect on service users. The police and other key stakeholders will be involved in evaluating a dimming programme to establish an acceptable level of dimming.

Part-night lighting:

There is a common perception that implementing part-night lighting could lead to increases in road accidents, crime, antisocial behaviour and fear of crime. Implementation of part night lighting by other Local Authorities, however has shown this not to be the case. This risk will be minimised by applying exception criteria to exclude certain situations and by carrying out site-specific risk assessments and consulting the community on draft proposals.

Responsible Owner/ Senior Officer



Date of Initial Screening

1st May 2012



Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
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Age	Yes	Med	Low	The exception criteria recognise that the proposals could have a disproportionate adverse impact on elderly or vulnerable people, particularly in emergency situations such as ambulance call-out. For this reason all-night, lighting will be maintained in areas with sheltered housing and other residences accommodating vulnerable people. All-night, lighting will also be maintained in areas with 24hr operational emergency services sites including hospitals.	
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Gender	No	None	None		
Gender identity	No	None	None		
Race	No	None	None		
Religion or belief	No	None	None		

Sexual orientation	No	None	None		
Pregnancy and maternity	No	None	None	Maternity: All-night, lighting will be maintained in areas with 24hr operational emergency services sites including hospitals.	
Marriage and Civil Partnerships	No	None	None		

Part 1: INITIAL SCREENING

N/A – Commenced at FULL IMPACT ASSESSMENT

Context

Aims and Objectives

Beneficiaries

Consultation and data

Potential Impact

Adverse Impact:

Positive Impact:

JUDGEMENT

Option 1 – Screening Sufficient YES/NO

Justification:

Option 2 – Internal Action Required YES/NO

Option 3 – Full Impact Assessment

YES

Equality and Diversity Team Comments

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

Name:

Job Title:

Date:

DMT Member

Signed:

Name:

Job Title:

Date:

Part 2: FULL IMPACT ASSESSMENT

Name

Street Lighting Policy agreed by POSC May 2010.

Project Name: Common Sense Management of Street Lighting Energy

Responsible Owner/ Senior Officer:



Date of Full Equality Impact Assessment:

1st May 2012

Scope of the Assessment

Process and criteria	Essential?	Barriers identified and groups affected
Communicate the positive outcomes of trials in other authorities initially, then add positive experience from sites in Kent as project rolls out. Seek support from police in monitoring and communicating outcomes	Yes	Fear of crime may increase in elderly or women.

Information and Data

The project will be reducing the level of lighting throughout the county and this may lead to more vulnerable groups of people (such as the elderly) feeling more fearful of crime. However the evidence from other areas shows that these fears are ill-founded. Essex County Council recently finished a part-night lighting pilot involving about 6000 lights, which have been switched off from midnight to 5.30 am since April 2007. During this period, crime in the area has actually dropped slightly and traffic accidents have not increased. Fear of crime was measured by asking citizens if they felt safe after dark. The percentage of people who felt safe after dark in the pilot areas dropped after the part-night lighting was introduced (it dropped overall in Essex as well). However, it did recover a year after the pilot had been in place to a higher level than its starting point before the pilot started.

A similar story has emerged from a trial in Gloucestershire where lights in 3 parishes were successfully switched off between midnight to 5.30 am, and this approach is now being rolled out with the conversion of 7000 lights.

Monitoring of all sites in which lighting levels have been reduced will be carried out in conjunction with the emergency services, and lighting will be reinstated should this be necessary. The switch-off of lighting will be between midnight and 05.30 am when most people are indoors or in bed. As an additional measure, street lighting in areas of sheltered housing with elderly residents will remain on all night to give these residents a feeling of security.

It is hoped that positive evidence from the trials in Essex and Gloucestershire can be added to, by evidence from the sites in Leicestershire as the measures are rolled out. This will contribute to alleviating the increased fear of crime that some people may experience.

There may be slight adverse impact on disabled users (particularly partially sighted people) being able to access their properties by walking or mobility scooter in darkness. However, this is considered to be very unlikely due to the current levels of lighting being retained up to midnight.

The project will deliver significant benefits to the wider community in terms of reducing costs to taxpayers, reducing carbon emissions and reducing light pollution. These benefits outweigh the increase in fear of crime of some groups, which on the evidence available is unfounded, and is expected to reduce with time as the measures are shown to have no adverse impacts.

Involvement and Engagement

A communications strategy has been prepared aimed at achieving good two-way communications with the public, their democratic representatives, community groups and other stakeholders. As part of this plan feedback is encouraged both on the project in general and on specific draft proposals that will be published. The exception criteria, used as a basis for decision making, have been designed to minimise any disproportionate impact on protected groups. Final proposals will be determined by the project team after consideration of comments received during consultation and are confirmed by Cabinet.

Judgement

We have carefully considered and applied the exception criteria as part of the site-specific risk assessments.

The exception criteria are:

- On some main traffic routes.
- In town centres.
- Locations with a significant night-time traffic record between midnight and 05.30am.
- Areas identified by the Police as having an above average record of crime.
- Areas provided with CCTV local authority or Police surveillance equipment.

- Areas with sheltered housing and other residences accommodating vulnerable people.
- Areas with a 24hr operational emergency services site including hospitals and nursing homes.
- Formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night.
- Where road safety measures are on place in the highway, such as roundabouts, central carriageways islands, chicanes, speed humps, etc.

The above will ensure that the main concerns regarding part night lighting are addressed.

We will carry out consultations on draft proposals with local community groups and consider comments received before finalising proposals.

Action Plan

We will carry out consultations on draft proposals with local community groups and consider comments received before finalising proposals.

Monitoring and Review

We will monitor impacts following implementation of energy saving measures and carry out post-implementation review after, six months.

We will be prepared to modify or fine-tune the measures taken to mitigate adverse impacts.

Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
All	Ensure that fear of crime does not increase as a result of the project	Communicate the positive outcomes regarding crime in other counties initially. Seek support from police in monitoring and communicating outcomes	Fear of crime in most vulnerable groups does not increase in future			
All	Ensure that relevant equality data & info is available to support the decision making process	Carry out detailed analysis of future customer satisfaction surveys/research	To ensure that current level of information is fully understood and any perceived inequalities are addressed			

Appendix E- Street Lighting Strategy Review- Dover District Council

Safe and Sensible Street Lighting Project - Review of Trial Switch-Off – Dover District

Date of Review: January 2015

Sites originally proposed for inclusion in the trial switch-off but subsequently withdrawn:

East Kent Access Location B

East Kent Access Location C

A256 By-Pass – Right Turn Lane Venson

A256 By-Pass – Right Turn Lane Tilmanstone

A256 By-Pass – Right Turn Lane Eythorne

Sites originally proposed for inclusion in the trial switch-off but subsequently modified to part-night lighting:

East Kent Access Location A – Sandwich by-pass (22 lights)

East Kent Access Location D – Monks Way (23 lights)

East Kent Access Location E – Ramsgate Road (56 lights)

East Kent Access South – Ramsgate Road (6 lights)

Site location	Whitfield Hill	Remarks
No. of lights switched off	31	-
No. of lights converted to part night	0	-
Lights switched off/ converted (DATE)	22/08/2013	-
Police: crime and anti-social behaviour issues Period: August 2013 - December 2014	19/12/13 - Theft from Motor Vehicle (Lorry in Layby) 03.00.	-
Police remarks	<p>Lack of street lighting could have contributed to the crimes but this has not been highlighted as a major contributory factor.</p> <p>The theft from M/V on Whitfield Hill was against a lorry in the layby overnight, the theft in Ash was against unsecure flats which were under construction near the junction.</p>	Trial switch off has not had an adverse impact.
Crashes	SLIGHT - 23.00 DARK . WET. Single vehicle lost control. SLIGHT - 16.40 LIGHT. DRY. V1 hit rear of V2.	Not lighting related.
Traffic Schemes remarks	<p>This section of road historically has had a poor safety record with emergency run-off lanes for larger vehicles going downhill.</p> <p>Permanent switch-off should be approached with extreme caution and maybe part-time lighting would be a better option.</p>	<p>Comments noted: this was considered prior to the switch-off.</p> <p>The trial has not shown that this is a hazardous site.</p>

<p>Enquiries received following implementation (site specific)</p>	<p>2/9/13 Reporter enquiring about trial in response to local resident concerned about highway safety.</p> <p>9/9/13 Resident. Supportive but concerned about visibility of escape lane.</p> <p>9/9/13 Resident concerned about safety of pedestrians using footway, feels lights should be on until at least 11 pm.</p> <p>9/9/13 Resident concerned about busy road and lack of lighting, would be satisfied with part-night lighting.</p> <p>Other representations made at this time by local Members.</p> <p>10/9/13 Resident concerned about visibility of verge, sharp bend and escape lane. Red reflectors distracting.</p> <p>11/9/13 Resident concerned that lights are not working and that area near escape lane is dangerous. Noted pedestrians using torches.</p> <p>13/9/13 District Councillor on behalf of several concerned residents who had understood lights would be off between midnight and 5.30 am.</p> <p>1/10/13 Resident and child had to use footway at 11:30 pm following car breakdown; fell and sprained ankle due to uneven surface and lack of lighting., also concerned by volume and speed of traffic.</p> <p>11/10/13 Resident who regularly drives this road</p>	<p>Concentration of enquiries in the early months, but since then far fewer enquiries have been received, indicating perhaps that residents are largely accepting of the change.</p>
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	<p>commenting that the lack of light was difficult at first but that the reflective strips help, and they now find the lack of light manageable.</p> <p>23/12/13 Residents concerned that the trial switch-off has not taken into consideration the number of vehicles and pedestrians using Whitfield Hill or its history of crashes and suggesting the lights should be switched back on for safety reasons.</p> <p>23/1/14 Resident perplexed that lights on Whitfield Hill have been switched off when some nearby are on day and night - advised the latter are Dover DC lights awaiting repair.</p> <p>22/4/14 Resident enquiring about the trial switch-off.</p> <p>17/11/14 Resident reporting lights not working - advised of trial switch-off, but feels it is dangerous.</p> <p>6/1/15 Resident who cycles along Whitfield Hill regularly concerned about safety.</p> <p>9/1/15 Resident enquiring about the trial switch-off.</p>	
Street Lighting	Structural assessment: 3 nr. columns scheduled for re-testing/possible replacement by 2016; 28 nr. in acceptable condition, scheduled for re-testing in 2019.	The majority of columns are in good condition.
Highway Operations	No issues raised.	-
Developments	No issues raised.	-

Other relevant issues	None.			-			
Conclusion	The trial switch-off has had an adverse effect			The trial switch-off has not had an adverse effect			✓
Points to be taken into consideration	Severity of adverse effects Political sensitivity			Potential developments/improvements Condition of columns Do the part-night exclusion criteria apply?			
Remarks				This road is a major road and would have been excluded from the part-night conversions. It has very few conflict areas within the area of switch-off, which might suggest the lights are suitable for removal. However, given the concerns expressed by the traffic engineer and by local residents, and the fact that the columns are not due for imminent replacement, my recommendation would be to continue the trial with a view to replacing the lights with LED in due course.			
Recommendation	Switch back on immediately		Continue trial – replace with LED in due course		Continue trial – replace with LED in due course	✓	Remove columns

Site location	A257 Ash By-Pass - Sandwich Road	Remarks
No. of lights switched off	28	-
No. of lights converted to part night	0	-
Lights switched off/ converted (DATE)	23/08/2013	-
Police: crime and anti-social behaviour issues Period: August 2013 - December 2014	18/1/14 - Theft from property 03.00.	-
Police remarks	Lack of street lighting could have contributed to the crimes but this has not been highlighted as a major contributory factor.	Noted.
Crashes	SLIGHT - 09.11 LIGHT.DRY. V2 pulled out into path V1.	No night time (dark) crashes.
Traffic Schemes remarks	Lights have been retained at junctions along the A256 and also at the A257/Guilton junction, so it is not clear why a different approach should have been taken at these junctions.	Comments noted: junctions along the A256 were originally proposed for inclusion in the trial switch-off but were withdrawn in response to political sensitivities.
Enquiries received following implementation (site specific)	13/1/14 Resident concerned that bus no longer goes into Ash village but sets passengers down on by-pass where lights are switched off - advised to contact bus company.	-
Street Lighting	Structural assessment: all columns in acceptable condition, scheduled for re-testing in 2019.	-
Highway Operations	No issues raised.	-

Developments	No issues raised.			-			
Other relevant issues	None.			-			
Conclusion	The trial switch-off has had an adverse effect			The trial switch-off has not had an adverse effect			<input checked="" type="checkbox"/>
Points to be taken into consideration	Severity of adverse effects Political sensitivity			Potential developments/improvements Condition of columns Do the part-night exclusion criteria apply?			
Remarks				This road is a major road and would have been excluded from the part-night conversions. Given this, the fact that the junctions may be regarded as conflict areas, and the fact that the columns are not due for imminent replacement, my recommendation would be to continue the trial with a view to replacing the lights with LED in due course.			
Recommendation	Switch back on immediately		Continue trial – replace with LED in due course		Continue trial – replace with LED in due course	<input checked="" type="checkbox"/>	Remove columns

Site location	Betteshanger Road	Remarks
No. of lights switched off	24	-
No. of lights converted to part night	0	-
Lights switched off/ converted (DATE)	22/08/2013	-
Police: crime and anti-social behaviour issues Period: August 2013 - December 2014	None reported.	-
Police remarks	None.	-
Crashes	None reported.	-
Traffic Schemes remarks	Hadlow College are intending to move in to Betteshanger Business Park, so It may be advisable to just retain temporary switch off, rather than permanent column removal.	Comment noted.
Enquiries received following implementation (site specific)	None received.	-
Street Lighting	Structural assessment: all columns in acceptable condition, scheduled for re-testing in 2019.	-
Highway Operations	No issues raised.	-

Developments	No issues raised.			-				
Other relevant issues	None.			-				
Conclusion	The trial switch-off has had an adverse effect			The trial switch-off has not had an adverse effect		✓		
Points to be taken into consideration	Severity of adverse effects Political sensitivity			Potential developments/improvements Condition of columns Do the part-night exclusion criteria apply?				
Remarks				As a minor road, this road would not have been excluded from part-night lighting. However, the arrival of Hadlow College will potentially increase the number of motor vehicle, cyclist and pedestrian movements in this area, and taking into account the fact that the columns are not due for imminent replacement, my recommendation would be to continue the trial with a view to replacing the lights with LED in due course.				
Recommendation	Switch back on immediately		Continue trial – replace with LED in due course		Continue trial – replace with LED in due course	✓	Remove columns	

Site location	Folkestone Road, Farthingloe	Remarks
No. of lights switched off	61	-
No. of lights converted to part night	0	-
Lights switched off/ converted (DATE)	23/08/2013	-
Police: crime and anti-social behaviour issues Period: August 2013 - December 2014	10/5/14 - Burglary from dwelling 00.00. 11/3/14 - Burglary Other 21.00.	-
Police remarks	Lack of street lighting could have contributed to the crimes but this has not been highlighted as a major contributory factor.	Noted.
Crashes	SERIOUS 23.10. DARK . WET. Foreign vehicle assumed Dual Carriageway, drove on wrong side of road.	Confirmation from police separately that absence of lighting not a contributory factor.
Traffic Schemes remarks	There is an on carriageway cycle lane within the 40mph limit. It is very possible that the Safety Audit for the original cycle scheme depended on the presence of street lighting, and so the removal of lighting would need a similar such sign-off from an accredited safety audit assessment team.	Comments noted: of the lights included in the trial, 6 nr. are close to the start of or within the 40mph speed limit. The remainder of the road has no cycle lane, and continues beyond the extents of the trial as an unlit road.
Enquiries received following implementation (site specific)	27/8/13 Resident concerned that lack of lighting is a hazard to highway users. 14/5/14 Police officer investigating crash (see above), requesting details of lighting in this area, which were provided. 21/11/14 local business (farm) concerned about	

	<p>increasing levels of fly-tipping, would prefer lights to be on or part-night. 19/12/14 MP on behalf of disabled resident whose car broke down in unlit area and who feels lack of lighting is dangerous and lights should be switched back on.</p>		
Street Lighting	<p>Structural assessment: 58 nr. columns likely to need replacement in around 2 years; 3 nr. in acceptable condition, scheduled for re-testing in 2019.</p> <p>Highway Operations: no issues raised.</p> <p>Developments: no issues raised.</p>	<p>The majority of these columns will need to be replaced in the near future, at a cost of around £1,500 per column, or £91,500 if all 61 columns were replaced.</p> <p>This would be reduced to a cost of around £1,000 per column, or £61,000 for all 61 columns - plus ongoing energy and maintenance savings - if the columns were removed and not replaced.</p>	
Highway Operations	No issues raised.		
Developments	No issues raised.		
Other relevant issues	None.		
Conclusion	The trial switch-off has had an adverse effect	The trial switch-off has not had an adverse effect	✓
Points to be taken into consideration	<p>Severity of adverse effects</p> <p>Political sensitivity</p>	<p>Potential developments/improvements</p> <p>Condition of columns</p> <p>Do the part-night exclusion criteria apply?</p>	
Remarks		<p>This road is a major road and would have been excluded from the part-night conversions; however, there is no requirement to provide lighting on major roads, and the area immediately south-west of the trial site is of similar character and is unlit.</p> <p>Taking into account both the traffic engineer's observations and the potential savings to be achieved</p>	

					<p>by not replacing columns which are near the end of their life, my recommendation would be to</p> <p>(a) retain the 6 nr. columns within or at the entrance to the 40 mph speed limit, and</p> <p>(b) remove the remaining 55 nr. columns.</p> <p>This would achieve savings of around £27,500 plus ongoing energy and maintenance savings.</p>			
Recommendation	Switch back on immediately		Continue trial – replace with LED in due course		Continue trial – replace with LED in due course	✓	Remove columns	✓

Appendix F (i)- Street Lighting Strategy Consultation Responses (Kent Police)- September 2013



**Kent
Police**

Protecting and serving the people of Kent

**Rob Price
Assistant Chief Constable
(Local Policing and Partnerships)**



Kent County Council
Invicta House
County Hall
Maidstone
Kent ME14 1XX

Direct Line: 01622 652656

Fax: 01622 652009

E-mail: acclpp@kent.pnn.police.uk

Date: 9 September 2013

Ref: RB/TS

Dear [REDACTED]

Street Lighting – Full switch off and part lighting project by KCC

I am aware the Chief Constable agreed that Kent Police would provide information, advice and guidance to you on your project to move to a programme of "part lighting" and in some locations full switch off of your road/street lighting stock. [REDACTED] has updated me on how the project is developing.

As you are aware, Kent Police cannot support the reduction of street lighting as it is proven to support reductions in crime (as per the College of Policing Reference material we have already provided). However, Kent Police recognises the reasons that this project is underway. Kent Police also recognises the careful and considered approach that KCC has taken in this project. We are grateful that you have consulted Kent Police. It is an example of our excellent partnership working which we have enjoyed over many years.

Kent Police welcome the exclusion criteria that KCC have set for where the lights will remain "full night lighting". We think that the exclusion criteria are a correct and considered approach which removes our concerns in a number of key geographic areas which will not be affected by the project as they fall within the criteria.

Kent Police have reviewed crime and disorder data across all of the Districts in Kent impacted upon by the project and have already provided advice and guidance on those locations where you intend that lighting will be "turned off" (accepting that the columns will not be removed at this time). In addition we have provided (non-personal) data for a 12 month period to assist KCC in their decision making on part lighting.

We request that KCC do not move to "part lighting" on those roads where there have been [REDACTED] or more crimes or [REDACTED] or more incidents of ASB within that 12 month period. It could well be that these roads are already within your exclusion criteria anyhow. This number was chosen as it is in line with what other Force areas in the country have set when looking at similar projects. We strongly emphasise that this numerical issue does not imply that any number below that is an acceptable level of crime. Rather, it identifies higher crime locations where we would be particularly concerned if the preventative benefits of lighting were reduced.

Kent Police headquarters Sutton Road, Maidstone, Kent ME15 9BZ
Tel: 101 Fax: 01622 654109 www.kent.police.uk

This is available in
large print on request

We have discussed with you situations where diverse groups may be disproportionately affected by this project. We understand that you are comfortable that your public consultation has achieved a range of views across communities who live in Kent. Kent Police, supported by information provided via the Kent Independent Police Advisory Group have advised you that some groups relating to faith, age and race could be disproportionately affected. Some faith groups (Muslim and Sikh in particular) have early morning opening of their places of worship which see increased volumes of people who will notice the removal of lighting.

In addition, "part night" workers generally linked to the night-time economy (a number of whom are from minority ethnic communities) could notice the changes. It is recognised that those workers may be in establishments already within the exclusion criteria you have set. A similar situation could be found in locations where there are a concentration of students who are socialising or studying late into the night (for example young people in Canterbury around the universities and colleges).

We recognise from the College of Policing study that it was difficult to draw any conclusion on the impact of effective street lighting on violent crime. However, Kent Police and KCC are both in agreement that violent crime is a priority and it is something that we need to look at in further detail. As a result I have asked if we can review violent crime specifically to ascertain if there are any particular geographic areas of concern. We will pass that information to you in the near future.

We welcome your research into other forms of "smart lighting" which may replace the current lighting stock and achieve your cost savings. If we can support you in that research please let me know.

Finally, I can confirm that we can help you run a post implementation review of crime and disorder (at a time to be agreed). We will, of course, notify you immediately of any key concerns that occur in the interim. We will review as agreed within four weeks of the full lighting switch off at areas in the Dover pilot area.

Yours sincerely

Rob Price
Assistant Chief Constable
(Local Policing and Partnerships)

Appendix F (ii)- Street Lighting Strategy Consultation Responses (Kent Police)- June 2014



**Kent
Police**

Protecting and serving the people of Kent

**Rob Price
Assistant Chief Constable
(Local Policing and Partnerships)**

Direct Line: 01622 652656

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E-mail: accpp@kent.pnn.police.uk

Date: 6 June 2014

Ref: RB/TS/LR

[Redacted]
Kent County Council
Invicta House
County Hall
Maidstone
Kent ME14 1XX

Dear [Redacted]

Street Lighting – Project by KCC

I am aware that you are now 6 months into the rollout of the part night phase of your street lighting project and that KCC has been having regular meetings with [Redacted] and [Redacted] team. We are grateful that you continue to consult with us. I understand that KCC have received a number of contacts from members of the public who are unhappy with the reduction in lighting. Kent Police have also received a number of calls direct from members of the public who are concerned about the effect of the reduction of street lighting is having on crime and disorder in their area. In the main, these relate to a fear in the increase of crime.

As per my letter to you in September 2013, you will be fully aware that Kent Police cannot support the reduction of street lighting as it is proven to support reductions in crime (as per the College of Policing Reference material we have already provided). I know that you are careful and considered in your extensive media and communications releases regarding this project. Could I ask that you ensure there is no implication in that messaging that the consultation you have had with Kent Police means that we agree to the reduction in street lighting within Kent. It remains that we fully understand why you are progressing this project.

As agreed, Kent Police continue to review and monitor crime and disorder data across all of the Districts in Kent. At this stage, it is too early to assess whether your lighting project is having an impact on reported crime and ASB. However, it is clear to Kent Police that this project certainly appears to be having an impact on the fear of crime within some of our communities.

Yours sincerely

**Rob Price
Assistant Chief Constable
(Local Policing and Partnerships)**

Kent Police headquarters Sutton Road, Maidstone, Kent ME15 9BZ
Tel: 101 Fax: 01622 654109 www.kent.police.uk

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large print on request**

Kent Police - Form No. 3354a rev 3/08 v5.1

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Appendix G- Street Lighting Strategy Exclusion Criteria

Safe & Sensible Street Lighting - Consultation Breakdown

Published criteria questions: We are using a set of Criteria questions to select which lights should not be switched off during these times. Do you agree with the following criteria that would define where lights would not be switched off.

	Yes	No	Declined to answer
Question One: Main routes and locations with a significant night-time traffic record between 12 midnight and 5:30am (1am and 6.30am during British Standard Summer Time)	370	116	60
Question Two: Town Centres	376	110	60
Question Three: Areas identified by the Police as having an existing record of crime or having the potential for increased crime levels if the street lighting is changed	417	71	58
Question Four: Areas with sheltered housing and other residences accommodating vulnerable people	373	115	58
Question Five: Areas with operational emergency services site including hospitals and nursing homes	415	71	60
Question Six: Formal pedestrian crossing, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night	407	75	64
Question Seven: Where road safety measures are in place in the highway, such as roundabouts, central carriageways islands, chicanes, speed humps etc	371	103	72
Question Eight: Roads that have local authority CCTV or Police surveillance equipment	387	100	59
Question Nine: Sites with existing or with potential road safety concerns	389	89	68
What other criteria do you think we should include? (The following comments were received)	Total	% of the total comments received (546) rounded up to nearest whole/half %	
Signs/Traffic signals should be turned off at these times:	5	1%	
Lighting around shopping/commercial areas should be turned off:	8	1.50%	
Busy roads/lorry heavy roads should be left on:	4	0.70%	
Weather conditions must be taken into consideration:	10	2%	
School bus routes/area around schools should be left on later in winter:	6	1%	
Areas around public transport trains/buses should be left on especially for shift workers/people home from nights out:	31	6%	
Paths/cycles ways should have lights remain on:	7	1.30%	
Lighting should not be turned off around hospitals and/or other emergency services:	6	1%	

Appendix H - Street Lighting Reversal Requests (As approved by Cabinet Member, David Brazier)

Site Name	Location	Reason for switch	Date of order
Abbey Drive	Joydens Wood, Dartford	Error (Exclusion Criteria)	
Abbey Way	North Willesborough, Ashford	Error (Exclusion Criteria)	
Albert Road	Swanscombe & Greenhithe, Ashford	Error (Exclusion Criteria)	
Albion Road	Birchington	Error (Exclusion Criteria)	
Alma Street Passage	Sheerness East, Swale	Error (Exclusion Criteria)	
Alton Avenue	Kings Hill, Tonbridge & Malling	Error (Exclusion Criteria)	
Anivil Terrace	Joyce Green, Dartford	Error (Exclusion Criteria)	
Barton Road	Barton, Canterbury	Error (Exclusion Criteria)	
Beatrice Gardens	Coldharbour, Gravesham	Error (Exclusion Criteria)	
Birch Road	Wincheap, Canterbury	Error (Exclusion Criteria)	
Bradbourne Lane	Ditton, Tonbridge & Malling	Error (Exclusion Criteria)	
Brandon Road	Newington, Thanet	Error (Exclusion Criteria)	
Braunstone Drive	Allington, Maidstone	Error (Exclusion Criteria)	
Bridgeside	Deal	Error (Exclusion Criteria)	
Brook Street	Tonbridge, Tonbridge & Malling	Error (Exclusion Criteria)	
Brooke Avenue	Garlinge, Thanet	Error (Exclusion Criteria)	
Cavell Square	Deal	Error (Exclusion Criteria)	
Charlock Close	Allington, Maidstone	Error (Exclusion Criteria)	
Church Court Grove	St Peters	Error (Exclusion Criteria)	
Clivenden Close	Allington, Maidstone	Error (Exclusion Criteria)	
Clyde Street	Sheerness, Swale	Error (Exclusion Criteria)	
Cobbetts Way	Edenbridge S&W, Sevenoaks	Error (Exclusion Criteria)	
Collins Road	Herne Bay	Error (Exclusion Criteria)	

Coombfield Drive	Bean & Darenth	Error (Exclusion Criteria)	
Cornwall Road	Joyce Green, Dartford	Error (Exclusion Criteria)	
Dark Hill	Faversham, Swale	Error (Exclusion Criteria)	
Dean Road	Sittingbourne	Error (Exclusion Criteria)	
Downsview Road	Sevenoaks Kippington, Sevenoaks	Error (Exclusion Criteria)	
Eclipse Drive	Sittingbourne, Swale	Error (Exclusion Criteria)	
Fulham Road	Margate	Error (Exclusion Criteria)	
Great Brooms Road	Southborough & High Brooms, Tunbridge Wells	Error (Exclusion Criteria)	
Green Lane	Paddock Wood East	Error (Exclusion Criteria)	
Hereford Road	Shepway South, Maidstone	Error (Exclusion Criteria)	
James Street	Sheerness, Swale	Error (Exclusion Criteria)	
John Newington Close	Little Burton Farm, Ashford	Error (Exclusion Criteria)	
Kimberly Road	Ramsgate	Error (Exclusion Criteria)	
Lambourne Drive	Kings Hill, Tonbridge & Malling	Error (Exclusion Criteria)	
Lydbrook Close	Grove, Swale	Error (Exclusion Criteria)	
Marsh Street	Dartford	Error (Exclusion Criteria)	
Marsh Street North	Dartford	Error (Exclusion Criteria)	
Middletune Avenue	Milton Regis, Sittingbourne	Error (Exclusion Criteria)	
Milbourne Grove	Milton Regis, Sittingbourne	Error (Exclusion Criteria)	
Monastary Avenue	Dover	Error (Exclusion Criteria)	
Mount Road	Barton, Canterbury	Error (Exclusion Criteria)	
Nunnery Road	Canterbury	Error (Exclusion Criteria)	
Orchard Avenue	Aylesford, Tonbridge & Malling	Error (Exclusion Criteria)	
Osprey Court	Sittingbourne	Error (Exclusion Criteria)	
Oswald Road	St. Radigunds, Dover	Error (Exclusion Criteria)	
Park Avenue	Broadstairs	Error (Exclusion Criteria)	
Park Drive	Woodstock, Swale	Error (Exclusion Criteria)	

Pilgrims Way	Barton, Canterbury	Error (Exclusion Criteria)	
Prospect Road	Birchington	Error (Exclusion Criteria)	
Quarry Road	Tunbridge Wells	Error (Exclusion Criteria)	
Quetta Road	Ramsgate	Error (Exclusion Criteria)	
Riversdale Road	Ramsgate	Error (Exclusion Criteria)	
Rockstone Way	Ramsgate	Error (Exclusion Criteria)	
Rolfe Lane	New Romney Town, Shepway	Error (Exclusion Criteria)	
Shaftesbury Avenue	Folkestone Chertiton, Shepway	Error (Exclusion Criteria)	
Sir John Moore Avenue	Hythe Central, Shepway	Error (Exclusion Criteria)	
Sonora Way	Sittingbourne	Error (Exclusion Criteria)	
Springwood Drive	Godinton, Ashford	Error (Exclusion Criteria)	
Sun Road	Swanscombe, Dartford	Error (Exclusion Criteria)	
Sweetbriar Lane	Eythorne & Shepherdswell	Error (Exclusion Criteria)	
Taylor Row	Wilmington, Dartford	Error (Exclusion Criteria)	
Trevelyan Close	Joyce Green, Dartford	Error (Exclusion Criteria)	
Tudor Farm Close	Weald East, Ashford	Error (Exclusion Criteria)	
Vine Lands/Copperfields	Lydd, Shepway	Error (Exclusion Criteria)	
Westfield Road	Birchington	Error (Exclusion Criteria)	
Weyburn Drive	Ramsgate	Error (Exclusion Criteria)	
Willetts Hill	Monkton	Error (Exclusion Criteria)	
Willow Farm Way	Canterbury	Error (Exclusion Criteria)	
Windmill Road	Sittingbourne	Error (Exclusion Criteria)	
Wood Lane	Bean & Darent	Error (Exclusion Criteria)	
Woodbury Road	Blue Bell Hill & Walderslade, Tonbridge & Malling	Error (Exclusion Criteria)	
Castle Street	Burham, Tonbridge & Malling	Error (Non-KCC columns)	
Ferry Lane	Burham, Tonbridge & Malling	Error (Non-KCC columns)	
Knowle Road	Burham, Eccles & Wouldham, Tonbridge & Malling	Error (Non-KCC columns)	

Manley Boulevard	Snodland West, Tonbridge & Malling	Error (Non-KCC columns)	
Mill St/High St	Snodland East, Tonbridge & Malling	Error (Non-KCC columns)	
Portland Road	Burham, Tonbridge & Malling	Error (Non-KCC columns)	
Cecil Avenue	Sheerness	Cabinet Member decision	13/01/2015
Charnock	Swanley, Sevenoaks	Cabinet Member decision	20/02/2015
Cromwell Road	Sheerness	Cabinet Member decision	13/01/2015
Granville Place	Sheerness	Cabinet Member decision	13/01/2015
Harris Road	Sheerness	Cabinet Member decision	13/01/2015
Mascalls Park	Paddock Wood East	Cabinet Member decision	14/01/2015
Whiteway Road	Queenborough	Cabinet Member decision	13/01/2015, 14/01/2015
Wisteria Gardens	Swanley, Sevenoaks	Cabinet Member decision	18/12/2014
The Warren	Gravesend, Gravesham	Cabinet Member decision	05/12/2014
Keary Road	Swanscombe, Dartford		