

EQUALITY IMPACT ASSESSMENT

REVIEW OF STREET LIGHTING OPTIONS

September 2015

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KENT COUNTY COUNCIL

EQUALITY IMPACT ASSESSMENT

Directorate:

Growth, Environment and Transport

Name of policy, procedure, project or service:

Review of Street Lighting Options

What is being assessed?

Kent County Council are looking to replace all of its street light lanterns with Light Emitting Diode (LED) technology and control these remotely using a Central Management System (CMS).

The CMS coupled with LED technology will allow individual street lights or groups of street lights to be turned off or on, dim the brightness of the light and also to monitor the amount of energy being used.

Once all of the street lights have been upgraded to LED technology and CMS has been installed, this will give Kent County Council greater flexibility in delivering its street lighting service and enable it to change its current street lighting policy (see Appendix A).

Kent County County will then have two options:

Option 1 - Continue with 'Part-Night Lighting' across Kent for lights that do not meet the exclusion criteria as detailed under '*Areas where street lighting has not been switched off*' (on page 12). This means Kent County Council owned street lights are switched off in selected areas between 12 midnight and 5.30am during winter, or 1am and 6.30am during summer.

Kent County Council also has an additional option of dimming the brightness of all selected street lights that are left switched on during late evenings/early mornings.

Option 2 – Have 'All-Night Lighting' across Kent, which means Kent County Council owned street lights are kept switched on all night long.

Kent County Council also has an additional option of dimming the brightness of all street lights in Kent that are switched on late evenings/through the night/early mornings.

This Equality Impact Assessment looks at the impact of Option 1 and Option 2 on Project Characteristics.

Responsible Owner/ Senior Officer

Roger Wilkin, Interim Director (Highways, Transportation & Waste)

Date of Initial Screening:

03/07/15

Date of Full EqIA:

A public consultation will take place between 21 September and 29 November 2015, asking the people of Kent their thoughts and views on Option 1 and Option 2.

This EqIA will then be updated once the public consultation has finished and the consultation results are available. The full impact assessment will take into account the analysis by Protected Characteristics.

The consultation results will then be reviewed by Kent County Council's Cabinet Committee and they will choose either Option 1 or Option 2 to shape a new Kent County Council street lighting policy which will replace its old one. Whichever Option is chosen will then be applied county-wide to all Kent County Council owned street lights.

Other EqIAs:

Once Cabinet Committee have reviewed the results of the consultation and a decision been made by them to go with either Option 1 or Option 2, their decision will then be used to inform the new street lighting policy.

A separate Equality Impact Assessment will need to be written on this new street lighting policy and any impact it will have on Protected Characteristics.

Record of changes to this Equality Impact Assessment

| Version | Author | Date | Comment |
|----------------|----------------------------|-------------|--|
| 2 | Iain Norman | 10/08/15 | First draft for review by Rob Clark and Akua Agyepong |
| 3 | Akua Agyepong | 27/08/15 | Comments made on first draft |
| 4 | Iain Norman | 08/09/15 | Revised version for review by Rob Clark following comments made by EqIA team |
| 5 | Akua Agyepong | 17/09/15 | Comments made on second draft |
| 6 | Iain Norman and Anne Wynde | 18/09/15 | Revised version for review by Rob Clark following comments made by EqIA team |

Initial Screening Assessment – Option 1: Part-Night Lighting i.e. Selected street lights are switched off between the hours of 12 midnight and 5.30am (Greenwich Mean Time) or 1am and 6.30am (British Summer Time), with additional options for those street lights left on to dim during late evenings/early mornings).

| Protected Characteristic | Could this policy, procedure, project or service, or any proposed changes to it, 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 | Internal action must be included in Action Plan | If yes you must provide detail |
| Age | Yes. Any impact from street lights being switched off or dimmed late at night will be in respect to mobility or where personal safety is an issue. | None | Low | a) No. Street lights will not be turned off at night outside of sheltered housing, other residences accommodating vulnerable people, formal pedestrian crossing, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night, or areas with a 24 hour operational emergency service such as hospitals and nursing homes. These locations were identified as part of the Part-Night Lighting project as being considered not suitable for part-night lighting (see 'Areas where street lights have not been switched off'). b) No | n/a |
| Gender | No | None | None | | |
| Gender identity | No | None | None | | |
| Race | No | None | None | | |

| | | | | | |
|--------------------|---|------|-----|--|-----|
| Disability | Yes. Any impact from street lights being switched off or dimmed late at night will be in respect to mobility or where personal safety is an issue . | None | Low | <p>a) No. Street lights will not be turned off at night outside of sheltered housing, other residences accommodating vulnerable people, formal pedestrian crossing, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night, or areas with a 24 hour operational emergency service such as hospitals and nursing homes (see '<i>Areas where street lights have not been switched off</i>').</p> <p>b) No</p> | n/a |
| Religion or belief | Yes. Those who use places of worship late at night where personal safety is an issue | None | Low | <p>a) Yes. Further information is required on whether or not 'Religion or belief' is seen as a Protected Characteristic that will be impacted upon disproportionality should street lights be turned off at places of worship late at night.</p> <p>b) Yes. If any location or area has been identified during the consultation (which once Option 1 or Option 2 has been chosen) which by turning off street lights at night has an impact on 'Religion or belief', then Kent County Council will need to carry out an assessment to identify who owns the street lighting in that area (i.e. whether the street lights are owned by Kent County Council, the local Parish or Town Council, Borough or District Council or privately owned). If the street light is Kent County Council owned, then places of worship could be considered to be added to the list of places outside which lights would not be turned off (see '<i>Areas where street lights have not been switched off</i>').</p> | n/a |

| | | | | | |
|---------------------------------|----|------|------|---|-----|
| Sexual orientation | No | None | None | | |
| Pregnancy and maternity | No | None | None | <p>a) No. Street lights will not be turned off at night outside of sheltered housing, other residences accommodating vulnerable people, formal pedestrian crossing, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night, or areas with a 24 hour operational emergency service such as hospitals and nursing homes (see '<i>Areas where street lights have not been switched off</i>').</p> <p>b) No</p> | n/a |
| Marriage and Civil Partnerships | No | None | None | | |
| Carer's responsibilities | No | None | None | <p>a) No. Street lights will not be turned off at night outside of sheltered housing, other residences accommodating vulnerable people, formal pedestrian crossing, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night, or areas with a 24 hour operational emergency service such as hospitals and nursing homes (see '<i>Areas where street lights have not been switched off</i>').</p> <p>b) No</p> | n/a |

| | | | | | |
|--|--|-------------|------------|---|------------|
| <p>All Protected Characteristic groups</p> | <p>Yes. There maybe locations or areas not currently identified where street lighting will not be switched on at night or dimmed, which may then impact on All Protected Characteristics.</p> <p>Any impact from street lights being switched off or dimmed late at night will be in respect to mobility or personal safety.</p> | <p>None</p> | <p>Low</p> | <p>a) Yes. Any locations or areas identified during the consultation which aren't currently on the list of places where street lights are kept on all night (see '<i>Areas where street lights have not been switched off</i>') or will have an impact through dimming, will need to be reviewed following a decision by Cabinet Committee to go with either Option 1 or Option 2.</p> <p>b) Yes. If any location or area has been identified during the consultation (which once Option 1 or Option 2 has been chosen) which by turning off street lights at night or dimming has an impact on all Protected Characteristics, then Kent County Council will need to carry out an assessment to identify who owns the street lighting in that area (i.e. whether the street lights are owned by Kent County Council, the local Parish or Town Council, Borough or District Council or privately owned). If the street light is Kent County Council owned, then these locations or areas could be considered to be added to the list of places outside which lights would not be turned off (see '<i>Areas where street lights have not been switched off</i>').</p> | <p>n/a</p> |
|--|--|-------------|------------|---|------------|

Initial Screening Assessment – Option 2: All-Night Lighting (with additional options for dimming during late evenings/early mornings).

| Protected Characteristic | Could this policy, procedure, project or service, or any proposed changes to it, 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 | Internal action must be included in Action Plan | If yes you must provide detail |
| Age | No | | | | |
| Disability | No | | | | |
| Gender | No | | | | |
| Gender identity | No | | | | |
| Race | No | | | | |
| Religion or belief | No | | | | |
| Sexual orientation | No | | | | |
| Pregnancy and maternity | No | | | | |
| Marriage and Civil Partnerships | No | | | | |
| Carer's responsibilities | No | | | | |

| | | | | | |
|--|--|-------------|------------|---|------------|
| <p>All Protected Characteristic groups</p> | <p>Yes. There maybe locations or areas not currently identified where dimming of street lighting late at night or early morning may have an impact on All Protected Characteristics.</p> <p>Any impact from street lights being dimmed late at night or early morning will be in respect to mobility or personal safety.</p> | <p>None</p> | <p>Low</p> | <p>c) Yes. Further information is required on whether or not 'All Protected Characteristics' will be impacted upon disproportionality should street lights be dimmed late at night. This information will come from the public consultation, specifically the analysis by Protect Characteristics.</p> <p>a) Yes. If a particular location or area has been identified during the consultation (which once Option 1 or Option 2 has been chosen) which by dimming street lights at night has an impact on all Protected Characteristics, then Kent County Council will need to carry out an assessment to identify who owns the street lighting in that area (i.e. whether the street lights are owned by Kent County Council, the local Parish or Town Council, Borough or District Council or privately owned). If the street light is Kent County Council owned, then these locations or areas could be considered as part of a list of places outside which street lights will not be dimmed.</p> | <p>n/a</p> |
|--|--|-------------|------------|---|------------|

Part 1: INITIAL SCREENING (August 2015)

Proportionality

| Low | Medium | High |
|---|--|---|
| Low relevance or Insufficient information / evidence to make a judgement. | Medium relevance or Insufficient information / evidence to make a Judgement. | High relevance to equality, / likely to have adverse impact on protected groups |

Option 1: Part-Night Lighting

(i.e. selected Kent County Council owned street lights are switched off between 12 midnight and 5.30am during winter, or 1am and 6.30am during summer, with the option to dim the brightness of those lights remaining switched on during late evenings/early mornings).

State rating & reasons

Based on the results from the initial screening assessment, the number of people potentially affected by Option 1: Part-Night Lighting will be more than 501. This gives a score of 4 on the Risk Rating Matrix.

Using the Risk Rating Matrix, a likelihood of 'Possible' and risk rating of 'Moderate Impact', combined with the score of 4 (for number of potential people affected) gives an overall score of 10 points which gives Option 1: Part-Night Lighting as having a 'Medium Impact'.

Option 2: All-Night Lighting

(i.e. all Kent County Council owned street lighting are kept switched on all night long, with the option to dim the brightness of these lights during late evenings/early mornings).

State rating & reasons

Based on the results from the initial screening assessment, the number of people potentially affected by Option 1: All-Night Lighting will be more than 501. This gives a score of 4 on the Risk Rating Matrix.

Using the Risk Rating Matrix, a likelihood of 'Unlikely' and risk rating of 'Minor Impact', combined with the score of 4 (for number of potential people affected) gives an overall score of 6 points which gives Option 1: Part-Night Lighting as having a 'Medium Impact'.

Context

Legal requirement by Kent County Council

Where street lighting is provided, Kent County Council is under a duty of care to ensure that it is maintained in accordance with all its legal obligations and that it adheres to professional guidance and good industry practice.

Kent County Council is required to maintain any street lighting it does provide in a safe condition for the benefit of the community it serves.

On the 1 April 1967, under the provisions of the Local Government Act 1966, Kent County Council assumed responsibility for the maintenance and operation of highway lighting throughout the County generally, including the provision of new installations.

District Councils also have the power to provide lighting as local lighting authority under the powers of the Public Health Act 1985.

Where District, Town or Parish Councils wish to provide lighting on a highway the consent of Kent County Council, as Highway Authority, is required.

The Highways Agency is the Highway Authority for road lighting on Trunk Roads and motorways, and will have its own policies and practices for the maintenance of those installations.

Introduction of Part-Night Lighting in 2013

Between December 2013 and autumn 2014, part-night lighting was introduced following extensive discussion, debate and a 3 month public consultation.

Approximately 60,000 street lights, which is about half of the lights Kent County Council own, now turn off for part of the night. These are located mainly in residential and minor roads.

This means that all Kent County Council owned street lights are switched off between 12 midnight and 5.30am during winter (GMT or Greenwich Mean Time) and between 1am and 6.30am during summer (BST or British Summer Time)

Some Parish and District Councils maintain their own lights and so these aren't included in the part-night lighting scheme.

If you would like to see whether the street lights in your street have part-night lighting you can do this using your post code via the online map at the following website link: [link to street lights map](#)

Areas where street lights have not been switched off

The following locations were considered not being suitable for part-night lighting and so the street lights have not been switched off at night time:

- Sites of potential road safety concerns
- On some main traffic routes
- Town centres
- Locations with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am summer time)
- Areas identified by the police
- Areas provided with local authority or police CCTV surveillance equipment
- Areas with sheltered housing and other residences accommodating vulnerable people
- Areas with a 24 hour 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 on the highway

(note: the word 'vulnerable' used in the above list is hard to define and depends really on each individuals particular circumstances in relation to part-night lighting).

Aims and Objectives

The aims and objectives of this street lighting project are to:

- ✓ Reduce energy consumption by around 60%
- ✓ Reduce carbon emissions by around 60%
- ✓ Reduce light pollution
- ✓ Make annual savings of around £5.2m (at today's prices)

The key steps to making this happen are:

1. Upgrade all of Kent County Councils current stock of 120,000 street lights to light emitting diode (LED) technology
2. Install a computerised Central Management System (CMS)
3. A public consultation on Option 1 (Part-Night Lighting) and Option 2 (All-Night Lighting) with additional options to dim the brightness of street lights lit late at night
4. A change in Kent County Council's current street lighting policy following Cabinet Committee's review of the public consultation results around Option 1 or Option 2
5. Put into action either Option 1 or Option 2 following Cabinet Committee's decision

Beneficiaries

Option 1: Part-Night Lighting

(i.e. selected Kent County Council owned street lights are switched off between 12 midnight and 5.30am during winter, or 1am and 6.30am during summer, with the option to dim the brightness of those lights remaining switched on during late evenings/early mornings).

The table below shows a list of benefits should Option 1 be chosen.

| Protected Characteristic | Benefits to Protected Characteristics if Option 1: Part-Night Lighting is chosen | Benefits to Protected Characteristics if Option 1: Part-Night Lighting is chosen, with additional options for dimming. |
|-------------------------------------|---|---|
| Age | None | None |
| Disability | None | None |
| Gender | None | None |
| Gender Identity | None | None |
| Race | None | None |
| Religion or belief | None | None |
| Sexual orientation | None | None |
| Pregnancy/maternity | None | None |
| Managing Civil Partnerships | None | None |
| Carers responsibilities | None | None |
| All Protected Characteristic groups | None | None |

Option 2: All-Night Lighting

(i.e. all Kent County Council owned street lighting are kept switched on all night long, with the option to dim the brightness of these lights during late evenings/early mornings).

The table below shows a list of benefits should Option 2 be chosen.

| Protected Characteristic | Benefits to Protected Characteristics if Option 2: All-Night Lighting is chosen | Benefits to Protected Characteristics if Option 2: All-Night Lighting is chosen, with additional options for dimming. |
|---------------------------------|--|--|
| Age | | |
| Disability | | |
| Gender | | |
| Gender Identity | | |

| | | |
|-------------------------------------|--|--|
| Race | | |
| Religion or belief | | |
| Sexual orientation | | |
| Pregnancy/maternity | | |
| Managing Civil Partnerships | | |
| Carers responsibilities | | |
| All Protected Characteristic groups | Roads, pavements, footpaths and access routes lit up late at night, meaning travelling through these areas is easier from a mobility point of view as well as a greater sense of personal safety in relation to crime. | Roads, pavements, footpaths and access routes are dimmed and so are partially lit up late at night, meaning travelling through these areas is easier from a mobility point of view as well as a greater sense of personal safety in relation to crime. |

Information and data

The people of Kent interact with street lighting we believe on a location-by-location basis. For example, elderly patients that live in the Tunbridge Wells region in most part generally use the Accident & Emergency Services at Pembury Hospital and interact with Kent County Council's street lighting at the entrance & exits to this hospital.

To help us understand how people generally interact with street lighting on a daily basis, we carried out a desktop exercise (see *Appendix B*). In this exercise; we looked at different locations and considered what times of the day those locations were approximately open until, so we have an idea of whether or not there's a potential for people visiting those locations late at night to be impacted on by part-night lighting/dimming.

We then carried out a second desktop exercise (see *Appendix C*). In our second desktop exercise, we looked at the same locations as the first exercise (as well as the times of the day those locations were approximately open until) then considered whether any of the 10 Protected Characteristics such as Age, Gender etc. were potentially affected by Option 1: Part-Night Lighting or Option 2: All-Night Lighting. We then used the findings from our second desktop exercise to inform the initial screening assessment.

For our initial screen assessment regarding the impact of Option 1: Part-Night Lighting on Protected Characteristics, we also referred to a previous Equality Impact Assessment (written in 2013) as part of the Part-Night Lighting Consultation (see *Appendix D*).

Involvement and Engagement

The initial screen assessment for Option 1 (Part-Night Lighting) and Option 2 (All-Night Lighting, with additional options for dimming) has shown that further information is required regarding how Protected Characteristics are impacted upon by either option, in order that Cabinet Committee has enough information available to them to decide on whether to pick Option 1 or 2.

One source of data which will help Kent County Council identify any potential adverse impacts on Protected Characteristics as a result of Option 1 or Option 2 is via a public consultation.

A public consultation will take place between 21 September and 29 November 2015 and will consist of:

- A Consultation Document, which sets out the future options for street lighting
- 2 x Focus Groups especially for Older Residents (i.e. Aged 70 and over)
- 2 x Focus Groups with shift workers who travel to and from work after midnight and before 5.30am.
- Online questionnaire
- Paper questionnaire
- An Easy Read version of the Consultation Document and Questionnaire
- 3 x Deliberative Events across Kent with a representative sample of Kent residents

The consultation will be supported by a comprehensive Communications Plan, which will include:

- Direct mail/emails to key stakeholder groups
- Newspaper, radio and bus advertising
- Press release and media briefings
- Advertising in Libraries and Gateways with hard copies of the consultation document and promotional postcard available
- Consultation document and promotional material provided to the Community Warden and Community Liaison Officer Team for distribution at the public meetings they attend
- Social media
- Invites to those registered with Kent County Council's Consultation Directory

Potential Impact

Option 1: Part-Night Lighting

Adverse Impact:

(i.e. selected Kent County Council owned street lights are switched off between 12 midnight and 5.30am during winter, or 1am and 6.30am during summer, with the option to dim the brightness of those lights remaining switched on during late evenings/early mornings).

The initial screening assessment shows there is a potential adverse impact on the following Protected Characteristics is Option 1: Part-Night Lighting is chosen:

| Protected Characteristic | Aspect of Option 1: Part-Night Lighting that will impact on group | Aspect of Option 1: Part-Night Lighting (with dimming) that will impact on group |
|-------------------------------------|---|---|
| Age | | |
| Disability | | |
| Gender | | |
| Gender Identity | | |
| Race | | |
| Religion or belief | Street lights switched off late at night near places of worship may have an impact on this Protected Characteristic Groups sense of personal safety | Street lights dimmed late at night near places of worship may have an impact on this Protected Characteristic Groups sense of personal safety |
| Sexual orientation | | |
| Pregnancy/maternity | | |
| Managing Civil Partnerships | | |
| Carers responsibilities | | |
| All Protected Characteristic groups | Street lights switched off late at night in locations or areas not currently identified may have an impact on all Protected Characteristic Groups sense of personal safety or their personal mobility | Street lights dimmed late at night in locations or areas not currently identified may have an impact on all Protected Characteristic Groups sense of personal safety or their personal mobility |

Positive Impact:

The initial screening assessment has not shown there to be any positive impact with regards to Option 1: Part-Night Lighting.

Option 2: All-Night Lighting

Adverse Impact:

(i.e. all Kent County Council owned street lighting are kept switched on all night long, with the option to dim the brightness of these lights during late evenings/early mornings).

The initial screening assessment shows there is a potential adverse impact on the following Protected Characteristics is Option 2: All-Night Lighting is chosen:

| Protected Characteristic | Aspect of Option 2: All-Night Lighting that will impact on group | Aspect of Option 1: All-Night Lighting (with dimming) that will impact on group |
|-------------------------------------|---|---|
| Age | | |
| Disability | | |
| Gender | | |
| Gender Identity | | |
| Race | | |
| Religion or belief | | |
| Sexual orientation | | |
| Pregnancy/maternity | | |
| Managing Civil Partnerships | | |
| Carers responsibilities | | |
| All Protected Characteristic groups | | Street lights dimmed late at night in locations or areas not currently identified may have an impact on all Protected Characteristic Groups sense of personal safety or their personal mobility |

Positive Impact:

The table shown under the 'beneficiaries' section has shown that Option 2: All-Night Lighting will have a positive impact on All Protected Characteristics.

This is due to all roads, pavements, footpaths and access routes being lit late at night, meaning travelling through these areas is easier from a mobility point of view as well as a greater sense of personal safety in relation to crime.

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| JUDGEMENT |
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Option 1: Part-Night Lighting

(i.e. selected Kent County Council owned street lights are switched off between 12 midnight and 5.30am during winter, or 1am and 6.30am during summer, with the option to dim the brightness of those lights remaining switched on during late evenings/early mornings).

It is acknowledged that a number of Protected Characteristics will be impacted upon by Option 1: Part-Night Lighting, as switching off street lights in selected areas late at night will affect people's personal mobility and have impact on their sense of personal safety.

To help mitigate people's fears around personal safety, Kent County Council worked very closely with Kent Police as part of the 2013 Part-Night Lighting Project, using their crime statistics and experience to identify sites with a record of crime. These sites continue to be lit on an all-night basis. We have also excluded sites with a history of accidents. We are continuing to work with the police. If there is a negative effect on crime levels or road safety that can be attributed to the absence of street lighting the decision will be reviewed and lights may be turned back on.

Also as part of the 2013 Part-Night Lighting Project, there were a number of areas and locations considered not suitable for part-night lighting and a decision was made not to have their street lights switched off late at night (see section '*Areas where street lights have not been switched off*').

It is acknowledged from the initial screening assessment that there may be additional areas and locations that will need to be reviewed and possibly included on the list of areas not suitable for part-night lighting; taking into account the results of the public consultation should Option 1 be chosen.

It is also acknowledged from the initial screening assessment that further information is required regarding which Protected Characteristics may be affected by Option 1 along with how they are affected. The results of the public consultation will help with this should Option 1 be chosen.

Option 2: All-Night Lighting

(i.e. all Kent County Council owned street lighting are kept switched on all night long, with the option to dim the brightness of these lights during late evenings/early mornings).

It is acknowledged from the initial screening assessment that there maybe areas and locations that will need to be reviewed a list created of areas not suitable for dimming; taking into account the results of the public consultation should Option 1 be chosen.

It is also acknowledged from the initial screening assessment that further information is required regarding which Protected Characteristics may be affected by Option 1 if dimming is applied, along with how these Protected Characteristics are affected. The results of the public consultation will help with this should Option 1 with dimming be chosen.

| | |
|--|------------|
| Option 1 – Screening Sufficient | NO |
| Option 2 – Internal Action Required | NO |
| Option 3 – Full Impact Assessment | YES |

Only go to full impact assessment if an adverse impact has been identified that will need to undertake further analysis, consultation and action.

Initial EqIA - 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:



Date: 18th September 2015

Name: Robert Clark

Job Title: LED Streetlighting Programme Manager

DMT Member

Signed:



Date: 18th September 2015

Name: Roger Wilkin

Job Title: Interim Director of Highways, Transportation and Waste

Action Plan – Equality Impact Assessment as part of the pre-consultation/policy review stage (August 2015)

| Protected Characteristic | Issues Identified | Action to be taken | Expected outcomes | Owner | Timescale | Cost implications |
|-------------------------------|---|--------------------------------------|---|-----------|---|--|
| All Protected Characteristics | There is insufficient information or data on the views of Protected Characteristics with regards to Option 1 or Option 2 and their thoughts on dimming with either option | Public consultation will be required | We will understand much clearer from a Protected Characteristic's perspective what the likely impact of either Option 1 or Option 2 will be along with their thoughts on dimming with either option. | Rob Clark | Public consultation to take place between 21 September – 29 November 2015 | Cost to run a full public consultation |
| All Protected Characteristics | Until the results of the public consultation have been reviewed by Cabinet Committee and a decision made by them whether to go with Option 1 or Option 2 (and dimming with each), the direction of a new street lighting policy is not known and the impact on Protected Characteristics is not known | Cabinet Committee decision required | <p>Cabinet Committee will review the public consultation results and chose either Option 1 or Option 2 and whether to dim any street lights lit late at night.</p> <p>The future direction of a new street lighting policy will be known and a review of any impact on Protected Characteristics can then take place.</p> | Rob Clark | <p>Cabinet Committee decision date:</p> <p>To be confirmed</p> | None |

APPENDIX A: Kent County Council Street Lighting Policy for Kent (July 2010)

Kent County Council Street Lighting Policy for Kent

Kent Highway Services (KHS) provides and maintains street lights, lit signs and lit bollards for the benefit of highway users and to aid crime prevention. However, there is no statutory requirement on highway authorities to provide public lighting, therefore this policy document lays out the ways in which lighting is provided and maintained.

Energy and Carbon Emission

Kent Highway Services are committed to the reduction of energy consumption and CO₂ emissions through a variety of policy commitments:-

SL P1 - When installing new or when replacing existing units, energy efficient, low wattage 'white' lighting will be used. In specific locations 'white' light may not be appropriate, in these instances other energy efficient lighting will be used.

SL P2 – Newly lit streets or streets that are benefiting from replacement lighting will be designed to use the minimum amount of units or minimum energy consumption and will be assessed to consider if de-illumination, part night lighting, light dimming or removal of certain units is appropriate. These options will only be carried out after full consultation with the emergency services and representatives of the local community.

SL P3 – All streets in the County that are currently lit will be assessed and will be given a 'lighting category' from the British Standard for Street Lighting Design. Based on this category and other factors such as local amenities, night-time activity, traffic flows, community safety and crime levels. KHS will assess 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.

SL P4 – All lit signs will be assessed to current standards and replaced with non illuminated signs where appropriate. All signs that remain lit will be lit during the hours of darkness only, using low energy units. Where accessibility for maintenance is difficult or expensive, long life lamps will be considered.

SL P5 – All lit bollards will be assessed to current standards and replaced with high-reflectivity, non-illuminated bollards where appropriate. All bollards that remain lit will be lit during the hours of darkness only, using low energy units. Where accessibility for maintenance is difficult or expensive, long life lamps will be considered.

SL P6 – All 'mercury' type units have been replaced with efficient low energy units (6300 units) during 2009-10.

Maintenance

Kent Highway Services are committed to maintenance in accordance with the principles set out in 'Well-lit Highways – Code of Practice for Highway Lighting Management'. The following policies enable KHS to provide an effective maintenance regime

SL P7 – All reported faults will be assessed and visited with the intention of affecting a permanent repair within 28 working days (a permanent repair may not be possible on the first visit due to the need for specialist parts or because of electricity supply faults). If the unit is unlit because of an electrical supply fault the electricity supply company will be notified.

SL P8 – As appropriate, lamps will be bulk changed on a cyclical basis to ensure efficiency of maintenance and certainty of lighting.

SL P9 – The selection of new or replacement apparatus will take account of whole life cost, including repair, vandal resistance, energy consumption, other lighting styles in the vicinity and ongoing maintenance. Minimising environmental impact such as sky glow will also be a consideration.

SL P10 – All lit units and private cable installations will be the subject of an electrical test every 6 years in accordance with BS7671.

SL P11 – Structural testing of lighting columns will be carried out as recommended by the Institution of Lighting Engineers Technical Report No22, and 'Well-lit Highways – Code of Practice for Highway Lighting Management'.

Efficiency and Cost Reductions

Kent Highway Services are committed to providing value for money for the residents of Kent. The cost of energy and maintenance is reviewed regularly and the following policies support the aims of an efficient street lighting service

SL P12 – The cost of energy for street lighting will be assessed and paid based on half-hourly meter readings.

SL P13 – The inventory of the Kent lighting stock will be completely reviewed by the end of June 2010 and continuously maintained to ensure unmetered electricity payments are correct, maintenance regimes can be planned accurately and future reductions can be targeted.

SL P14 – All redundant equipment will be assessed for potential reuse where appropriate, recycled or disposed in accordance with current waste disposal standards.

SL P15 – New technological developments and methods of working will be assessed and implemented if they are deemed appropriate and will ensure a sustainable lighting service.

APPENDIX B: Desktop exercise to help us understand how residents, businesses and those travelling through Kent interact with street lighting on a daily basis

| Location | <i>Opening times (very approximate)</i> | <i>Interaction with street lighting late at night</i> |
|-------------------------------------|---|---|
| Police stations | 24 hrs | All groups at night |
| Road lay-bys | 24 hrs | All groups at night |
| Showground's/Events Parks | 24 hrs | All groups at night |
| Taxi ranks | 24 hrs | All groups at night |
| Sports grounds | 7 – 7pm | Closed at night time |
| Adventure parks | 7 – 7pm | Closed at night time |
| Support group locations | 7 – 7pm | Closed at night time |
| Caravan / camping sites | 24 hrs | All groups at night |
| Leisure centres | 7 – 7pm | Closed at night time |
| Post offices | 7 – 7pm | Closed at night time |
| Veterinarians | 7 – 7pm | Closed at night time |
| Law Courts / Local Magistrates | 7 – 7pm | Closed at night time |
| Military facilities | 24 hrs | Military personnel at night |
| Houses (front and rear) | 24 hrs | All groups at night |
| Mobile home/Travellers sites | 24 hrs | All groups at night |
| Sheltered housing | 24 hrs | Workers, relatives, services and residents at night |
| Residential homes | 24 hrs | Workers, relatives and services only at night |
| Blocks of flats | 24 hrs | All groups at night |
| Prisons | 24 hrs | Workers and services only at night |
| Psychiatric institutions | 24 hrs | Workers and services only at night |
| Hospitals | 24 hrs | All groups at night |
| Banks / Building Societies | 24 hrs | Security staff only at night |
| Accident & Emergency centres | 24 hrs | All groups at night |
| Out-patients | 7 – 7pm | Closed at night time |
| Nurseries | 7 – 7pm | Closed at night time |
| Community support groups | 7 – 7pm | Closed at night time |
| Day centres | 7 – 7pm | Closed at night time |
| Registry offices | 7 – 7pm | Closed at night time |
| Crematoriums | 7 – 7pm | Closed at night time |
| Community Centres | 7 – 7pm | Closed at night time |
| Town halls | 7 – 7pm | Closed at night time |
| Village halls | 7am – 2am | Private parties, Firework events, wedding receptions etc. therefore all groups at night |
| Public houses | 11am – 4am | All groups at night |
| Restaurants | 7am – 2am | All groups at night |
| Night clubs | 24 hrs | All groups at night |
| Airports | 24 hrs | All groups at night |
| Shopping malls | 7 – 7pm | Security staff only at night |
| Industrial estates (shopping malls) | 7 – 7pm | Security staff only at night |
| Industrial estates (business parks) | 7 – 7pm | Security staff only at night |
| Garden centres | 7 – 7pm | Closed at night time |

| | | |
|---|-----------|--|
| Petrol service stations | 24 hrs | All groups at night |
| Car parks | 24 hrs | All groups at night |
| Public parks / recreational grounds / open green spaces | 24 hrs | Any that aren't closed, then all groups at night using |
| Dentists | 7 – 7pm | Closed at night time |
| Businesses (in town centres) | 24 hrs | Workers, services and customers |
| Places of worship (churches, mosques, gurdwara's, synagogues' etc.) | 24 hrs | Access to religious places of worship during the night as part of religious requirements |
| Alleyways | 24 hrs | All groups at night |
| Alleyways (rear of houses) | 24 hrs | All groups at night |
| Underpasses | 24 hrs | All groups at night |
| Pedestrian footway/bridges | 24 hrs | All groups at night |
| Bridges | 24 hrs | All groups at night |
| Rural footpaths | 24 hrs | All groups at night |
| Motorway slip-roads | 24 hrs | All groups at night |
| Bus stops | 5am – 2am | All groups at night |
| National cycle routes | 24 hrs | All groups at night |
| Locks / canals | 24 hrs | All groups at night |
| Ferry ports | 24 hrs | All groups at night |
| Train stations | 24 hrs | All groups at night |
| | | |

APPENDIX C: Desktop exercise for use in the Initial Screening Assessment which helps us to understand how Protected Characteristics are affected by Option 1: Part-night lighting or Option 2: All-night lighting

For use with Option 1 (Part-night lighting) in the the table below, the following areas were considered not suitable for part-night lighting and so the street lights have not been switched off at night time:

1. Sites of potential road safety concerns
2. On some main traffic routes
3. Town centres
4. Locations with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am summer time)
5. Areas identified by the police
6. Areas provided with local authority or police CCTV surveillance equipment
7. Areas with sheltered housing and other residences accommodating vulnerable people
8. Areas with a 24 hour operational emergency services site including hospitals and nursing homes
9. Formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night
10. Where road safety measures are in place on the highway

| Location | Opening times (very approximate) | Protected Equality Characteristics disproportionately affected by: Option 1 – Part-Night Lighting | Protected Equality Characteristics disproportionately affected by: Option 2 – All-Night Lighting |
|-------------------------------|----------------------------------|--|--|
| Police stations | 24 hrs | n/a – lights switched on all night (i.e. areas identified by the police or provided with local authority or police CCTV equipment) | n/a |
| Road lay-bys | 24 hrs | n/a – lights switched on all night (on some main traffic routes and sites of potential road safety concerns) | n/a |
| Showground's/ Events Parks | 24 hrs | n/a – not open late at night | n/a |
| Taxi ranks | 24 hrs | n/a – lights switched on all night in town centres | n/a |
| Sports grounds | 7 – 7pm | n/a – not open late at night | n/a |
| Support group locations | 7 – 7pm | n/a – not open late at night | n/a |
| Adventure parks | 7 – 7pm | n/a – not open late at night | n/a |
| Caravan / camping sites | 24 hrs | n/a – camping site lights usually on 24 hours and are privately owned | n/a |
| Leisure centres | 7 – 7pm | n/a – not open late at night | n/a |
| Post offices | 7 – 7pm | n/a – lights switched on all night (i.e. areas identified by the police or provided with local authority or police CCTV equipment) | n/a |
| Veterinarians | 7 – 7pm | n/a – not open late at night | n/a |
| Law Courts / | 7 – 7pm | n/a – lights switched on all night (i.e. town | n/a |

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| Local Magistrates | | centres, areas identified by the police or provided with local authority or police CCTV equipment) | |
| Military facilities | 24 hrs | n/a – lights switched on all night (i.e. areas identified by the police or provided with local authority or police CCTV equipment) | n/a |
| Houses (front and rear) | 24 hrs | n/a – rural & some residential areas. Lights switched on all night in town centre areas | n/a |
| Mobile home/Traveller sites | 24 hrs | n/a – camping site are rural based where there is no street light provision or street lights are privately owned | n/a |
| Sheltered housing | 24 hrs | n/a – lights switched on all night (i.e. areas with sheltered housing and other residences accommodating vulnerable people) | n/a |
| Residential homes | 24 hrs | n/a – lights switched on all night (i.e. areas with sheltered housing and other residences accommodating vulnerable people) | n/a |
| Blocks of flats | 24 hrs | n/a – lights switched on all night (i.e. areas with sheltered housing and other residences accommodating vulnerable people) | n/a |
| Prisons | 24 hrs | n/a – lights switched on all night (i.e. areas identified by the police or provided with local authority or police CCTV equipment) | n/a |
| Psychiatric institutions | 24 hrs | n/a – lights switched on all night (i.e. areas with sheltered housing and other residences accommodating vulnerable people, or 24 hour operational emergency services site including hospitals and nursing homes) | n/a |
| Hospitals | 24 hrs | n/a – lights switched on all night (i.e. 24 hour operational emergency services site including hospitals and nursing homes) | n/a |
| Banks / Building Societies | 24 hrs | n/a – lights switched on all night (i.e. areas identified by the police or provided with local authority or police CCTV equipment) | n/a |
| Accident & Emergency centres | 24 hrs | n/a – lights switched on all night (i.e. 24 hour operational emergency services site including hospitals and nursing homes) | n/a |
| Out-patients | 7 – 7pm | n/a – not open late at night | n/a |
| Nurseries | 7 – 7pm | n/a – not open late at night | n/a |
| Community support groups | 7 – 7pm | n/a – not open late at night | n/a |
| Day centres | 7 – 7pm | n/a – not open late at night | n/a |
| Registry offices | 7 – 7pm | n/a – not open late at night | n/a |
| Crematoriums | 7 – 7pm | n/a – not open late at night | n/a |

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| Community Centres | 7 – 7pm | n/a – not open late at night | n/a |
| Town halls | 7 – 7pm | n/a – not open late at night | n/a |
| Village halls | 7am – 2am | Applies to all Protected Characteristic groups at night. | n/a |
| Public houses | 11am – 4am | n/a – lights switched on all night (i.e. areas identified by the police or provided with local authority or police CCTV equipment) | n/a |
| Restaurants | 7am – 2am | n/a – lights switched on all night (restaurants based in town centres only). Otherwise, applies to all Protected Characteristic groups at night. | n/a |
| Night clubs | 24 hrs | n/a – lights switched on all night (i.e. areas identified by the police or provided with local authority or police CCTV equipment) | n/a |
| Airports | 24 hrs | n/a – lights switched on all night (i.e. areas identified by the police, provided with local authority or police CCTV equipment or locations with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am summer time)) | n/a |
| Shopping malls | 7 – 7pm | n/a – not open late at night | n/a |
| Industrial estates (shopping malls) | 7 – 7pm | n/a – not open late at night | n/a |
| Industrial estates (business parks) | 7 – 7pm | n/a | n/a |
| Garden centres | 7 – 7pm | n/a – not open late at night | n/a |
| Petrol service stations | 24 hrs | n/a – lights usually privately owned. Or lights switched on all night as they are locations with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am summer time) | n/a |
| Car parks | 24 hrs | n/a – lights usually privately owned or owned by the local borough/district council | n/a |
| Public parks / recreational grounds / open green spaces | 24 hrs | n/a - Most parks close at night. Street lighting are usually around, not in the middle of open green spaces/recreational grounds. Any lights in the middle are usually privately owned or owned by the local borough/district council | n/a |
| Dentists | 7 – 7pm | n/a – not open late at night | n/a |
| Businesses (in | 24 hrs | n/a – lights switched on all night in town | n/a |

| | | | |
|---|--------|---|-----|
| town centres) | | centre areas | |
| Places of worship (churches, mosques, gurdwara's, synagogues' etc.) | 24 hrs | n/a if located in town centre areas as lights switched on all night. If located however in rural or other areas, then the 'Religion' Protected Characteristic may be disproportionately affected, as entrances and exits to places of worship will be unlit street lights late at night. | n/a |
| Alleyways | 24 hrs | n/a – lights switched on all night (i.e. formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night) | n/a |
| Alleyways (rear of houses) | 24 hrs | n/a – lights switched on all night (i.e. formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night). If n/a – then applies to all Protected Characteristics. | n/a |
| Underpasses | 24 hrs | n/a – lights switched on all night (i.e. formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night). If n/a – then applies to all Protected Characteristics. | n/a |
| Pedestrian footway/bridges | 24 hrs | n/a – lights switched on all night (i.e. formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night). If n/a – then applies to all Protected Characteristics. | n/a |
| Bridges | 24 hrs | n/a – lights switched on all night (i.e. formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night). If n/a – then applies to all Protected Characteristics. | n/a |
| Rural footpaths | 24 hrs | n/a – lights switched on all night (i.e. formal pedestrian crossings, subways and enclosed footpaths and alleyways where one end links to a road that is lit all night). If n/a – then applies to all Protected Characteristics. | n/a |
| Motorway slip-roads | 24 hrs | n/a – lights switched on all night (i.e. sites of potential road safety concerns, locations with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am | n/a |

| | | | |
|-----------------------|-----------|--|-----|
| | | summer time), some main traffic routes, or where road safety measure are in place on the highway) | |
| Bus stops | 5am – 2am | n/a – lights switched on all night (i.e. sites of potential road safety concerns, locations with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am summer time), some main traffic routes, where road safety measure are in place on the highway or located in a town centre) | n/a |
| National cycle routes | 24 hrs | n/a – lights switched on all night if on a main traffic routes, or if in a location with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am summer time). If n/a, then it applies to all Protected Characteristics. | n/a |
| Locks / canals | 24 hrs | n/a – lights switched on all night if the area has been identified by police. If n/a, then it applies to all Protected Characteristics. | n/a |
| Ferry ports | 24 hrs | n/a – lights switched on all night if the area has been identified by police, on a main traffic routes, or if in a location with a significant night-time traffic record between about midnight and 5.30am winter time (1am to 6.30am summer time), or provided with local authority or police CCTV equipment. If n/a, then it applies to all Protected Characteristics. | n/a |
| Train stations | 24 hrs | n/a – lights switched on all night if the area has been identified by police or provided with local authority or police CCTV equipment. If n/a, then it applies to all Protected Characteristics. | n/a |
| | | | |

APPENDIX D: Initial Screening Assessment from the Part-Night Lighting Equality Impact Assessment 2013

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 | | |