INITIAL EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

STREETLIGHTING REVIEW

Please Note:-

This document describes an initial assessment of equalities impacts in relation to the "*Streetlighting Review"*.

The council has a statutory duty to consider the impact of its actions in relation to the following protected characteristic groups:-

1. Age
2. Disability
3. Gender Reassignment
4. Marriage and Civil Partnership
5. Pregnancy and Maternity
6. Race
7. Religion or Belief
8. Sex
9. Sexual Orientation

Therefore, the council wishes to hear and proactively consider any comments in relation to how any aspect of the options presented may impact on any sections of the community as listed above. Any feedback in relation to equalities and any point raised within this document will inform a full Equality Impact Assessment and Analysis of the Streetlighting Review proposals.

You can find out more and tell us your views by completing our survey online at **www.southglos.gov.uk/librarychanges** or sending your comments to:

Email: **consultation@southglos.gov.uk**

Write to: South Gloucestershire Council, Corporate Research & Consultation Team, Council offices, Badminton Road, Yate, BRISTOL, BS37 5AF

Phone: 01454 868154

Copies of the consultation are available from your local library or one stop shop.

Information about consultation meetings, events and drop in session are available from the consultation web page **www.southglos.gov.uk/librarychanges**

The consultation on these proposals starts on CONSULTATION TEAM TO ENTER Monday 11th July 2022 for a 12 week period which closes on XXth XX 2022.

SECTION 1 - INTRODUCTION

The council is responsible for approximately 31,500 streetlights and 2,500 lit road traffic signs and bollards.

Over the last 30 - 40 years, lighting has traditionally been provided by low pressure (SOX) and high pressure sodium (SON) lamps. However, technology is continually being developed and based on a policy of using the most efficient method of illumination and lighting stock management, the Council commenced a 10-year programme to replace all SOX and SON lights with LED lights in 2014. Over the next six months we will complete this transition to the most efficient LED lighting. Brightness levels have also been dimmed over recent years to reduce energy consumption and unnecessary light pollution.

The Council operates streetlights following a schedule which is aligned with when most vehicles and pedestrians need them. They are brighter in the period between when the sun sets and 11pm and then again from 6am until the sun provides sufficient light for them to be turned off.

Since January 2023, the Council has been trialling lights dimmed to 25% of their full capacity in some locations and is now proposing to that this change is rolled-out across all streetlights in South Gloucestershire.

The table below shows the **current streetlighting schedule**:

Time period	Lighting level
15 minutes after sunset until 11:00pm	75%
11:00pm to 06.00am	50%
06:00am until 15 minutes before sunrise	75%

The Council is proposing to introduce a new schedule which continues to prioritise brightest lighting levels when most people need them but dimming the lights further between 11pm and 6am as follows.

The table below shows the **proposed streetlighting schedule**:

Time period	Lighting level
15 minutes after sunset until 11:00pm	75%
11:00pm to 06.00am	25%
06:00am until 15 minutes before sunrise	75%

Changing the programme is very time-consuming and costly because each streetlight needs to be individually programmed. If a proposed schedule is agreed, to minimise the resource required to update the brightness levels, it would be implemented by making the changes as part of our normal maintenance programme, so individual streetlights do not need to be visited multiple times. In this scenario, all 31,500 lights would expect to be updated over a two-year period starting from April 2024.

SECTION 2 – RESEARCH, ENGAGEMENT AND CONSULTATION

NB. This section will be updated post consultation.

Bi-annual StreetCare Survey

The Council's StreetCare Division conducts a bi-annual survey of resident perceptions of services. The survey specifically asks residents for satisfaction levels in regard to Streetlighting.

The following table shows resident satisfaction levels with Streetlighting as elicited via the bi-annual Streetcare Survey since 2012.

Table 1: Table to show the percentage of residents stating satisfaction with Streetlighting

Year:	2012	2015	2017	2019	2021	2023
All residents	**52%**	**57%**	**62%**	**70%**	**69%**	**69%**
Female	61%	57%	44%	70%	69%	68%
Male	45%	54%	47%	66%	70%	70%
Non Disabled	53%	57%	65%	70%	70%	70%
Disabled	51%	55%	54%	60%	64%	67%
White British	54%	55%	63%	69%	70%	70%
BAME	43%	73%	58%	71%	68%	68%
Under 35	56%	62%	66%	73%	75%	71%
35-64	N/A	53%	60%	68%	69%	68%
65+	58%	58%	64%	69%	69%	69%
Over 75 years	N/A	57%	76%	69%	72%	74%

Areas highlighted GREEN are those where the satisfaction level of people in this Protected Characteristic group is 10% or more above the average.
Areas highlighted RED are those where the satisfaction level of people in this Protected Characteristic group is 10% or more below the average.

The data shows the following key points:

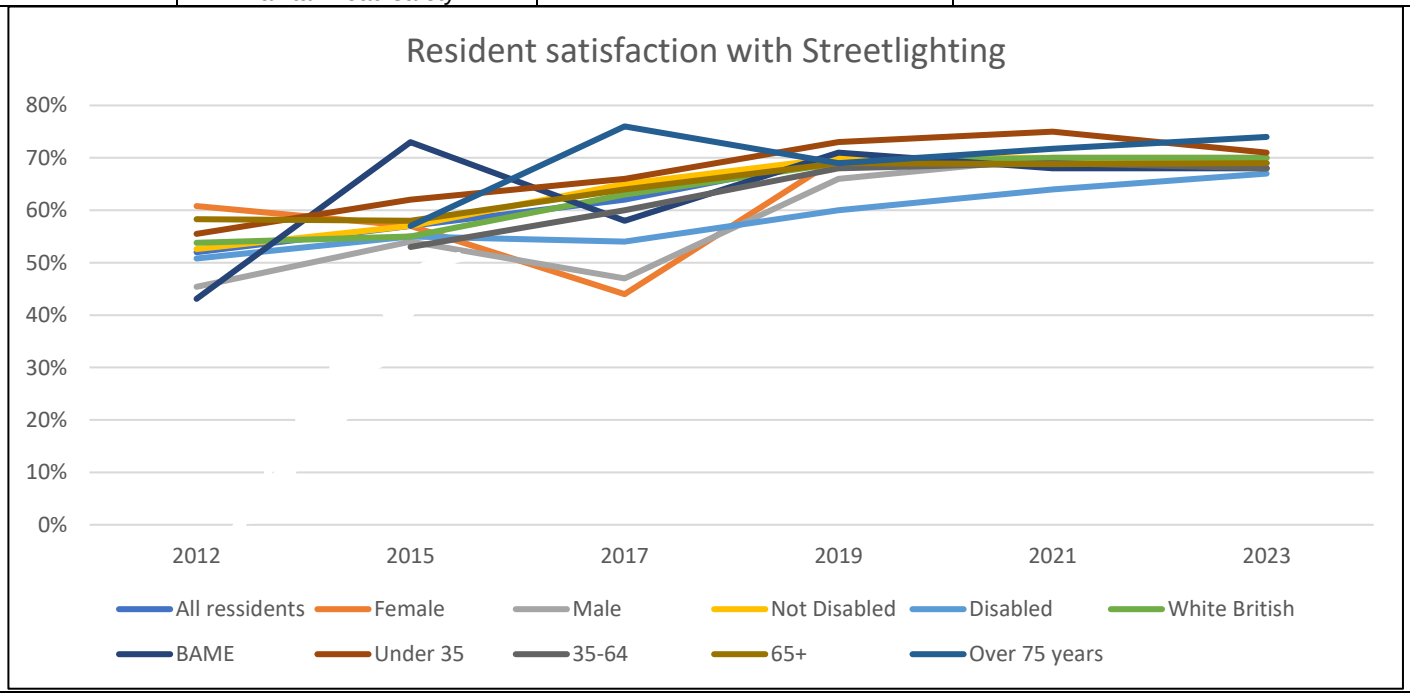
- Overall, there has been an increase in resident satisfaction levels over the 12 year time period (17% increase).

- There have been some periods of lower satisfaction reported by Females, Males, Disabled People and people from Black, Asian and minority ethnic groups, however, the 2021 and 2023 surveys found no disparities in satisfaction levels between Protected Characteristic groups.

The information below provides a timeline of Streetlighting policy changes in South Gloucestershire and maps these against resident satisfaction levels.

Timeline

2008 and earlier	2008 - 2014	2014	2014 - 2017	2017 onwards
All streetlights operated an all night basis.	Lights changed to part night. Eventually, of all streetlights: approx. 60% were all-night operation, 40% were part night.	Commencement of a 10-year programme to replace all SOX and SON lights with LED lights.	As they were changed to LED, lights continued to operate on a part-night regime between 1am and 5am. Lighting levels lowered to:75% output until midnight; Midnight to 5am - 50%; Back to 75% from 5am.	As they were changed to LED all street lighting operates all night.
All streetlights are SOX and SON lamps.	All streetlights are SOX and SON lamps. Exceptions to part-nighting are where deemed all-night lighting will:- 1. Mitigate night-time crime or ASB 2. Maintain road safety	Column replacement & maintenance programmes aligned with LED roll out. Exceptions to part-nighting are where deemed all-night lighting will:- 1. Mitigate night-time crime or ASB 2. Maintain road safety	Exceptions to part-nighting are where it is deemed all night lighting will:- 1. Mitigate night-time crime or ASB; 2. Maintain road safety.	Dimming regime implemented as follows: 75% output from dusk till 11pm; 50% output from 11pm to 6am; 75% output from 6am - dawn.



The timeline, mapped to resident satisfaction levels shows the following key points:

- Overall, reported satisfaction levels for every group has increased over the 12 year period (17% increase).

- There was a drop in satisfaction reported by Females, Males, Disabled People and people from Back, Asian and minority ethnic groups during the period 2015-17 when part-night lighting was introduced; however, the satisfaction levels of these groups have all increased since 2019 after part-nighting was replaced by the current dimming regime, with no disparities evident within the 2021 or 2023 surveys.

Annual Council Budget Survey

The Council also runs an annual survey as part of its budget-setting process. The survey asks residents to state satisfaction levels with a wide range of services. This allows for comparisons to made and the following table shows:

1. the five council services with the highest satisfaction levels in 2022/23;
2. the five council services with the highest satisfaction levels when averaged over the last 10-year period:

	2022/23 satisfaction level	**10-year aggregated satisfaction level**
Libraries	79%	56%
Parks and Open Spaces	78%	68%
Waste & Recycling services	77%	72%
Streetlighting	69%	63%
Sport and leisure facilities	65%	49%

Violence Against Women and Girls (VAWG) Survey

During January and February 2023, the Council ran a survey on the subject of violence against women and girls. The findings of this survey include the following:

- The majority of respondents would like to see more better streetlighting (80%) and CCTV (68%).

- Respondents who are significantly more likely to want better street lights are those aged under 35 (95% of under 25s and 87% of 25-35s) and those who have experienced any abuse in the last 5 years (82% vs 75% those who haven't).

- The most frequent suggestion for what would help women and girls feel safer was more police or street marshal presence (95 mentions). This was followed by improving footpaths and cyclepaths, almost entirely by improving lighting.

- Respondents were asked if they had any other comments; the most frequent theme was the suggestion of better education (46 mentions). As elsewhere, other frequent mentions were for better lighting and more police presence.

Previously conducted Streetlighting EqIAAs

Streetlighting has been subject to a number of previous EqIAAs in South Gloucestershire and key issues raised include the following:

Group	Issue(s) Raised
Age (older people)	Older people may feel more vulnerable to crime as a result of reduced lighting, but much depends on the specific circumstances as well as other factors such as crime rates, policing and quality of public spaces. Older people may feel more concerned that anti-social behaviour could increase. There is potential impact by indirectly restricting social activities during the hours that lights are switched off. This may occur because of fears about community safety or road safety and also because of fears about trips and falls during the hours that lights are dimmed.
Age (younger people)	Similarly to older people, there is a concern that crime and anti-social behaviour will increase. Younger adults are more likely to be out and about after dark (e.g. accessing night time entertainment) and therefore, be more likely to be impacted by dimmer lighting, including concerns that anti-social behaviour could increase. Road safety is an issue relevant to all groups, however, has been raised under this heading because older children and young adults are seen as key groups for reducing road traffic casualties. Accident rates are also higher during the hours of darkness.
Disability	People with disabilities may feel more vulnerable to crime as a result of reducing lighting, but much depends on the specific circumstances as well as other factors such as crime rates, policing and quality of public spaces. People with visual or mobility impairments may find street lighting helpful in assisting them to navigate and avoid hazards, as such, there is a potential negative impact on risk of falling and accessibility. There may be potential for an increase in 'hate crime' against disabled people.
Race	People may feel more vulnerable to crime as a result of dimmed lighting, but much depends on the specific circumstances as well as other factors such as crime rates, policing and quality of public spaces. There may be potential for an increase in 'hate crime' against people from minority ethnic groups.
Sex	Females may feel more vulnerable to crime as a result of dimmed lighting, but much depends on the specific circumstances as well as other factors such as crime rates, policing and quality of public spaces. There may be potential for an increase in 'hate crime' and gender based crimes, including violence, especially against females.
Sexual Orientation and Gender Reassignment	LGBTQ+ people may feel more vulnerable to crime as a result of dimmed lighting, but much depends on the specific circumstances as well as other factors such as crime rates, policing and quality of public spaces.
Religion/Belief	People may feel more vulnerable to crime as a result of reducing lighting, and it is recognised that this is particularly relevant to faith communities who may be at risk of hate crime e.g. Islamophobia, but much depends on the specific circumstances as well as other factors such as crime rates, policing and quality of public spaces.
Pregnancy and Maternity	In addition to the potential to feel more vulnerable to crime as a result of reducing lighting, there is also an issue to be raised in relation to impact on travel to access maternity unit/hospital care.
Marriage and Civil Partnership	It is not considered that the protected characteristic of "Marriage and Civil Partnership" is relevant to the impacts in changes to street lighting.

SECTION 3 – IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

NB. This section will be updated post consultation.

The information shown in Section 2 of this EqIAA shows the following key points emerging:

- Overall, there has been an increase in resident satisfaction levels with streetlighting between 2012 and 2023 (17% increase).
- Streetlighting is one of the top five council services with greatest resident satisfaction in both 2022/23 and when satisfaction is averaged over the last 10-year period.
- There have been some periods of lower satisfaction reported by Females, Males, Disabled People and people from Black, Asian and minority ethnic groups, however, the 2021 and 2023 surveys found no disparities in satisfaction levels between Protected Characteristic groups.
- There was a drop in satisfaction reported by Females, Males, Disabled People and people from Back, Asian and minority ethnic groups during the period 2015-17 when part-night lighting was introduced, however, the satisfaction levels of these groups have all increased since 2019 after part-nighting was replaced by the current dimming regime, with no disparities evident within the 2021 or 2023 surveys.
- The Violence Against Women and Girls (VAWG) Survey of January and February 2023 found that 80% of respondents would like to see more better streetlighting. People aged under 35 are significantly more likely to want better streetlights, as are those who have experienced any abuse in the last 5 years.
- The most frequent suggestion in the VAWG survey for what would help women and girls feel safer was more police or street marshal presence. This was followed by improving footpaths and cyclepaths, almost entirely by improving lighting.
- During the last 4 years, hate crime in South Gloucestershire has increased by 46% and there is a concern over whether reduced levels of lighting would impact this further.

The impacts identified fall under the following three broad areas:-

1. Crime and anti-social behaviour including fear of crime and anti-social behaviour.
2. Night time road accidents.
3. Trip, slip and fall accidents.

Crime and anti-social behaviour including fear of crime and anti-social behaviour

With regard to crime and anti-social behaviour, a joint statement issued by the Police and the council in 2013 states: *Police and the Council have been monitoring the impact of part night lighting on crime as it has been rolled out in towns and villages across South Gloucestershire. The findings mirror the national picture, which is that part night lighting has so far not had any notable adverse impact on crime. We will not be complacent and will continue to monitor incidents to ensure South Gloucestershire remains a safe place to live and work.*

In 2023, we know fear of crime is a concern for many, and as part of our planning, we have engaged with the police and colleagues in our anti-social behaviour team to understand potential negative consequences of dimming streetlights. There continues to be no evidence suggesting a direct correlation between dimming lights and crime.

Night time road accidents

A March 2020 paper by the Royal Society for the Prevention of Accidents concluded that:

The latest evidence concluded that there was no evidence of an association between reduced lighting and night-time collisions across England and Wales. However, previous research has concluded that there are positive safety benefits. Surveys have shown that the public are in favour of street lighting as a way of improving road safety and that, if anything, it needs to be improved in some areas.

There are economic and environmental reasons why some organisations may wish to reduce the amount of lighting. However, there are safety reasons why lighting needs to be available.

In some locations, a reduction in lighting quality may not increase the risk of an accident. However, there is the danger that an unconsidered removal or reduction in quality could actually increase accidents and their severity. Therefore, when considering removal or dimming of lights, location based traffic and accident evidence should be assessed. Accident rates should be monitored to ensure that sacrificing the quality of lighting does not unduly increase the risk.

It is noted that the data and information held by the Council raises no issues of concern and this includes data and information in relation to the trials since January 2023.

Street lighting will continue to be provided. This would be at the proposed lighting levels and the Council will assess location based traffic and accident evidence on an ongoing basis.

Trip, slip and fall accidents

With regard to trip, slip and fall accidents, this is potentially proportionately more likely amongst older people and Disabled People. Lighting will continue to be provided at the proposed levels and the Council will assess location based trip, slip and fall accident evidence on an ongoing basis.

SECTION 4 - ACTIONS TO BE TAKEN

NB. This section will be updated post consultation.

At this stage, consultation with residents is being conducted and all feedback will be analysed and considered. At this stage, however, the following actions have been identified:

1. All resident feedback will be analysed and this EqIAA document will be updated to reflect all feedback received. This includes the feedback of South Gloucestershire Equalities Voice.

Should the proposals be adopted, the following actions have been identified (all consultation feedback will be analysed and this section updated post consultation):

2. Given the levels of fear of crime it is important that residents are proactively made aware that there is no evidence suggesting a direct correlation between dimming lights and crime – this has the potential to assist residents in reducing fear of crime.

3. In relation to the trials underway since January 2023, data and information will be further scrutinised in respect of impacts.

4. Street lighting will continue to be provided at the proposed lighting levels and the Council will assess location-based evidence on an ongoing basis.

SECTION 5 - EqIAA OUTCOME

NB. This is an initial EqIAA, therefore, there is no outcome at this stage until all consultation feedback has been analysed and considered and this EqIAA updated.

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	☐	
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	☐	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	☐	
Outcome 4: Stop and rethink.	☐	

SECTION 6 - SOURCES OF EVIDENCE INFORMING THIS EqIAA

- South Gloucestershire Council Streetcare satisfaction survey data 2012, 2015, 2017, 2019, 2021, 2023.
- South Gloucestershire Council Budget survey results 2013/14 – 2022/23
- Streetlighting previous EqIAAs
- Street Lighting and Road Safety paper, March 2020 (ROSPA)