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| **Equality Impact Assessment Report** | **Please enter responses below in the right hand columns** |
| **Date** | 10/08/2015 |
| **Sign-off path for EIA** (please add/delete as applicable) | Cluster management team (CLT) - Delivery |
| **Title of Project, business area, policy/strategy** | **Lambeth LED Street lighting** |
| **Author** | **Michael Munnelly** |
| **Job title, division and department** | **Principal Engineer**  **Environmental Services & Highways** |
| **Contact email and telephone** | **020 7926 8970**  **MMunnelly@lambeth.gov.uk** |
| **Strategic Director Sponsor** | **Sue Foster** |

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| **London Borough of Lambeth**  **Full Equality Impact Assessment Report** | | **Please enter responses below in the right hand columns.** |
| **1.0 Introduction** | | |
| **1.1 Business activity aims and intentions**  *In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the political vision, and outcomes?* | The project aims to convert 12,981 of Lambeth's street lighting stock from SON-T (sodium) bulbs to LED (Light Emitting Diode) bulbs. The two key drivers behind this work are a reduction in CO2 emissions and revenue savings, both resulting from reduced energy use. Lambeth's PFI lighting contractors, Bouygues, and an independent consultant identified significant savings to be made if Lambeth convert its lighting to LED and there is also a continued need to reduce our CO2 emissions as part of our Carbon Reduction Commitment.  This project will change street lighting levels to the new British street lighting Standard. This new standard is a lower lighting level than is currently used in Lambeth. British Standards are set as a formal consensus between industry and Government operating to principles of standardisation and standardisation policy. The new British Lighting standards are already being used across the UK. Street signs will continue to be lit with the Sodium lights and will not be affected by transfer to LED’s and Central Management System (CMS system).  The project is made up of two phases. Phase one is converting the existing street lighting assets into LED bulbs. Phase two, which will take place approximately one year after the LED’s are introduced, adds a Central Management System (CMS) which performs remote controlled management of the street lights. At present the columns lighting levels are controlled on an individual basis which prevents adaptability across the lighting stock. The new system would give flexibility and increase the opportunities for making savings. | |
| **2.0 Analysing your equalities evidence** | | |
| **2.1 Evidence**  *Any proposed business activity, new policy or strategy, service change, or procurement must be informed by carrying out an assessment of the likely impact that it may have. In this section please include both data and analysis which shows that you understand how this decision is likely to affect residents that fall under the protected characteristics enshrined in law and the local characteristics which we consider to be important in Lambeth (language, health and socio-economic factors).* ***Please check the council's equality and monitoring policy and your division’s self assessment. Each division in 2012 reviewed its equality data and completed a self assessment about what equality data is relevant and available.***  **IF YOUR PROPOSAL ALSO IMPACTS ON LAMBETH COUNCIL STAFF YOU NEED TO COMPLETE A STAFFING EIA.** | | |
| **Protected characteristics and local equality characteristics** | **Impact analysis**  **For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and:**  *Please explain how you justify your claims around impacts.*  *Please include any data and evidence that you have collected including from surveys, performance data or complaints to support your proposed changes.*  *Please indicate sources of data and the date it relates to/was produced (e.g. ‘Residents Survey, wave 10, April 12‘ or ‘Lambeth Business Survey 2012’ etc)* | |
| **Race** | None  Around 40% of Lambeth’s population is white with a UK background. Around 15% are white with other backgrounds. 8% are from Central and South America, 8% from Australasia and 4% from North America. Black People make up a quarter of the Borough. Around 11.5% of Lambeth’s population is Black African, followed by 9.8% of the population Black Caribbean. Lambeth has the second largest Black Caribbean population in London after Lewisham that has 11% (State of the Borough 2014)  The nature of this programme of works does not have any specific impact on race. There is no evidence to suggest any specific impact and in other areas that LED’s have been introduced as pilot studies, no problems or complaints have occurred. | |
| **Gender** | Unknown  There are slightly more women than men resident in Lambeth – around 155,400 females compared to 154,700 males. Males and females have different age profiles. The young working age population, from around 25 to 50, is about 51% male and 49% female. For all ages over 50, there are more females than males. 53% of people aged 50+ are female, 47% male (State of the Borough 2014).  After lighting levels decrease in phase one of the project, there is a potential for a decrease in the perception of safety among residents. This could potentially result in both women and men feeling more vulnerable outside of daylight hours. Other Local Authorities that have implemented LED street lighting have not reported an increase in complaints or issues relating to the impact on gender. | |
| **Gender re-assignment** | None  It has been estimated that 20 transgender people per 100,000 people in the UK, which suggests roughly 50-60 people in Lambeth.  There is no specific evidence or information relating to street lighting levels and Gender re-assignment residents. | |
| **Disability** | Positive and Negative -  Around 37,000 people in Lambeth say their day-to-day activities are limited by long term illness or disability, about 17,000 limited a lot and 20,000 limited a little. About 60% of people with a limited health condition are aged over 50. The Department of Health predicts that 145 residents have a serious visual impairment (State of the Borough 2014).  Street signs will continue to be lit with the Sodium lights and will not be affected by transfer to LED’s and CMS system.  Any street user that depends on clear visibility, i.e. wheel chair users or mobility scooters could be affected by a change to the new British Lighting Standard. Other Local Authorities that have implemented the change have not reported a significant increase in complaints or issues relating to the impact on disability. Because of this it is anticipated that the risk of any negative impact is very low.  Pedestrians with visual impairments or visual disabilities who have trouble seeing the transition between a curb ramp and street could be impacted by a decrease in street lighting levels. There is no further evidence to quantify this potential impact.  Feedback from Drivers where LED street lighting has been used elsewhere indicates that the white light that is emitted from LED’s, as apposed to the yellow light emitted from Sodium lights, creates more contrast thus improving visibility. | |
| **Age** | None  Nearly a third of a million people live in Lambeth – at least 310,000. The population structure is as follows.  Children and young people: About a fifth – 21% - of Lambeth’s population is aged 20 or under, around 66,000 people. Compared to other London boroughs, there is a low percentage of people ages 15 to 19 (4.6%).  Young working age: Over half of the population, 51%, is aged between 20 and 44, around 157,000 people. About two-thirds of young working age people are over 30. Lambeth is in the top ten London boroughs for people aged 20 to 24 (8.8%), and the top five for people aged 25 to 29 (14.2%) and 30 to 44 (28.8%).  Older working age: Less than a fifth of the population, 18%, is aged between 45 and 64, around 57,000 people. Nearly four fifths of older working age people are under 60. Only 3% are aged 60 to 64, which is in the bottom five boroughs in London.  Older people: Less than a tenth, 7.6%, of the population is aged 65 or over, 23,000 people. About half of older people are aged 65-74. Lambeth is in the bottom five boroughs in London in all older age categories: 65 to 74 (4.2%), 75 to 84 (2.5%), 85 to 89 (0.6%) and 90 and over (0.3%).  Although crime remains the top concern for adult residents in Lambeth, the level of concern is unchanged and remains at the lowest level recorded, with two in five adults (38%) citing this as a worry. Concern about crime amongst young people (21% stating that they worry about crime) is on a par with 6 months ago (Wave 12 Residents survey 2013) If street lighting levels decrease there is a potential for this figure to increase if a link is drawn between street lighting levels and an increase in crime.  Currently the biggest perceived anti-social behavior (ASB) problem amongst adults in the local area is people using or dealing drugs (37% find this a problem), replacing rubbish and litter which was the biggest ASB concern in November 2012. The main concern for young people is rubbish and litter with 42% highlighting this issue (drugs was the main concern for young people in November 2012).  There is no specific evidence or information relating to street lighting levels and the age of residents. | |
| **Sexual orientation** | None  Recent health estimates suggest that Lambeth has one of the largest populations of men that have sex with men (MSM) in the UK. 3-5% of respondents to the Lambeth resident’s survey identified themselves as lesbian, gay or bisexual. This level remained constant since first being asked in 2007, although this is likely to be an under representation.  There is no specific evidence or information relating to street lighting levels and the sexual orientation of residents. | |
| **Religion and belief** | Unknown  Over 60% of Lambeth’s residents have a religion and 28% have no religion.   |  |  |  | | --- | --- | --- | | Christian | 160,944 | 53.1% | | No religion | 84,803 | 28.0% | | Religion not stated | 26,501 | 8.7% | | Muslim | 21,500 | 7.1% | | Buddhist | 2,963 | 1.0% | | Hindu | 3,119 | 1.0% | | Other religion | 1,682 | 0.6% | | Jewish | 1,134 | 0.4% | | Sikh | 440 | 0.1% |   There is no specific evidence or information relating to street lighting levels and the religion or belief of residents. The British Lighting standard will reduce the lighting levels across the borough and this includes the street lighting outside buildings of worship. | |
| **Pregnancy and maternity** | None  There are around 4,000 - 5,000 births in Lambeth every year. Between 2 to 3% of respondents to Lambeth’s Residents Survey are currently pregnant or on maternity leave, suggesting that at any one time, there are between 6,000 and 9,000 Lambeth residents currently pregnant or on maternity leave.  There is no specific evidence or information relating to street lighting levels and pregnancy and maternity of residents. The British Lighting standard will reduce the lighting levels across the borough but this is not expected to impact on pregnancy or maternity. | |
| **Marriage and civil partnership** | None  There is no specific evidence or information relating to street lighting levels and marriage and civil partnership. | |
| **Socio-economic factors** | Unknown  There is no specific evidence or information relating to street lighting levels and the socio-economic background of residents. Part of the communication platform that will be used to promote the scheme will be social media based. The technology to access this information could prevent low income residents who do not own a smart phone or computer from getting access to information. To counter this, the communications strategy will also use printed media and letter drops so that all residents get equal access to relevant information.  LED street lighting has been introduced across a number of London Boroughs including Bromley, Barnet and Enfield. During the benchmarking phase of Lambeth’s planned works no issues were highlighted in relation to a reported increase in the fear of crime.  The recent peer reviewed article in Heath and Place suggests that: ‘Although a household survey identified little direct impact from lighting reductions on determinants of health such as mobility or fear of crime, at a social level reduced street lighting may have significant effects in urban and suburban settings where residents associate well-lit streets with competent and trustworthy government (p.9 Reduced street lighting at night and health: A rapid appraisal of public views in England and Wales,. Green. J et al. 2015),’ This highlights that whilst no direct issues are associated with the reduction in street lighting levels, some areas could see an increase in the fear of crime when lighting levels are adjusted to the British Standard, in turn the association for the local authority could be negative. | |
| **Language** | None  There is no specific evidence or information relating to street lighting levels and the effect on language. | |
| **Health** | Unknown  There is no specific evidence or information relating to street lighting levels and the effect on health. It is now accepted that artificial night-time lighting has various effects on humans (not to mention wildlife) and that exposure to optical radiation affects human physiology and behavior, both directly and indirectly. Many areas are not well understood, and a position statement from the Illumination Engineering Society (IES) emphasizes mainly the need for further research.  All of the LED fittings that Lambeth will be using are approved and certified by British lighting standards. | |
| **2.2 Gaps in evidence base**  *What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.* | The gaps in the evidence is that there is no specific evidence that monitors the impact of updating street lighting to the new British Lighting standard, which will ultimately result in lower street lighting levels across the Borough.  The lighting levels in the new British Lighting standard have been tested and approved as an acceptable quality and intensity of illumination. This is a standard that is set across the UK and is specific to different setting such as Motorways, A roads, Side roads, High streets etc. | |
| **3.0 Consultation, Involvement and Coproduction** | | |
| **3.1 Coproduction, involvement and consultation**  *Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?* | The key stakeholders are:   * Elected Members * Residents / Community Organisations and Groups * Lambeth Community Safety * Emergency Services * Transport for London (TFL)   The project has not involved an engagement strategy because there has been no opportunity for residents to influence or take part in the decision making process. The provisional agreement to fund and implement the project was made by Lambeth’s Asset Management Cabinet Advisory Panel (AMCAP) in October 2014. The involvement for the key stakeholders is informed and update as part of the Communications strategy that provides on-going updates and project information.  The project will use the existing channels of communication available to the Borough including printed and on-line content. Lambeth Talk, the Borough wide publication, will be used to promote the scheme in the September issue. Online information as well as leaflet drops will also be taking place. This will give residents up to date information about what is happening. | |
| **3.2 Gaps in coproduction, consultation and involvement**  *What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)? Please describe where more consultation, involvement and/or coproduction is required and set out how you intend to undertake it. If you do not intend to undertake it, please set out your justification.* | There have been no gaps in the co-production, consultation or involvement that have been identified as part of the planned works. Industry experts and Lambeth staff have agreed a programme of street light replacements. These works will not include any additional engagement work. The justification is that there is no opportunity for residents to influence the physical works that are taking place. | |
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| **4.1 Conclusions and justification**  *What are the main conclusions of this EIA? What, if any, disproportionate negative or positive equality impacts did you identify at 2.1? On what grounds do you justify them and how will they be mitigated?* | The 1991 Home Office report that investigated the link between street lighting levels and crime concluded that, as deployed on a broad scale, better street lighting has had little or no effect on crime. In their words, “the dominant overall conclusion was of no significant change”. Additionally, they did find that the improved street lighting was welcomed by the public, and that it provided a measure of reassurance to some people - particularly women – who were fearful in their use of public space when poorly lit (Atkins. S, Home Office, 1991).  From discussions with London Borough of Barnet, Enfield and Bromley who have introduced LED street lighting, no valid complaints or increased fear of crime have occurred. It is acknowledge that these assessments should be considered on a case by case basis and local environmental factors could have an impact. Although Lambeth represents its own environmental considerations, there is no significant difference between these London Boroughs so a comparative assessment applicable and acceptable.  A recent study into street lighting and safety, led by the London School of Hygiene & Tropical Medicine in partnership with University College London and published in the Journal of Epidemiology and Community Health, looked at councils which had implemented a range of schemes. The report says that changing street lighting levels in the UK has no impact on crime or traffic collisions. Researchers analysed 14 years of data from 62 councils in England and Wales which had tried strategies such as permanently switching off lights or dimming them (Reduced street lighting at night and health: A rapid appraisal of public views in England and Wales,. Green. J et al. 2015).  The Equality Impact Assessment concludes that the proposals are reasonable, but accepts that local factors may influence the impacts in specific areas when rolled out across the Borough. | |
| **4.2 Equality Action plan**  *Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer.* | | |
| **Equality Issue** | **Mitigating actions** | |
| To ensure that the equality analysis has  accurately covered all the equality  impacts; and the mitigations have reduced any disproportionate impact | Review the EIA and assess whether the mitigating actions were sufficient.  Michael Munnelly 25/06/2015 | |
| **Making sure that crime and the impact of changing to LED’s has been considered** | The council has worked with the police to make them aware of the streets affected by dimmer lighting. | |
| **Disability groups being negatively affected by the change to LED lighting** | Engagement with DASL (Lambeth’s key Disability Forum) to discuss the impact of LED lighting and how the project will be communicated. Any areas of issue can be adjusted post construction during review period. | |
| **Negative impact on vulnerable residents** | All-night, full-power lighting will be maintained in areas with sheltered housing and other residences accommodating vulnerable people. This includes areas with 24hr operational emergency services sites including hospitals. | |
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| **5.0 Publishing your results** |  | |
| The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate. | | |
| **EIA publishing date** |  | |
| **EIA review date** | 1st February 2018 | |
| **Assessment sign off (name/job title):** | Raj Mistry – Acting Director of Environment | |

All completed and signed-off EIAs must be submitted to [equalities@lambeth.gov.uk](mailto:equalities@lambeth.gov.uk) for publication on Lambeth’s website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers’ name, email and phone number).