### **CABINET**

#### 21 October 2025

# Update to the Street Lighting and Illuminated Assets Policy with respect to Part Night Lighting

# Report by Director of Environment & Highways

#### RECOMMENDATION

#### 1. The Cabinet is RECOMMENDED to

- A) APPROVE the updated Streetlighting and Illuminated Assets Policy and supporting Electrical Procedure (Annex A).
- B) APPROVE the adoption of the proposed Part-Night Lighting Implementation Framework (Annex B), following stakeholder engagement and public consultation feedback (Annexes E&F).

# **Executive Summary**

- 2. Following the Cabinet Member decision in November 2024<sup>1</sup> to defer the previous part-night lighting proposals, and a subsequent report to the Place and Overview Scrutiny Committee in February 2025<sup>2</sup> outlining the part-night lighting revised framework approach, this report presents the proposed new policy and approach to part-night lighting following stakeholder engagement and public consultation feedback. The report outlines the concerns raised regarding part-night lighting, as well as its levels of support.
- 3. Following the stakeholder engagement and public consultation feedback, the Street Lighting and Illuminated Assets Policy, and its supporting Electrical Procedure, equalities impact assessment (EIA) and climate impact assessment (CIA) have also been updated. The previous Street Lighting and Illuminated Assets policy was agreed by Cabinet on 18 October 2022 and was due for review.
- 4. It was previously estimated that part-night lighting could save up to approx. £400k and 400Tc02e of carbon annually if it was delivered Oxfordshire wide. To provide a more granular understanding of benefits with the scheme by scheme basis approach now promoted, three part-night lighting scheme desktop case studies have been carried out using the proposed Part-Night Lighting

<sup>&</sup>lt;sup>1</sup> Decision - Dark Skies - Street Lighting Illumination Proposals | Oxfordshire County Council

<sup>&</sup>lt;sup>2</sup> Agenda for Place Overview & Scrutiny Committee on Wednesday, 5 February 2025, 10.00 am | Oxfordshire County Council

- Implementation Framework ('the Framework'), to show what the potential cost and carbon savings of part-night lighting could be scheme by scheme (Annex G).
- 5. The policy update is to act as an enabler for those communities who wish to apply for part night lighting in their locality. There is no council funded programme to cover the costs of implementing part night lighting. As such, any associated costs for implementation will need to be sourced by those parties applying for the initiative in their locality.

# **Background and Context**

- 6. Oxfordshire County Council, in its capacity as the highway authority, operates approximately 60,000 streetlights across the county and is responsible for the provision and maintenance of streetlights in Oxfordshire. Under the Highway Act 1980 the council has the power, but not the duty, to provide street lighting.
- 7. Part-night lighting is the practice of switching off streetlights during quieter night-time hours. Over half of UK councils have introduced part-night lighting in their areas. This measure is primary aimed at saving energy, reducing carbon emissions and reducing costs, but there are clear environmental benefits which support nighttime pollinators and bio-diversity gains.
- 8. In November 2024 a part-night lighting proposal "Proposed highway street lighting profiles, specifically with regard to operational hours and illumination levels (part-night lighting)" and its supporting EIA, was presented for decision at Cabinet Member Decision (CMD). A high volume of concerns were received about the proposal from Councillors, community groups and stakeholders, so the decision on the proposal was deferred with a request that a revised approach for part-night lighting be developed which involved much greater input from stakeholders and the public.
- 9. Following the CMD feedback, the revised approach was presented to Place Overview and Scrutiny Committee on 5 February 2025. The proposal outlined using key elements: data and insights, a two-phase engagement and consultation process, understanding impacts and risks, and using updated implementation processes to review how part-night lighting could be delivered in Oxfordshire.
- 10. This report details the work carried out to complete the review, and how the review outputs are feeding into, and support, an updated Framework proposal which includes the updated streetlighting policy, and its supporting EIA, and CIA's, with example case studies to provide context for potential cost and carbon savings.

# **Proposed Part-Night Lighting Implementation Framework**

- 11. After drawing on best practice principles developed for the 20mph programme and engaging with stakeholders and holding a public consultation, a revised proposal for the Framework has been developed. It proposes that part night lighting schemes in Oxfordshire would only be promoted where:
  - Schemes are individually requested by local town or parish councils, or local governance authorities, with support from OCC councillor.
  - The part night lighting exemption criteria does not apply.
  - Crime and road safety data have been reviewed to assess levels of risk.
  - Local residents and key stakeholders within the proposed scheme areas have been consulted on individual schemes via a public consultation.
  - Any and all risk feedback from key stakeholders, police, community safety groups, transport providers, and the nighttime economy, have been evaluated, in terms of probability and mitigated, where appropriate

If the above are met, then officers would prepare a report with recommendations for consideration, on whether or not to proceed, to be determined at Oxfordshire County Councils delegated decision by Cabinet Member for Transport Management.

12. The Framework is detailed in Annex B. It follows a six-step engagement process. The relevant Parish and Town Council considers the urban or rural geographical positioning of the part-night lighting scheme within their area first, with engagement with their residents and stakeholders. Each scheme would also be considered with Thames Valley Police input and analysed using the police crime and road safety data, also using Street Safe (StreetSafe | Police.uk) data to flag up any local crime or safety concerns. Only after going through each of the process steps would a scheme be considered for Delegated Decision.

# Stakeholder Engagement

- 13. During the spring of 2025, engagement activities was conducted through workshops with various stakeholder groups. These workshops included a diverse range of key stakeholders to ensure equitable representation across Oxfordshire:
  - Representatives of community groups
  - District, town and parish councillors
  - Emergency services and community safety teams
  - Representatives of women and girls groups
  - Employers, including of shift and nighttime economy workers.
- 14. The objectives of the workshops were to gather stakeholder views and concerns regarding part-night lighting and share the proposed Framework. It was important to hear stakeholders feedback on the potential impacts of part-night lighting, especially from stakeholders who represent those with protected characteristics, or those who are 'at higher risk' from crime or harm in our communities.

- 15. The same five key questions were asked at each of the stakeholder workshops to generate and focus discussion, and the feedback from the workshops highlighted several key themes:
  - Safety Concerns: Stakeholders, particularly representatives of women and girls groups, and community emergency services highlighted the potential negative impact of part night lighting on safety. Concerns were raised about increased crime rates, fear of walking in unlit areas, and the safety of vulnerable groups such as women, disabled or elderly individuals, and nighttime shift workers.
  - **Psychological Impact**: The psychological safety provided by street lighting was a recurring theme. Participants emphasised that well-lit areas contribute to a sense of security and reduce the need for extra planning and behaviour change precautions when going out at night.
  - Environmental and Biodiversity Benefits: Some stakeholders, particularly district, town, and parish councillors, valued the environmental benefits of reduced light pollution and the positive impact on biodiversity.
  - Tailored Solutions: There was a strong call for locally tailored solutions
    that consider the specific needs of different local community areas,
    including public transport routes, and areas with high footfall, or nighttime
    economy locations.
  - Community Engagement: Effective communication and engagement with residents is considered crucial. Stakeholders stressed the importance of engaging local communities and ensuring their feedback and local knowledge is used to inform part-night lighting decision-making and implementation.
- 16. In conclusion, the stakeholder groups acknowledged that while part-night street lighting has the potential to support the council's net zero ambitions and improve the night-time environment for bio-diversity gains, community safety is paramount, and it is essential to carefully consider the safety and well-being of all residents, especially those who are more vulnerable, before implementing a part-night lighting scheme.
- 17. The stakeholder feedback has clearly indicated that locally tailored schemes that consider safety first, with high levels of community engagement are key to the successful implementation of part-night lighting. The full stakeholder engagement report is available in Annex E

#### **Public Consultation**

18. The public consultation was held via 'Let's Talk Oxfordshire' from Monday 9 June to Sunday 6 July 2025. The consultation asked for views on the proposed part-night lighting implementation framework, and for views on part-night lighting in general.

19. The consultation received a high level of engagement, with 1,284 responses. The full consultation report is available as Annex F, with summaries provided below.

# **Consultation findings**

#### Main areas of support

- 20. There is a clear understanding of part-night lighting's environmental benefits, with a high level of support for part-night lighting in Oxfordshire. This is evidenced through the responses to several of the consultation questions as detailed below.
- 21. There was a higher percentage of completely 'positive' and 'mostly positive' responses (646 / 50.4%) compared to those who answered, 'mostly negative' or 'completely negative' (562 / 43.9%) to the question; "After reading the draft framework and frequently asked questions, what is your overall view of partnight lighting in Oxfordshire?"
- 22. A higher proportion of respondent's feedback was that they did not think we need to change the proposed Framework exemptions, with 615 / 48.1% answering 'No', compared to the 347 / 27.9% who answered 'yes', to the question; "Some factors would make an area unsuitable for part-night lighting, we are calling these 'Exemptions'. The exemptions are listed in the draft framework. Do you think that anything should be added, removed or changed in the list of exemptions?"
- 23. 566 respondents (44.5%) thought that parish and town councils and local governance authorities are the right people to request part-night lighting in their areas, compared to the 377 / 29.7% who responded 'no' to the question: "The draft framework says that part-night lighting would only be considered in areas where it is requested by the town and parish councils, or local governance authorities, and supported by the area's Oxfordshire County Councillor. Do you think that these are the right people to be able to request part-night lighting? Please remember that a local public consultation would also take place before any part-night lighting scheme was introduced."
- 24. The majority of respondents 628 / 50.5% also think that nothing needs to be changed within the proposed implementation framework process when asked the question: "This image shows the draft implementation process by which a part-night lighting scheme could be introduced. You can also read through the process here. Do you think that anything should be added, removed or changed in this draft implementation process?" This compares to the 347 / 27.9% who responded yes.
- 25. Overall, there is clear support for the environmental, sustainability and cost savings that part-night lighting can achieve in Oxfordshire.

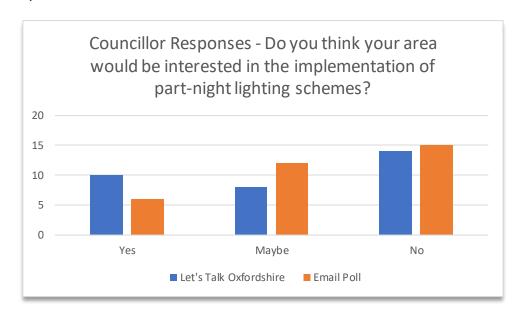
#### Main areas of opposition

- 26. The main concern of respondents to the consultation was safety. Those who oppose part-night lighting feel that part-night lighting will make streets less safe, and that well-lit streets are essential for preventing crime and ensuring public safety. The perception is that there will be an increase in crime and anti-social behaviour if part-night lighting is implemented, with darkness encouraging criminal activities. Legal and accountability issues were raised, with one respondent asking who would be held accountable if a crime or accident occurs due to a lack of streetlighting and requesting accountability mechanisms be put in place.
- 27. The are concerns about potential impact on vulnerable groups, with strong sentiment that part-night lighting will disproportionately affect younger people, the elderly and disabled individuals, but especially women and those who work late shifts or rely on public transport. There are concerns that reduced lighting will affect the night-time economy, as people stated they may avoid going out at night due to safety concerns.
- 28. Respondents also raised environmental versus safety considerations. While respondents acknowledge the environmental benefits of part-night lighting, they argue that these should not come at the expense of public safety. There were suggestions for alternative solutions, such as motion-activated lighting, that could also balance safety and environmental concerns.
- 29. Respondents also raised concerns that part-night lighting would disproportionately affect urban areas, especially areas of high footfall, or where there is a density of street infrastructure. This is reflected within the consultation feedback, where the post codes provided by Oxfordshire residents were analysed and this shows that a higher proportion of residents in urban areas expressed opposition to part-night lighting. It is worth noting that the urban case study (Annex G) indicates that urban areas would most likely not pass the implementation framework's exemption list.
- 30. There was also feedback indicating a distrust of local government, and lack of trust in the council's consultation decision-making processes, with commentary challenging the council's financial intent. There is a belief that the council is considering cost-cutting over public safety and that the consultation process is not genuinely considering residents' opinions. However, it should be noted that the original proposal of November 2024 has been completely reviewed following the consultation on that proposal, demonstrating that the council does genuinely consider residents' opinions.
- 31. Within the consultation responses from those who oppose part-night lighting, there are some who oppose it as a concept completely, even with the proposed implementation framework mitigations and checking processes taken into consideration.
- 32. The Framework itself does answer and mitigate concerns raised via the consultation; each scheme would be reviewed with the police using crime data to understand areas of crime risk, and public consultations would be carried out

to ensure residents views are considered. All schemes would also be reviewed against the exemption list, and where an exemption applies, the scheme would not be implemented. Also, if any concerns were raised with a scheme post implementation, schemes would be reviewed and stood down if required.

# Public Consultation Parish and Town Council Response

33. The consultation also provided an opportunity to gather feedback from Parish and Town councillors regarding their potential level of interest for implementing part-night lighting schemes within their areas. For those that identified themselves as councillors, an additional question was asked; 'Do you think your area would be interested in the implementation of part-night lighting schemes?' 65 responded, with their level of interested indicated below:



34. Alongside the responses received above, there were also 10 feedback emails received from councils, expressing a range of levels of support for part-night lighting within their areas. It is important to note that the consultation was not a formal invitation for parish or town councils to apply for part-night lighting within their areas, but a means of assessing the appetite for part-night lighting within Oxfordshire.

# **Updated Part Night Lighting EIA**

35. The concerns received through the stakeholder engagement workshops, and public consultation feedback have been reviewed to understand the potential impacts part-night lighting proposals may have on Oxfordshire's residents especially marginalised and vulnerable residents. The concerns raised come from a range of diverse perspectives, but the concerns are clear, especially for women, people from a younger or older age range, people with disabilities, those who undergone gender reassignment, or people from areas of

deprivation. as well as carers. An assessment of these concerns, and their impacts on those with protected characteristics is contained in the EIA, attached at Annex C.

- 36. Evidence found during the production of this report suggests that reduced street lighting has had no statistically significant effects on road safety at night or that reduced street lighting was associated with crime<sup>3</sup>. However, the genuine concerns of residents and stakeholder community groups are acknowledged, and these are outlined in the updated part-night lighting equalities impact assessment (Annex C).
- 37. By acknowledging the concerns raised via the consultation, the Framework has been developed in such a way that it allows for the steps that operate as 'check points', introducing mitigating actions and measures into the implementation process:
  - Using a targeted exemption list: The exemption list addresses specific concerns, and part-night lighting will not be introduced in any of the following areas:
    - Major road junctions, including roundabouts, slip roads and rail crossings
    - Where there are traffic calming measures, significant road narrowing or intrusions
    - Controlled crossing points
    - Areas supporting a night-time economy
    - Steps / stairs / gates / obstacles
    - Waterside paths
    - Remote alleyways
    - Subways and underpasses
    - Where there is Local Authority / police CCTV / ANPR
    - o Areas with high levels of crime or road traffic collisions
  - Public consultations and key stakeholder engagement on each proposed part-night lighting scheme: For each proposed scheme, parish and town councils will need to demonstrate that they have engaged with their various local stakeholder groups, and each individual scheme will have its own public consultation carried out via 'Let's Talk Oxfordshire' to ensure all views are heard. to ensure all views are heard.
  - Crime and road safety data analysis: There will also be a parallel process of engagement with Thames Valley Police to review crime and road safety data for each scheme to ensure that part-night lighting is not introduced in areas where is already heightened risks or concerns. There will be an ongoing annual evidence led part-night lighting monitoring and review meeting with Thames Valley Police, and where and if evidence supports it, schemes may be removed from the part-night lighting programme (if requested by Thames Valley Police and agreed with the council).

<sup>&</sup>lt;sup>3</sup> What is the effect of reduced street lighting on crime and road traffic injuries at night? A mixed-methods study | NIHR Journals Library

38. The equalities impact assessment (Annex C) is considered a live document and will be reviewed on an ongoing basis.

# **Updated Part Night Lighting CIA**

- 39. Part-night lighting can offer several environment benefits including reducing light pollution, supporting nocturnal wildlife such as moths and pollinators, and increasing biodiversity. Switching off lights also reduces energy consumption and its associated carbon use. A climate impact assessment has been carried out to detail these benefits for part-night lighting implementation in Oxfordshire (Annex D).
- 40. The assessment scores how part-night lighting can increase energy efficiency, enhance biodiversity, and drive behaviour change, underlining that these are main aims of the proposal. It is a clear behaviour change to address the climate and ecological emergency and will promote energy reduction and carbon saving to Oxfordshire's residents through example.
- 41. The consultation feedback did underline that the environmental benefits of partnight lighting cannot outweigh the perception of safety afforded by street lighting, and the climate impact assessment mitigations to reduce negative impacts does reference how concerns about crime will be factored into scheme considerations.
- 42. The climate impact assessment is considered a live document and will be reviewed on an ongoing basis.

# Corporate Policies and Priorities

- 43. The previous Street Lighting and Illuminated Assets policy and procedure allowed for Part-night lighting; however, it not specify how, or under what circumstances, part-night lighting may be implemented in a local area.
- 44. The Street Lighting and Electrical Assets Policy and procedure have been updated with regards to part-night lighting, to provide clarity, and outline the technical aspects (Annex A). Policy numbers SLP2 and SLP3 have been updated to include part-night lighting and policy SLP11 is a new additional policy specifically referencing the part-night implementation framework
- 45. The Policy's supporting procedure 'Procedure for Street Lighting and Illuminated Assets, has also been updated to include part-night lighting, with wording updated throughout, and is within its Annex C which has added in detailing part-night lighting schemes.
- 46. Both documents are intended to be used together to support operational delivery and are considered working documents. They have been submitted for cabinet approval as updated policy documents.

# **Financial Implications**

- 47. The development of this part-night lighting implementation framework and its associated engagement has been funded through existing service budgets.
- 48. The previous countywide framework, is now, through this policy proposed to be replaced by a community based framework and as such the previously estimated energy saving of £400k is now not realisable. The cost of implementing changes to the streetlights to a part-night lighting regime, estimated at £50 per light, will be funded by the scheme applicants. As such there are no planned costs to be incurred by the Council.
- 49. The new framework, if implemented, would mean that savings would be incremental and realised on a scheme by scheme basis. Electricity cost savings. At this time it is difficult to estimate the predicted annual benefit, as there is no firm understanding of the volume and/or the timeframe of individual scheme applications.
- 50. The table below summaries the information from the case studies in the attached annexes:

Catchment	Nos c	of	Cost	of	Potential	kWh	CO2e
	lights		change		Annual	saving	saving
	changed		£50/light		Saving		
Rural	46		£2,300		-£341	1,420	0.28
Urban	102		£5,100		-£3,340	13,952	2.73
Residential	165		£8,250		-£1,515	6,313	1.23

51. Any future commitment to provide funding by the council into a programme for part night lighting will be considered as part of the normal budget setting process.

Comments checked by:

Rob Finlayson, Strategic Finance Business Partner, rob.finlayson@oxfordshire.gov.uk (Finance)

# **Legal Implications**

- 52. There is no general requirement or obligation for the council to light the highway. Oxfordshire has set its own policy based on the council's priorities and general guidance and good practice.
- 53. The legislation and guidance to which the council must have regard when exercising its power to light the highway includes:
  - a. Section 97 of the *Highways Act 1980* gives the council the power to provide street lighting.
  - b. Regulation 5 of *The Highways (Road Humps) Regulations 1999* requires that road humps are illuminated.

- c. Section 17 of the *Crime and Disorder Act 1998* places on the council the duty to consider crime and disorder implications of exercising its various functions.
- d. Section 39 of the *Road Traffic Act 1988* imposes upon the council a responsibility for taking measures to prevent road traffic accidents.
- e. The *Traffic Signs Regulations and General Directions 2016* require some traffic signs to be directly illuminated when within a system of street lighting. Traffic sign illumination will not be affected by this initiative.
- f. The design requirements in BS 5489 allow road lighting levels to be lowered during periods of low traffic volumes
- 54. The proposed policy and Framework, which enable parish and town councils or local governance authorities to request changes to the operational provision of street lighting, are within the powers of the council.

Comments checked by:

<u>Jennifer.crouch@oxfordshire.gov.uk</u>, Head of Law (Environmental) jennifer.crouch@oxfordshire.gov.uk (Legal)

# **Staff Implications**

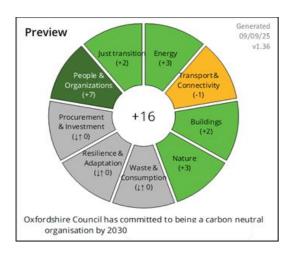
55. There are no new staffing implications arising from specifically from this report. The development of part-night lighting proposals is being funded through existing service budgets.

# **Equality & Inclusion Implications**

- 56. The council recognises the implications that these proposals may have on the physical and psychological safety of marginalised and vulnerable residents.
- 57. The council accept that the previous part-night lighting equalities impact assessment did not capture the needs or potential impacts of part-night lighting on marginalised and vulnerable residents sufficiently enough. But following the engagement with stakeholders and the comprehensive feedback from residents via the public consultation, the equalities impact assessment has been updated, and is presented in Annex C.
- 58. The updated assessment outlines where the negative impacts on protected characteristics could potentially occur and includes the proportional mitigations and interventions that have been put in place to reduce the negative impacts. The council acknowledges the concerns raised about the proposals outlined within this report and there will be ongoing monitoring to understand the potential impacts part-night lighting may have on Oxfordshire's communities.
- 59. The equalities impact assessment is a living document, and the council will continue to engage with stakeholders and our communities to ensure that it is truly reflective of the diversity within Oxfordshire.

# **Sustainability Implications**

60. The initiative makes a significant net positive impact to Carbon Reduction and Sustainability as demonstrated in the attached Annex D Climate Impact Assessment (CIA), and summarised extract below from the CIA.



- 61. The proposal impacts positively impacts the following categories within the Climate Impact Assessment, People & Organisation, Energy, Nature and Buildings. The assessment of the proposal on the climate impact on Transport and Connectivity, produced a negative score, which was based upon the feedback from stakeholder engagement, linked to the perception and fear of increased crime and potential negative impacts on road safety, which may cause some highly impacted groups to rely more on private car and taxi use during the hours of scheme operation. However, based upon the results of the consultation, and considering where and when schemes will be employed taking into account the exemption criteria, this is likely to impact a very small number of residents. Where a PNL scheme may be allowed (not exempt), consultation and engagement with local communities, stakeholders and highly impacted and vulnerable groups, alongside analysis of; crime, fear of crime and accident data, will be the determining factor in officers recommending a scheme for approval. Officers believe these mitigation measures would be reduce the negative potential impacts to an acceptable level.
- 62. As exact carbon savings will depend on uptake and each scheme will produce different savings figures, officers have provided case study examples in Annex G of this report.
- 63. There are beneficial sustainability implications as a result of implementing partnight lighting in terms of electricity, costs, and carbon savings. The three case studies discussed above provide a more granular and detailed understanding of this, but this in turn will be dependent on the volume and number of schemes implemented. Longer term monitoring will indicate the scale of the electrical, costs, and carbon savings.

# **Risk Management**

- 64. The council recognises the crime and safety risks associated with implementing part-night lighting and acknowledge the concerns raised through the engagement processes. The Framework has been designed to be managed on a risk basis. Each of the six-step stages provide an opportunity to re-assess risks, and apply mitigations as required for that specific scheme. Each scheme will be different and will be reviewed on its own merits.
- 65. Officers will continue to work with the police and community safety stakeholders and other council services to analyse available crime and safety data when reviewing proposed and any existing part-night lighting schemes.
- 66. The council also recognise the risks of working with vulnerable stakeholders and community groups. Through stakeholder mapping, seeking professional advice, adhering to data governance and accessibility legislation and completing risk assessments, as appropriate, the council will aim to protect the interests and wellbeing of all residents.

Paul Fermer, Director of Environment and Highways

Annex: Annex A – Street Lighting and Illuminated Assets Policy &

**Electrical Procedure** 

Annex B – Part Night Lighting Implementation Framework

Annex C – Part Night Lighting EIA Annex D – Part Night Lighting CIA

Annex E – Stakeholder Engagement Report Annex F – Part-Night Lighting and Street Lighting

Consultation report.

Annex G – Part Night Lighting Case Studies

Background papers: None

Other Documents: None

Contact Officer: Sean Rooney, Head of Highways & Road Safety

September 2025