



# Official Complaint to Surrey County Council

## Switching off All Street Lights during the Hours of Midnight to 5am Every Night for Significant Numbers of Streets in Surrey (85%)

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Date: 3<sup>rd</sup> November 2017

Version: 2.0

## Version Control and Distribution List

Version Number	Author	Date	Reason for Changes
0.1	Paul Steynberg	25/10/17	Initial Draft for Discussion
0.2	Paul Steynberg	31/10/17	Information added
1.0	Paul Steynberg /John Lazenby	02/11/17	Draft update prior to submission
2.0	Paul Steynberg /John Lazenby	03/11/17	Final update prior to submission

## Distribution List

Name	Title/Interest	Date Distributed	E-Mail Address
Complaints Office	Complaints email address	3 November 2017	county.complaints@surreycc.gov.uk

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## 1. Introduction

This paper serves to formally complain about the activities that Surrey County Council (SCC) are currently performing whereby they are switching off complete and/or part street lights across the County in such a way that:

- Is not acceptable to the public;
- Has put the public's property and personal safety at risk;
- Is contrary to the survey used to initiate the theory that underpins the entire initiative;
- Completely ignores many years of generally acceptable advice from our own Police force and other reputable institutions based on many years of costly surveys and whitepapers and relies on a single unknown and to date unverified study from the London School of Hygiene and Tropical Medicine published in 2015;
- Was implemented despite the consultation process being flawed and in direct contradiction of Central Government Consultation Principles and SCC's own Consultation Principles published on 11<sup>th</sup> January 2016;

## 2. Action Taken Already

Despite numerous correspondences with the Leader of SCC, Cllr David Hodge and multiple correspondences to all SCC Councillors this issue has largely been completely ignored. We feel we have no further recourse but to formally complain to the council.

## 3. Desired Outcome

As council tax payers, we are acutely aware and acknowledge that there have been severe cuts to local funding however as a society we do not believe that the funding shortages by blacking out ALL the lights in 85% of the affected streets is an appropriate action to take. We believe that a longer and more informed consultation should have taken place and alternatives looked at.

This paper will demonstrate that SCC's decision to turn off the street lights without proper consultation is not something that the public want and that there has been a significant increase in crime and associated fear as a result. The public would like to:

- Have the lights all switched back on immediately
- Be consulted properly and appropriately and
- Explore other revenues/expenses from which to fund the required savings

## 4. Public Support

There is growing support for the street lighting to be fully reinstated. The following websites and petitions and comments within show this support.

**Facebook Page** - <https://www.facebook.com/groups/1008027575995026/> with 3,400 members  
Surrey CC Put our Street Lights back on - <https://www.facebook.com/groups/864884400325346/>

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**Main Petition** - [https://www.change.org/p/surrey-county-council-surrey-cc-put-our-street-lights-back-on?recruiter=342239611&utm\\_source=share\\_for\\_starters&utm\\_medium=copyLink](https://www.change.org/p/surrey-county-council-surrey-cc-put-our-street-lights-back-on?recruiter=342239611&utm_source=share_for_starters&utm_medium=copyLink) sitting at 5,000 votes

**George Kokimakis Petition** - <https://www.change.org/p/surrey-county-council-keeping-the-lights-on-in-surrey> with 4,391 votes

**Beca** - <https://www.change.org/p/surrey-police-turn-the-street-lights-back-on> - 448 votes

**Matthew Leadbeater** - <https://www.change.org/p/surrey-county-council-stop-county-council-to-turn-street-lights-off-and-think-of-health-and-safety> with 98 votes

Despite this public outcry there has been no interest or acknowledgment of the issues by SCC.

We believe that the consultation process was purposely kept low key, is in contravention of Central Government Policy and Surrey CC's own Consultation Principles and was designed by SCC to ensure that there could only be one possible result. We request that the following process be followed so that fairness to the public of Surrey and SCC working in the public interest are seen to be key elements.

1. ALL street lights across Surrey should immediately be turned back on
2. The survey should be re issued and be widely promoted on the Council website, on all social media, in all local press and on all local radio stations
3. The survey form should be available online, easy to find and should be available as a hard copy if required by members of the public who might not have access to a computer.
4. The questions in the survey must be give the following options

**Are you in favour of the council switching off street lights for part of the night where deemed safe to do so in order to reduce energy bills and reduce CO2 emissions and to minimise the risk and effect of crime?**

**Options:**

- **None (all lights remain on)**
- **Some (a few on each street)**
- **Many (several on each street)**
- **All (whole streets)**

1. The sorting of the survey results should be done with 3 members of the public present.
2. The results of the survey should be publically announced on the Council website, on all social media, in all local press and on all local radio stations
3. The decision to turn off any street light should be taken in the public interest
4. If the overall vote is for none of the street lights to be turned off then ALL lights should remain on during hours of darkness

## 5. Previous SCC Consultation Process

SCC published a set of consultation principles on 11<sup>th</sup> January 2016 [1] and the consultation that was executed did not meet the minimum standards of these principles nor did it follow Central Government

Consultation Principles. Based on this alone, we believe that the consultation process should be re-run, during which time ALL the lights should be switched back on again. (As per section 8 of this document)

A copy of this document can be found here: [2]

This document is broken down into sections A through K.

### 5.1. Section B – Consultations should have a purpose

The consultation did have a purpose and the questions put to the respondents were just 3 questions.

Are you in favour of the council switching off street lights for part of the night where deemed safe to do so in order to reduce energy bills and reduce CO2 emissions?

They were provided with 3 options:

- Many
- Some
- None

None of the respondents had an option to answer “ALL”. So, you could have many, some or none of your streets lights off, but no option or ALL of them. A full analysis of the street light switch offs reveals that of the 9,029 streets SCC decided to affect, 7,633 have ALL their lights switched off, an option not given to be answered and thus not given to be executed. The outcome of the survey was actually:

Many	Some	None	Total
390	253	199	842
46%	30%	24%	100%

[3]

The 3 questions asked of the public have no correlation to the underlying activity that it is purported to have ultimately lead to. NOBODY was asked whether they wanted ALL their street lights switched off in their streets. The likelihood is that very few people would have said yes to that option. Currently as a result 85% of all affected street lights have ALL lights off. On this single issue the council has executed an option they did not provide the public with during consultation and we demand that the practice desist immediately.

842 people polled in a county that boasts a population of approximately 1.1m. More effort should have been made to obtain a more representative sample. We will come onto this under section G. The survey even noted that some people were concerned about crime yet completely ignored this factor.

### 5.2. Section C - Consultations should be informative

Members of the public were not informed that their entire streets would be plunged into darkness and that after midnight their daughters, mothers, spouses, children would be forced to walk home without any

lighting whatsoever. They believed that some or many of the lights would be dimmed or switched off but that enough light would be made available to navigate and to feel safe. The consultation was not actually informative and was very misleading.

### 5.3. Section D - Consultations are only part of a process of engagement - Consider whether informal iterative consultation is appropriate, using new digital tools and open, collaborative approaches. Consultation is not just about formal documents and responses. It is an on-going process.

A study published in 2015 by the London School of Hygiene and Tropical Medicine (LSHTM) found no link between street lights being dimmed or switched off and any increase in road accidents or crime. SCC appear to have based their entire decision on a single study from a little known institution and chose to ignore all preceding advice from every police force in England. We have read though countless surveys and there are arguments for both sides of the fence BUT ALL studies talk about reduced or increased lighting, not taking out complete streets.

The London School of Hygiene and Tropical Medicine survey ends with a short disclaimer which suggests that there was not enough evidence available from all of the local authorities (LA's) involved and that only a low number of LA's responded. The survey indicates that this might be due to the fact that those none responding LA's may have noticed a rise in crime and or accidents as a result of turning off the street lights. This disclaimer therefore practically makes the survey null and void.

Below are some excerpts from Police forces around the UK. Should we ignore their advice rather and accept the advice and findings of the London School of Hygiene and Tropical Medicine over many years of research by respected criminologist and scientists?

Surrey Police website: <https://www.surrey.police.uk/advice/protect-your-home-and-belongings/vehicle-crime/>

Note paragraph 2 under extra precautions: When away from home, **try to park in a well-lit**, open location, or a police approved ParkMark car park.

A formal paper put out by the Metropolitan Police from an in-depth study written by Peter Kane, Crime Prevention Design Advisor, Metropolitan which quotes as part of it foreword "targeted lighting improvements have been proven to reduce crime and the fear of crime and if design partners can discuss lighting values using a common language, they will find it easier to provide a higher quality of night time environment.

Under his section on "Public Spaces" he continues to support light as a crime deterrent even to publish the following table for public spaces:

#### Average levels of Illuminance in Lux

Pedestrian only traffic	20 Lux*
Mixed vehicular and pedestrian	30 Lux*
Bus station passenger areas	25 Lux*
Urban large car park	
Short stay	30 Lux
Long stay	15 Lux
Urban small car park	
Short stay	20 Lux
Long stay	15 Lux
Urban local car park	10 Lux
Rural large car park	
Short stay	15 Lux
Long stay	15 Lux
Rural small car park	
Short stay	10 Lux
Long stay	10 Lux
Rural local car park	05 Lux
Sports stadium and similar venues (Escape, Anti Panic)	30 Lux**

\*Dependent on Environmental Zone (see Light Pollution section on page 24)

\*\*Minimum for Stands and Exit Areas

“We wish to draw the reader’s attention to the mixed vehicular and pedestrian (30 Lux), certainly does not suggest we switch off ALL the lights in a street.” [4]

Here is a quote directly from the Central Government Website:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/3893/manualforstreetsevidence.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3893/manualforstreetsevidence.pdf)

“In terms of personal safety and security, respondents are particularly concerned about poor street lighting and pedestrian walkways. Poor street lighting and deserted walkways increase insecurity, encourage crime and prevent residents from using their streets effectively and using more sustainable modes of transport. This document won and I quote “The ‘Manual for streets’ has won a Royal Town Planning Institute prize. The award recognizes that the document is radically changing designers’ and local authorities’ approach to residential street design for the better.” “ [5]

On page 9 we quote “Making appropriate provision for road-based public transport, cycling and walking can help to encourage modal shift from the private car, and so contribute to the sustainability and health agendas. Enhancing street environments through a high quality public realm incorporating local materials and historic street features, removal of clutter and pedestrian barriers, use of shared space where appropriate and enhanced street lighting can help to stimulate local economic activity, reduce street crime and encourage a sense of local community; this in turn encourages more local, shorter distance travel on foot or by cycle. This will be particularly important in conservation areas, national parks, World Heritage sites and other environmentally sensitive areas.”

To follow on from this award winning document there is a second version to be read in conjunction with the first titled called “Manual for Streets 2” and can be found here: <http://www.ciht.org.uk/en/document-summary/index.cfm/docid/055693F6-8DB0-4BBE-AA9FF1B5BC5E9412> [6]

12.6.1 Street lighting can contribute to:

- improving road safety;

- assisting in the protection of property;
- discouraging crime and vandalism;
- making residents and street users feel secure;
- Enhancing the appearance of the area after dark; and
- Encouraging walking, cycling and the use of public transport.

From an extract by B Jones published by the Department of International Development. "By 2020, an estimated 2.3 million people will die each year in road traffic crashes, 90% of them in low- and middle-income countries. The risk of crashing is higher in the dark than in daylight; street lighting is a relatively low cost intervention that may prevent crashes." [7]

The author admits that the methodological quality of the studies was poor however his conclusion is still that Street Light may prevent road traffic crashes, injuries and deaths. [8]

Cheshire Police - If you don't have a garage, park on your drive or on a **well lit street**. - <https://www.cheshire.police.uk/advice-and-support/roads-and-vehicle-safety/vehicle-crime/>

Sussex Police - Park with care, particularly at night or if you are leaving the vehicle for some time. If possible always park in a busy, **well lit area**. - <https://sussex.police.uk/advice/protect-your-home-and-belongings/vehicle-crime/>

Interpol - Where possible, park in a **well-lit** highly visible area - <https://www.interpol.int/Crime-areas/Vehicle-crime/Advice-for-car-owners/Preventing-car-theft>

Met Police - Parking in **well-lit** areas and busy streets increases the chances of a thief being seen, so they'll probably steer clear. - <https://www.met.police.uk/crime-prevention/theft-from-a-vehicle/vehicle-safe-and-sound/>

Cumbria Police - Park with care, if possible in a busy, **well lit** area. - <https://www.cumbria.police.uk/Advice-Centre/Road-and-Vehicle-Safety/Vehicle-Crime-and-Seized-Vehicle-Information.aspx>

The AA - Park somewhere safe – your garage, a **well-lit**, busy street or a car park displaying the 'Park Mark' sign- <https://www.theaa.com/driving-advice/security/protect-your-car>

College of Policing - If you have to walk alone at night take extra care. Stay on roads that are **well lit** and relatively busy - <https://www.police.uk/crime-prevention-advice/theft-and-robbery/>

Nottinghamshire Police - Where possible ensure that your vehicle is parked on your driveway or in your garage if you have one. Alternatively, ensure your vehicle is parked in a **well lit** area.- <https://www.nottinghamshire.police.uk/advice/prevention/vehicle>

Liconshire Police - Use your garage or park in **well-lit**, well-populated and overlooked areas. - <https://www.lincs.police.uk/reporting-advice/driving-roads-and-vehicles/theft-from-motor-vehicles/>

Again from Lincolnshire Police - Consider dusk till dawn lighting to **illuminate the area**. When parking on a street, pick a **well-lit** and populated area. - <https://www.lincs.police.uk/reporting-advice/driving-roads-and-vehicles/theft-of-motor-vehicles/>

<https://www.citylab.com/equity/2014/02/street-lights-and-crime-seemingly-endless-debate/8359/>

“The connection between light and crime may not be what most of us think it is, but the connection between light and our sense of safety is exactly what it's always been. Those Southampton researchers who measured crime rates in Wandsworth also found that the new lights "provide[d] reassurance to some people who were fearful in their use of public space," particularly women. Lighting increases a sense of community, and community pride. It brings us outdoors in our neighborhoods, helps us get to know each other. Fear keeps us out of the alley, and attraction to light and what it represents draws us to illuminated streets.”

We would assume that we would get the same message from every police station in the UK.

#### 5.4. Section F - Consultations should be targeted

Reading through all of the material we could not find information which was specifically aimed at people who might be out on the streets between the hours of midnight and 5pm.

#### 5.5. Section G - Consultations should take account of the groups being consulted

SCC's own policy on Consultation Principles states:

“Consult stakeholders in a way that suits them. Charities may need more time to respond than businesses, for example. When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action.”

The survey was conducted from 5<sup>th</sup> August to 2<sup>nd</sup> September 2016. [9]. This is a 4 week period and not 12 weeks as per the Central Government Policy.

Schools were closed for end of term break from [10] – 29<sup>th</sup> July to 4<sup>th</sup> September 2016. Most people with children would take their holidays during this period.

### 6. Money from Elsewhere/Is ALL expenditure necessary and should it be put ahead of Public Safety?

SCC manages a total annual budget of in the region of just shy of £1b. [11] We suggest, looking at the breakdown of this budget that the £210,000 (0.02%) figure to fund the lighting could be found from somewhere else rather than turn off the lights across entire streets, plunging members of the public in to darkness and leaving people scared about their personal safety and the safety of their property.

#### **Watts Gallery**

We can see that Surrey CC awarded a grant of £1m to Watts Gallery in 2016 and another £400k in 2017.

A simple analysis of the ledgers of the county for the past 12 months show an extraordinary reliance on contractors and consultant who always come at a premium. Can Surrey CC not consolidate and have centrally supporting permanent roles?

The council also has discretionary funds totalling almost £10m.

Our councillors at their discretion can issue grants to voluntary, community and social enterprise organisations. We would certainly recommend at this time of austerity that Surrey CC could reallocate £210k from this spend to get Surrey’s street lights back on. We put it to you that these discretionary funds are not to be spent on a compulsory basis. The council can decide as to how or if this money is spent.

## 7. Crime Statistics

Crime in Surrey has increased substantially since the lights were switched off. Here is a graph to demonstrate. This data is directly from Surrey Police. We would like to draw your attention to the spike post the lights being switched off. Whilst we appreciate that there have been Police cuts throughout Surrey we put it to you that the spike in crime across Surrey as a whole since the lights were turned off is no coincidence. We believe that this is as a direct result of Surrey CC’s actions and that most of the crimes committed between the hours of midnight and 5am could have been prevented had the lights been left on. Data is directly downloaded from Police public crime data and most night time occurring categories are more acute.



## 8. Some Comments from Local Constituents

Here are some other bits of information from our Facebook group worth noting and some comments from residents in these totally dark roads:

**Terrible it's just not right to be in pitch black at night, I do ladies pamper parties and come home late on some occasions, my road is incredibly hard to park down and end up parking far down my road if I'm back late. I feel so vulnerable and scared walking in the pitch black to my house after work, it's just not right I shouldn't have to feel that way.**

**My neighbour's car was stolen from their driveway in the early hours of this morning. We live on Chadacre, upper end before the school. Police are involved. These streetlights really need to come back on!!!**

**Holly McNally My neighbour had his car broken into outside my house at 1am I caught it on CCTV but could only see his silhouette because it was so dark. He used his mobile as a torch**

**Karen Matthews We had a car window smashed and our van broken into twice in the same week - one month after the lights were turned off...the ashtray of the car was thrown onto the pavement, obviously looking for money, at least if the streetlight outside was on they would have seen all that was in there was 40 pence...so we certainly want the lights back on...its costing a fortune replacing windows and door locks...!**

**Abigail Casbierd to SURREY CC PUT OUR STREETLIGHTS BACK ON - Thank you for adding me to your group, I am completely in support of this, as I leave to go to work at 3.30am every morning and unfortunately do not have the luxury of parking directly outside my house, so therefore have to walk down a now pitch black road to get to my car. The summer months were bad enough but now the darker mornings are here it is very unsettling. At the moment I am able to just jump in my car but when the frost sets in I will have to stand in the dark for sometime to de-icer my car not a thought I relish much. The road I live in also has a house that is a stop gap address for people just released from prison and it was only a few weeks ago that I was walking to my car when I came face face with somebody walking towards me that I wasn't even aware was there until we were in front of each other!! So please even if it is 1 light per street please turn them on!!**

The human cost of Surrey CC's actions is unnecessary and unacceptable and for the most part could have been prevented.

## 9. Conclusion

If nothing else I would suggest we switch the lights all back on and run another survey and as the 4<sup>th</sup> question is would you want all your lights switched off in your street. That would be a fairer way of moving forward rather than just ignoring our constituents.

## Works Cited

- [1] Cabinet Office - Civil service reform, "Guidance Consultation principles: guidance," 14 January 2016. [Online]. Available: <https://www.gov.uk/government/publications/consultation-principles-guidance>. [Accessed 25 October 2017].
- [2] Cabinet Office - Civil Service Reform Guide, [Online]. Available: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/492132/20160111\\_Consultation\\_principles\\_final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf).
- [3] SURREY COUNTY COUNCIL - Cabinet Meeting 18 October 2016, "SURREY COUNTY COUNCIL CABINET 12 DATE: REPORT OF: LEAD OFFICER: SUBJECT: 18 OCTOBER 2016 MR JOHN FUREY, CABINET MEMBER FOR HIGHWAYS, TRANSPORT AND FLOODING TREVOR PUGH, STRATEGIC DIRECTOR – ENVIRONMENT AND INFRASTRUCTURE STREET LIGHTING – INTRODUCTION OF A PART- NIGHT LIGHTING PROGRAMME," [Online]. Available: <https://mycouncil.surreycc.gov.uk/documents/s32981/item%2012%20-%20Cabinet%20Part%20Night%20Lighting%20report.pdf>.
- [4] P. Kane, *Lighting Against Crime - A Guide For Crime Reduction Professionals*, Metropolitan Police Office, 2011.
- [5] Y. I, B. A, R. S, E. T and P. R, "Guidance Manual for streets," [Online]. Available: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/3893/manualforstreetsevidence.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3893/manualforstreetsevidence.pdf).
- [6] Chartered Institution of Highways and Transportation, September 2010. [Online]. Available: <http://www.ciht.org.uk/en/document-summary/index.cfm/docid/055693F6-8DB0-4BBE-AA9FF1B5BC5E9412>.
- [7] Department for International Development, "Does street lighting reduce injuries caused by road traffic accidents? Evidence Update, Trauma Series, June 2011," June 2011. [Online]. Available: <https://www.gov.uk/dfid-research-outputs/does-street-lighting-reduce-injuries-caused-by-road-traffic-accidents-evidence-update-trauma-series-june-2011>.
- [8] "Evidence Update Summary of a Cochrane Review Trauma Series," [Online]. Available: [https://assets.publishing.service.gov.uk/media/57a08ab4e5274a31e0000728/Trauma\\_CD004728\\_June2011\\_Final.pdf](https://assets.publishing.service.gov.uk/media/57a08ab4e5274a31e0000728/Trauma_CD004728_June2011_Final.pdf).
- [9] Surrey County Council, "Surrey County Council – Part Night Lighting Consultation 12 August 2016," [Online]. Available: <https://mycouncil.surreycc.gov.uk/documents/s32982/Item%2012%20-%20Annex%201.pdf>.
- [10] Surrey County Council, "Surrey County Council School term and holiday dates 2016/2017," [Online]. Available: [https://www.surreycc.gov.uk/\\_\\_data/assets/pdf\\_file/0003/52716/FINAL-2016-2017-School-Term-and-Holiday-Dates.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0003/52716/FINAL-2016-2017-School-Term-and-Holiday-Dates.pdf).
- [11] Surrey County Council, "Open Data," [Online]. Available: <http://data.surreycc.gov.uk/def/concept/folders/themes/transparency>.