

City Environment, South Downs & The Sea Committee

Date: **23 January 2024**

Time: **4.00pm**

Venue: **Council Chamber, Hove Town Hall**

Members: **Councillors:** Rowkins (Chair), Fowler (Deputy Chair), Pickett (Opposition Spokesperson), Alexander, Burden, Galvin, Muten, Robinson, C Theobald and Winder

Contact: **John Peel**
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Date of Publication - Monday, 15 January 2024

AGENDA

Part One

Page

PROCEDURAL MATTERS

33 PROCEDURAL BUSINESS

- (a) **Declarations of Substitutes:** Where councillors are unable to attend a meeting, a substitute Member from the same political group may attend, speak and vote in their place for that meeting.
- (b) **Declarations of Interest:**
 - (a) Disclosable pecuniary interests;
 - (b) Any other interests required to be registered under the local code;
 - (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

- (c) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public. A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and on-line in the Constitution at part 7.1.

34 MINUTES

7 - 14

To consider the minutes of the meeting held on 14 November 2023

Contact Officer: John Peel

Tel: 01273 291058

35 CHAIRS COMMUNICATIONS

36 CALL OVER

- (a) Items 40 - 42 will be read out at the meeting and Members invited to reserve the items for consideration.
- (b) Those items not reserved will be taken as having been received and the reports' recommendations agreed.

37 PUBLIC INVOLVEMENT

To consider the following matters raised by members of the public:

- (a) **Petitions:** To receive any petitions presented by members of the public;
- (b) **Written Questions:** To receive any questions submitted by the due date of 12 noon on the 17 January 2024;
- (c) **Deputations:** To receive any deputations submitted by the due date of 12 noon on the 17 January 2024.

38 ITEMS REFERRED FROM COUNCIL

To Follow

To consider items referred from the last meeting of Full Council held on 14 December 2023

- (a) Petitions
 - (i) Neglect of Public Facilities at Wish Park is Impacting the Community's Health

39 MEMBER INVOLVEMENT

15 - 16

To consider the following matters raised by Members:

- (d) **Petitions:** To receive any petitions;
- (e) **Written Questions:** To consider any written questions;
- (f) **Letters:** To consider any letters;
- (g) **Notices of Motion:** to consider any Notices of Motion referred from Full Council or submitted directly to the Committee.

40 FEES & CHARGES 2024-25

17 - 42

Report of the Executive Director, Economy, Environment & Culture; Executive Director, Health & Adult Social Care; Executive Director for Housing, Neighbourhoods & Communities

Contact Officer: *David Wilder*

Ward Affected: *All Wards*

41 WEED MANAGEMENT

43 - 102

Report of the Executive Director, Economy, Environment & Culture

Contact Officer: Rachel Chasseaud

Tel: 01273 290753

Ward Affected: All Wards

42 PROCUREMENT OF LIQUID FUEL

103 - 106

Report of the Executive Director, Economy, Environment & Culture

Contact Officer: Ian Greene

Tel: 01273 294707

Ward Affected: All Wards

43 ITEMS REFERRED FOR FULL COUNCIL

To consider items to be submitted to the 1 February 2024 Council meeting for information.

In accordance with Procedure Rule 24.3a, the Committee may determine that any item is to be included in its report to Council. In addition, any Group may specify one further item to be included by notifying the Chief Executive no later than 10am on the eighth working day before the Council meeting at which the report is to be made, or if the Committee meeting take place after this deadline, immediately at the conclusion of the Committee meeting

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Further information

For further details and general enquiries about this meeting contact John Peel, (01273 291058, email john.peel@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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Brighton & Hove City Council

City Environment, South Downs & The Sea Committee

4.00pm 14 November 2023

Council Chamber, Hove Town Hall

Minutes

Present: Councillor Rowkins (Chair) Fowler (Deputy Chair), Pickett (Opposition Spokesperson), Alexander, Burden, Galvin, Muten, Robinson, C Theobald and Winder

Other Members present: Councillors

Part One

22 PROCEDURAL BUSINESS

22(a) Declarations of substitutes

22.1 There were none.

22(b) Declarations of interest

22.2 Councillor Winder declared a non-pecuniary interest in Item 32 due to being a member of a community group based at The Level.

22.3 Councillor Fowler declared a pecuniary interest in Item 30 due to being a shop owner in the proposed T-Zone area. Councillor Fowler would leave the Chamber during discussion of the item.

22(c) Exclusion of press and public

22.3 In accordance with section 100A of the Local Government Act 1972 ("the Act"), the Committee considered whether the press and public should be excluded from the meeting during an item of business on the grounds that it was likely, in view of the business to be transacted or the nature of proceedings, that if members of the press and public were present during that item, there would be disclosure to them of confidential information (as defined in section 100A(3) of the Act) or exempt information (as defined in section 100(I) of the Act).

22.4 **Resolved-** That the press and public not be excluded from the meeting.

23 MINUTES

23.1 **Resolved-** That the minutes of the previous meeting be approved as the correct record.

24 CHAIRS COMMUNICATIONS

24.1 The Chair provided the following communications:

“Since the last meeting of this committee, this administration has continued to work tirelessly on our priorities and those of our residents – restoring basic services and cleaning up the city and our neighbourhoods.

Improving the reliability of our refuse and recycling collections has been a top priority, and I’m pleased to say that our new afternoon collection crew has completed its first week of service. They provide a great deal of additional operational flexibility; last week they collected from West Hove, Hollingbury, Portslade and the city centre – refuse and recycling, kerbside and communal.

Today we will be approving another expansion in our recycling service – the second such improvement since taking office 6 months ago. This expansion is focussed on our recycling drop off points and will see 54 new bins for food and drink cartons being added to locations around the city.

We will also be rolling out 21 new containers for waste electrical items. We currently have only 2 such containers, and the only option for residents who do not live near to either of those is to take these items to one of our two Household Waste Recycling Centres. In other words, drive it to the tip. Consequently, a significant amount of electricals end up in household waste, despite containing a range of materials that can be reused.

Last week, Cllr Fowler and I visited Light Brothers in Lewes, our contractor for the processing of waste electricals. We met staff and saw first-hand the range of materials that can be extracted for recycling, including a variety of metals and the lithium from batteries. They are also able to extract any harmful materials to be disposed of safely and responsibly.

We will be reviewing the impact of these new containers and aim to add a further units in due course.

Following the success of our first Big Clean Up weekend in the summer, which saw councillors leading clean-up events in their wards, we are now holding another event, this time focussed on the city centre. On Saturday November 25th, councillors will be leading teams in the area around Brighton Station, as well as St James’ Street, West Street and other high footfall areas. We’d love to welcome anybody who would like to come and join, and residents can find details by contacting either me or their ward councillor.

Today, we’re also bringing forward proposals to increase fines for environmental offences, including graffiti tagging, which has blighted the city for so long. Recently, we have successfully identified taggers and have sent them out to clean it up and paint it out. Since the election in May, we have identified and fined 15 taggers, compared to only 5 in the same 6-month period last year.

Later this month, on November 21st, we’ll be holding the first event in our Re-Imagine Brighton & Hove series, focussed on tagging. The event will bring together residents, businesses, community groups, councillors & officers, police and others to gather views and ideas to help inform our Graffiti Tagging Reduction Strategy, which will come to this committee in the new year.

Having reopened the vast majority of the city’s public toilets, we are very pleased to be bringing forward plans for a brand new toilet and café at one of the city centre’s most used parks, The Level. Questions will rightly be asked about the existing building, the former Velo Café, and its attached public toilet. Serious issues with the plumbing and

drainage that stem back to the design and construction have meant that the building is currently unusable, and the costs involved in bringing it back to life are extremely high. The old toilets, tucked away in a discrete external corner of the building, were blighted by drug use and antisocial behaviour. On top of that, the rent was too high and caused successive businesses to struggle. Suffice it say, the project was not a success. We are now actively exploring options for the building, but the scale of the work required and the costs involved mean that sadly it will be some time before it can be repurposed. What we are proposing today will restore public toilet facilities to the park quickly by refurbishing one of the two period pavilion buildings to become a new public toilet, managed and monitored by an adjoining café. We have already had several expressions of interest in running this new venture, and residents in the area are very pleased that we are taking this action”.

25 CALL OVER

25.1 All items on the agenda were reserved for discussion.

26 PUBLIC INVOLVEMENT

26.1 There were none.

27 MEMBER INVOLVEMENT

b) Member Questions

1) Storm Ciarán

25.1 Councillor Pickett read the following question:

“What effort was made by the Council to inform the public, in good time, about possible preparatory actions needed to cope with the impact of Storm Ciarán? For example, at what point before the storm were residents told to not leave bins out? At what point was it communicated publicly by the Council that public toilets would be closed?”

25.2 The Chair provided the following reply:

Thank you for your question.

When the Amber weather warnings were first issued on Tuesday 31 October, social media posts from the Met Office and the Environment Agency were shared on the council’s X (formerly known as Twitter) and Facebook accounts advising people to be prepared for bad weather and to keep an eye on the forecast.

Information about the changes to services, including the suspension of refuse and recycling collection rounds and the closure of toilets were kept up to date on a dedicated storm web page from Wednesday lunchtime, once decisions were agreed by services and advice issued by the Local Resilience Forum.

A note and a link to this page was put up as a banner on every page of the council’s website advising people that they could find information about service changes due to the storm. Social media posts were also shared throughout the day on Wednesday and Thursday, directing residents to the page for more information. They covered the latest

advice and changes to services including bin collections, cancellation of planned events, health advice, seafront safety, travel advice and road closures.

Information was shared by local partners including East Sussex Fire & Rescue Service, NHS Sussex, and was reported on by local news, TV and Radio.

A message was also added to the Environment Contact Centre telephone line for the duration of Thursday 2 November, notifying residents of the suspension of waste collections, with an explanation of when they would instead be collected.

We would of course like to have been able to give more notice of service interruptions, but weather unfortunately does not bend to the will of human schedules. Operational decisions need to be made on the basis of the best possible information, which in the case of severe weather often means the previous day or indeed on the day. It goes without saying that the safety of our residents and staff is always the primary factor”.

25.3 Councillor Pickett asked the following supplementary question:

“Does the Administration feel it could have acted sooner with messages considering how dangerous the storm was?”

25.4 The Chair provided the following reply:

“My view is that we put out information as best as we could on all channels. Thankfully the storm event was not as severe as predicted it might be”.

2) Brighton Reimagined

25.5 Councillor Pickett read the following question:

“With regard to your planned Brighton Reimagined meetings, the first meeting is about graffiti. As this is a council event, many questions present themselves: what is the budget and where is it coming from? How will findings be used? How is the council ensuring a plurality of diverse voices are represented at these meetings? How does this relate to the recently published graffiti strategy and consultation? How was it decided this was the most pressing environmental issue to cover in a community meeting?”

25.6 The Chair provided the following reply:

“Thank you for your question. I actually counted 5 questions, but I will exercise my chair’s discretion and answer them in turn.

There is no dedicated budget for the Reimagine Brighton & Hove events. As far as possible, the events will be delivered at zero cost. Where some expenditure is unavoidable, such as the hiring of community space or providing printed promotional materials, the costs will be covered by the Policy & Communication Teams’ budgets.

The findings will be used to inform the updated Graffiti Tagging Reduction Strategy and Action Plan, which will be brought to a future meeting of this Committee for approval.

In terms of diverse representation, a comprehensive invitation list was created, which includes a variety of businesses, community groups, faith groups, developers and so on.

The event has been promoted publicly through email marketing and social media channels.

The event has been shared with Community Works, which supports charities, volunteers, businesses and the public sector across the city, and has a membership of over 500.

The council's Community Engagement Team has also shared the details of the event with their networks.

If anyone would like to attend that hasn't received details of the event, they can contact Lucie Spicer. lucie.spicer@brighton-hove.gov.uk.

As far as graffiti being one of the early events: The report that came to the last committee was an update on the delivery of the 2018 Graffiti Reduction Strategy and was seeking approval to begin consulting on ways to improve the Strategy. This event forms part of that consultation and seeks to broaden how we gather view and ideas from residents, with a focus on real conversations.

The timing of the Reimagine events broadly coincided with plans for a review of the Graffiti Tagging Reduction Strategy and offered an opportunity to engage with communities on a high-profile issue whilst also complementing the planned consultation work. The three further events will look at the cost of living, safety in the city and health and wellbeing".

25.7 Councillor Pickett asked the following supplementary question:

"How are young people specifically being engaged?"

25.8 The Chair provided the following reply:

"I can find out. Our approach is to invite as broad a range of people as possible. If there are any groups beyond the ones I've listed, I'll come back to you directly".

3) **Flooding**

25.9 On behalf of Councillor Meadows, Councillor Theobald read the following question:

"In November 2000 a scrutiny was requested and granted to look at the flooding across the city including Patcham. During the panel discussions the Southern Water Waste Water Manager advised the Panel "that the storm water network was neither designed nor expected to cope with the volume of surface runoff and groundwater infiltration carried by the system towards the end of 2000". The Waste Water Manager also reported that the "main strategic sewer network was sufficient for the needs of extrapolated local population levels for the next 20 years".

23 years on with the flooding and sewage levels in Patcham rising it is clear that that the sewer system is no longer sufficient for Patcham's needs, so my question would be what actions is the council going to take, as many of the actions from the scrutiny were not completed".

25.10 The Chair provided the following reply:

"As the Lead Local Flood Authority, we have a responsibility to manage flooding from surface water and ground water. We do not have responsibilities for the sewer itself becoming overwhelmed. However, as the surface water is discharged into the sewers further down the catchment, we have a responsibility to work in partnership with Southern Water to manage the ongoing flood risk within the city.

As part of our ongoing activities, we are talking with Southern Water and looking at ways to work collaboratively to deliver solutions to the flooding issues. The council is actively seeking opportunities for SuDS and other nature-based solutions to reduce the amount of surface water entering the sewers.

I share your concerns on flooding in the city. It is worth pointing out that, frighteningly, the types of weather we now experience are different to those in 2000, with what was considered a 1 in 10-year event now occurring every couple of years.

Next Monday, I am meeting with officers to review our strategy for Flood Risk Management around the city and will be seeking to identify what more we can do. It is worth noting, though, that as with so many other council activities, maintaining our existing infrastructure is extremely challenging after 13 years of Tory cuts. We all want to see things improve, so I trust that you'll join me in voting Labour at the next general election".

25.11 Councillor Theobald asked the following supplementary question:

"Has the council done anything to take preventative flooding measures in Patcham such as issuing sandbags?"

25.12 "I've met with Patcham residents and have asked for a meeting with officers. It is spectacular what residents there have done on this matter. In terms of practical measures, I will look and what can be done and come back to you directly".

28 OFFICIAL FEED AND FOOD CONTROLS SERVICE PLAN 23/24 - MID YEAR REPORT

25.1 The Committee considered a report of the Executive Director, Housing, Neighbourhoods & Communities that set out the Official Feed and Food Controls Service Plan 23/24, Mid Year Report.

25.2 Councillors Pickett and Theobald asked questions on the report.

25.3 **Resolved-**

1) That the committee notes the contents of the Official Feed and Food Controls Service Plan, Mid Year Report set out in the appendix to this report.

29 IMPROVING RECYCLING POINTS

29.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture that sought approval to rollout additional carton and WEEE containers across the city to increase the opportunities for recycling.

29.2 The Head of City Environment Strategy & Service Improvement explained the following correction to the report:

"Crown Street has now been excluded from Table 1 and Table 3 of Appendix 1. This means that a carton container will not be placed at this location. It also means that a

waste electrical and electronic equipment (WEEE) container will not be placed at this location. Crown Street was included by mistake and officers are sorry about this.

This does not affect the recommendation at 2.1. There had been a miscount in the number of containers to be rolled out and with the removal of Crown Street, the total number of carton containers remains 54. Again, apologies for this oversight.

Where there are changes to the report are 3.2, 3.6 and 7.1.

3.2 should read "There are currently 30 containers across the city for residents to use. The audit identified opportunities for an additional 54 containers to be rolled out across 49 locations. 47 of these will be in new locations (some with multiple bins) and two existing locations will have an extra container."

3.6 should read "There are currently only two WEEE containers for residents to use across the city. This has reduced considerably over the last few years due to vandalism, with people breaking into the containers to access the equipment. The audit identified an additional 57 locations for WEEE containers".

7.1 should also reflect the 57 locations for WEEE containers, rather than 58 in the last sentence".

29.3 Councillor Pickett moved the following motion to amend recommendation 2.1 and 2.2 as shown in bold italics below:

2.1. That Committee agrees to ***a consultation on the*** rollout ***of*** an additional 54 carton recycling containers to recycling points across the city.

2.2. That Committee agrees to ***a consultation on the*** rollout ***of*** 21 new WEEE containers to recycling points across the city.

29.4 Councillor Theobald formally seconded the motion.

29.5 Councillors Fowler, Pickett, Muten Galvin, Robinson, Theobald and Alexander asked questions and contributed to the debate of the report.

29.6 The Chair then put the motion to the vote that failed.

29.7 The Chair then put the recommendations to the vote that were approved.

29.8 **Resolved-**

- 1) That Committee agrees to rollout an additional 54 carton recycling containers to recycling points across the city.
- 2) That Committee agrees to rollout 21 new WEEE containers to recycling points across the city.

30 ENVIRONMENTAL ENFORCEMENT FRAMEWORK UPDATE

30.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture that sought approval to update the Environmental Enforcement Framework and related activities.

30.2 Councillors Pickett, Theobald and Robinson asked questions and contributed to the debate of the report.

30.3 Resolved-

- 1) That Committee notes the results of the public consultation on extending time-banding zones across the city in Appendix 1.
- 2) That Committee approves the expansion of time-banding zones to the roads detailed in Appendix 2 (a map is available in Appendix 3).
- 3) That Committee notes the objections received to the extension of the flyering licence area as detailed in Appendix 4.
- 4) That Committee agrees to extend the flyering licence area to the roads detailed in Appendix 5.
- 5) That Committee agrees to increase the Fixed Penalty Notice amount for some environmental offences as detailed in paragraph 3.21.
- 6) That Committee approves the updated Environmental Enforcement Framework (tracked changes version) as detailed in Appendix 6.
- 7) That Committee notes the implementation of other offences following previous committee approvals as described in paragraphs 3.24 and 3.25.

Note: Councillor Fowler left the Chamber during discussion and voting on the item.

31 THE MACLAREN PAVILION

31.1 The Committee considered a report of the Executive Director, Economy, Environment & Culture that sought approval to change the MacLaren Pavilion into a split-use café and public toilet facility to provide alternative public toilet facilities at The Level.

31.2 Councillors Fowler, Winder, Theobald and Pickett asked questions and contributed to the debate of the report.

31.3 Resolved-

- 1) That Committee agrees for the MacLaren Pavilion to change to a split-use café and public toilet facility, which is subject to planning approval.

32 ITEMS REFERRED FOR FULL COUNCIL

25.1 No items were referred to Full Council for information.

The meeting concluded at 5.25pm

Brighton & Hove City Council

City Environment, South Downs & The Sea Committee

Agenda Item 39(b)

Subject: Member Questions

Date of meeting: 23 January 2024

The question will be answered without discussion. The person who asked the question may ask one relevant supplementary question, which shall be put and answered without discussion. The person to whom a question, or supplementary question, has been put may decline to answer it.

The following written questions have been received from Members:

(1) Councillor Pickett- Bulky Waste Charges

Again, your manifesto states that your party intends to bring about an end to collection charges for bulky waste. Can the Chair explain how this proposal fits with the recent independent auditor's report which encouraged the council to consider increasing fees and charges wherever possible to address the looming budget deficit facing the city?

(2) Councillor Pickett- Dogs Being Poisoned On The Beach

I was concerned to read recent reports of dogs becoming seriously unwell after visiting the seafront in Hove. I understand the council has launched an investigation. Can you update us to any findings, and outline what form this type of investigation takes?

(3) Councillor Pickett- Pocket Park Street Planters

The council committed to establishing a series of pocket parks around the city, particularly in areas where cars are being parked on pavements. These pocket parks are being funded by residents. However, I am aware that currently, none are being approved due to the understandable worry that the council will have to take on the costs for maintenance and possible removal at a later date as has happened in the past. I understand a Department for Transport report, that includes a Manual for Streets, is being drafted to include legal agreements between the council and resident groups, that might include a deposit to cover future costs. When can we expect this report and action to get more planters in place as many residents are keen to improve their car-heavy areas with natural planting?

Brighton & Hove City Council

City Environment, South Downs & The Sea Committee

Agenda Item 40

Subject: Fees and Charges 2024-25

Date of meeting: 23rd January 2024

Report of: Executive Director, Economy, Environment & Culture;
Executive Director, Health & Adult Social Care; Executive
Director for Housing, Neighbourhoods & Communities

Contact Officer: Name: John Lack
Email: john.lack@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

1.1 The purpose of this report is to set out the proposed 2024/25 fees and charges for the service areas covered by the City Environment, South Downs & The Sea Committee, in accordance with corporate regulations and policy.

2. Recommendations

2.1 That Committee agrees the proposed fees and charges for 2024/25 as set out within the report.

2.2 That Committee delegates authority to the Executive Director of Economy, Environment & Culture (in relation to paragraphs 3.5 - 3.12), the Executive Director of Health & Adult Social Care (in relation to paragraphs 3.13 – 3.17) the Executive Director of Housing, Neighbourhoods & Communities (in relation to paragraphs 3.18 - 3.20) to change fees and charges as notified and set by central Government during the year.

Note: If the above recommendations are not agreed, or if the committee wishes to amend the recommendations, then the item will need to be referred to the Strategy, Finance & City Regeneration Committee meeting on 8th February 2024 to be considered as part of the overall 2024/54 budget proposals. This is because the 2024/25 budget proposals are developed on the assumption that fees and charges are agreed as recommended and any failure to agree, or a proposal to agree different fees and charges, will have an impact on the overall budget proposals, which means it needs to be dealt with by Strategy, Finance & City Regeneration Committee as per the requirements of the constitution. This does not fetter the committee's ability to make recommendations to Strategy, Finance & City Regeneration Committee.

3. Context and background information

- 3.1 As part of the budget setting process Executive Directors are required to agree changes to fees and charges through relevant Committee Meetings. The management of fees and charges is fundamental both to the financial performance of the City Council and the achievement of the Council's corporate priorities. The council's Corporate Fees & Charges Policy requires that all fees and charges are reviewed at least annually and should normally be increased in line with the cost of providing the service to maintain income in proportion to the net cost of service.
- 3.2 The Corporate Fees & Charges Policy also stipulates that increases above or below an agreed 'corporate rate of inflation' should be approved by committee. However, it should be noted that the corporate rate of inflation (3.5% for 2024/25) is not a default rate of increase and is a financial planning assumption only, set early in the financial year, and should not therefore determine actual increases which should normally reflect current and projected inflationary cost pressures to ensure that income is maintained in proportion to expenditure.
- 3.3 The committee are advised that if the proposed fees & charges recommended in this report are not agreed, or if the committee wishes to amend the recommendations, then the item will normally need to be referred to the Strategy, Finance & City Regeneration Committee meeting on 8th February 2024 to be considered as part of the overall 2024/25 budget proposals. This is because the 2024/25 final budget proposals will have been developed on the assumption that fees and charges are agreed as recommended and therefore any rejection or amendment of the proposed fees and charges may have an impact on the overall budget proposals, which means it would need to be dealt with by Strategy, Finance & City Regeneration Committee as per the requirements of the constitution. However, this does not fetter the committee's ability to make alternative recommendations to Strategy, Finance & City Regeneration Committee.
- 3.4 It is not always possible when amending fees and charges to increase by the exact inflation figure due to rounding. As a result, some fees and charges are rounded for ease of payment and/or administration.

City Transport – Public Spaces

- 3.5 It is proposed to increase most of the Public Spaces fees and charges by 10% to ensure all costs are recovered.
- 3.6 Changes in legislation relating to fees for objects on the highway have resulted in an increase in the cap. It is proposed to increase fees and charges for objects on the highways to better reflect the costs to the authority in maintaining this service. With the introduction of a new application or late renewal fee, existing tables and chairs licence fees are capped to support small businesses.
- 3.7 The proposed fees and charges are set out in Appendix 1.

City Environmental Management

City Parks - Allotments, Parks and Sports Bookings

- 3.8 It is proposed to set Tennis Court charges for Adult and Concessionary bookings to remain competitive to other Community Interest Companies. This will reduce the Tennis Court charges from £10.10 and £9.00 for Adult and Concessionary bookings to £9.00 and £8.00 respectively. It is anticipated the reduction of tennis court fees would encourage more bookings and generate income to meet existing income targets.
- 3.9 It is also proposed to uplift charges for allotments by 10% to contribute to the overall cost of providing the service. It is also proposed to uplift remaining sports bookings and Parks Charges by the corporate rate of inflation of 3.5%. Details of City Parks fees and charges are set out in Appendix 2.

City Clean - Flyering Licenses

- 3.10 Flyering licences fees are set at a rate that is considered reasonable to allow appropriate regulation and minimisation of flyering activity and to partly recover the cost of work required to clear the litter generated from flyering activity. It is proposed that flyering licences are uplifted by 10%. All licences will be valid for 24 hours.

Garden Waste Collection Service

- 3.11 The existing garden waste collection service charge is currently £85 per household per year. The proposal is to increase the garden waste charges by £9 to £94 per household per year which is comparable with neighbouring authorities.

Bulky Waste Collection Service

- 3.12 The current Bulky Waste fee is £60 for three items, with each extra item charged at £12 each and white goods charged at £45. The proposal is to maintain Bulky Waste fees at current year levels. It is anticipated the maintaining of the fee will encourage users to the service in order to meet existing income targets. Details of City Clean fees and charges are set out in Appendix 2.

Bereavement Services

- 3.13 This year's fees & charges review for Bereavement Services has again considered the continuing competitive market and all other options available to bereaved families, when making funeral arrangements. The majority of our funeral business comes from Local Independent Funeral Directors who have the difficulty of trying to compete with the larger companies (e.g Dignity/ Co-op / CPJ Field). These companies currently have established and major national advertising campaigns offering low-cost funerals – cremation only, no funeral service etc. We are proposing an average

increase on cremation fees of around 5.5%, and 8.5% on our burials in our cemeteries. Despite this increase it is hoped we can minimise the impact on the Local Independent funeral directors at a time when, we acknowledge, they will be impacted by rising costs due to the current and continuing financial crisis. We hope to remain as their crematorium of choice in the local area. It should be noted there is a direct competitor immediately adjacent to our Woodvale Cemetery and Crematorium grounds, which is privately owned by Dignity Funeral Services, the largest owner of private crematoria in the country.

- 3.14 Benchmarking has been carried out with local neighbours where comparable fees and charges are available. This provides valuable information because they are alternative service providers who customers are most likely to opt for as an alternative to Brighton & Hove City Council's services.
- 3.15 As with previous reviews, there are no proposals to change charging policies in relation to children. The proposals are formulated to be consistent with the general principle of cost recovery as already stated, including maintaining the facilities we have at Woodvale where our Crematorium chapels and grounds are grade 2 listed.
- 3.16 The proposals to increase cremation, burial and memorialisation fees from 1 April 2024 will generate an estimated additional £0.091m assuming business levels remain consistent with the 2022/23 year. These proposals are based on the service continuing to follow best practice in line with guidance from the Institute of Cemeteries and Crematorium Management (ICCM), a national organisation providing policy and best practice guidance to Burial and Cremation authorities.
- 3.17 Please see Appendix 3 proposed Bereavement Services fees and charges and Appendix 4 Bereavement Services benchmarking.

Safer Communities

Trading Standards

- 3.18 It is proposed to increase the non-statutory fees and charges in line with the September RPI rate of inflation at 8.9%.

Environmental Health

- 3.19 It is proposed to increase the majority of the non-statutory fees and charges in line with the September RPI rate of inflation at 8.9%.
- 3.20 The proposed fees and charges for Safer Communities are set out in Appendix 5.

4. Analysis and consideration of alternative options

- 4.1 The proposed fees and charges in this report have been prepared in accordance with the council's fees and charges policy and form part of the

proposed budget strategy. They take account of the requirement to increase by the corporate inflation rate of +3.5% (unless otherwise stated) and consideration has been given to other factors such as statutory requirement, cost recovery and prices charged by competitor / comparator organisations.

5. Community engagement and consultation

5.1 Not undertaken

6. Conclusion

6.1 Fees and charges are considered to be an important source of income in enabling services to be sustained and provided. A wide range of services are funded or part funded by fees and charges including those detailed in this report. The overall budget strategy aims to ensure that fees and charges are maintained or increased as a proportion of gross expenditure through identifying income generating opportunities, ensuring that charges for discretionary services and trading accounts cover costs, and ensuring that fees and charges keep pace with price inflation and/or competitor and comparator rates.

6.2 Fees and charges budgets for 2024/25 are assumed to increase by a standard inflation rate of +3.5% with the exception of those listed within this report. The council's Corporate Fees and Charges Policy requires that all fees and charges are reviewed at least annually and should normally be increased by either; the standard rate of inflation, statutory increase or increases in the costs of providing services.

7. Financial implications

7.1 The fees and charges recommended in this report have been reviewed in line with the Corporate Fees & Charges Policy and all relevant regulations and legislation. The anticipated recurring financial impacts of fee changes will be reflected within service revenue budgets. Increases to meet the corporate rate of inflation of 3.5% are normally applied to all council income budgets as a minimum but fees & charges should normally be set to recover costs and/or maintain income in proportion to expenditure. Increases above or below the corporate rate of inflation require approval by the relevant service committee or Strategy, Finance & City Regeneration Committee and can result in additional contributions toward the cost of services and/or corporate and service overheads. This can also result in the achievement of a net budget saving to the council. Where this is the case, this will be reflected in Budget proposals for the relevant service and will be incorporated within the revenue budget report to Strategy, Finance & City Regeneration Committee and Budget Council in February 2024. Income from fees and charges is monitored as part of the Targeted Budget Monitoring (TBM) process.

Name of finance officer consulted: John Lack Date consulted: 08/01/2024

8. Legal implications

- 8.1 The council needs to establish for each of the charges imposed both the power to levy charges of that type, and, where applicable, the power to set the charge at a particular level. In some cases, the amount of the charges is set by Government. In other cases where a figure is not prescribed, for example the general power to charge for discretionary services under the Local Government Act 2003, the amount that can be charged is restricted to cost recovery. In some prescribed cases, such as charging for trade waste collection, legislation enables the Council to set charges at a commercial rate. In all cases the council must act reasonably and ensure that any statutory formalities which govern particular charges are complied with.

Name of lawyer consulted: Victoria Simpson Date consulted: 15/01/2024

9. Equalities implications

- 9.1 Management of fees and charges is fundamental to the achievement of council priorities. The council's fees and charges policy aims to increase the proportion of costs met by the service user. Charges, where not set externally, are raised by corporate inflation rates as a minimum unless there are legitimate anti-poverty considerations.

10. Sustainability implications

- 10.1 There are no direct sustainability implications arising from the recommendations in this report.

11. Other Implications

- 11.1 There are no other significant implications arising from the recommendations in this report.

Supporting Documentation

1. Appendices

1. Proposed City Transport (Public Spaces) Fees & Charges 2024/25
2. Proposed City Environmental Management Fees and Charges 2024/25
3. Proposed Bereavement Services Fees and Charges 2024/25
4. Bereavement Services Benchmarking 2024/25
5. Proposed Safer Communities Fees and Charges 2024/25

2. Background documents

1. None

Appendix 1 - Proposed City Transport (Public Spaces) Fees and Charges 2024/25

	2023/24	2024/25	
	Actual Charge	Proposed Charge	Change %
SCAFFOLD LICENCE			
Initial 6 weeks	£92.00	£102.00	10.9%
Renewal subsequent 8 weeks	£92.00	£102.00	10.9%
Initial 6 weeks for 12m. length along the Public Highway	£290.00	£319.00	10.0%
Renewal subsequent 8 weeks for 12 meter length along Public Highway	£290.00	£319.00	10.0%
Monitored contractor or retrospective licence for 6 weeks under 12 meter (£92 Surcharge)	£184.00	£204.00	10.9%
Monitored contractor or retrospective licence for 6 weeks over 12 meter (£92 Surcharge)	£382.00	£421.00	10.2%
SKIP LICENCE			
Returnable Deposit	£92.00	£102.00	10.9%
Deposit Processing Fees	£24.00	£27.00	12.5%
1 day Licence Standard Skip	£11.00	£13.00	18.2%
7 day Licence Standard skip	£37.00	£41.00	10.8%
28 day Licence Standard Skip	£70.00	£77.00	10.0%
1 day Licence Large Skip	£37.00	£41.00	10.8%
7 day Licence Large Skip	£70.00	£77.00	10.0%
28 day Licence Large Skip	£137.00	£151.00	10.2%
HOARDING			
Area of Hoarding per square metre initial 6 week application	£28.00	£31.00	10.7%
Area of Hoarding per square metre renewal 8 week application	£28.00	£31.00	10.7%
BUILDING MATERIALS			
Per week	£43.00	£48.00	11.6%
Secure Hazardous Waste, Lockable Storage Containers, Temporary offices, Welfare facilities and Asbestos removal, decontamination units per square metre	£29.00	£32.00	10.3%
Crane. Tower cranes, mobile work platforms on the highway.	£136.00	£150.00	10.3%
OBJECTS ON THE HIGHWAY			
SHOP DISPLAY			
New application or late renewal fee	New	£500.00	N/A
Shop Display licence less than 5 square metres	£125.00	£150.00	20.0%
Shop Display licence more than 5 square metres	£200.00	£350.00	75.0%
TABLES AND CHAIRS			
New application or late renewal fee	New	£500.00	N/A
Table and Chair licence less than 5 Square meters	£150.00	£150.00	0.0%
Table and Chair licence more than 5 Square meters	£350.00	£350.00	0.0%
A-BOARD LICENCE			
New application or late renewal fee	New	£200.00	N/A
Annual licence fee	£125.00	£138.00	10.4%
OTHER FEES			
Highway Licence detail changes	£37.00	£41.00	10.8%
One off promotions per square metre	£37.00	£41.00	10.8%
Temporary Event Advertising Signs - first 50 (each)	£13.00	£15.00	15.4%
Temporary Event Advertising Signs - over 50 (each)	£7.00	£8.00	14.3%
Highway pre-construction survey	£385.00	£424.00	10.1%
CULTIVATION LICENCE			
Licence for individuals who wish to cultivate a highway verge or other highway green space adjacent to their property.	£43.00	£48.00	11.6%

Appendix 2 - Proposed City Environmental Management Fees and Charges 2024/25

	2023/24		2024/25	
	Charge	Proposed Charge	Change %	
CITY PARKS				
Allotments Rents per square metre - 25% discount to allotment rent for senior citizens, full-time students, unemployed, disabled and community groups	£0.36	£0.40	11.1%	
Allotments Waiting List Application	£18.80	£20.70	10.1%	
Allotments Annual Administration Fee	£25.00	£27.50	10.0%	
Dedicated Benches	£2,100.00	£2,174.00	3.5%	
Tree Planting - dedicate a tree in a park	£381.70	£395.10	3.5%	
Tree Planting - dedicate a street tree	On Request	On Request		
Copy of Tree preservation order (TPO)	£41.40	£42.90	3.6%	
High Hedge Complaint Fee	£650.00	£672.80	3.5%	
BOWLS				
Per person per hour - Casual	£4.00	£4.20	5.0%	
Concessionary per hour - Compass Card, Over 65s, unemployed (casual)	£2.50	£2.60	4.0%	
Club session - Outside area club	£5.70	£5.90	3.5%	
Club concessionary session - Compass Card, Over 65s, unemployed, outside area club	£4.20	£4.40	4.8%	
Season ticket - adult unattended green	£101.90	£105.50	3.5%	
Season ticket - junior	£73.00	£75.60	3.6%	
Pavilion - evening committee meetings	£41.40	£42.90	3.6%	
CRICKET				
Adult (wicket only)	£67.50	£69.90	3.6%	
Junior (wicket only)	£35.90	£37.20	3.6%	
Changing facilities	£41.40	£42.90	3.6%	
Training strip - Aldrington	£21.60	£22.40	3.7%	
STALLBALL, SOFTBALL & ROUNDERS				
First match booked	£32.50	£33.70	3.7%	
Subsequent matches	£19.90	£20.60	3.5%	
CYCLING				
Preston Park Cycle Track per hour - Club Events	£37.80	£39.20	3.7%	
Preston Park Cycle Track per hour - Commercial Events	£63.10	£65.40	3.6%	
Club season (once a week 2.5hrs for 3 months) [VAT exempt]	£209.20	£216.60	3.5%	
TENNIS				
Adult court per hour	£10.10	£9.00	-10.9%	
Junior court per hour (under 18's)	£5.30	£5.50	3.8%	
Concessionary court per hour Compass Card, Over 65s, unemployed	£9.00	£8.00	-11.1%	
Junior court per hour weekday before 5 (including summer holidays)	£2.60	£2.70	3.8%	
Concessionary court per hour weekday before 5 (including summer holidays)	£4.40	£4.60	4.5%	
Season ticket	£117.60	£121.80	3.6%	
Junior season ticket	£18.00	£18.70	3.9%	
Club season ticket	£40.20	£41.70	3.7%	
FOOTBALL				
Adult (pitch only)	£69.50	£72.00	3.6%	
Changing facilities	£41.40	£42.90	3.6%	
Junior (pitch only)	£19.90	£20.60	3.5%	
Changing facilities	£41.40	£42.90	3.6%	
Junior training, no requirements	£18.60	£19.30	3.8%	
5/7-a-side @Preston/Waterhall (per pitch)	£56.00	£58.00	3.6%	
PAVILIONS				
Pavilion -Casual per day	£137.60	£142.50	3.6%	
Play group Mile Oak per half day [always VAT exempt]	£18.60	£19.30	3.8%	
Table Tennis Mile Oak per evening [VAT exempt]	£31.00	£32.10	3.5%	
RENTS				
Waterhall [Brighton Rugby Club VAT exempt]	£5,016.20	£5,191.80	3.5%	
Patcham Utd (Horsdean pitch + pavilion season)	£2,398.30	£2,482.30	3.5%	
Brighton & Hove Cricket Club - Pitch	£925.60	£958.00	3.5%	
Brighton & Hove Cricket Club - Clubroom	£925.60	£958.00	3.5%	
Rottingdean croquet club	£1,402.10	£1,451.20	3.5%	
MISCELLANEOUS				
Hot Air Ballooning (flat year rate)	£379.70	£393.00	3.5%	
Cross Country (flat rate, no facilities)	£43.00	£44.60	3.7%	
School Sports (Initial 8x100m) [VAT exempt]	£88.40	£91.50	3.5%	
School Sports (overmarking) [VAT exempt]	£32.90	£34.10	3.6%	

Appendix 2 - Proposed City Environmental Management Fees and Charges 2024/25

	2023/24	2024/25	
	Charge	Proposed Charge	Change %
FLYERING LICENCES			
One day licence	£70.00	£77.00	10.0%
One week licence	£193.00	£213.00	10.4%
Annual licence	£413.00	£455.00	10.2%
Additional Badge (cost per badge)	£44.00	£49.00	11.4%
Fringe Badge	£44.00	£49.00	11.4%
CITY CLEAN			
Annual Green (Garden) Waste Collection	£85.00	£94.00	10.6%
Bulky Waste Collection			
Up to 3 items for collection	£60.00	£60.00	0.0%
Each additional item	£12.00	£12.00	0.0%
White goods	£45.00	£45.00	0.0%

Appendix 3: Proposed Bereavement Services Fees & Charges 2024/25

fee shown inc VAT

Service	What is charged for	Fee 23/24 £	Proposed Fee 2024/25 £	Percentage Increase/ Decrease
Cremation	Adult Cremation (18 and over)	755	793	5%
Cremation	Child Cremation (17 or below/Still-birth/Foetal remains)	No Charge	No charge	N/A
Cremation	Early Service/Public Health Cremation (Set appointment times)	540	594	10%
Cremation	Cremation Only Unattended (No Service/ Set appointment)	455	460	1%
Cremation	Body Parts Cremation (No use of Chapel)	120	130	8%
Cremation	Additional Fee for Saturday Cremation	285	299	5%
Cremation	Additional Fee for Sunday or Bank Holiday Cremation	570	598	5%
Cremation	Additional 30 mins in Crematorium Chapel	250	280	12%
Use of Crematorium chapel	Use of Crematorium Chapel (Mon- Fri) (no linked cremation or burial)	new fee	340	N/A
Use of Crematorium chapel	Use of Crematorium Chapel on a Saturday (no linked Cremation or burial)	new fee	639	N/A
Use of Crematorium chapel	Use of Crematorium Chapel on a Sunday or Bank Hol (no linked Cremation or burial)	new fee	938	N/A
Cremation	Visual Tributes Single Photo	15	15	0%
Cremation	Visual Tributes Additional Single Photo	new fee	12	N/A
Cremation	Visual Tributes Basic Slideshow	60	60	0%
Cremation	Visual Tributes Music Tribute	75	78	4%

Service	What is charged for	Fee 23/24 £	Proposed Fee 2024/25 £	Percentage Increase/ Decrease
Cremation	Visual Tributes Themed Tribute	new service	96	N/A
Cremation	Visual Tributes Checking Supplied Video	33	39	18%
Cremation	Visual Tributes Downloadable copy	12	12	0%
Cremation	Visual Tributes Each extra 25 Photos or part thereof	27	27	0%
Cremation	Webcast Live & 28 day view again	78	78	0%
Cremation	Webcast / Visual tribute Keepsake (DVD, USB) 1st Copy	66	66	0%
Cremation	Webcast /Visual Tribute Keepsake (DVD, USB) additional copies	33	33	0%
Strewing Remains	Witnessed Strewing in GOR - Mon-Fri Person Cremated at Woodvale	No Charge	No charge	N/A
Strewing Remains	Witnessed Strewing in GOR - Mon - Fri Other Crematoria	99	99	0%
Strewing Remains	Witnessed Strewing at Woodland Valley - Mon - Fri	120	130	8%
Strewing Remains	Witnessed Strewing in GOR Additional Charge for Saturday Morning	125	135	8%
Cremated Remains	Temporary storage per month (after first 3 months)	50	50	0%
Cremated Remains	Split of Cremated Remains (Per Casket)	20	20	0%
Certified Extract from Register	Certified Extract From Register of Cremations	25	25	0%
Certificate	Duplicate Cremation Certificate	25	25	0%
Grave Purchase	Adult	913	995	9%
Grave Purchase	Adult - non resident	2490	2490	0%

Service	What is charged for	Fee 23/24 £	Proposed Fee 2024/25 £	Percentage Increase/ Decrease
Grave Purchase	Adult Woodland Valley Burials	1023	1080	6%
Grave Purchase	Adult - non resident Woodland Valley Burials	2790	2790	0%
Grave Purchase	Child 17 yrs and under	No Charge	No charge	N/A
Interment	Depth of 1, 2 or 3	1162	1255	8%
Interment	Depth of 1, 2 or 3 Non resident	3168	3168	0%
Interment	Child 17 yrs and under	No Charge	No charge	N/A
Interment	Public Health/ Hospital Contract	760	800	5%
Interment	Large Coffins Additional Fee	160	175	9%
Interment	Body Parts (No use of Chapel)	220	250	14%
Grave Purchase	Cremated remains Woodland Valley	825	850	3%
Grave Purchase	Cremated remains -non resident Woodland Valley	2250	2250	0%
Cremated Remains Interment	Cremated Remains	220	250	14%
Cremated Remains Interment	Cremated Remains 2nd interment at same time	110	125	14%
Cremated Remains Interment	Additional Digging Fee Per Foot (After 3 Feet)	75	82	9%
Cremated Remains Interment	Cremated remains Additional fee - Saturday	320	350	9%
Cremated Remains Interment	Cremated remains Additional fee - Sunday/ Bank Holiday Subject to staff availability	480	525	9%
Cremated Remains	Scattering Ashes on a Grave Monday-Friday	120	132	10%

Service	What is charged for	Fee 23/24 £	Proposed Fee 2024/25 £	Percentage Increase/ Decrease
Cremated Remains	Scattering Ashes on a Grave Additional Fee Saturday	285	300	5%
Cremated Remains	Scattering Ashes - on a Grave Additional Fee Sunday/ Bank Holidays Subject to staff availability	480	525	9%
Biodegradable Containers for Ashes Burials	Wooden Casket With Name Plate	120	132	10%
Biodegradable Containers for Ashes Burials	Wooden Casket (Double Size)	180	198	10%
Biodegradable Containers for Ashes Burials	NatureUrn® in Oatmeal or Green	60	60	0%
Biodegradable Containers for Ashes Burials	Brown Acorn Urn	60	60	0%
Biodegradable Containers for Ashes Burials	Woodvale Cardboard Casket (if not cremated at Woodvale)	24	24	0%
Certified Extract from Register	Certified Extract From Register of Burials	25	25	0%
Grave Deed	Transfer of Exclusive Right of Burial By Probate	80	85	6%
Grave Deed	Transfer of Exclusive Right of Burial By Statutory Declaration	135	145	7%
Grave Search	Prices from	27	27	0%
Interment Weekend Prices	Interment on Saturdays (Depth of 1, 2 or 3) Supplement	380	415	9%
Interment Weekend Prices	Interment on Sundays or Bank Holidays (Depth of 1, 2 or 3) Supplement Subject to staff availability	570	620	9%
Memorial Permit Fee	Full Permit Single Headstone (up to 2ft 6 inches)	160	168	5%
Memorial Permit Fee	Full Permit Single Headstone (over 2ft 6 inches)	240	252	5%
Memorial Permit Fee	Tablet for Lawn Memorial Cemetery	140	148	6%
Memorial Permit Fee	Kerbset only 7ft x 3ft	130	140	8%

Service	What is charged for	Fee 23/24 £	Proposed Fee 2024/25 £	Percentage Increase/ Decrease
Memorial Permit Fee	Additional Cover Slab or Chippings	130	130	0%
Memorial Permit Fee	Additional Inscription	70	75	7%
Memorial Permit Fee	Vase with Inscription	70	75	7%
Mortuary Fee	Private post mortem	288	296	3%
Mortuary Fee	High Risk Post Mortem	815	840	3%
Mortuary Fee	Forensic Post Mortem Out of Hours	485	493	2%
Mortuary Fee	High Risk Forensic Post Mortem Out of Hours	1012	1037	2%
Mortuary Fee	Transfer fee from RSCH to City Mortuary	65	65	0%
Memorials				
Memorial Book of Remembrance	2 Line entry	138	150	9%
Memorial Book of Remembrance	Additional lines	24	27	13%
Memorial Book of Remembrance	Floral emblem - additional to 5 line entry	90	90	0%
Memorial Book of Remembrance	Badge / Crest - additional to 5 line entry	96	96	0%
Memorial Book of Remembrance	Illuminated Capital - additional to 5 line entry	132	132	0%
Memorial Book of Remembrance	Full Coat of arms - additional to 5 line entry	144	144	0%
Memorial Tree of remembrance	Memorial leaf - 5 year initial purchase	210	252	20%
Memorial Tree of remembrance	Memorial leaf - 2 year renewal	90	120	33%

Service	What is charged for	Fee 23/24 £	Proposed Fee 2024/25 £	Percentage Increase/ Decrease
Memorial Tree of remembrance	Memorial leaf - additional years at time of initial purchase or renewal	27	33	22%
Memorial Hall of memory	Recordia Leather panel 5 year initial purchase	246	291	18%
Memorial Hall of memory	Recordia Leather panel - 2 year renewal	90	120	33%
Memorial Hall of memory	Recordia Leather panel - additional years at time of purchase or renewal- per year	27	33	22%
Memorial Woodland Valley plaque	Solid Oak plaque - up to 3 lines of text	496	516	4%
Memorial Woodland Valley plaque	Additional lines	32	33	3%
Memorial Bulb Commemoration	Bulb commemoration	80	84	5%
Garden of Remembrance	Plaque in Woodland Walk - 5 year initial purchase	430	519	21%
Garden of Remembrance	Plaque in Woodland Walk - additional years at time of purchase or renewal	28	48	71%
Garden of Remembrance	Plaque in Woodland Walk - 2 year renewal	102	147	44%
Garden of Remembrance	Plaque with Rose Bush - 5 year initial purchase	450	522	16%
Garden of Remembrance	Plaque with Rose Bush - additional years at initial purchase or renewal - per year	30	54	80%
Garden of Remembrance	Plaque with Rose Bush - 2 year renewal	125	180	44%
Garden of Remembrance	Plaque with Tree Rose - 5 year initial purchase	500	570	14%
Garden of Remembrance	Plaque with Tree Rose- additional years at initial purchase or renewal - per year	35	60	71%
Garden of Remembrance	Plaque with Tree Rose - 2 year renewal	145	195	34%
Garden of Remembrance	Plaque on Tree - 5 year initial purchase	670	681	2%

Service	What is charged for	Fee 23/24 £	Proposed Fee 2024/25 £	Percentage Increase/ Decrease
Garden of Remembrance	Plaque on Tree - additional years at time of purchase or renewal	52	81	56%
Garden of Remembrance	Plaque on Tree - 2 year renewal	230	282	23%
Garden of Remembrance	Plaque in Childrens Garden - 5 year initial purchase	245	306	25%
Garden of Remembrance	Plaque in Childrens Garden- additional years at time of purchase or renewal	25	39	56%
Garden of Remembrance	Plaque in Childrens Garden - 2 year renewal	75	99	32%
Garden of Remembrance	Plaque on Memorial Seat - 5 year initial purchase	1492	1650	11%
Garden of Remembrance	Plaque on Memorial Seat- additional years at time of purchase or renewal	130	132	2%
Garden of Remembrance	Plaque on Memorial Seat - 2 year renewal	420	420	0%
Garden of Remembrance	Plaque on Shared Memorial Seat 5 year initial purchase	572	612	7%
Garden of Remembrance	Plaque on Shared Memorial Seat additional years at time of purchase or renewal	38	48	26%
Garden of Remembrance	Plaque on Shared Memorial Seat - 2 year renewal	210	210	0%
Garden of Remembrance	Memorial Niche - 5 year initial purchase includes tablet and basic inscription up to 80 characters	830	858	3%
Garden of Remembrance	Memorial Niche - additional years at time of initial purchase or renewal	40	66	65%
Garden of Remembrance	Memorial Niche - 5 year renewal	New	471	N/A
Garden of Remembrance	Memorial Niche - each additional characters for inscription	3	3	0%
Garden of Remembrance	Memorial Niche - Motif	72	75	4%
Garden of Remembrance	Memorial Niche - Photo plaque	105	108	3%

Bereavement Services - Benchmarking at December 2023

Proposed Fees & Charges Increases for those Categories

					Private	Private	Local Authority	Local Authority	Local Authority	Local Authority	Local Authority	Local Authority	Private	Private	Private
Service	Description	BHCC Current Fees from 01/04/23	BHCC Proposed Fees from 01/04/24		Downs Fees from 01/07/23 (Dignity)	Surrey & Sussex Crematorium from 01/07/23 (Dignity)	Adur & Worthing Fees from 01/01/23	Lewes & Seaford from 01/04/2021 - Under review	Eastbourne Fees from 01/05/23	Newhaven Town Council from 01/04/2023	Hastings Fees from 01/01/23	Wealden Crematorium Fees from 01/04/23	Clayton Wood Woodland Fees from 30/1/23 (Southern Co-Op)	Chichester Crematorium from 1/7/23 (Dignity)	Arun Crematorium from 7/8/23 (Westerleigh)
Cremation fees															
Cremation	Adult	755	793		748 (713 + 35 fuel surcharge)	1210 (1175 + 35 fuel surcharge)	999	N/A	790	N/A	894	935 (Committal only 720)	N/A	1195 (1160 + 35 fuel surcharge)	895 (higher rate for part of Friday) plus energy
Cremation	Direct/Contract (Early Slot)	455 to 540	460 & 594		534/ 710 (499/675 + 35 fuel surcharge)	534 / 980 (499 to 955 + 35 fuel surcharge)	520-725	N/A	N/A	N/A	529-736	399-750	N/A	534 / 980 (499 to 945 + 35 fuel surcharge)	475- 625 plus energy surcharge 29)
Strewing Remains	Cremated own crematorium	0	0		0	0	unwitnessed 50 witnessed 75	N/A	Unwitnessed 0 , witnessed 50/80	N/A	unwitnessed 0, witnessed GOR 64	Unwitnessed 0, witnessed 50	N/A	0	0
Strewing Remains	Other Crematoria	99	99		97	97	unwitnessed 105	N/A	Unwitnessed 35 /Witnessed 80-100	N/A	64 to 152	50	230-335	97	100
Additional fee	Use of Crematorium chapel weekday - extra slot	250	280		429	535	300	N/A	200	N/A	259	235 (30 mins) 450 (45 mins)	185 (30 mins) 395(60 mins)	535	420
Additional fee	Use of Crematorium chapel Saturday supplement	285	299		304	475	400	N/A	N/A	N/A	N/A	315 (extra chapel time 30 mins 290/ 45 mins 555)	525	445	100
Additional fee	Use of Crematorium chapel Sunday/ BH supplement	570	598		642	1010	N/A	N/A	N/A	N/A	N/A	N/A	710	980	305
Cemetery fees															
Non Resident Charges	Method of Additional Charge (eg 2 x resident price)				N/A	N/A	N/A	Double fees	Double fees	Double fees except children where supplement charged	Double fees	N/A	N/A	N/A	N/A
Grave Purchase	Adult - ROB 50 years	913 - resident 2490 - non res	995- resident 2490 - non res		N/A	N/A	4400 for 100 Yrs	1169 to 1199	1040-1160	1093	1130 to 1821	N/A	N/A	N/A	N/A
Grave Purchase	Adult Woodland Burials	1023 - resident 2790 - non res	1080 - resident 2790 - non res		N/A	N/A	N/A	N/A	N/A	N/A	569	N/A	woodland glades- 2050 to 3030 meadow- 1725 to 4360	N/A	N/A
Grave Purchase	Child Age limits vary For B&H - 17 and under	0	0		N/A	N/A	0	0	400-580 depending on age and location	188 (non res 376)	0	N/A	625 (0-2 years)	N/A	N/A

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Service	Description	BHCC Current Fees from 01/04/23	BHCC Proposed Fees from 01/04/24		Downs Fees from 01/07/23 (Dignity)	Surrey & Sussex Crematorium from 01/07/23 (Dignity)	Adur & Worthing Fees from 01/01/23	Lewes & Seaford from 01/04/2021 - Under review	Eastbourne Fees from 01/05/23	Newhaven Town Council from 01/04/2023	Hastings Fees from 01/01/23	Wealden Crematorium Fees from 01/04/23	Clayton Wood Woodland Fees from 30/1/23 (Southern Co-Op)	Chichester Crematorium from 1/7/23 (Dignity)	Arun Crematorium from 7/8/23 (Westerleigh)
Grave Purchase	Ashes plot	825 - resident 2250 - non res	850 - resident 2250 - non res		N/A	N/A	825	310 (10 years in GoR)	635 - 1265 (depending if res / where cremated)	283 (in GOR)	919	N/A	920 to 1465 (plot for 2) 1525 to 2350 (plot for 4)	N/A	N/A
Interment	Depth of 1	1162 - resident 3168 - non res	1255 - resident 3168 - non res		N/A	N/A	600	925	1065	990	866	N/A	625 (935 hand dug) all graves single depth only	N/A	N/A
Interment	Depth of 2	1162 - resident 3168 - non res	1255 - resident 3168 - non res		N/A	N/A	940	1220	1160	1284	866	N/A	N/A	N/A	N/A
Interment	Depth of 3	1162 - resident 3168 - non res	1255 - resident 3168 - non res		N/A	N/A	940	1622	N/A	1725	866	N/A	N/A	N/A	N/A
Interment	Child Age limits vary For B&H - 17 and under	0	0		N/A	N/A	0	0 (<12 yrs) (>12 adult fee) 925	0 (< 12 years) 12 + 532.50	0 (non resident 160)	0 - non resident fees apply	N/A	625 (935 hand dug)	N/A	N/A
Interment	Cremated Remains	220	250		N/A	N/A	200	280	235 - 465 depending if res/ where cremated	285 (non resident 570)	152	N/A	290	N/A	N/A
Interment	Cremated Remains 2nd interment at same time	110	125		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Additional charge	Interment outside normal weekday operating MINIMUM CHARGE	0	0		N/A	N/A	175 per hr	N/A	N/A	N/A	N/A	N/A	395	N/A	N/A
Additional charge	Saturday supplement - full burial	380	415		N/A	N/A	500	N/A	N/A	N/A	N/A	N/A	650	N/A	N/A
Additional charge	Sunday/ BH supplement - full burial	570	620		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1020	N/A	N/A
Additional charge	Saturday supplement - ashes burial	320	350		N/A	N/A	500	N/A	N/A	N/A	N/A	N/A	100	N/A	N/A
Additional charge	Sunday/ BH supplement - ashes burial	480	525		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	160	N/A	N/A

Service	Description	BHCC Current Fees from 01/04/23	BHCC Proposed Fees from 01/04/24		Downs Fees from 01/07/23 (Dignity)	Surrey & Sussex Crematorium from 01/07/23 (Dignity)	Adur & Worthing Fees from 01/01/23	Lewes & Seaford from 01/04/2021 - Under review	Eastbourne Fees from 01/05/23	Newhaven Town Council from 01/04/2023	Hastings Fees from 01/01/23	Wealden Crematorium Fees from 01/04/23	Clayton Wood Woodland Fees from 30/1/23 (Southern Co-Op)	Chichester Crematorium from 1/7/23 (Dignity)	Arun Crematorium from 7/8/23 (Westerleigh)
Scattering on a grave	Weekday	120	132		N/A	N/A	N/A	N/A	N/A	65 (non resident 130)	152	N/A	230-335	N/A	N/A
Cemetery Chapel Fee	with burial in cemetery	99	99		N/A	N/A	0	98	200	N/A	259	N/A	0 - full burial 150 - scattering	N/A	N/A
Cemetery Chapel Fee	no burial or burial elsewhere	184	184		N/A	N/A	225	N/A	200	N/A	259	N/A	375	N/A	N/A
Transfer Grave deed	Transfer of Exclusive Right of Burial By Probate	80	85		N/A	N/A	145	75	70	N/A	N/A	N/A	N/A	N/A	N/A
Transfer Grave deed	Transfer of Exclusive Right of Burial By Statutory Declaration	135	145		N/A	N/A	145	75	90	N/A	N/A	N/A	N/A	N/A	N/A
Grave Search	Prices from	27	27		N/A	N/A	40	32	5	N/A	N/A	N/A	N/A	N/A	N/A
Memorial Permit Fee	Single headstone up to 2ft 6 inches	160	168		N/A	N/A	155 - (1st permit inc in ROB fee)	223	110	225	122	N/A	N/A	N/A	N/A
Memorial Permit Fee	Single headstone over 2ft 6 inches	240	252		N/A	N/A	155 - (1st permit inc in ROB fee)	N/A	140-160	225	194 (over 2 ft)	N/A	N/A	N/A	N/A
Memorial Permit Fee	Tablet	140	148		N/A	N/A	155 - (1st permit inc in ROB fee)	222	55	225	122	N/A	N/A	N/A	N/A
Memorial Permit Fee	Kerbset	130	140		N/A	N/A	155 - (1st permit inc in ROB fee)	276	110/165	283 inc headstone	194	N/A	N/A	N/A	N/A
Memorial Permit Fee	Vase with inscription	70	75		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Memorial Permit Fee	Additional Work (Additional Inscription)	70	75		N/A	N/A	80	106	55	101	122	N/A	N/A	N/A	N/A

Service	Description	BHCC Current Fees from 01/04/23	BHCC Proposed Fees from 01/04/24		Downs Fees from 01/07/23 (Dignity)	Surrey & Sussex Crematorium from 01/07/23 (Dignity)	Adur & Worthing Fees from 01/01/23	Lewes & Seaford from 01/04/2021 - Under review	Eastbourne Fees from 01/05/23	Newhaven Town Council from 01/04/2023	Hastings Fees from 01/01/23	Wealden Crematorium Fees from 01/04/23	Clayton Wood Woodland Fees from 30/1/23 (Southern Co-Op)	Chichester Crematorium from 1/7/23 (Dignity)	Arun Crematorium from 7/8/23 (Westerleigh)
Memorial Permit Fee	Additional Work (Cleaning stone)	0	0		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Appendix 5 - Proposed Safer Communities Fees and Charges 2024/25

	2023/24	2024/25	
	Charge	Proposed Charge	Change %
LICENCE TO STORE EXPLOSIVES			
Fees are set by the Health and Safety Executive and will be updated in line with national fee setting guidance.			
Licence to store explosives where, by virtue of regulation 27 of, and Schedule 5 to, the 2014 Regulations, a minimum separation distance of greater than 0 metres is prescribed.			
1 Year	£189.00	Set by HSE	
2 Years	£248.00	Set by HSE	
3 Years	£311.00	Set by HSE	
4 Years	£382.00	Set by HSE	
5 Years	£432.00	Set by HSE	
Renewal of licence to store explosives where a minimum separation distance of greater than 0 metres is prescribed. Fees are set by the Health and Safety Executive.			
1 Year	£88.00	Set by HSE	
2 Years	£150.00	Set by HSE	
3 Years	£211.00	Set by HSE	
4 Years	£272.00	Set by HSE	
5 Years	£333.00	Set by HSE	
Licence to store explosives where no minimum separation distance or a 0 metres separation distance is prescribed. Fees are set by the Health and Safety Executive.			
1 Year	£111.00	Set by HSE	
2 Years	£144.00	Set by HSE	
3 Years	£177.00	Set by HSE	
4 Years	£211.00	Set by HSE	
5 Years	£243.00	Set by HSE	
Renewal of licence to store explosives where no minimum separation distance or a 0 metres minimum separation distance is prescribed. Fees are set by the Health and Safety Executive.			
1 Year	£55.00	Set by HSE	
2 Years	£88.00	Set by HSE	
3 Years	£123.00	Set by HSE	
4 Years	£155.00	Set by HSE	
5 Years	£189.00	Set by HSE	
Varying the name of licensee or address of site. Fee set by the Health and Safety Executive.			
	£37.00	Set by HSE	
Transfer of licence. Fee set by the Health and Safety Executive.			
	£37.00	Set by HSE	
Replacement of licence if lost. Fee set by the Health and Safety Executive.			
	£37.00	Set by HSE	
Licence to store petroleum , as per Provision of the Petroleum (Consolidation) Regulations 2014 under which a fee is payable . Fees are set by the Health and Safety Executive			
<u>Storage Certificate</u>			
Not exceeding 2,500 litres	£45.00	Set by HSE	
Exceeding 2,500 litres but not exceeding £50,000 litres	£61.00	Set by HSE	
Exceeding £50,000 litres	£128.00	Set by HSE	
<u>Licence to keep petrol of a quantity:</u>			
Not exceeding 2,500 litres	£45.00	Set by HSE	
Exceeding 2,500 litres but not exceeding £50,000 litres	£61.00	Set by HSE	
Exceeding £50,000 litres	£128.00	Set by HSE	
Weights and Measures			
Weights and Measures verification fees officer time per hour	£96.00	£105.00	8.9%
Weights and Measures verification fees NAWI under 1 tonne	£74.00	£80.00	8.9%
Weights and Measures verification fees weights over 5kg under 500mg	£12.00	£13.00	8.9%
Weights and Measures verification fees other weights	£10.00	£11.00	8.9%
Weights and Measures verification fees liquid fuel first nozzle	£148.00	£160.00	8.9%
Weights and Measures verifications fees liquid fuel additional nozzle	£94.00	£102.00	8.9%

Appendix 5 - Proposed Safer Communities Fees and Charges 2024/25

	2024/25		
	2023/24	2024/25	
	Charge	Proposed Charge	Change %
LOCAL AUTHORITY POLLUTION PREVENTION AND CONTROL			
<u>Application Fee:</u>			
Standard process (includes solvent emission activities)		Set nationally by DEFRA	
Additional fee for operating without a permit		Set nationally by DEFRA	
PVRI, SWOBs and Dry Cleaners		Set nationally by DEFRA	
PVR I and II combined		Set nationally by DEFRA	
VRs and other Reduced Fee Activities		Set nationally by DEFRA	
Reduced fee activates: Additional fee for operating without a permit		Set nationally by DEFRA	
<u>Mobile plant (not using simplified permits):</u>			
for the first and second permits		Set nationally by DEFRA	
for the third to seventh applications		Set nationally by DEFRA	
for the eight and subsequent applications		Set nationally by DEFRA	
Note: where an application for any of the above is for combined Part B and waste application, add an extra £297 to the above amounts.			
<u>Annual Subsistence Charge:</u>			
Standard process Low		Set nationally by DEFRA	
Standard process Medium		Set nationally by DEFRA	
Standard process High		Set nationally by DEFRA	
PVRI, SWOBs and Dry Cleaners Low/Medium/High		Set nationally by DEFRA	
PVR I & II combined Low/Medium/High		Set nationally by DEFRA	
Vehicle refinishers and other reduced fees Low/Medium/High		Set nationally by DEFRA	
Mobile plant, for the first and second permits Low/Medium/High		Set nationally by DEFRA	
for the third to seventh applications Low/Medium/High		Set nationally by DEFRA	
eighth and subsequent permits Low/Medium/High		Set nationally by DEFRA	
Late Payment Fee		Set nationally by DEFRA	
the additional amounts in brackets above must be charged where a permit is for a combined Part B and waste installation			
Where a Part B installation is subject to reporting under the E-PRTR Regulation, add an extra £99 to the above amounts:			
<u>Pollution Release and Transfer Register</u>			
Application		Set nationally by DEFRA	
Additional fee for operating without a permit		Set nationally by DEFRA	
Annual Subsistence Low		Set nationally by DEFRA	
Annual Subsistence Medium		Set nationally by DEFRA	
Annual Subsistence High		Set nationally by DEFRA	
Late Payment Fee		Set nationally by DEFRA	
Substantial Variation		Set nationally by DEFRA	
Transfer		Set nationally by DEFRA	
Partial transfer		Set nationally by DEFRA	
Surrender		Set nationally by DEFRA	
<u>Transfer and Surrender:</u>			
Standard process transfer		Set nationally by DEFRA	
Standard process partial transfer		Set nationally by DEFRA	
New Operator at low risk reduced fee activity (extra one-off subsistence charge - see Art 15 (2) of charging scheme)		Set nationally by DEFRA	
Surrender: all Part B activities		Set nationally by DEFRA	
Reduced fee activities: transfer		Set nationally by DEFRA	
Reduced fee activities: partial transfer		Set nationally by DEFRA	
<u>Temporary transfer for mobiles:</u>			
First transfer		Set nationally by DEFRA	
repeat following enforcement or warning		Set nationally by DEFRA	
<u>Substantial Change:</u>			
Standard process		Set nationally by DEFRA	
Standard process where the substantial change results in a new PPC activity		Set nationally by DEFRA	
Reduced fee activities		Set nationally by DEFRA	
OTHER FEES			
Language school inspection	£101.00	£110.00	8.9%
Information to solicitors	£172.00	£187.00	8.9%

Appendix 5 - Proposed Safer Communities Fees and Charges 2024/25

	2023/24	2024/25	
	Charge	Proposed Charge	Change %
FOOD PREMISES REGISTER			
Signal page copy	£10.00	£11.00	8.9%
Copy containing information regarding particular category (by hand)	£106.00	£115.00	8.9%
Copy containing information regarding particular category (by post)	£174.00	£190.00	8.9%
Full copy of register (by hand)	£324.00	£353.00	8.9%
Full copy of register (by post)	£345.00	£376.00	8.9%
Food Hygiene Rating Scheme (FHRS) re-inspection of premises requested by business	£172.00	£187.00	8.9%
ANIMAL WELFARE			
Collection of reclaimed dogs:			
Statutory charge (set by government)	£25.00	Set by Government	
dog warden charges (includes VAT)	£33.00	£36.00	8.9%
kennelling per day (includes VAT)	£33.00	£36.00	8.9%
administration charge (includes VAT)	£18.00	£20.00	8.9%
Vaccination (includes VAT)	£31.00	£34.00	8.9%
Dog Control Fixed penalty	£96.00	£105.00	8.9%
Noise Pollution - Domestic - Fixed Penalty	£118.00	£130.00	8.9%
Noise Pollution - Commercial - Fixed Penalty	£589.00	£640.00	8.9%
Domestic Dog Boarding Commercial Dog Boarding Cat Boarding Domestic Dog Breeding Commercial Dog Breeding Dog Day Care Pet Vending Exhibition of Animals Hiring Horses Variation/transfer of licence Appeals/site visit		These licence fees were reported and agreed at Licensing Committee in October 2023.	
Dangerous Wild Animals	£295.00	£320.00	8.9%
Export Licences	£70.00	£76.00	8.9%
Zoo	£6,130.00	£6,680.00	8.9%
Zoo (with dispensation)	£3,408.00	£3,710.00	8.9%
HEALTH PROMOTION / EDUCATION			
Training Courses:			
Food Safety Level 2 (previously Basic Food Hygiene)	£79.00	£86.00	8.9%
Intermediate Food Hygiene	£162.00	£176.00	8.9%
Food Safety Level 2 retake of exam	£36.00	£39.00	8.9%
Level 1 course for 10 people	P.O.A	P.O.A	N/A
Level 1 course for 15 people	P.O.A	P.O.A	N/A
ENVIRONMENTAL HEALTH			
Contaminated Land Environmental Information Regulations Request (per hour)	£35.00	£38.00	8.9%
Export Health Certificate (EHC)	£121.00	£132.00	8.9%
Additional EHCs at the same visit (33% reduction)	£81.00	£88.00	8.9%
WORKS IN DEFAULT			
Environmental Health Manager	£107.00	£117.00	8.9%
Senior EHO per hour	£99.00	£108.00	8.9%
EHO/Senior Technical Officer	£88.00	£96.00	8.9%
Technical Officer per hour	£80.00	£87.00	8.9%
Admin staff per hour	£47.00	£51.00	8.9%

Appendix 5 - Proposed Safer Communities Fees and Charges 2024/25

	2023/24	2024/25	
	Charge	Proposed Charge	Change %
PEST CONTROL			
Call out charge for pest control	£59.00	£64.00	8.9%
Wildlife Advice Service	£59.00	£64.00	8.9%
Pest Control Self Help Kits (including postage and packaging)	£31.00	£34.00	8.9%
Pest Control Self Help Kits (including postage and packaging) including natural chemical	£31.00	£34.00	8.9%
Air Vent Fitting Service - small (10in x 4in)	£25.00	£27.00	8.9%
Air Vent Fitting Service - medium (10in x 7in)	£31.00	£34.00	8.9%
Air Vent Fitting Service - small and medium extra	£14.00	£15.00	8.9%
Air Vent Fitting Service - large (10in x 9in)	£34.00	£37.00	8.9%
Air Vent Fitting Service - large extra	£15.00	£16.00	8.9%
Rats and Mice - Residential (up to 3 visits)	£132.00	£144.00	8.9%
Rats and Mice - Residential (additional visit)	£50.00	£54.00	8.9%
Wasps - Residential	£76.00	£83.00	8.9%
Fleas (1-2 Bedroom property) - residential	£110.00	£120.00	8.9%
Fleas (3-4 Bedroom property) - residential	£132.00	£144.00	8.9%
Fleas (5+ Bedroom property) - residential	£187.00	£204.00	8.9%
Cockroaches (1-2 Bedroom property) - residential	£215.00	£234.00	8.9%
Cockroaches (3-4 Bedroom property) - residential	£284.00	£309.00	8.9%
Cockroaches (5+ Bedroom property) - residential	£364.00	£396.00	8.9%
Commercial per visit rate	£76.00	£83.00	8.9%
Squirrels in loft service	£188.00	£205.00	8.9%
Carpet moth treatment (1-2 Bedroom property) - residential	£107.00	£117.00	8.9%
Carpet moth treatment (3-4 Bedroom property) - residential	£129.00	£140.00	8.9%
Carpet moth treatment (5+ Bedroom property) - residential	£177.00	£193.00	8.9%
Mice humane trapping service	£319.00	£347.00	8.9%
Wasp catchers (include 1 visit each month for 3 months)	£177.00	£193.00	8.9%
Fox repellent service	£59.00	£64.00	8.9%
False Widow Spider treatment (1-2 Bedroom property) - residential	£96.00	£105.00	8.9%
False Widow Spider treatment (3-4 Bedroom property) - residential	£118.00	£129.00	8.9%
False Widow Spider treatment (5+ Bedroom property) - residential	£165.00	£180.00	8.9%

Brighton and Hove City Council

City Environment, South Downs & The Sea Committee

Agenda Item 41

Subject: Weed Management

Date of meeting: 23 January 2024

Report of: Executive Director: Economy, Environment and Culture

Contact Officer: Name: Melissa Francis
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Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The purpose of this report is to provide an update and ask Committee to consider a change in policy regarding the management of weeds in the city. The report and its appendices provide information on how the council has managed weeds on hard surfaces from 2020 to 2023 (Appendix 1) and the weed management methods tested, what has been adopted and what has been disregarded (Appendix 2).
- 1.2 The report presents options to Committee on how to manage weeds on hard surfaces from 2024. Three recommendations are presented to Committee in section 2 below. More information on these is contained in the main body of the report and in appendices 3 to 7.

2. Recommendations

- 2.1 That Committee note the contents of this report and its appendices.
- 2.2 That Committee agrees to continue with the current policy not to use glyphosate in the city's parks and open spaces, as described more fully in paragraph 3.15. The exception to this is when it is used to manage invasive species.

That Committee agrees either:

- 2.3 To continue with the current policy on weed management and instruct the council's City Environmental Management Services to continue to use manual techniques to manage and remove weeds from across the city, as described more fully in paragraphs 3.17 to 3.19. This is until a cost-effective and viable non-glyphosate option is available.

Or

- 2.4 Subject to approval at Budget Council, to amend the current policy to support the use of glyphosate to manage weeds on all hard surfaces and instruct the council's City Environmental Management Services to engage with contractors to use a controlled-droplet application to manage and remove weeds from across the city in 2024, as described more fully in paragraphs 3.21 to 3.24 and 3.28 to 3.29. Further to this, Committee agrees to delegate authority to the Executive Director – Economy, Environment & Culture, in consultation with the Committee Chair, to determine the most effective approach for weed management in future years based on the outcomes achieved in 2024.

Or

- 2.5 Subject to approval from Budget Council, to amend the current policy to support the use of glyphosate to manage weeds on all hard surfaces and instruct the council's City Environmental Management Services to engage with contractors to use traditional glyphosate to manage and remove weeds from across the city in 2024, as described more fully in paragraphs 3.25 to 3.29. This will be subject to a review in winter 2024 to see if there is an option to move to a controlled-droplet application for 2025. Further to this, Committee agrees to delegate authority to the Executive Director – Economy, Environment & Culture, in consultation with the Committee Chair, to determine the most effective approach for weed management in future years based on the outcomes achieved in 2024.
- 2.6 That Committee notes that recommendations 2.4 and 2.5 require Budget Council approval on 22 February 2024, before decisions can be implemented.

3. Context and background information

- 3.1 On 26 November 2019, the Environment, Transport & Sustainability Committee:
- Agreed to end the use of glyphosate by Brighton and Hove City Council's City Environmental Management services with immediate effect, other than in exceptional cases to kill invasive plant species, such as Japanese Knotweed or to kill tree stumps.
 - Agreed that City Environmental Management would not engage with contractors to use glyphosate on any land managed by these departments.
 - Noted that the removal of weeds in parks and on hard surfaces would be undertaken manually as an alternative approach to using pesticides.
- 3.2 Committee was advised it would not be possible to remove all weeds from highways and pavements manually and there would be more visible weeds for longer periods of time. Committee was also advised of the likelihood of damage to the highway infrastructure over time because of weed root

impact. Appendix 1 sets out how the council has managed weeds on hard surfaces from 2020 to 2023.

- 3.3 There are significant biodiversity and sustainability benefits to ending the use of glyphosate, including increasing habitats for insects and other pollinators, and reducing the risk of chemicals entering the water system. The adverse impacts of glyphosate are greater when using a traditional glyphosate application, compared to a controlled-droplet application.
- 3.4 However, it is recognised that the current approach to weed management is leading to major issues for the city and this is why a report is being presented to Committee seeking a decision on how to manage weeds from 2024. The current budget of £0.189m covers six full-time staff to tackle weeds. During 2023, 701 roads were manually weeded once, out of 2048 roads across the city. This represents 34% of the city but does not take into account the volume of weeds on each road or the different lengths of road.
- 3.5 After five years of not using glyphosate and relying on manual weed removal, it is not possible to remove the majority of weeds from the highway in a timely manner. This is because manual methods predominately result in foliage being removed and not root systems.
- 3.6 This has become a cause of concern for residents who have complained about the look of the city. Some residents with mobility issues have raised concerns stating they are not able to leave home for fear of tripping. The council's biodiversity duties need to be balanced against the equality duties and the duty to keep the city's highways clear and free of obstructions.
- 3.7 There is a backlog of highway maintenance required due to damage caused by weeds and it is not possible to manage the volume of remedial work. It has also increased the cost of repairing the highway. This is covered in some detail in Appendix 3.
- 3.8 There has also been a proliferation of basal tree sprouts. Glyphosate applications previously suppressed this growth. Contractors remove basal tree sprouts on behalf of the council; however, this is an additional unbudgeted cost. The work is not completed at a pace that keeps the tree sprouts under control and, as a budget is not available for this work, it is not possible to remove them any quicker.
- 3.9 Since the council stopped using glyphosate, City Environmental Management has continued to research, test and trial cost-effective alternative methods of weed removal, without the use of glyphosate. Appendix 2 details the weed management methods tested, what has been adopted and what was disregarded. Any successful trials of machinery have been adopted. Some trialled methods may have been effective in a small area but are not viable and/or cost-effective to be used on large areas of public highway.

- 3.10 City Environmental Management has not been able to find another local authority that has managed its weeds on the public highway without the use of glyphosate for as long as Brighton and Hove City Council.

Glyphosate

- 3.11 Glyphosate is the active substance in many herbicides (weed killers) and is widely used around the world. It is a non-selective, systemic herbicide and was first used in the UK in 1976. Glyphosate is effective in controlling most weed species, including perennials and grasses in many situations, including amenity, forestry, aquatic and industrial situations. Since it is approved for use in many countries, it has been subjected to extensive testing and regulatory assessment in the EU, USA and elsewhere and by the World Health Organisation.
- 3.12 Section 11 of the report sets out the biodiversity and sustainability implications of using glyphosate.
- 3.13 There is conflicting evidence on the public health implications of the use of glyphosate. This is detailed in section 13.
- 3.14 If the decision is to reintroduce the use of glyphosate as the council's policy for weed management, officers will continue to seek alternative, cost-effective equipment and technologies that can be used to effectively remove weeds over the city's extensive highways.
- 3.15 This report is recommending the continuation of the current policy not to use glyphosate in the city's parks and open spaces where leisure activities and dog walking are undertaken and where there are playgrounds. The exception to this is when it is used to manage invasive species. This will protect a substantial habitat for wildlife and pollinator insects. It will also mean more weeds will be visible in the city's parks.

Options for weed management moving forward

- 3.16 As indicated in the recommendations in Section 2, there are three options for weed management moving forward: manual removal, a controlled-droplet application and a traditional glyphosate application. Appendix 3 sets out the benefits and disbenefits of each option. This should be read in conjunction with:
- Appendix 4: Equality Impact Assessment
 - Appendix 5: sustainability implications – controlled-droplet application and traditional glyphosate application
 - Appendix 6: sustainability implications – manual removal

Manual removal of weeds

- 3.17 If Committee agrees to recommendation 2.3, the approach to weed removal will be the same as the approach in 2023 and with the limited resources available. This will be the traffic light system to identify hot spot 'red zones' based on access, trip hazards and damage to highway infrastructure.

Highway Inspectors will continue to notify the Street Cleansing Team of issues, in addition to feedback from street cleansing staff, Councillors, and members of the public. Upon being notified of an issue, Street Cleansing Supervisors will make a site visit to assess the area. If the weeds are categorised as 'red,' the weeds will be removed. There could be other weeds present but not causing a hazard, which will not be removed.

- 3.18 Weed removal operatives will continue to use tools, including strimmers, hoes, shovels and weed rippers. Barrow staff will also undertake weeding as part of their role.
- 3.19 City Environmental Management will continue to look at opportunities to use the Tidy Up Team and Community Payback to help manage weeds across the city.
- 3.20 To fully weed hard surfaces in streets annually, additional budget would be required. Based on the proportion of roads cleared in 2023 (34%), additional resources of at least approximately £0.369m would be the minimum required to clear weeds once per year only. Visiting only once is unlikely to be sufficient to manage and remove weeds effectively. This figure does not take into account the volume of weeds on each road or the different lengths. It also does not take into account the additional capital cost of the vehicles and equipment required to support the additional resource. This approach will continue to remain ineffective in managing weeds as manual techniques predominantly remove the foliage and not the root system. Therefore, it is highly likely that weeds will continue to grow back and there will be further damage to highway infrastructure.

Controlled-droplet application and less glyphosate application

- 3.21 Controlled-droplet applications are available for weed management and use less glyphosate than the traditional approach. The glyphosate is mixed with an oil which allows the droplets to adhere to the plant. The application is applied in large droplets released under gravity (unlike the traditional method of glyphosate application, which is a pressurised mist). This reduces drift and the likelihood of the application adhering to non-target items. It does not produce breathable droplets. Torbay Council and Walsall Council use a droplet-controlled application to manage weeds.
- 3.22 Based on the soft market research completed to inform this report, three applications are recommended for Brighton and Hove. However, because it is untried and untested on a large scale and because weeds have not been treated for five years, more or fewer applications may be required. It is likely the first application will be in April/May, with the city taking six-to-eight weeks to complete. It is not possible to say when the second application will take place as this will depend on the impact of the first application and weather conditions. It is likely to be May/June once the first application has been completed. The third application will be in September/October, but this will be dependent on the weather. The application will not be blanket across the city; it will only be applied where weeds are visible.

- 3.23 The estimated cost of the three applications is £0.266m. This does not include the cost of the equipment required, which is estimated at £0.035m. Therefore, the total cost for this application in 2024 is estimated to be at least £0.301m. These are high-level costs and through the soft market testing, contractors commented that because this is untried and untested on this scale and because weeds have not been treated for five years, costs could be higher than this. If the costs increase substantially, the approach will be reviewed.
- 3.24 This approach will be subject to a review in winter 2024 to consider its effectiveness.

Traditional glyphosate application

- 3.25 Based on the soft market research completed to inform this report, three applications of traditional glyphosate are recommended. It is likely the first application will be in April/May, with the city taking six-to-eight weeks to complete. It is not possible to say when the second application will take place as this will depend on the impact of the first application and be weather dependent. It is likely to be May/June once the first application has been completed. The third application will be in September/October, but this will be dependent on the weather. The application will not be blanket across the city; it will only be applied where weeds are visible.
- 3.26 The estimated cost of three applications is £0.110m. These are high-level costs and through the soft market testing, contractors commented that because weeds have not been treated for five years, costs could be higher than this.
- 3.27 This approach will be subject to a review in winter 2024 to see if there is an option to move to a controlled-droplet application for 2025. There may be a financial implication that would require a committee decision.
- 3.28 For both controlled-droplet and traditional glyphosate applications, the treatment will be subject to the weather and can only be completed in dry conditions and when rain is not forecast for six to eight hours.
- 3.29 Both controlled-droplet and traditional glyphosate applications will be applied in line with the [Control of Pesticides Act 1986](#) and any new legislation introduced during the contract duration. Risk Assessment Method Statements (RAMS) will be prepared by the contractor and agreed with the council, which will set out mitigations to reduce the risk posed to residents and biodiversity. Control of Substances Hazardous to Health (COSHH) assessments will also be completed. Pesticide application will only be carried out by trained, qualified operatives who hold the relevant NPTC PA1 and PA6 certification. Those undertaking the weed application will be expected to wear full and appropriate Personal Protective Equipment (PPE).

4. Analysis and consideration of alternative options

- 4.1 The main body of the report and the appendices set out the information on the options available for Committee to consider in order to make a decision.

5. Conclusion

- 5.1 This report presents the options available to Committee to manage weeds in Brighton and Hove. Based on experiences to date, a manual approach to weed removal is not sufficient to keep weeds under control across the whole city. This has impacted on the council's ability to keep the highways clear and free of obstructions. It affects the council's ability to meet its equalities duties.
- 5.2 Alternatives to manual weed management are controlled-droplet and traditional glyphosate applications. As stated in the report and appendices, the controlled-droplet application is untried and untested on this scale, particularly as the weeds have not been treated for five years. It is more costly than the traditional application. The traditional application is proven to work and continues to be used by many local authorities across the country.
- 5.3 Following Committee's decision, City Environmental Management will continue to review new equipment and technologies available to remove weeds without the use of glyphosate.
- 5.4 It is recommended that the council continues with the current policy not to use glyphosate in the city's parks and open spaces where leisure activities and dog walking are undertaken and where there are playgrounds. The exception to this is when it is used to manage invasive species. This will protect a substantial habitat for wildlife and pollinator insects. It will also mean more weeds will be visible in the city's parks.

6. Community engagement and consultation

- 6.1 No direct community engagement or consultation has taken place in relation to the report's recommendations.
- 6.2 A Weed Working Group was set up and met in October 2023 to carry out a 'vertical slice' consultation, with stakeholders from every aspect and at relevant level to form part of the working group. The stakeholders included councillors, officers from Cityclean, City Parks, Highways and Biodiversity, plus Pesticide Action Network UK and a local resident. The range of perspectives and experiences from this meeting was extremely useful. The outcome of this Working Group is this report to Committee to make a decision on future weed management.
- 6.3 Since 2019, the council has received:
- Six compliments to the Customer Feedback Team about the new approach to weed management, including:
 - "I love seeing more wildflowers and long grasses in my neighbourhood".
 - "there are many of us who love seeing such an abundance of plant life thriving in our city".

- Five Stage 1 complaints, specifically mentioning the decision not to use pesticides, and suggesting the manual approach to weed removal is not effective.
 - 51 Stage 1 complaints about the state of pavements / highways and overgrown weeds, suggesting the council is not doing enough to manage weeds.
 - One Stage 1 complaint about weed removal as it was “providing miniature nature reserves”.
- 6.4 A [2023 survey by the National Highways and Transport Network](#) stated that public satisfaction with *weed killing on pavements* was 28% in Brighton and Hove. This was a 3% reduction on the previous year and 11% less than the average score of 39%. For *weed killing on roads*, the satisfaction was 35%, which was 4% less than last year and 9% less than the average of 44%.
- 6.5 In addition, two insurance claims, relating to slips, trips or falls due to weeds, have been made to the council since 2019 to the time of writing. Of these two claims, one was settled, and the claimant was awarded £210. For the other, council liability was denied.

7. Financial implications

- 7.1 There are no direct financial implications arising from recommendation 2.1, 2.2, 2.3 or 2.6.
- 7.2 The options of recommendation 2.4 and 2.5 have different financial implications and may contain additional risks as set out in the report.
- 7.3 Agreeing option 2.3 will continue to use the limited resources available and manual techniques to manage and remove some weeds from across the city. Staffing costs and equipment for continued manual techniques will be contained within existing Street Cleansing budgets. Any significant variation to budgets will be reported as part of the council’s monthly budget monitoring process.
- 7.4 Agreeing option 2.4 of use of a controlled-droplet application is estimated to cost at least an additional £0.266m per annum for three applications and capital costs of equipment of £0.035m as outlined in paragraph 3.23. These are high level costs and could be significantly higher as weeds have not been treated for five years. There is currently no budget available for these additional costs. Service pressures for £0.266m ongoing expenditure and £0.035m one off capital have been requested as service pressures for 2024/25 budget setting. The 2024/25 budget will be agreed at Budget Council on 22nd February 2024. Should recommendation 2.4 be agreed, and service pressure funding not awarded, Street Cleaning budgets would have an estimated £0.266m revenue overspend at the start of the new financial year or there may be a need to revisit the decision made by Committee. Any significant variation to budget will be reported as part of the council’s monthly Targeted Budget Monitoring process.

- 7.5 Agreeing option 2.5 of use of traditional glyphosate is estimated to cost an additional £0.110m during 2024/25. Recommendation 2.5 also sets out this will be subject to a review in Winter 2024 to see if there is an option to move to controlled-droplet application for 2025. As highlighted in paragraph 7.4 there is no budget available for the estimated £0.110m in 2024/25 or the ongoing costs of controlled droplet application if this is the preferred option from 2025/26. £0.266m recurring revenue service pressure for 2024/25 budget setting has been requested as part of future weed management options. The 2024/25 budget will be agreed at Budget Council on 22nd February 2024. Should recommendation 2.5 be agreed and service pressure funding not awarded, Street Cleaning budgets would have an estimated £0.110m revenue overspend at the start of the new financial year or they may be a need to revisit the decision made by Committee. Any significant variation to budget will be reported as part of the council's monthly Targeted Budget Monitoring process.

Name of finance officer consulted: John Lack Date consulted: 10/01/2024

8. Legal implications

- 8.1 The Council is required to comply with the Public Contract Regulations 2015 in relation to the procurement and award of contracts above the relevant financial threshold for services, supplies and works.
- 8.2 The Council's Contract Standing Orders (CSOs) will also apply to the procurement of good and services.
- 8.3 As noted in the body of the Report, where a service Committee seeks to make a decision committing the Council to expenditure in relation to which there is no/ insufficient budgetary provision, then the decision can only be made subject to such provision being made by the relevant body. In this case, if this Committee decides to approve either recommendation 2.4 or 2.5 then the authority to incur the relevant expenditure will be sought from budget Council in February 2024.

Name of lawyer consulted: Eleanor Richards and Victoria Simpson
Date consulted: 10/01/2024

9. Equalities implications

- 9.1 An Equality Impact Assessment is contained in Appendix 4.
- 9.2 The council has a duty to keep the city's highways clear and free of obstructions. As stated in the EIA, "this EIA has been prepared to help inform the decision making of the CESS Committee in relation to weed management. The EIA has identified some disproportionate negative impacts and some possible positive impacts that should be read in conjunction with Weed Management Report presented to CESS Committee on 23 January 2024. If the decision is to use herbicide / glyphosate, then the limitations of manual weed removal may be mitigated and all areas could widely be weed-free potentially leading to less slips, trips, and falls or other

risks and hazards for those who may be elderly, disabled, wheelchair and pushchair users or be impacted in another way due to the presence of weeds on pavements and other areas.”

10. Procurement implications

10.1 If recommendation 2.4 or 2.5 is agreed, the procurement process will comply with Contract Standing Orders and the council’s procurement policies.

10.2 Soft market research was completed to inform this report and to understand better which recommendation would be suited to Brighton and Hove.

Notable points of this research are:

- The reduction in chemical use in the controlled-droplet products is offset by the cost, compared to traditional glyphosate.
- The general impression from contractors is that controlled-droplet applications have been developed for, and are typically utilised, in small areas e.g. shrub borders and car parks. They are effective and have their place, but it is not considered an economically viable substitute for conventional methods over large areas.
- Because Brighton and Hove has not received chemical weed treatment for five years, it is likely the perennial weeds have become established and may be difficult to treat, in particular bramble, ivy and buddleia. The opinion is that controlled-droplet applications would be the least effective for controlling this type of plant.
- The topology and diverse environment of Brighton and Hove may require a mixed application approach, including a combination of handheld and vehicle-based droplet control systems and other techniques, including conventional methods.
- Contractors recommended an outcome-based specification to allow contractors to offer the best possible, lowest glyphosate option, rather than being too prescriptive. This will help continue the council’s commitment to keeping glyphosate usage low and support the biodiversity and sustainability objectives of the council.

11. Sustainability implications

11.1 There is evidence that glyphosate has an adverse impact on biodiversity and sustainability as it affects nature conservation, including habitats for insects and other pollinators and presents a risk of chemicals entering the water system. As an example, [research published in Science in June 2022](#) highlighted the impact glyphosate has on bumblebees.

11.2 Conversely, the [Health & Safety Executive](#) says “the responsible use of pesticides in amenity areas as part of an integrated programme of control can help deliver substantial benefits for society. These include: management of conservation areas, invasive species and flood risks; access to high quality sporting facilities; and safe public spaces (for example, by preventing weed growth on hard surfaces creating trip hazards), industrial sites and transport infrastructure”.

- 11.3 Appendices 5 and 6 set out the sustainability considerations of the options presented using the guidance to support officers when assessing projects for their sustainability and climate impacts.
- 11.4 Appendix 5 indicates that using a controlled-droplet or traditional glyphosate application will have some positive and some negative impacts. Primarily, the negative impacts relate to the *biodiversity and nature conservation* theme as this approach does not support the council's objectives relating to the climate and biodiversity emergency. Positive impacts are identified in relation to the *health, safety, wellbeing and local communities* theme by reducing noise in communities and having less of an impact on manual workers. However, there are some negative impacts in relation to this theme too, due to the potential risk to public health which is detailed further in section 13.
- 11.5 Appendix 6 indicates that continuing with manual techniques will have some positive and some negative impacts. Primarily, the positive impacts relate to the *biodiversity and nature conservation* theme, with this approach supporting the council's objectives relating to the climate and biodiversity emergency and being the lead partner in The Living Coast UNESCO Biosphere. The negative impacts primarily relate to *health, safety, wellbeing and local communities* theme, with this approach creating noise for residents and impacting on staff wellbeing due to the intense, manual nature of the work. It also means not all weeds can be removed, leading to obstructions on the highway.
- 11.6 The Pesticide Action Network (PAN) UK has published information on the [effects of glyphosate on the environment](#).
- 11.7 In October 2022, the council sought the Environment Agency and Southern Water's views on the impact / risks of using herbicides / glyphosate on highways and in parks. Particular questions were asked on whether herbicides / glyphosate would permeate through the aquifer and contaminate drinking water and the sea or would this only occur if using the chemical near to open water. Their feedback is contained in Appendix 7.

12. Corporate implications

- 12.1 The Council Plan has several commitments which may be impacted by the decision on weed management, including:
- Ensure our streets, public spaces and facilities are well-maintained, clean and attractive.
 - Ensure that all decisions made by the council take into account the climate and biodiversity crises.
 - Provide a safer, more accessible and attractive environment that enables people to walk, wheel and cycle more.
 - Conserve and manage habitats and spaces where plants and animals can thrive, and biodiversity is restored.
 - Increase biodiversity, tackle water pollution and work towards carbon neutrality through the implementation of the City Downland Estate Plan.

13. Public health implications

- 13.1 In July 2023, an [European Food Safety Authority assessment](#) of the impact of glyphosate on the health of humans, animals and the environment did not identify critical areas of concern. Some data gaps were reported in the conclusions as issues that could not be finalised, or outstanding issues for the European Commission and Member States to consider in the next stage of the renewal approval process.
- 13.2 On 16 November 2023, European Member states did not reach the required qualified majority to renew or reject the approval of glyphosate during a vote at the Appeal Committee. In the absence of the required majority in either direction, the Commission was obliged to adopt a decision before the previous approval expired on 15 December 2023. The Commission, based on comprehensive safety assessment carried out by the European Food Safety Authority and the European Chemicals Agency, [proceeded to renew the approval of glyphosate for a period of 10 years](#), subject to certain new conditions and restrictions.
- 13.3 A [report from the International Agency for Research on Cancer in March 2015](#) found that the herbicide glyphosate was classified as “probably carcinogenic to humans (Group 2A)¹”. The report also stated “there was limited evidence of carcinogenicity in humans for non-Hodgkin lymphoma”. The evidence was based on, mostly agricultural exposures, in the USA, Canada and Sweden. The report goes on to say “the general population is exposed primarily through residence near sprayed areas, home use and diet, and the level that has been observed is generally low”.
- 13.4 In February 2020, the [United States Environmental Protection Agency](#) (EPA) “found that there are no risks of concern to human health when glyphosate is used in accordance with its current label... that glyphosate is unlikely to be a human carcinogen. The interim decision also identified potential ecological risks to non-targeted organisms, primarily non-target plants through spray drift”.
- 13.5 The [Health & Safety Executive](#) provides guidance on the use of glyphosate in public spaces: “legally enforceable conditions of use are imposed on the way products can be applied, to ensure the public are not exposed to levels of pesticides that would harm health or have unacceptable effects on the environment. It is important that users (or those who cause or permit others to use pesticides) not only comply with the authorised conditions of use but also use products in a responsible and sustainable fashion”. If Committee agrees to recommendation 2.4 or 2.5, appropriate monitoring arrangements will be put in place with the contractor. This will include, for example,

¹ “Group 2A means that the agent is probably carcinogenic to humans. This category is used when there is limited evidence of carcinogenicity in humans and sufficient evidence of carcinogenicity in experimental animals. Limited evidence means that a positive association has been observed between exposure to the agent and cancer but that other explanations for the observations (called chance, bias, or confounding) could not be ruled out. This category is also used when there is limited evidence of carcinogenicity in humans and strong data on how the agent causes cancer.”

ensuring the contractor complies with the [Control of Pesticides Act 1986](#) and any new legislation introduced during the contract duration.

Supporting Documentation

Appendices

- Appendix 1: weed management on hard surfaces 2020 to 2023
- Appendix 2: weed management methods
- Appendix 3: benefits and disbenefits
- Appendix 4: Equality Impact Assessment – weed management
- Appendix 5: sustainability implications – controlled-droplet application and traditional glyphosate application
- Appendix 6: sustainability implications – manual removal
- Appendix 7: feedback from the Environment Agency and Southern Water on the use of glyphosate

Background documents

1. [City Environment Improvement Programme Update Report](#) to City Environment, South Downs & The Sea Committee on 19 September 2023 (item 18)
2. [City Environment Improvement Programme Update Report](#) to Environment, Transport & Sustainability Committee on 14 March 2023 (item 88)
3. [City Environment Modernisation Update Report](#) to Environment, Transport & Sustainability Committee on 15 November 2022 (item 46)
4. [City Environment Modernisation Update Report](#) to Environment, Transport & Sustainability Committee on 22 June 2022 (item 8)
5. [Managing weeds and verges](#) presented to Environment, Transport & Sustainability Committee on 15 March 2022 (item 97)
6. [City Environment Modernisation Update Report](#) to Environment, Transport & Sustainability Committee on 21 September 2021 (item 41)
7. [City Environment Modernisation Update Report](#) to Environment, Transport & Sustainability Committee on 16 March 2021 (item 80)
8. [City Environment Modernisation Update Report](#) to Environment, Transport & Sustainability Committee on 29 September 2020 (item 29)
9. [Pesticide reduction and weed management](#) presented to Environment, Transport & Sustainability Committee on 16 March 2021 (item 81)
10. [Pesticide Reduction Plan](#) presented to Environment, Transport & Sustainability Committee on 26 November 2019 (item 48)
11. Glyphosate impairs collective thermoregulation in bumblebees at <https://www.science.org/doi/10.1126/science.abf7482>
12. Issues associated with the use of the herbicide (weedkiller) glyphosate: Frequently Asked Questions About Glyphosate available at <https://www.hse.gov.uk/pesticides/using-pesticides/general/glyphosate-faqs.htm>
13. IARC Monographs Volume 112: evaluation of five organophosphate insecticides and herbicides available at <https://www.iarc.who.int/wp-content/uploads/2018/07/MonographVolume112-1.pdf>

14. Glyphosate: no critical areas of concern; data gaps identified available at <https://www.efsa.europa.eu/en/news/glyphosate-no-critical-areas-concern-data-gaps-identified>
15. Glyphosate (US EPA) available at <https://www.epa.gov/ingredients-used-pesticide-products/glyphosate#:~:text=Glyphosate%20is%20a%20widely%20used,in%20the%20U.S.%20since%201974.>
16. Glyphosate available at <https://www.pan-uk.org/glyphosate/>
17. No qualified majority reached by Member States to renew or reject the approval of glyphosate available at https://ec.europa.eu/commission/presscorner/detail/en/statement_23_5792

Appendix 1: weed management on hard surfaces 2020 to 2023

2020

From March 2020, the country was in lockdown due to the Covid 19 pandemic. Lower footfall on hard surfaces, due to lockdown, impacted weed growth. Lockdown also had a significant impact on resources to undertake weeding as a high percentage of staff followed government advice and self-isolated. Those staff still working were deployed to urgent frontline duties. Recruitment agencies struggled to provide additional resource because people were receiving pay whilst on furlough and were not seeking alternative employment.

During 2020, hoes were mainly used to manually remove the weeds. Weed rippers were also utilised.

2021

The council included six additional operative vacancies as part of seasonal recruitment to work on weed management. Once again, the recruitment was severely impacted due to a national shortage of manual workers and the continuing furlough scheme, along with the difficulties people faced coming out of the benefit system to take on temporary work.

To ensure the weed removal did take place, contractors were used for three weeks to target areas of the city. This was funded from the underspend arising from not being able to recruit operatives.

During 2021, weeds were mainly removed using hoes and weed rippers. A specialist low vibration weed strimmer was trialled which was introduced the following season.

2022

Additional recurring funding of £0.070m for six additional seasonal staff for weed removal was added to the budget. This increased the number of seasonal staff to remove weeds to twelve, however Cityclean were only able to secure, on average, two to three agency staff per week.

An additional £0.172m in a budget amendment for more street cleaners was also added. The funding was used to recruit one Street Cleansing Driver and four Street Cleansing Operatives. Whilst these staff are not dedicated to weed removal, they do support this work as they undertake weeding in their patch.

For the 2022 weeding season, a different approach to recruitment was undertaken. Recruitment events were held to attract applicants who may struggle to complete an online application. Cityclean also worked with the Adult Education Manager to recruit seasonal staff through a pre-employment course called 'Get started at Cityclean'. Despite these additional measures, Cityclean was not able to fill all seasonal vacancies. Several recruitment campaigns were run from January to July.

Recruitment agencies were not able to regularly supply staff. This did not just affect Brighton & Hove City Council, but other industries.

Community Payback were also approached to provide resources but unfortunately, they were not able to supply anyone.

Contractors were engaged between June and mid-August to support weed removal. During this period, they completed 40 days weed removal at a cost of £0.042m.

During 2022, twelve strimmers were purchased. Delays in the supply chain resulted in these arriving in July. An extendable arm, that is attached to a sweeper and removes weeds, was also purchased.

In addition to the above, operatives continued to use hoes, shovels and weed rippers.

2023

Due to the extreme difficulty recruiting seasonal staff, a decision was made to recruit six permanent Street Cleansing Operatives instead of twelve seasonal staff. Three staff were allocated to the east of the city, and three staff to the west of the city to focus on weed removal all year round. Staff were recruited by February and undertook preparatory deep cleaning work over the winter to reduce the occurrence of weeds in the spring/summer.

A traffic light system was introduced to identify hot spot 'red zones' across the city based on access, trip hazards and damage to highway infrastructure. Highway Inspectors notified the Street Cleansing Team of issues, in addition to feedback from street cleansing staff, Councillors, and members of the public. Once notified of an issue, Street Cleansing Supervisors made a site visit to assess the area. If the weeds were categorised as 'red,' the weeds were removed. There could have been other weeds present, but not causing a hazard and these were not removed.

An additional mechanical weed ripper was purchased, which has increased the time staff can weed due to fewer vibrations.

Where parking suspensions took place, Cityclean were notified and crews attended the area using sweepers and weed rippers to remove weeds without the risk of damaging vehicles.

The Tidy Up Team undertook some weed removal using volunteers, and The Big Clean Up event was run in August. Community Payback carried out weeding, edging, hedge cutting, litter picking, painting and other improvements.

Managing weeds

In central areas of the city, weeds are predominantly managed in two ways: high footfall (which reduces the occurrence of weeds) and barrow operatives who remove weeds as part of their daily routes. Barrow operatives use hoes, brushes and strimmers to remove weeds, alongside their other duties including litter, flyposting and sticker removal. Streets in central areas are tended to by more barrow operatives than the east and west of the city.

In the east and west of the city, barrow operatives also manage weeds as part of their daily duties. The staff follow a schedule which is weekly in higher footfall areas, such as near shops, or fortnightly in the quieter areas.

They are supplemented by a team of three (one in east and one in west) who use a vehicle to transport additional equipment for weed management, such as weed rippers. They are a dedicated weed removal teams and also use hoes, brushes and strimmers, alongside the weed ripper machine.

The weed removal teams follow a schedule of work. Once an area has been weeded, the crew are unlikely to return until the following season, even when there are requests to do so. This is because they do not have capacity to return to areas already weeded because there is not capacity to do so. This team also responds to 'red zone' hazards.

Barrow operatives are advised not to exceed two hours weeding on any given day due to difficult manual work and the risk of musculoskeletal injuries. There are also measures in place to manage the use of machinery by the weed removal teams to prevent injuries.

Appendix 2: weed management methods

1. Weed management arrangements in place				
Method	Description	Benefits	Risks / dis-benefits	Officer feedback
Manual weeding	Using manual techniques such as hoeing, brushing, ripping, mowing and pulling	<ul style="list-style-type: none"> • Pesticide-free and avoid potential risks associated with pesticide use • Encourages biodiversity and sustainability • Mitigates potential public health risks 	<ul style="list-style-type: none"> • Labour intensive and time consuming • Requires a large amount of labour to be truly effective • Hard physical work for staff; considerable wellbeing issues for staff; risk of vibration injuries that have to be carefully managed • Trees susceptible to damage • Above surface growth treated and not root system therefore short term • Weeds will remain as its not possible to visit and manage all areas • Risk of damage to vehicles e.g. weed rippers can cause small stones to be projected that can damage cars 	<ul style="list-style-type: none"> • Current method has limited effect due to lack of root removal and area to be covered • Significant impact on staff • Beneficial for biodiversity
Hoes	Using hoe between pavement cracks and elsewhere to remove weeds	<ul style="list-style-type: none"> • Pesticide-free • Encourages biodiversity and sustainability • Successful at cutting weeds 	<ul style="list-style-type: none"> • Does not always remove the roots • Very slow process • Requires manual removal of residue 	<ul style="list-style-type: none"> • Physically demanding; repetitive strain means that an Operative can only do for three hours a day, between breaks
Mechanical sweeper	Mechanical sweeper for pavements to remove weeds. Weeding arm has a brush to remove weeds.	<ul style="list-style-type: none"> • Pesticide-free • Encourages biodiversity and sustainability • Covers a long distance on long and wide pavements 	<ul style="list-style-type: none"> • Does not remove roots • Limited where this can be used due to size of vehicle. Obstructions such as street furniture, narrow pavements, road signs, overhanging trees, shop 	<ul style="list-style-type: none"> • Sweeper cannot do high speed rotation as this could project stones • Uneven surfaces means that the sweeper cannot get into all corners and cracks

1. Weed management arrangements in place

Method	Description	Benefits	Risks / dis-benefits	Officer feedback
		<ul style="list-style-type: none"> Residue is collected by the sweeper within the suction box 	<ul style="list-style-type: none"> signs mean the sweeper cannot access everywhere Brush requires changing once a week 	
Weed ripper (two types in use)	Weed ripper with a metal brush attached at the front	<ul style="list-style-type: none"> Pesticide-free Encourages biodiversity and sustainability 	<ul style="list-style-type: none"> Does not always remove roots Slow process Physically demanding; risk of vibration injuries that have to be carefully managed One van is needed to transport with tail lift/ramp to load one weed ripper Doesn't sweep or pick up residue, also requires manual labour for sweeping/picking up loose weeds and silt Requires transportation of five litres of petrol at a time due to fumes, which requires daily trip to petrol station 	<ul style="list-style-type: none"> Risks relating to hand arm vibration means control measures are required with two operatives adopting task rotation; one uses the equipment for 30 minutes, the other sweeps and then after 30 minutes they rotate tasks ensuring there is a break from using vibratory machinery Each operative can use the equipment for a total of 120 minutes per shift, therefore not very efficient
Strimmer with wire brush	Strimmer with weed ripping brushes that are interchangeable	<ul style="list-style-type: none"> Pesticide-free Encourages biodiversity and sustainability Successful at cutting weeds Lower vibration than some strimmers but all strimmers and rippers are high vibration 	<ul style="list-style-type: none"> Does not remove roots Slow process Doesn't sweep or pick up residue Physically demanding; risk of vibration injuries that have to be carefully managed Requires transportation of five litres of petrol at a time due to fumes, which requires daily trip to petrol station Van with tail-lift is needed to transport weed ripper 	<ul style="list-style-type: none"> This has helped speed up operations but can only be used for limited periods by each operative every day Each operative can use the equipment for 20 minutes at a time. Operatives are working in pairs: one uses the equipment for 20 minutes, whilst the other sweeps the residue, then they swap, therefore not very efficient

2. Weed management methods considered and rejected

Method	Description	Benefits	Risks / dis-benefits	Officer feedback
Acetic acid (vinegar)	Vehicle and knapsack used to treat weeds	<ul style="list-style-type: none"> • Pesticide-free • No licence required for application • Could be applied by hand / knapsack application 	<ul style="list-style-type: none"> • Has been trialled, but feedback from PAN UK is it has not been effective • Strong smell, can give operator headache • Above surface growth only and not root system • Expensive 	<ul style="list-style-type: none"> • Did not pursue as not considered a viable option • Pesticide Action Network (PAN) UK continue to say that <i>'this method is not very effective on larger areas of hard surface. As for being environmentally friendly that is probably open to interpretation. Better than glyphosate and other herbicides but it still kills vegetation and possibly has an impact on soil. But as a natural substance it is much more understood and less harmful than synthetic pesticides. But the real question is efficacy – so probably not a great choice for commercial use.'</i>
Benzalkonium Chloride (for killing moss)	Alternative pesticide badged as being biodegradable and less harmful to the environment	<ul style="list-style-type: none"> • Claims to be more environmentally friendly and biodegradable 	<ul style="list-style-type: none"> • Harmful in contact with skin and if swallowed • Causes burns • Very toxic to aquatic organisms 	<ul style="list-style-type: none"> • Not recommended due to toxicity and lack of suitability
Crystal salt and vinegar	Manually apply salt and vinegar to the weeds prior to removal after rain	<ul style="list-style-type: none"> • Natural substance – no licence required 	<ul style="list-style-type: none"> • Does not remove roots • Trialled by Palmeira Square community; feedback was that it killed the leaves and not the roots and the weeds grew back • Large amounts of salt needed to be used • Negative impact on pets, snails and slugs • Strong smell, can give operator headache • Issue with storage • Would have to be applied by hand to very large areas 	<ul style="list-style-type: none"> • Trialled in summer 2021, separately and together • Not recommended due to lack of effectiveness, for method of application, labour requirements, risk to biodiversity and smell

2. Weed management methods considered and rejected

Method	Description	Benefits	Risks / dis-benefits	Officer feedback
Electric voltage shock	An electric charge is applied to each weed individually	<ul style="list-style-type: none"> • Pesticide-free • Kills small weeds and roots 	<ul style="list-style-type: none"> • Does not remove large roots • Time consuming as must operate per weed • Danger to animals and users • Requires road and pavement to be closed during operation • Requires generator within a van • Not suitable in wet / damp conditions • Requires two to three staff to be deployed 	<ul style="list-style-type: none"> • Found to be unsafe and impractical • Not recommend as not practical or efficient and not to the standard required • Public safety concerns
Flame throwing	Flamers are portable gas torches that produce intense heat that quickly boils the water in plant cells, causing them to burst. This approach has been around for a while.	<ul style="list-style-type: none"> • Pesticide-free • Throwers relatively cheap to purchase • Suitable for weeds on hard surfaces 	<ul style="list-style-type: none"> • Not very effective on perennial weeds • Brings health and safety risks (banned in the domestic market) • Not particularly effective 	<ul style="list-style-type: none"> • Did not pursue as not considered a viable option • Concerns about insurance and health and safety
Hot foam	Combines heat with biodegradable foam made from natural plant oils and sugars. The heat is used to kill the weed while the foam acts as a thermal blanket keeping the heat applied for long enough to kill the root.	<ul style="list-style-type: none"> • Pesticide-free • Foam is safe and non-toxic • Can be used in all weather • Claims to kill 95% of targeted weeds 	<ul style="list-style-type: none"> • Relatively new technology • Expensive • Additional cost of olive oil rather than palm oil • Host vehicle could impede traffic flow on many narrow city streets • Parked vehicles could prevent access to pavements • Requires several intensive treatments to remove roots 	<ul style="list-style-type: none"> • Trialled in September 2019 • Lewes District Council carried out a six-month trial of using hot foam to remove weeds around playgrounds. They have now stopped using this due to the high cost and lack of effectiveness • Would probably still need operatives with wand / Knapsack, or manual weeding, to reach some areas • Not suitable for large hard surface areas and not very effective
Hot water	Boiling water is applied onto hard surfaces and a blast of thermal energy kills the weed and the root system	<ul style="list-style-type: none"> • Pesticide free • Kills small weeds • Steam is safe and non-toxic 	<ul style="list-style-type: none"> • The previous trial demonstrated that it does not remove large weeds or weed roots. The newer system may address this 	<ul style="list-style-type: none"> • Trialled in 2020 • Two weeks later, new weeds had started to grow • The machine was cumbersome and loud and releasing excessive steam,

2. Weed management methods considered and rejected

Method	Description	Benefits	Risks / dis-benefits	Officer feedback
		<ul style="list-style-type: none"> The new system is all electric and purports to be quiet 	<ul style="list-style-type: none"> Uses large amounts of water that has to be transported 	<p>which was not good in areas of high footfall</p> <ul style="list-style-type: none"> Water needs transporting too so will need a trailer Could not use on pavements next to parked vehicles due to risks of boiling water – new system may address this
Hot water product	The sudden surge of hot water damages the plant tissue.	<ul style="list-style-type: none"> Pesticide free Kills small weeds Steam is safe and non-toxic Very quiet; noise is like a garden hose When unplugged the water is stored hot for up to 10 hours The water is not at pressure, so there is no spray 	<ul style="list-style-type: none"> Uses large amounts of water that has to be transported Water has to be heated before being transported (between 6 – 9 hours) The 600 litre version is 460kg empty, so requires a larger vehicle to move it around, such as a van or vehicle with a trailer The 300 litre version is 310 kg empty. It can be fitted in some utility vehicles or on the back of a compact tractor or a pickup truck 	<ul style="list-style-type: none"> New system designed in Finland Been on the market in Finland for about four years (note that they have a much shorter growing season than the UK) Not being trialled/used by any UK companies/LAs as of May 2023
Infra-red	The system consists of a shrouded spraying head mounted on the front of a purpose-built vehicle. Within the shrouded head are sensor units and spray nozzles. The sensor units detect the presence of weeds and triggers the appropriate spray nozzles to accurately apply the correct amount of herbicide just to those	<ul style="list-style-type: none"> Claim is up to 80% reduction in glyphosate Vehicle can mount pavement No blanket spraying Targets weeds only 	<ul style="list-style-type: none"> Still contains glyphosate Host vehicle could impede traffic flow on many narrow city streets/pavements Parked vehicles could prevent access to pavements Not so effective on smaller weeds 	<ul style="list-style-type: none"> Large vehicle on pavement but impressive if can target weeds Would probably still need operatives with wand / Knapsack, or manual weeding, to reach some areas

2. Weed management methods considered and rejected

Method	Description	Benefits	Risks / dis-benefits	Officer feedback
	weeds and their immediate surroundings.			
[Different type of] weed electrical ripper machine	Electric rather than diesel weed ripper – still removing surface weeds rather than roots	<ul style="list-style-type: none"> • Pesticide free • Reduced use of diesel 	<ul style="list-style-type: none"> • Does not remove roots • Requires several batteries per day as charge is one hour when battery is new • Trialled various sizes and different manufacturers • Doesn't sweep or pick up residue • Requires two operatives on rotating tasks due to Hand Arm Vibration 	<ul style="list-style-type: none"> • Trialled in January 2022 • Not recommend as not practical or efficient and not the standard required
[Different type of] weed ripper	Weed ripper with brushes that removes surface weeds	<ul style="list-style-type: none"> • Pesticide free • Limited 	<ul style="list-style-type: none"> • Does not remove roots • Requires several batteries per day as charge is one hour when battery is new. • Trialled two different sizes • Doesn't sweep or pick up residue • Requires two operatives on rotating tasks due to HAV 	<ul style="list-style-type: none"> • Trialled on 22 September 2021 and 23rd November 2021
Electric barrow sweeper	Sweeper with Weed ripper functionality	<ul style="list-style-type: none"> • Removes small weeds • Lightweight • Can access all pavements • Only requires one person to operate 	<ul style="list-style-type: none"> • Does not remove roots • Very low pressure; more designed for sweeping litter • Manually operated • Requires a charging point so has limited geographical area where it can be operated in, otherwise requires a trailer to transport • Filter tends to block frequently due to weeds 	<ul style="list-style-type: none"> • Trialled on 29 June 2022 • Not recommend as not practical or efficient and does not reach the standard required.

Appendix 3: benefits and disbenefits of each option

Manual removal of weeds	Benefits	Disbenefits
Biodiversity and sustainability	Continuing to use manual techniques for weed management will mean the council continues its ban on glyphosate, except for in exceptional circumstances. This means the council can continue to deliver on its commitment to address the climate and biodiversity emergencies declared in 2018. Manual techniques will also support the delivery of The Living Coast UNESCO Biosphere objective on biodiversity conservation and Strategic Risk 36 which is to address climate and ecological change.	As evidenced by the experiences since 2020, a manual approach to weed removal means it is not possible to remove all weeds from across the city. Weeds in channels can inhibit surface water flowing in the channels and gullies. The weeds also trap rubbish and other detritus. These blocked gullies can then lead to surface water flooding. Furthermore, the limitation of manual removal leads to more damage to the highway infrastructure. This means tarmac and paving slabs need to be repaired / replaced more frequently. There is a carbon cost to this.
Cost	There is no increase in cost for continuing with the manual removal of weeds. The same approach including tools and staff will be used as in 2023 to manage weeds across the city. This is budgeted for.	The higher sickness rate due to musculoskeletal injuries / issues may mean agency staff are required to undertake weed management. This will increase the cost of manual weed removal.
Efficiency / effectiveness		The Street Cleansing Service is demand led. Depending on need, staff can be deployed from weeding or their barrow route to deal with other tasks such as large events or clearing up around communal refuse or recycling bins. This means that even with a full resource and planned works, not all weed removal may take place. There is high turnover of staff within the Street Cleansing Service which means the service is always carrying a level of vacancy. This is particularly the case for weed removal as it is intensive manual labour and staff find it is not the job for them, sometimes after one day. As evidenced in Appendix 1, there have been historic issues with recruiting enough staff to

Manual removal of weeds	Benefits	Disbenefits
		<p>undertake weed removal. This all impacts on the effectiveness of the manual approach to weed removal.</p> <p>It is not possible for operatives to weed all day. For example, mechanical weed rippers can generally only be used for 20 to 40 minutes before a break is required. Although staff are rotated, this means the efficiency of weed removal is affected.</p> <p>Having not used pesticide for five years, weeds in many parts of the city are well established, meaning they are bigger and more difficult to remove. There is not sufficient resource to be able to remove these effectively which means they are either strimmed or hoed. Strimming and hoeing the weeds does not remove roots; this means the weeds grow back quickly. Areas weeded at the beginning of the season need weeding again before the end of the season and there is not enough resource to undertake a second round of weed removal.</p>
Equalities		<p>As evidenced, a manual approach to weed removal means it is not possible to remove all weeds from across the city. This presents a risk that the council is not meeting its equalities duties by not keeping the city's highways clear and free of obstructions. Further information on the impact on some protected characteristics is available in Appendix 4.</p>
Highways		<p>Highways Inspectors have reported that weeds are now damaging the highway infrastructure. The highway carriageway currently has an immediate maintenance backlog of £57 million that is estimated to increase to £212 million by 2043 at the current rate of investment. The growth of weeds is currently not factored into these figures, but continuing with manual weed removal is likely to see this figure grow substantially. A typical replacement of a footway in asphalt is £11,000 for 100m², and this equates to approximately three footway renewals per year from the existing footway safety budget. If the condition of footways continues to degrade due</p>

Manual removal of weeds	Benefits	Disbenefits
		<p>to damage caused by weeds, it will mean there will be an increased budget gap and pressure for the council.</p> <p>Weeds can also damage the carriageway surface which allows water ingress. Freezing, then thawing, causes the highway to form defects or premature deterioration of the surface.</p>
Public health	<p>There is conflicting evidence on the public health implications of the use of glyphosate. As detailed in the main report, a report from the International Agency for Research on Cancer in March 2015 found that the herbicide glyphosate was classified as “probably carcinogenic to humans”. Using manual techniques to remove weeds will mean this risk is mitigated.</p>	
Staff		<p>The manual removal of weeds is hard on the body. More staff are informing management of musculoskeletal complaints due to weeding. In the last 12 months, 56 street cleansing staff (out of 155) have received treatment from the on-site physiotherapist, citing ‘weeding’ as the cause or contributing factor to their injury or condition.</p> <p>The tools used to remove weeds manually present risks relating to whole body vibration and hand arm vibration. Appropriate training, breaks and PPE is provided but use of tools can impact on staff wellbeing and sickness levels.</p>

Controlled-droplet spray	Benefits	Disbenefits
Biodiversity and sustainability	<p>Using a controlled-droplet application is a better option than using traditional glyphosate.</p>	<p>Using a controlled-droplet approach will mean the council is not taking all the action it can to address the climate and biodiversity emergencies declared in 2018. It will not support the delivery of The Living Coast UNESCO Biosphere objective</p>

Controlled-droplet spray	Benefits	Disbenefits
	Controlled-droplet applications use less glyphosate than the traditional approach.	on biodiversity conservation or Strategic Risk 36 which is to address climate and ecological change. See Appendices 5 and 6 for more information on the sustainability implications. However, this option is a better option than using traditional glyphosate. This is because the application is applied in large droplets released under gravity (unlike the traditional method of glyphosate application, which is a pressurised mist). This reduces drift and the likelihood of the application adhering to non-target items.
Cost		Based on the soft market testing completed to inform this report, a controlled-droplet approach to weed management is not the most cost-effective way to manage weeds across the city. The estimated costs are more expensive than traditional glyphosate: £0.266m compared to £0.110m. Funding for this treatment is subject to Budget Council approval in February 2024.
Efficiency / effectiveness	<p>Using a controlled-droplet application is likely to tackle most weeds and use less glyphosate.</p> <p>Controlled-droplet weed management may tackle the established roots. This may mean the weeds may not grow back once they have been treated.</p> <p>Using a controlled-droplet application will mean barrow operatives will have more time for other duties, such as litter picking.</p> <p>The use of contractors will mean the planned weed management work will take place (weather dependent) rather than having to respond to other needs within a demand led service.</p>	<p>Having not used pesticide for five years, weeds in many parts of the city are well established, meaning they are bigger and more difficult to remove. This means the controlled-droplet applications may not be as effective at removing these weeds compared to traditional glyphosate.</p> <p>Controlled-droplet applications are untried and untested way to manage weeds on hard surfaces on a large scale and because of this, more applications may be required, which will increase the cost.</p>
Equalities	The use of a controlled-droplet application is likely to mean the council is better placed to meet its equalities duties by keeping	Having not used pesticide for five years, weeds in many parts of the city are well established, meaning they are bigger and

Controlled-droplet spray	Benefits	Disbenefits
	<p>the highway free of obstructions. Further information on the impact on some protected characteristics is available in Appendix 4.</p>	<p>more difficult to remove. This means the controlled-droplet applications may not be as effective at removing these weeds compared to traditional glyphosate and may mean the council is not able to meet its equalities duties and keep the highway free of obstructions.</p>
Highways	<p>Using a controlled-droplet application is likely to mean there is reduced damage to the highway infrastructure, with weeds and their roots treated before they start to cause damage. This may lead to reduced cost of replacing / repairing the highway caused by weed damage.</p> <p>There is likely to be fewer trip hazards on the highway.</p> <p>There is likely to be less opportunity for water ingress meaning fewer instances of premature deterioration of the surface during freeze/thaw conditions.</p>	<p>Having not used pesticide for five years, weeds in many parts of the city are well established, meaning they are bigger and more difficult to remove. This means the controlled-droplet applications may not be as effective at removing these weeds compared to traditional glyphosate and may mean that repairs to the highway continue to be required due to damage caused by weeds.</p>
Impact on staff	<p>Using contractors to manage weeds means there will be a reduced need for manual labour and therefore the number of musculoskeletal injuries will reduce across the workforce. It will also reduce the risk of whole body vibration and hand arm vibration injuries.</p>	
Public health	<p>There is conflicting evidence on the public health implications of the use of glyphosate. A July 2023 assessment by the European Food Safety Authority of the impact of glyphosate on the health of humans, animals and the environment did not identify critical areas of concern. On 16 November 2023, the European Commission renewed the approval for the use of glyphosate for a further 10 years.</p>	<p>There is conflicting evidence on the public health implications of the use of glyphosate. As detailed in the main report, a report from the International Agency for Research on Cancer in March 2015 found that the herbicide glyphosate was classified as “probably carcinogenic to humans”. However, using a controlled-droplet application is a better option than using traditional glyphosate. This is because the application is applied in large droplets released under gravity (unlike the traditional method of glyphosate application, which is a pressurised mist) and does not produce breathable droplets.</p>

Traditional glyphosate	Benefits	Disbenefits
Biodiversity and sustainability		Using traditional glyphosate will mean the council is not taking all the action it can to address the climate and biodiversity emergencies declared in 2018. It will not support the delivery of The Living Coast UNESCO Biosphere objective on biodiversity conservation or Strategic Risk 36 which is to address climate and ecological change. See Appendices 5 and 6 for more information on the sustainability implications.
Cost		Based on the soft market testing completed to inform this report, traditional glyphosate is the most cost-effective way to manage weeds across the city. The estimated costs are £0.110m (compared to £0.266m for a controlled-droplet approach). Funding for this treatment is subject to Budget Council approval in February 2024.
Efficiency / effectiveness	<p>Traditional glyphosate is a tried and tested way to manage weeds, with many local authorities using glyphosate for weed removal, as well as homeowners in their own gardens. It is proven to work effectively and efficiently to tackle weeds on hard surfaces on a large scale.</p> <p>Traditional glyphosate will tackle the established roots. This means the weeds are unlikely to grow back once they have been treated, keeping the city's highways will remain free of weeds.</p> <p>Using a traditional glyphosate application will mean barrow operatives will have more time for other duties, such as litter picking.</p> <p>The use of contractors will mean the planned weed management work will take place (weather dependent) rather</p>	

Traditional glyphosate	Benefits	Disbenefits
	than having to respond to other needs within a demand led service.	
Equalities	The use of traditional glyphosate to manage weeds will mean the council is better placed to meet its equalities duties. Further information on the impact on some protected characteristics is available in Appendix 4.	
Highways	<p>Using a traditional glyphosate application will mean there is reduced damage to the highway infrastructure, with weeds and their roots treated before they start to cause damage. This will lead to reduced cost of replacing / repairing the highway caused by weed damage.</p> <p>There will also be fewer trip hazards on the highway.</p> <p>There will be less opportunity for water ingress meaning fewer instances of premature deterioration of the surface during freeze/thaw conditions.</p>	
Impact on staff	Using contractors to manage weeds means there will be a reduced need for manual labour and therefore the number of musculoskeletal injuries will reduce across the workforce. It will also reduce the risk of whole body vibration and hand arm vibration injuries.	
Public health	There is conflicting evidence on the public health implications of the use of glyphosate. As detailed in the main report, a July 2023 assessment by the European Food Safety Authority of the impact of glyphosate on the health of humans, animals and the environment did not identify critical areas of concern. On 16 November 2023, the European Commission renewed the approval for the use of glyphosate for a further 10 years.	There is conflicting evidence on the public health implications of the use of glyphosate. As detailed in the main report, a report from the International Agency for Research on Cancer in March 2015 found that the herbicide glyphosate was classified as “probably carcinogenic to humans”.

Appendix 4: Equality Impact Assessment – weed management

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the ‘activity’ you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service’s approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, ‘activity’ is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Weed Management
Directorate:	Economy, Environment & Culture

Service:	City Environment
Team:	City Clean
Is this a new or existing activity?	N/A – This is the first EIA completed for weed management
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Lynsay Cook, Head of Strategy & Service Improvement
Accountable Manager:	Melissa Francis, Head of Cityclean Operations
Additional stakeholders collaborating or contributing to this assessment:	City Environment officers Equalities, Diversity & Inclusion Team

3. About the activity

Briefly describe the purpose of the activity being assessed:

In November 2019, the [Environment, Transport & Sustainability Committee](#) agreed that City Environmental Management services end the use of glyphosate with immediate effect other than in exceptional cases to kill invasive plant species, such as Japanese Knotweed or to kill tree stumps. Committee was advised it would not be possible to remove all weeds from highways and pavements manually and there would be more visible weeds for longer periods of time.

Since 2019, Cityclean has been using manual methods of weed removal while looking at other alternative weed control techniques. Feedback suggests that the manual approach is not sufficient for managing weeds across the city. Therefore, a Weed Management Report is to be presented to City Environment, South Downs & The Sea (CESS) Committee in January 2024. Committee is being asked to agree either:

To continue with the current policy on weed management and instruct the council's City Environmental Management Services to continue to use manual techniques to manage and remove weeds from across the city, as described more fully in paragraphs 3.17 to 3.19 of the main report. This is until a cost-effective and viable non-glyphosate option is available.

Or
Subject to approval at Budget Council, to amend the current policy to support the use of glyphosate to manage weeds on all hard surfaces and instruct the council's City Environmental Management Services to engage with contractors to use a controlled-droplet application to manage and remove weeds from across the city in 2024/25, as described more fully in paragraphs 3.21 to 3.24 and 3.28 to 3.29 of the main report. Further to this, Committee agrees to delegate authority to the Executive Director – Economy, Environment & Culture, in consultation with the Committee Chair, to determine the most effective approach for weed management in future years based on the outcomes achieved in 2024/25.

Or
Subject to approval from Budget Council, to amend the current policy to support the use of glyphosate to manage weeds on all hard surfaces and instruct the council's City Environmental Management Services to engage with contractors to use traditional glyphosate to manage and remove weeds from across the city in 2024, as described more fully in paragraphs 3.25 to 3.29 of the main report. This will be subject to a review in winter 2024 to see if there is an option to move to a controlled-droplet application for 2025. Further to this, Committee agrees to delegate authority to the Executive Director – Economy,

Environment & Culture, in consultation with the Committee Chair, to determine the most effective approach for weed management in future years based on the outcomes achieved in 2024.

This EIA should be read in conjunction with the Weed Management Report and appendices being presented to Committee.

Glyphosate is the active substance in many herbicides (weed killers) and is widely used around the world. It is a non-selective, systemic herbicide and was first used in the UK in 1976. Glyphosate is effective in controlling most weed species, including perennials and grasses in many situations, including amenity, forestry, aquatic and industrial situations. Since it is approved for use in many countries, it has been subjected to extensive testing and regulatory assessment in the EU, USA and elsewhere and by the World Health Organisation.

As indicated in the main report, there are differing views on whether glyphosate is safe to use given the reported impact on human beings and wildlife.

What are the desired outcomes of the activity?

This EIA has been prepared to help inform the decision making of the CESS Committee in relation to weed management. The EIA should be read in conjunction with Weed Management Report presented to CESS Committee on 23 January 2023.

The council must meet its statutory duty to maintain a safe and usable highway network. The council also has commitments following the declaration of climate and biodiversity emergencies in 2018.

Which key groups of people do you think are likely to be affected by the activity?

All residents and visitors to the city.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

A Weed Working Group was set up and met in October 2023 to carry out a 'vertical slice' consultation, with stakeholders from every aspect and at relevant level to form part of the working group.

The stakeholders included councillors, officers from Cityclean, City Parks, Highways and Biodiversity, plus Pesticide Action Network UK and a local resident.

The range of perspectives and experiences from this meeting was extremely useful. The outcome of this Working Group is the Weed Management Report to Committee to make a decision on future weed management.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(Delete and indicate as applicable from the options Yes, No, Not Applicable)

Age	No
Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	No

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered "NO" to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

Some data is gathered through formal complaints and compliments from residents and visitors. City Environmental Management does not have data split by protected characteristics to assess intersectional, cumulative, or direct impacts other than through analysing of complaints and compliments

feedback content from residents. This is shared below. It is recognised this a data gap and the council and service need to explore improved data gathering that enables more informed impact analysis and decision-making.

Since 2019, the council has received:

- Six compliments to the Customer Feedback Team about the new, manual approach to weed management, including:
 - “I love seeing more wildflowers and long grasses in my neighbourhood”.
 - “there are many of us who love seeing such an abundance of plant life thriving in our city”.
- Five Stage 1 complaints about the decision not to use pesticides, and suggesting the manual approach to weed removal is not effective.
- 51 Stage 1 complaints about the state of pavements / highways and overgrown weeds, suggesting the council is not doing enough to manage weeds.
- One Stage 1 complaint about removing weeds from a resident’s street as they were “providing miniature nature reserves”.

Of the Stage 1 complaints received:

- Five were concerned about weeds causing trip hazards for the elderly.
- Two were concerned about weeds and the impact on disabled people.
- One commented on the issues caused by weeds for wheelchair users and those with walkers and other mobility aids.
- One commented that their elderly mother had tripped and had to visit hospital due to weeds.
- One parent commented that they sometimes had to go into the road with their pushchair, with another commenting they struggle to get their pushchair “through the gap”.
- One commented on the issues caused by the weeds for those with wheelchairs and pushchairs.

One of the options presented in the report to CESS Committee is to use glyphosate to manage the weeds on the city’s highways and pavements. If this method is approved, it can be argued that highways and pavements will be less hazardous for certain groups of people in terms of slips, trips, and falls. If the council continues to manage weeds manually, not all weeds will be removed, and some areas will be more hazardous.

Two insurance claims, relating to slips, trips, or falls due to weeds, have been made to the council since 2019 to the time of writing. Of these two claims, one was settled, and the claimant was awarded £210. For the other, council liability was denied.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

City Environment will continue to review the feedback it receives in relation to weed management, following a decision being made by CESS Committee.

If Committee agrees to the use of herbicide / glyphosate, appropriate monitoring arrangements will be put in place with the contractor. This will include, for example, ensuring the contractor complies with the [Control of Pesticides Act 1986](#) and any new legislation introduced during the contract duration. Furthermore, daily updates will be provided by the contractor, including the work completed and what is planned. City Environment will undertake inspections of the work completed by the contractor on a regular basis.

The council and service need to improve data gathering and analysis through equality and intersectional lenses as a service to improve future insights and decision-making, addressing any assumptions and gaps in data today due to lack of protected characteristics and extended equalities data gathering.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

5.1 Age

<p>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.</p>	<p>Yes</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Negative:

Of the complaints received since 2019, five were specifically concerned about weeds causing trip hazards for the elderly. A further complaint commented that their elderly mother had tripped and had to visit hospital due to weeds. This suggests that the current approach to weed removal could have a negative disproportionate impact on a particular Age group, with large and unmanaged weeds causing trip hazards and obstructions for the elderly.

5.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Negative:

Of the complaints received since 2019, two were specifically concerned about weeds causing trip hazards for disabled people. A further complaint commented on the issues caused by weeds for wheelchair users and those with walkers and other mobility aids. Another commented on the issues caused by the weeds for those with wheelchairs [and pushchairs]. This suggests that the current approach to weed removal could have a negative disproportionate impact on disabled people, with large and unmanaged weeds causing trip hazards and obstructions for those who are blind, partially sighted, have mobility issues or for those using wheelchairs or mobility scooters.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

As 5.2 above.

5.3 Ethnicity, ‘Race’, ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	Yes
--	-----

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Negative:</p> <p>Of the complaints received since 2019, one parent commented that they sometimes had to go into the road with their pushchair, with another commenting they struggle to get their pushchair “through the gap”. A further complainant commented on the issues caused by the weeds for those with [wheelchairs] and pushchairs. This suggests that the current approach to weed removal could have a negative disproportionate impact on parents and carers of small children, with large and unmanaged weeds causing obstructions for those using pushchairs and prams.</p>
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5.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Negative:

Of the complaints received since 2019, two complainants referred to the issues caused by weeds for wheelchair users which, in turn, could cause issues for anyone pushing the wheelchair. This suggests that the current approach to weed removal could have a negative disproportionate impact on carers, with large and unmanaged weeds causing obstructions for those supporting wheelchair users.

5.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our Corporate Parenting Responsibility in connection to your activity.	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	No
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?

No

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

No

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?

No

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

N/A

5.17 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy and numeracy barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

There may be complex impacts for residents who are disabled and older, or disabled parents/carers or those who have other intersections contributing towards mobility issues.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1. SMART Action 1: Continue to review the feedback received in relation to weed management

2. SMART Action 2: Explore how intersectional equalities data gathering and analysis and, in turn, decision making can be improved with regards to weed management

Which action plans with the identified actions be transferred to?

- For example: FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

This action has been added to the City Environmental Management Improvement Programme.

Note: if a contractor is to be used for weed management, biodiversity and sustainability mitigations will be managed through contract management.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	X

If your decision is to “Proceed with caution”, please provide a reasoning for this:

This EIA has been prepared to help inform the decision making of the CESS Committee in relation to weed management. The EIA has identified some disproportionate negative impacts and some possible positive impacts that should be read in conjunction with Weed Management Report presented to CESS Committee on 23 January 2023.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

This EIA has been prepared to help inform the decision making of the CESS Committee in relation to weed management. The EIA has identified some disproportionate negative impacts and some possible positive impacts that should be read in conjunction with Weed Management Report presented to CESS Committee on 23 January 2024.

If the decision is to use herbicide / glyphosate, then the limitations of manual weed removal may be mitigated and all areas could widely be weed-free potentially leading to less slips, trips, and falls or other risks and hazards for those who may be elderly, disabled, wheelchair and pushchair users or be impacted in another way due to the presence of weeds on pavements and other areas.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

N/A

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Lynsay Cook, Head Strategy & Service Improvement at City Environment	03-Jan-24
Accountable Manager:	Melissa Francis, Head of Cityclean Operations	03-Jan-24

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment checklist and sign-off

EDI Business Partner to cross-check and indicate which aims of the equality duty, public sector duty and our civic responsibilities the EIA activity meets (enter Y/N/comments for all applicable options):

Y	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act . (i.e., the activity removes or minimises disadvantages suffered by different people due to their protected characteristics under the Act and beyond)
Y	Advance equality of access, opportunity, and representation of voice between those who share a protected characteristic and those who do not. (i.e., the activity takes steps to meet the needs of different people from protected groups under the Equality Act (and beyond) where these are different from the needs of other people)
Y	Creating community cohesion - Foster good relations between people who share a protected characteristic and those who do not. (i.e., the activity encourages different people from protected groups under the Equality Act (and beyond) to participate in public life or in other activities where their participation is disproportionately low)
Y – impact identified, recommendation made	Sustainability checklist elements and supporting pragmatic achievement of Carbon Neutral goals. Refer to the sustainability checklist .
Y	Addressing and providing inclusive and reasonable adjustments, and/ or meeting our anticipatory duties as a public sector provider, employer, and local authority.
Y	Addressing and removing health inequalities . Meeting the BHCC Joint Health and Wellbeing Strategy .
N/A	Consider if any corporate parental responsibilities are impacted, for example for care experienced people.
N/A	Creating social value and community wealth .
N/A – Should source from sustainable and eco-friendly suppliers	Creates and proactively considers for more inclusive and diverse suppliers, commissioned providers, procured service providers and/ or another procurement and commissioning outcome. Refer to our social value framework guidance and guidance around procurement and commissioning .
Y – but with data and engagement improvements identified	Meeting our core priority actions, strategic themes of engagement, data, policy, and procedure and workstream activities in the Fair & Inclusive Action Plan (FIAP) , Our council plan , Our strategic approach , Workforce Equality reports , Performance Management Framework , and Council-wide Equality Strategies such as Anti-Racism, Accessible City, Gender and more. Also refer to the EDI Internal Hub .
Y – potentially	Creates efficiencies, savings, improves public spending, and has other positive budgetary outcomes or impacts in the public interest and/ or for our people.
Y – for some	Improves our people and/ or user experience, creating equity of access, opportunity, experiential, and wellbeing outcomes.

EIA Reference number assigned: **EEC62-03-Jan-24 -Weed-Management**

For example, HNC##-25-Dec-23-Home-Energy-Saving-Landlord-Scheme

Once the EDI Business Partner has checked the above have been considered for by those submitting the EIA for approval, they will get the EIA signed off and send to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking and saving.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	03-Jan-24
EDI Manager:	Sabah Holmes	03-Jan-24
Head of Communities, Equality, and Third Sector (CETS) Service: <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i>	N/A	

Notes and recommendations from EDI Business Partner reviewing this assessment:

Approved

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Approved

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

N/A

Appendix 5: sustainability implications – controlled-droplet application and traditional glyphosate application

This guidance is to support project managers when assessing their projects for sustainability and climate impact and to ensure projects are supporting the wider goals of the city’s Carbon Neutral 2030 commitment.

<p>Proposal/advice title: weed management in Brighton & Hove Using either:</p> <ul style="list-style-type: none"> • a controlled-droplet application and less glyphosate than traditional glyphosate to manage and remove weeds from across the city • traditional glyphosate to manage and remove weeds from across the city 	<p>Directorate: Economy, Environment & Culture</p>	<p>Date: January 2024</p>
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Sustainability theme	Consideration	Relevant Yes/No?	If ‘Yes’, is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
Energy	<ul style="list-style-type: none"> ✓ Use renewable sources of energy (renewables that are alternatives to combustion), including clean energy providers ✓ Consider potential for generating renewable energy ✓ Minimise energy consumption 	Unknown	Unknown	It is unknown what the power source is for the equipment used until the procurement process is completed.	The invitation to tender could give extra weighting to contractors that use renewable sources of energy to power their equipment.
Sustainable travel and transport	<ul style="list-style-type: none"> ✓ Travel is kept to a minimum but where necessary active and sustainable travel is prioritised for people and deliveries/freight, meaning walking and cycling, public transport, car sharing, electric or low emission vehicles including e-cargo bikes and sustainable logistics solutions 	Unknown	Unknown	It is unknown how the contractors will move around the city until the procurement process is completed.	The invitation to tender could give extra weighting to contractors that use sustainable travel to complete the work.

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
	<ul style="list-style-type: none"> ✓ Consider use of shared mobility scheme options, like BTN BikeShare, car clubs, vehicle leasing ✓ Consider practices that eliminate or minimise the need to travel, like homeworking and local co-working hubs, remote access to services, like education, health ✓ Any new Controlled Parking Zone should consider the provision for electric vehicle charging infrastructure 				
Sustainable procurement	<p>The council requires its suppliers to conduct their operations in a sustainable manner, in line with our own priorities and commitments. These can be found in our Sustainable Procurement Policy. To ensure that our suppliers share our commitment to reducing the impact of the products and services they provide you can:</p> <ul style="list-style-type: none"> ✓ read the council's Sustainable Procurement Policy ✓ have a look at the council's Social Value Framework on p13 to 15 which lists Environmental Sustainability examples in the last column ✓ detail any sustainability requirements you want the winning bidder to follow and/ or deliver as part of the contract in your specification ✓ include a sustainability quality question in your tender 	Yes	Positive and negative	<p>Positive</p> <p>The approach to procurement will follow the council's policies.</p> <p>Negative</p> <p>The item being procured will not follow the Sustainable Procurement Policy. This is picked up in more detail below, in terms of the product being procured and its impact.</p>	<p>The invitation to tender could include a social value element and bidders will be asked to provide their ideas on how they can achieve this. This could, for example, include activities to offset the biodiversity impacts of the item being procured.</p>

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
	<ul style="list-style-type: none"> ✓ consider adding a Key Performance Indicator (KPI) that is linked to reducing environmental impact ✓ if you're buying food for the council or procuring a catering contract, read the council's Buying Standards for Catering Contracts; and include these requirements in your specification <p>For further help and advice, please contact the BHCC Procurement Team</p>				
Circular waste management practices and procurement	<ul style="list-style-type: none"> ✓ Consumption and use of virgin materials is eliminated or kept to an absolute minimum ✓ Consider leasing of equipment, materials, resources and property rather than purchasing or building new ✓ Use of 100% reused / repurposed materials ✓ Packaging and wasted materials are eliminated, kept to a minimum and made from renewable materials ✓ Ensure food waste is minimised or re-distributed to benefit local communities 	Yes	Positive	Use of contractors for weed management and their equipment, means it could be reused on other contracts.	
Sustainable economy	<ul style="list-style-type: none"> ✓ Support local economy and local employment ✓ Consider impact to local businesses and high streets ✓ Consider opportunities for quality green skills development and training ✓ Consider circular principles that are outlined in the BHCC Circular Economy Route Map 	Yes	Positive	The soft market testing indicates that there are local companies that can provide this service and therefore there will be local employment opportunities.	

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
Health, safety, wellbeing and local communities	<ul style="list-style-type: none"> ✓ Promote healthy, safe and secure environments in which to live and work ✓ Consider impact of noise, stress and air quality to local residents, building occupants and communities 	Yes	Positive and negative	<p>Positive</p> <p>More of the highway / pavement will be free of weeds, making it more accessible for people to move around, including those in wheelchairs, with mobility issues or pushing prams.</p> <p>Manual removal of weeds is hard on the body. Removing weeds using a weed management application will mean that this risk is negated.</p> <p>Negative</p> <p>Section 13 of the main report sets out some of the public health implications in relation to the use of glyphosate. The evidence suggests there may be a health risk.</p> <p>The adverse impacts of glyphosate are greater when using a traditional glyphosate application, compared to a controlled-droplet application.</p>	<p>The contract management arrangements will ensure the contractor complies with the Control of Pesticides Act 1986, the HSE guidance and any new legislation introduced during the contract duration.</p> <p>Those undertaking weed treatment will be wearing full and appropriate Personal Protective Equipment (PPE).</p> <p>Risk Assessment Method Statements will be prepared by the contractor and agreed by the council, which will set out mitigations to reduce any risk posed to residents.</p>
Sustainable water	<ul style="list-style-type: none"> ✓ Minimise water consumption and ensure water efficiency measures are in place ✓ Consider water harvesting and reuse ✓ Consider impact to water pollution from chemicals use, particularly in relation to vehicle use, cleaning and maintenance ✓ Consider use of sustainable urban drainage for minimising impact of water 	Yes	Negative	<p>If a weed treatment is used, there is a risk that this enters the water table.</p> <p>The adverse impacts of glyphosate are greater when using a traditional glyphosate application, compared to a controlled-droplet application.</p>	<p>The contract management arrangements will ensure the contractor complies with the Control of Pesticides Act 1986, the HSE guidance and any new legislation introduced</p>

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
	<p>pollution and surface water flooding, in particular, permeable surfaces</p> <ul style="list-style-type: none"> ✓ Use drought tolerant, native planting schemes to minimise irrigation requirements 				<p>during the contract duration.</p>
Biodiversity and nature conservation	<ul style="list-style-type: none"> ✓ Seek to protect, enhance and create natural habitats to support local species and wildlife ✓ Ensure pesticides and herbicides are not used unless in exceptional circumstances ✓ Consider ecosystem service impacts and appropriate mitigation ✓ Consider use of nature-based solutions ✓ Support the ambitions and aspirations of The Living Coast Biosphere ✓ Consider how local communities can be engaged and benefit from improvements to their natural environment 	Yes	Negative	<p>If a weed treatment is used, there is a risk to biodiversity and nature conservation.</p> <p>Brighton & Hove City Council declared a climate and biodiversity emergency in 2018. To address this, the council committed to enhancing and improving access to the most important natural habitats, including chalk grassland, woodland and hedgerows within the city. The reintroduction of glyphosate for weed removal will impact on the council's ability to address the climate and biodiversity emergency.</p> <p>One of the Strategic Risks (SR36) is <i>not taking all actions required to address climate and ecological change and transitioning our city to carbon neutral by 2030</i>. This was reported as red to Audit & Standards Committee in January 2023.</p> <p>The council is a lead partner in The Living Coast UNESCO Biosphere. One of the key objectives is the <i>conservation of biodiversity</i>. The</p>	<p>The contract management arrangements will ensure the contractor complies with the Control of Pesticides Act 1986, the HSE guidance and any new legislation introduced during the contract duration.</p> <p>The report is recommending the continuation of the current policy not to use glyphosate in the city's parks and open spaces where leisure activities and dog walking are undertaken and where there are playgrounds. The exception to this is when it is used to manage invasive species. This will protect a substantial habitat for wildlife and pollinator insects.</p>

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
				<p>reintroduction of glyphosate for weed removal will impact on the conservation of biodiversity.</p> <p>The 2012 Brighton & Hove Local Biodiversity Action Plan identifies species and habitats of importance and notes pesticide / herbicide / chemical impacts and threats on habitats and species of local importance. The reintroduction of glyphosate for weed removal will impact on the delivery of this Action Plan.</p> <p>Supplementary Planning Document 11, in its <i>notes on habitat creation and enhancement</i>, says “chemical applications should be avoided”.</p> <p>The adverse impacts of glyphosate are greater when using a traditional glyphosate application, compared to a controlled-droplet application.</p>	

Appendix 6: sustainability implications – manual removal

This guidance is to support project managers when assessing their projects for sustainability and climate impact and to ensure projects are supporting the wider goals of the city's Carbon Neutral 2030 commitment.

Proposal/advice title: weed management in Brighton & Hove Continuing to use manual techniques to manage and remove weeds from across the city in 2024.	Directorate: Economy, Environment & Culture	Date: January 2024
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Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
Energy	<ul style="list-style-type: none"> ✓ Use renewable sources of energy (renewables that are alternatives to combustion), including clean energy providers ✓ Consider potential for generating renewable energy ✓ Minimise energy consumption 	Yes	Positive and negative	<p>Positive</p> <p>Brushing and hoeing does not require any power.</p> <p>Negative</p> <p>The weed ripper is powered by petrol. Strimmers require electricity.</p>	City Environmental Management Services will continue to test and review weed removal machinery.
Sustainable travel and transport	<ul style="list-style-type: none"> ✓ Travel is kept to a minimum but where necessary active and sustainable travel is prioritised for people and deliveries/freight, meaning walking and cycling, public transport, car sharing, electric or low emission vehicles including e-cargo bikes and sustainable logistics solutions ✓ Consider use of shared mobility scheme options, like BTN BikeShare, car clubs, vehicle leasing ✓ Consider practices that eliminate or minimise the need to travel, like 	Yes	Positive and negative	<p>Some of the manual equipment requires transportation by vehicle.</p> <p>Positive</p> <p>A diesel or electric vehicle can transport strimmers, depending on availability.</p> <p>Negative</p> <p>A diesel vehicle is required to transport the weed ripper.</p>	A Fleet Replacement Programme is in place to work towards the decarbonisation of council fleet.

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
	<p>homeworking and local co-working hubs, remote access to services, like education, health</p> <ul style="list-style-type: none"> ✓ Any new Controlled Parking Zone should consider the provision for electric vehicle charging infrastructure 				
Sustainable procurement	<p>The council requires its suppliers to conduct their operations in a sustainable manner, in line with our own priorities and commitments. These can be found in our Sustainable Procurement Policy. To ensure that our suppliers share our commitment to reducing the impact of the products and services they provide you can:</p> <ul style="list-style-type: none"> ✓ read the council's Sustainable Procurement Policy ✓ have a look at the council's Social Value Framework on p13 to 15 which lists Environmental Sustainability examples in the last column ✓ detail any sustainability requirements you want the winning bidder to follow and/ or deliver as part of the contract in your specification ✓ include a sustainability quality question in your tender ✓ consider adding a Key Performance Indicator (KPI) that is linked to reducing environmental impact ✓ if you're buying food for the council or procuring a catering contract, read the council's Buying Standards for Catering 	No	N/A	N/A	N/A

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
	Contracts ; and include these requirements in your specification For further help and advice, please contact the BHCC Procurement Team				
Circular waste management practices and procurement	<ul style="list-style-type: none"> ✓ Consumption and use of virgin materials is eliminated or kept to an absolute minimum ✓ Consider leasing of equipment, materials, resources and property rather than purchasing or building new ✓ Use of 100% reused / repurposed materials ✓ Packaging and wasted materials are eliminated, kept to a minimum and made from renewable materials ✓ Ensure food waste is minimised or re-distributed to benefit local communities 	No	N/A	N/A	N/A
Sustainable economy	<ul style="list-style-type: none"> ✓ Support local economy and local employment ✓ Consider impact to local businesses and high streets ✓ Consider opportunities for quality green skills development and training ✓ Consider circular principles that are outlined in the BHCC Circular Economy Route Map 	No	N/A	N/A	N/A
Health, safety, wellbeing and local communities	<ul style="list-style-type: none"> ✓ Promote healthy, safe and secure environments in which to live and work ✓ Consider impact of noise, stress and air quality to local residents, building occupants and communities 	Yes	Positive and negative	Positive Some highways will be free of weeds, making it accessible for people to move around, including	Those undertaking weed treatment will be wearing full and appropriate Personal Protective Equipment (PPE).

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
				<p>those in wheelchairs, with mobility issues or pushing prams.</p> <p>Negative</p> <p>Using manual techniques to remove weeds means it is not possible to keep all of the highway free from weeds, potentially resulting in accessibility issues in some areas.</p> <p>Manual removal of weeds is noisy when scrapping pavements with hoes. Strimmers and weed rippers make a lot of noise.</p> <p>Manual removal of weeds is hard on the body and there is an increase in staff reporting musculoskeletal problems.</p>	<p>Risk Assessment Method Statements have been prepared by the council to ensure operatives minimise the risks caused by manual weed removal.</p>
Sustainable water	<ul style="list-style-type: none"> ✓ Minimise water consumption and ensure water efficiency measures are in place ✓ Consider water harvesting and reuse ✓ Consider impact to water pollution from chemicals use, particularly in relation to vehicle use, cleaning and maintenance ✓ Consider use of sustainable urban drainage for minimising impact of water pollution and surface water flooding, in particular, permeable surfaces ✓ Use drought tolerant, native planting schemes to minimise irrigation requirements 	No	N/A	N/A	N/A

Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
Biodiversity and nature conservation	<ul style="list-style-type: none"> ✓ Seek to protect, enhance and create natural habitats to support local species and wildlife ✓ Ensure pesticides and herbicides are not used unless in exceptional circumstances ✓ Consider ecosystem service impacts and appropriate mitigation ✓ Consider use of nature-based solutions ✓ Support the ambitions and aspirations of The Living Coast Biosphere ✓ Consider how local communities can be engaged and benefit from improvements to their natural environment 	Yes	Positive	<p>It is not possible to remove all weeds using manual methods. This means some weeds remain whilst others grow back providing a habitat for nature supporting council's ability to address the climate and biodiversity emergency.</p> <p>The council is a lead partner in The Living Coast UNESCO Biosphere. One of the key objectives is the <i>conservation of biodiversity</i>. The manual removal of weeds supports this.</p> <p>Supplementary Planning Document 11, in its <i>notes on habitat creation and enhancement</i>, says "chemical applications should be avoided". The manual removal of weeds supports this.</p>	

Appendix 7: feedback from the Environment Agency and Southern Water on the use of glyphosate

In October 2022, the council sought the Environment Agency and Southern Water's views on the impact / risks of using herbicides / glyphosate on highways and in parks. Particular questions were asked on whether herbicides / glyphosate would permeate through the aquifer and contaminate drinking water and the sea or would this only occur if using the chemical near to open water.

City Environment contacted the Environment Agency and Southern Water again in December 2023 to confirm that their position remained the same.

Their responses are detailed below:

Environment Agency

October 2022

"Glyphosate is monitored as part of the Environment Agency's Groundwater Quality Monitoring Network. While not routinely detected in groundwater, the data is limited, primarily because it is only monitored for annually at most, meaning peaks caused by applications to ground or heavy rainfall events can be missed. With the exception of two samples collected at Brighton Pavilion in 2012-2013 (glyphosate was not detected), we have no data for the Brighton Chalk. Therefore, a lack of monitoring points and data collection makes it difficult to adequately assess the impact and risks to groundwater, but we do know that it is more likely to be detected in shallow groundwater or where there are faster pathways to groundwater e.g. fractures, fissures, deep soakaways etc.

The Environment Agency's view on their application is that it should be avoided where possible. We would advise that any application is well managed in terms of timing and application rate to ensure minimal risk to groundwater and that application in the proximity of faster pathways is avoided. Brighton and Hove City Council have the deep soakaways mapped and if their use is restarted, we would advise avoiding areas where there is a risk of rapid migration to groundwater.

All our groundwater quality data is available here - [Open WIMS data](#). Local water companies also monitor groundwater quality at their sources and have detected glyphosate intermittently, so it might be worth contacting Southern Water. The Environment Agency and Southern Water are partners alongside Brighton and Hove City Council and SDNPA of The Aquifer Partnership which may be best placed to put you in touch with Southern Water".

December 2023

"Thank you for your enquiry. The Environment Agency's view on herbicides/glyphosate and the risks to groundwater have not changed since our previous response in October 2022. Application should be avoided where possible. Where it cannot be avoided its use should be limited and well managed in terms of timing and application rate to ensure minimal risk to groundwater".

Southern Water

October 2022

"I'd first like to say Southern Water are committed to helping protect our precious Chalk aquifers and work on a wide range of projects and initiatives, for example The Aquifer Partnership (TAP), to better understand water quality challenges in our groundwater catchments and work with landowners and stakeholders to help implement measures that will achieve long term improvements to the environment.

Across all of Southern Waters groundwater catchments, Glyphosate is the most commonly detected approved pesticide at levels of concern. It should be noted that any elevated detections occur as one-off events with most routine water quality samples historically containing either very low or undetectable concentrations. This is most likely related to rainfall events where Glyphosate/Herbicide applied to the ground is mobilised more rapidly downward to the aquifer.

The Chalk is generally highly vulnerable to surface contamination because the aquifer here in Brighton and Hove is unconfined (i.e. lacking any surface geological protection), there is a significant mix of potentially contaminating land uses in this area (i.e. transport, agriculture, urban, industry, wastewater), and one of the key properties of the Chalk, it having 'dual porosity', so water moves quickly along small gaps or fractures in the Chalk as well as much more slowly through the harder Chalk matrix. These properties make the Chalk a great aquifer for providing water, but it also means that it can transport contaminants rapidly over long distances with sometimes minimal attenuation.

Southern Water fully support the ban by Brighton and Hove City Council to end the use of glyphosate for weed removal in parks and highways, and would strongly encourage other landowners to follow suit".

December 2023

"Our position remains the same from a groundwater quality risk perspective we do not support the use of glyphosate within any of the groundwater catchments in Brighton and Worthing from which we abstract drinking water for customers.

As I covered in my previous email, the Brighton and Worthing area is particularly unique in relation to herbicide application because it is a Chalk aquifer which is highly vulnerable to surface contamination related to the dual porosity nature of the Chalk and lack of protection with the aquifer being unconfined and the risk of minimal contaminant attenuation. Our catchment risk assessments and water quality data show that glyphosate does travel down through the aquifer and is detected at elevated concentrations in drinking water.

From reviewing the EU commission decision on glyphosate we noted they did not reach a majority on the matter and seven application conditions are attached. The main change will be that a glyphosate risk assessment is required but no standardised assessment criteria has been released to our knowledge".

Brighton & Hove City Council

City Environment, South Downs & The Sea Committee

Agenda Item 42

Subject: Procurement of Liquid Fuel

Date of meeting: 23 January 2024

Report of: Executive Director Economy, Environment & Culture

Contact Officer: Name: Ian Greene
Tel: 01273 294707
Email: Ian.Greene@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The purpose of this report is to ask Committee to approve the procuring and awarding of contract(s) for the supply of diesel and Adblue (required fuel additive), based on the most competitive rates for supply.
- 1.2 The current contract for supply of diesel has expired and therefore it is necessary to undertake an exercise to obtain diesel and Adblue at the most competitive quantity break prices balanced against dependability of supply.

2. Recommendations

That the Committee:

- 2.1 Approve the procurement for the supply of diesel and AdBlue, based on the most competitive rates for the next 3 years + 0.5 year extension period.
- 2.2 Grants delegated authority to the Executive Director for Economy, Environment and Culture to carry out the procurement and award of the contract referred to in 2.1 above.

3. Context and background information

- 3.1 The Council operates a fleet of vehicles to deliver front line services, such as waste collection, street cleansing, city parks services, housing maintenance service and homecare services.
- 3.2 The council has a Fleet Strategy 2020-2030 which is working towards ending the use of fossil fuel for all council fleet by 2030. This is progressing well but there is still a requirement to operate some fossil fuel vehicles as the council transitions to non fossil fuel types over the life time of the

strategy. In order to ensure that the council makes best use of our limited resources and is in a position to take advantage of new technologies, the policy requires replacement of fleet with non fossil fuel types as vehicles come to end of life and if a suitable non fossil fuel type is available. The council will only purchase a new fossil fuel vehicle in exceptional circumstances, where there are not suitable alternatives.

- 3.3 The council now has 59 fully electric cars and vans out of a fleet of 532 and 4 Electric Refuse Collection Vehicles, which will rise to 11 in 2024.
- 3.4 The council purchases diesel and Adblue in bulk to achieve the best prices and for the efficiency of the Cityclean and Cityparks Services. Hollingdean Depot fuel tanks hold up to 50,000 litres of diesel.
- 3.5 Other fleet users in the council are encouraged to use the services at Hollingdean Depot to reduce cost to their service and to the council. The services already have budget provision to cover fuel costs that are recharged to them by Fleet Management.
- 3.6 The depot is also an important source of emergency fuel for the council fleet and other public service organisations, such as buses.
- 3.7 To achieve best value, a mini competition will be conducted using the nationally recognised CCS Framework. The Framework includes 9 major national fuel suppliers who will be bidding for the supply contract which will ensure best value for the Council. The process should take around 3 months to complete.
- 3.8 The annual cost to the council of purchasing diesel exceeds £1m. It is therefore necessary to undertake an exercise to obtain diesel at the most competitive rate balanced against the dependability of supply.

4. Analysis and consideration of alternative options

- 4.1 The Council could purchase diesel at a higher unit price and incur greater costs by using forecourt services.
- 4.2 Not only would this be more costly (currently approximately 20% more per litre) but it would decrease efficiency and incur additional costs for the Cityclean service in particular by incurring additional journeys and time delays whilst visiting commercial garage forecourts.
- 4.3 It is necessary to undertake a procurement to enter into a new contract for the provision of diesel and adblue given the overall value of the spend and the fact that the existing contract has expired.

5. Community engagement and consultation

- 5.1 No community engagement has taken place for the procurement of liquid fuel, as this is a resource for internal council use.

6. Conclusion

- 6.1 The initiation of procurement exercise for diesel and adblue is the recommended course of action as there is a need to award a bulk diesel supply contract to meet contract standing orders and procurement regulations.
- 6.2 To obtain diesel at the most competitive price with the dependability of supply, through a nationally recognised framework agreement will cost less than using fuel cards on retail forecourts.

7. Financial implications

- 7.1 Fuel is purchased through the fleet service and charged to each service user for the fuel used. It is anticipated that the estimated contract costs will be contained within the existing revenue budgets of each service. As well as the transition to electric and other energy efficient vehicles to reduce fuel spend, services across the council are encouraged to make use of the fuel at the depot as it is cheaper than alternatives. Any significant variation to budget will be reported as part of the council's monthly Targeted Budget Monitoring process.

Name of finance officer consulted: John Lack Date consulted: 03/01/2024

8. Legal implications

- 8.1 The Council is required to comply with the Public Contracts Regulations 2015 [PCR 2015] in relation to procurement and award of contracts above the relevant financial threshold for services, supplies and works. The value of a contract for the supply of diesel and Adblue over a 3 or 3.5 year period at a cost of over £1m per year exceeds the PCR 2015 financial threshold. Using a Framework is a compliant route to market. The Council's Contract Standing Orders (CSOs) will also apply to this procurement exercise.

Name of lawyer consulted: Eleanor Richards Date consulted 02/012024:

9. Equalities implications

- 9.1 There are no equalities issues with the procurement of Liquid Fuel.

10. Sustainability implications

- 10.1 Diesel is still the most economic fuel available for our fleet, while we as a Council work towards our goal of being Carbon Neutral by 2030. The Council have been procuring non fossil fuel vehicles which have less impact on the environment.
- 10.2 Although diesel emits Hydrocarbons (HC), NOx and Particulate Matter (PM) it is one of the most efficient dense fuels available. It contains more usable energy than petrol and delivers better fuel economy. Diesel engine technology is regulated in the European Union. The latest standard is Euro 6, which significantly reduces the emissions – HC, NOx and PMs. HGVs and vans are the largest users of diesel fuel for the Council. Currently 53% of Council vehicles are at Euro 6 standard, 27% at Euro 5 and the remaining fleet is a combination of Petrol, Hybrid and fully electric.

- 10.3 Diesel produces less CO2 than a petrol engine as it produces more energy. However, any new vehicle purchased will be Euro 7 (fully electric).
- 10.4 To demonstrate the commitment to sustainability the council has installed a full EV charging infrastructure at Hollingdean Depot and is currently installing work vehicle charge points in other council locations. Some examples are Stanmer Park offices and East Brighton Park.

11. Other Implications

Social Value and procurement implications

- 11.1 When RM6177 was awarded, Social values didn't have to be evaluated and embedded like it does now. Which is why our next framework RM6305 National Fuels 3 will have social value embedded in it, with questions to award on the framework covering two of the social value topics and KPI's to measure it on a regular basis. We have decided on the topics and at a minimum it will have a weighted scoring of 10%.

Appendices - None