



# Managing Weeds and Detritus

## Guidance Paper

Keep Wales Tidy, November 2022





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# Background

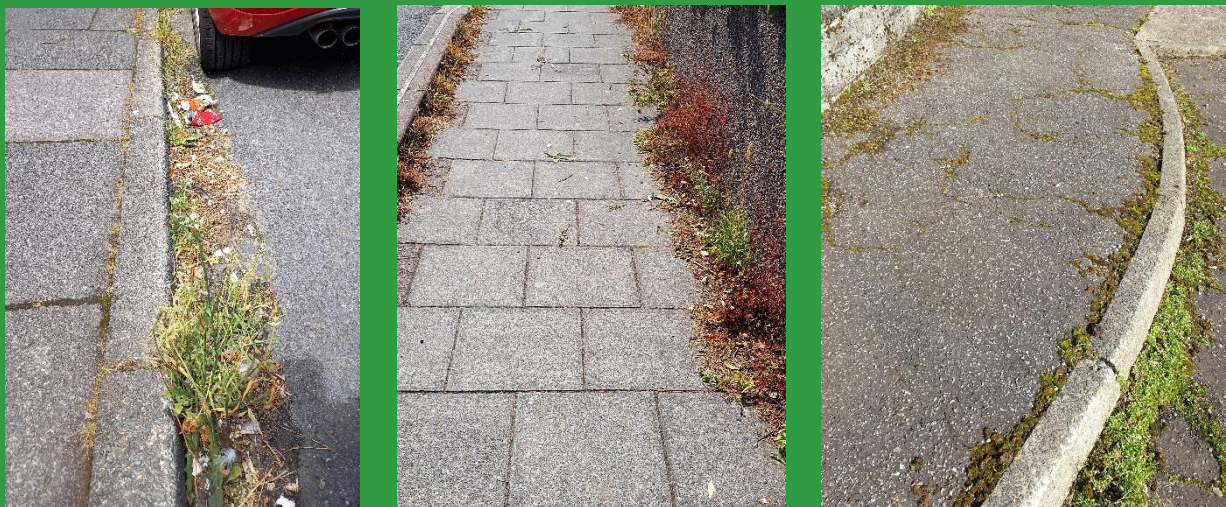
Keep Wales Tidy records and monitors many issues which impact the quality of the local environment. This includes avoidable issues which humans are responsible for such as litter, graffiti, and vandalism as well as weeds and detritus which are primarily naturally present in the local environment.

Weeds are plants which grow in unwanted places. When Keep Wales Tidy carries out assessments of Adverse Environmental Quality Indicators (AEQI) across Wales, it doesn't differentiate between moss and pretty 'garden escapes' as both encroach on to our streets.

Detritus are natural materials like '...dust, mud, soil, grit, gravel, stones, rotted leaf and vegetable residues, and fragments of twigs and other finely divided materials' but it only includes leaf and blossom fall if it has broken down (which recognises the difficulty of removing seasonal leaf fall).<sup>1</sup> Unlike weeds, detritus can move through processes associated with humans, animals, and nature (such as wind and water) - processes which also impact the distribution of litter, and a '...significant and avoidable source of detritus is uncollected grass cuttings and weed growth from seeds germinating in moist detritus'.<sup>2</sup>

Weeds and detritus have been the most common AEQIs present on the streets of Wales ever since Keep Wales Tidy started undertaking street cleanliness surveys in 2007-2008. Since then, levels of weeds have remained between 81% and 91% of all streets. Levels of detritus have remained between 82% and 94% of streets. However, these figures probably overstate the issues as they are both minor in presence on most streets and often not a significant problem.

This paper presents a balanced view of the issue of weeds and detritus which both recognises that weed control at all costs is not a suitable response. It is also setting out that there are circumstances in which weeds and detritus can impair the adequate standard of local environmental quality which local communities have the right to expect.



# Why are these issues important?

Of all the issues which impact our communities, weeds and detritus generally have the least impact on public perception<sup>3</sup>, although local authorities do receive complaints about them. In small amounts, they can have a positive impact as they can support our wildlife. However, if they are left to grow and accumulate, they can cause problems.

Table 1: Problems caused by unchecked weeds and detritus<sup>4,5,6,7,8,9</sup>

	Weeds	Detritus
Appearance	Weeds can become traps for litter. They can contribute to a neighbourhood looking uncared for (for example in densely populated areas of terraced houses where there are no verges or front gardens).	Detritus can make places look neglected. As with weeds, this can be more apparent in areas without verges or front gardens where weeds and litter accumulation result from the detritus.
Safety	Weeds can impact the visibility of areas around us (which can include obscuring traffic signs) and can become an obstruction forcing users into the road. They can also become a trip hazard. When they grow in kerbs or around drains, they can slow or prevent drainage, which can lead to localised flooding. The roots can force kerbs apart or make them uneven, also causing a trip hazard.	Accumulations on roads can obscure road markings. On pavements, it can pose a risk - including slipping - to pedestrians, particularly those with mobility issues and with prams or pushchairs. Blocked drains can lead to localised flooding. Fallen leaves are also slip hazards to pedestrians, with older people particularly at risk, especially in winter conditions.
Structure	The roots can also damage surfaces and walls which are expensive to repair.	A build-up of detritus can lead to weed growth which can in time lead to structural damage.

Keep Wales Tidy collected data on blocked drains as part of its street cleanliness surveys in 2016-2017. The findings showed that 14 of Wales' 22 local authorities had drains blocked by detritus with a total of 50 drains effected on 46 streets across Wales (four streets had two blocked drains). In one local authority, 7.2% of streets were affected by this issue.

## Who is responsible?

Local authorities and other land managers have a duty of care to the public, which includes making sure that weeds do not pose a hazard,<sup>10</sup> and local authorities are responsible for maintaining most pavements, which includes removing weeds.<sup>11</sup> Some weeds - such as native injurious and non-native invasive species - require special attention and are covered by legislation. These are beyond the scope of this paper.

The Environmental Protection Act 1990 imposes a duty on local authorities and other landowners to keep land, for which they are responsible, clear of litter and refuse; and on local authorities and the Welsh Government to keep public highways, for which they are responsible, clean.<sup>12</sup>

Maintenance and operational delivery of motorways and trunk roads (the Strategic Road Network) are carried out on behalf of the Welsh Government by two Trunk Road Agents; the South Wales Trunk Road Agent and the North and Mid-Wales Trunk Road Agent. A strategy recognising the need to maintain and increase the biodiversity of the network is to be put in place in 2023.

## How do local authorities tackle weeds and detritus?

While weeds may be removed manually or during sweeping operations, spraying weeds is still often standard practice and ‘...by their very name indicate that the weed has to be allowed to grow in the first place. To improve the efficacy of such treatment there is a tendency to allow the weeds to grow to a significant size thus improving the efficiency of uptake of the herbicide by the weed.’<sup>13</sup>

Local authorities tend to treat weeds twice or three times each year. This service is done in-house by some local authorities, others contract out this work, while in some local authorities the work is split between the council and contractors.

Guidance on weeds forms part of the UK Roads Liaison Group’s [Well-Managed Highway Infrastructure Code of Practice](#) which includes the following:

- Weed treatment should be undertaken according to traffic and pedestrian usage and should account for local concerns.
- The use of weedkillers should be kept to a minimum - more guidance is available in Best Practice Guidance Notes for Integrated and Non-chemical Amenity Hard Surface Weed Control (East Malling Research 2015). Association for Public Service Excellence (APSE) has also published a briefing note on [The Need for Integrated Weed Control](#).
- It is important to coordinate weed spraying with street cleansing arrangements.
- Environmental guidance should be adhered to, and spraying should be undertaken in accordance with the law.

## Weed control at Swansea Council

Swansea Council allocated £118,760 in 2022-2023 for contractors to keep weeds to a manageable level (rather than to achieve a weed-free surface). The council treats growth on adopted land (including highways, pavements, kerbs, channels, public footways, and council owned car parks), but is not responsible for treating weeds on private land or property owned by other public bodies or private organisations.

Most residential roads are treated with herbicide three times a year. The substance works its way through the plant and kills it completely. Weeds are not removed following the spray, instead they are left to rot away and spraying takes up to two weeks to have a visible impact. The council states “The herbicides used in Swansea have a very low toxicity and can be used in areas open to the public and their pets. In areas close to water courses and reservoirs, herbicides are not used”.

Weeds within the local authority can't be treated if:

- The weather is very hot - as the weedkiller can evaporate before it has been absorbed by the weeds.
- There is a risk of rain - the weedkiller would be washed off before it was absorbed by the weeds.
- It is windy - the spray can drift to adjacent land and cause damage.

Source: Swansea Council. *Frequently asked questions about weeds*. Available: <https://www.swansea.gov.uk/weedsFAQs?lang=en> (accessed 08/09/22)

## Changing approach to the use of glyphosate and other pesticides

The world's most common weedkiller glyphosate is controversial. The World Health Organisation says it is “probably carcinogenic”, while the European Food Safety Authority says the weedkiller is unlikely to cause cancer.<sup>14</sup> However, in 2018, a landmark case in California ordered the chemical company Monsanto to pay £226m to a groundskeeper who claimed the herbicide had caused his cancer. The jury found that the company knew the weedkiller was dangerous but that it had failed to warn consumers.<sup>15</sup>

The authorised use of glyphosate has a European Union end date of 15 December 2022. However in the UK, a legislation introduced post-Brexit means active substance (glyphosate) approvals due to expire before December 2023 now permits extension for three years to allow time to plan and implement the GB Review Programme. It is now likely that it will not be banned before 2026.<sup>16</sup>

Minimising the use of all pesticides is one of the important acts that needs to be taken to stop the decline of biodiversity. This requires a move towards Integrated Pest Management and systems that utilise the least environmentally harmful option when pests / unwanted plant growth goes beyond an agreed tolerance threshold.<sup>17</sup>



In July 2020, nature and environment writer Amanda Tuke encouraged councils to think about weeds in a different way as this would support biodiversity, save money and prioritise health and the environment.<sup>18</sup> She wrote to London councils about their weed policies and found that some have already acted in this area, as summarised in the table below.

Table 2: Weed control practices at London councils<sup>19</sup>

Council	Action
Croydon	Stopped using glyphosate in parks and social housing in 2019.
Hackney	Don't use weedkiller on tree pits and encourages residents to create tree pit gardens. Trialled a weed spraying exclusion zone in Homerton in spring 2019 which initially covered 22 streets and is being expanded to 70 streets.
Hammersmith and Fulham	Banned glyphosate in 2016, replacing it with foam and hot water treatments.
Haringey	Collaborating with Friends of Tower Gardens (who undertake hand weeding) to declare the park a herbicide free area.
Lambeth	Runs a scheme where streets can opt-out of weed control if they agree to manage the weeds themselves.
Westminster	Only uses weedkiller where there's a specific problem which is hard to eradicate. The council has used less than 10 litres of glyphosate during the last three years.

In Wales, there are several examples of changes to the usage of weedkillers. As of 2020, Wrexham had changed its practice by purchasing a machine to treat weeds by coating them in a Foamstream<sup>20</sup> made of natural plants oils. However the council admits it isn't as effective as using glyphosate and its use will be limited to parks and around schools.<sup>21</sup>

Vale of Glamorgan Council has also invested in Foamstream and has monitored its benefits and limitations. It is now being used widely in public parks and open spaces and it has performed well compared to other forms of non-chemical control (e.g. burning, hot water, ripping). It performs especially well for moss and ivy on smaller areas where linear spraying can be done. It works effectively in the right areas but it is not a straight substitute for weed killer.

Merthyr Tydfil has reviewed its weeds policy, but as there aren't any suitable herbicide substitutes (and other alternatives such as brushing, sweeping, hoeing, and hand weeding are more expensive due to being labour intensive), the council decided to continue to use glyphosate, but sparingly and away from areas of high public footfall.<sup>22</sup>

Denbighshire Council will be running a trial with their housing team to use increased manual street sweeping to investigate effectiveness in removing substrate and hence discouraging weed growth.

In England, local authorities continue to reduce the use of glyphosate to varying degrees. Brighton and Hove City Council had agreed to phase out all use of glyphosate by 2022. However, the council has experienced difficulty with recruiting staff for the amount of manual weeding needed<sup>23</sup> and found that where tarmac replaces paving stones, by not treating ground during construction works, weeds grow through the tarmac. The council continues to explore solutions to these obstacles.<sup>24</sup>

Portsmouth Council reported a steep reduction in the overall use of glyphosate but continued the use to control weeds on hard surfaces where they can interfere with visibility of road users and because weeds in kerbs or around drains can prevent or slow down drainage. Reduction in glyphosate usage has in part been enabled by maintaining surface integrity i.e. better reporting of surface defects and timely repairs, reducing opportunities for weeds to grow.<sup>25</sup>

## Verge management

The interest in changing practices to encourage wild pollinators and support wildlife has recently extended beyond weeds on our pavements and highways. In spring 2020, nature expert Iolo Williams urged Powys County Council to cut verges and roundabouts only where [visibility was impaired](#) which led to the council to leave verges to nature, and providing only a 'safety cut' in May (rather than the usual mowing regime).<sup>26,27</sup>

Wild plant charity Plantlife has a [road verge campaign](#) which is calling for reduced mowing of verges ('cut less, cut later') for wildflowers and biodiversity and has [management guidelines and case studies](#) to support the campaign.<sup>28</sup>

Denbighshire is an authority which is taking action to increase biodiversity by creating "[roadside nature reserves](#)" with sensitive cutting practices which are tailored to the habitat which is being encouraged<sup>29</sup>.

## Current Code of Practice in Wales

The Welsh Government (then Welsh Assembly Government) published a Code of Practice in 2007 to provide practical guidance to help duty bodies discharge the duties as set out in the Environmental Protection Act 1990. This Code of Practice is due to be reviewed in the near future but currently remains in place.

### Code of Practice on Litter and Refuse and Associated Guidance 2007

The guidance includes the following points on detritus:

- The duty relating to keeping highways clean includes litter and refuse and - where practical - the removal of detritus from both metalled highway surfaces and all other hard surfaces.
- However, the removal of detritus is a recommended standard only and there is a recognition that 'there are some practical difficulties in dealing with detritus which may make its removal a lower priority than other duties...'.<sup>30</sup>

Recommended standard for detritus:

- **Grade A:** No detritus
- **Grade B+:** No more than three items of detritus
- **Grade B:** Predominately free of detritus except for some light scattering
- **Grade C:** Widespread distribution of detritus with minor accumulations
- **Grade D:** Heavily affected by detritus with significant accumulations



- It is recommended that metalled highways should be free from detritus after cleansing to an A grade. The inclusion of the recommendation that all hard surfaces be cleansed to be free from detritus is to try to ensure that thorough cleansing is undertaken on a regular basis as without this, an area still appears dirty.
- Land managers should make a judgement as to the edge of that surface where it is next to a vegetated surface such as a grass verge. The amount of detritus then constitutes the extent of encroachment onto the metalled surface from this edge. It is good practice to cut back any vegetation that encroaches onto a metalled surface, and detritus can be managed through effective sweeping. Although an A grade may not be feasible in every situation, it is expected that an acceptable grade (B grade) is reached on the exposed metalled surface of a road or highway.
- Should an area become adversely affected by litter, refuse and / or detritus, the maximum response times for cleansing it to an acceptable standard are as follows:

High intensity of use	Medium intensity of use	Low intensity of use	Special circumstances
Half a day (by 6pm if reported before 1pm or by 1pm the next day if reported between 1pm and 6pm the previous day)	One day (by 6pm the following evening)	14 days	28 days or as soon as reasonably practicable

- Debris, detritus and other materials should not be left to become a danger to road users because if they accumulate, they can ‘...block channels, gullies and cause flooding; encourage weed growth; or become compacted’. The seasonal variations in these accumulations should be considered when putting together cleansing plans.
- It is recognised that large deposits of mud and slurry can present practicability issues, although every effort should be made to clear the land at the earliest opportunity.
- Seaweed and twigs on beaches should be left as these contribute to maintaining the local ecosystem.

Source: Welsh Assembly Government (2007). *Code of Practice on Litter and Refuse and Associated Guidance 2007*. Cardiff: Welsh Assembly Government.

In 2011, the Chartered Institution of Wastes Management in Scotland said it was concerned that ‘...government and local authorities are overly focused on the high profile issues of litter and fly-tipping to the detriment of other aspects of street cleansing such as footpath and road sweeping to remove detritus and weeding.’<sup>31</sup> When the Scottish Government published its new [Code of Practice on Litter and Refuse](#) in 2018, it included some notable differences from the current Welsh version.

Table 3: Keep Wales Tidy's view on the new Scottish Code of Practice on Litter and Refuse<sup>32</sup>

Aspect	Keep Wales Tidy's view
The duty is split into two (they're combined in the Welsh version). This puts additional emphasis on detritus which is reflected throughout the document.	Highlighting the difference between both duties is positive as it provides greater clarity into the local authority's responsibilities.
The removal of detritus isn't merely recommended and 'The tactics to support detritus-free roads should be deployed regularly to prevent small accumulations from becoming more significant, and expensive, problems to address'.	Keep Wales Tidy feels that it's acceptable to have small amounts of detritus. However, since accumulations can have serious consequences, we agree that when the issue begins to accumulate that cleansing is needed and that this should not be a recommendation only.
The definition of detritus goes beyond natural material. It also includes 'glass, plastic and other materials which can become finely divided'.	We are happy with the current Welsh definition as man-made items are separately categorised as litter.
There are just four grades for detritus (A, B, C and D).	The inclusion of the B+ for litter is positive as it recognises the very clean streets, but we don't feel it's necessary for detritus.
Grade D detritus definition is that 'Road surfaces are obscured or at high risk of hazard caused by detritus'.	This additional detail is useful as it reflects the serious consequences caused by significant detritus accumulations.

The Welsh document is currently under review and the above points should be considered as part of this process.

In 2016, Cardiff Council asked local residents in a tweet to help clean up leaves on their streets, wishing to encourage them to take pride in their area. A WalesOnline poll showed that only 30% of more than 500 respondents agreed that residents should help in this way.<sup>33</sup> There are however individuals and community groups in Wales who help clean up leaves and other detritus, with examples including a group in the Plasnewydd area of Cardiff (which collected 146 bags of leaves in a month),<sup>34</sup> and the community of Dyffryn in Newport clearing up litter and detritus following Storm Dennis in 2020<sup>35</sup>.

Businesses can also play a role in [boosting cleansing efforts and supporting environmental projects](#) for example through corporate volunteering or sponsorship.

## Policy links

- [Well-Managed Highway Infrastructure: Code of Practice](#) (UK Roads Liaison Group's 2016)
- [Best Practice Guidance Notes for Integrated and Non-chemical Amenity Hard Surface Weed Control](#) (Defra 2015)
- [The Need for Integrate Weed Control](#) (APSE)
- Code of Practice on Litter and Refuse and Associated Guidance 2007 (no longer available online)

## Recommendations

Keep Wales Tidy does not support a 'zero tolerance' approach to these issues. However, monitoring them - for example by undertaking street cleanliness surveys - is important. Although weeds and detritus are widespread across Wales, we would consider a 'small' presence of weeds and detritus graded up to a B grade (a light scattering) to be acceptable, with no need for the local authority to take any action.

Action is however necessary - and should be mandatory - where these issues begin to cause problems (see examples in Table 1). Weeding and cleansing policies should be regularly reviewed, and action taken should minimise both health and safety impacts and environmental damage. Practices may need to be adapted in response to changing weather patterns and extreme rainfall events as these wash detritus into gullies which exacerbates flooding incidents<sup>36</sup>.

The use of glyphosate-containing weedkillers should be minimised as much as possible and should not be used in high footfall areas or near water courses and drains. It will be important for councils and other bodies with land management responsibilities to learn from the experiences of those who trial alternatives to glyphosate use to establish best practice. Grassed verges and roundabouts should only be cut when absolutely necessary (to ensure good visibility) to support biodiversity and wildlife. Other herbicides also impact biodiversity and minimisation should be part of a strategic approach which minimises usage.

We would like the points raised in this document to be considered as part of the Welsh Government's review of the Code of Practice on Litter and Refuse and Associated Guidance.

Initiatives to encourage neighbourhood and business pride in the local environment (for example litter picking or creation and regeneration of green space) also have a potential to educate and involve communities in removal of detritus and weeds and hence assist in reducing the need for pesticide when the excessive detritus and weeds have developed.

At local authority level, increased collaboration is required across the departments working to tackle local environmental quality issues (including street cleansing, waste management, enforcement, parks and highways) and should cover all land uses for which the local authority is responsible. This should for example ensure that litter picking happens just before grass cutting and as previously mentioned make sure that weed spraying is coordinated with street cleansing arrangements. If there is a problem in the local community, it impacts the public regardless of whether it's on a road, a pavement, a path, or a grass verge.



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Gofalu am ein gwlad  
Caring for Wales