

Executive Report

Ward(s) affected: All

Report of Director of Service Delivery

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Petition: Make Guildford Pesticide-Free

Executive Summary

On 4 August 2021, an e-petition was launched on the Council's website requesting the Council to make Guildford pesticide-free.

The e-petition and supporting paper petition, which contained over 500 signatories, was debated at the Council meeting on 7 December 2021. Officers set out details of the proposed actions (Appendix 6) that could be taken in 2022 towards a pesticide free Guildford, which formed the basis of a motion proposed formally by the Lead Councillor for Environment in response to the petition.

Following the debate, the Council resolved: "That the Executive be requested to urgently consider and approve the proposed chemical reduction measures in 2022 set out in Appendix 6 to the report submitted to the Council, and to commit the Council to working with Surrey County Council in developing a joint pesticide policy."

The proposed measures include the following key actions:

- No chemical use within playparks by 1 August 2022.
- No use of Glyphosate except for specified invasive and/or noxious weeds and tree root removal on our parks, sports pitches, heritage, and countryside areas from 1 January 2022.
- Update the current policies with a new chemical, pesticide and fertiliser policy and action plan by 1 June 2022 for approval by the Executive that outlines the process to achieve the ambition for a pesticide free Council and identifies resource requirements.
- We are currently reviewing the highways weed control agency agreement with Surrey, as it is due for renewal in April 2022, and we will seek to agree a joint management approach to explore the efficiency, effectiveness, and implications of alternative

control methods with Surrey, with the specific aim of reducing or eliminating Glyphosate use in highway applications.

Recommendation to the Executive:

The Executive is asked to consider and approve the proposed chemical reduction measures in 2022 set out in Appendix 6 to this report, and to commit the Council to working with Surrey County Council (SCC) in developing a joint pesticide policy.

Reason for Recommendation:

To implement the resolution as agreed by the Council at its meeting on 7 December 2021.

Is the report (or part of it) exempt from publication? No

1. Purpose of report

- 1.1 This report is asking the Executive to consider and approve the measures proposed following the debate at the Council meeting on 7 December 2021 in response to the receipt of a petition and e-petition which stated:

“We the undersigned petition Guildford Borough Council to Phase out the use of pesticides, including glyphosate, in Guildford.”

- 1.2 At the meeting on 7 December 2021 the Council resolved: That the Executive be requested to urgently consider and approve the proposed chemical reduction measures in 2022 set out in Appendix 6 to the report submitted to the Council, and to commit the Council to working with Surrey County Council in developing a joint pesticide policy.

- 1.3 To assist the Executive in understanding the issues, the Parks and Countryside Development Lead has provided, by way of background information in section 3 below, details of:

- the Council’s current policy and approach to the use of chemicals, including pesticides,
- our current land management activities that include the use of chemicals
- Key areas where the Council is actively working to reduce pesticides and other chemicals

- 1.4 Section 4 below sets out details of the proposed actions that could be taken in 2022 towards a pesticide free Guildford, which formed the basis of the motion proposed at the December Council meeting by the Lead Councillor for Environment in response to the petition.

2. Strategic Priorities

- 2.1 Formal consideration by the Council of proposals contained in a petition is consistent with the Council’s desire to be open and accountable to its residents, deliver improvements and enable change across the Borough.

- 2.2 The proposed actions outlined in this report to phase out the use of chemicals, including glyphosate, in Guildford is consistent with the strategic theme of protecting the environment and priority outcomes to make every effort to protect and enhance our biodiversity and natural environment.

3. Background

Current Policy and Approach

- 3.1 As major landowners and custodians of large areas of public space we care deeply for the environment and ecology of the areas we manage with a view to protecting these areas so they can be enjoyed and used by current and future generations. We continue to reduce the use of fertiliser and chemicals as far as possible, and this mindset is embedded in our management approach.
- 3.2 Our approach is to reduce and phase out chemical use, including pesticides, wherever practical and achievable. Our activity recognises the ongoing development of new alternative methods to replace chemicals such as pesticides, fertilisers and cleaning agents, considering legal requirements and health and safety implications. Whilst it is our aim to phase out use of chemicals over time, we recognise at present it may not always be possible to eliminate their use altogether and that alternatives have an effectiveness and/or cost implication.
- 3.3 As part of this management approach, we have operated a chemical minimisation policy for nearly a decade. This was last updated in 2019 (see Appendix 1). The chemical policy covers the use of pesticides (herbicides, fungicides, insecticides) as well as other chemicals that could potentially cause harm.
- 3.4 The objectives for implementing the chemical minimisation policy can be summarised as follows:
- Compliance with legislation
 - Protect the health of staff and public
 - Protect the environment (watercourses, pollinators, priority species)
 - Reduce unnecessary chemical use
 - Ensure safe use, application, and storage of chemicals
 - Reduce applications where possible
 - Fulfil expectation from the public
- 3.5 The policy recognises that a balance needs to be achieved between public expectation on site management, cost, and environmental impacts.
- 3.6 Where chemicals are purchased and used, they are considered based on current knowledge, as those that will have least effect on the health and environment and are appropriate for the task.
- 3.7 It should be recognised there are several factors that require consideration:

- Legal obligations (e.g., removal of trip hazards, reduction of health hazards, invasive species control)
- Infrastructure maintenance and preventing deterioration
- Decline of natural habitats due to lack of management
- Provision of high-quality sports pitches
- Other Environmental impacts (increase in site visits, storage of arisings, use of additional machinery and ground compaction, burning of arisings, water usage for hot foam applications, reduction of desired species when dealing mechanically with invasive species).
- Each area of application will have a different solution, existing use of chemicals balances other constraints and limitations and often the use of chemicals is driven by public expectations of maintenance standards.
- Cost/ resource implication in using alternative methods to reduce herbicide use.

Works areas for the management of Council-owned land

- 3.8 Guildford Borough Council carries out land management activities with best consideration for current best practice, including provision of quality sports pitches. This includes legal obligations under the Occupiers Liability Act, conservation and species management, Stewardship Agreements and Green Flag standards.
- 3.9 Details of the Council's current land management activities that use chemicals are set out in Appendix 2 to this report.

Key areas where the Council is actively working to reduce pesticides and other chemicals.

- 3.10 The focus of our resources are those areas where we can achieve greatest environmental gain.

Increasing the herbicide free areas on The Mount and Tyting Farm

- 3.11 Guildford Borough Council manages the fields at Tyting Farm and The Mount in partnership with Butterfly Conservation to maintain rare butterfly habitat. This involves removal of developing scrub and controllable species whilst retaining the grassland flower sward, avoiding soil compaction, and preserving other developed habitats such as ant hills. The aims can only be achieved by hand removal of species or targeted spot treatment with herbicide. Through the engagement of volunteers and, when budget allows contractors, we continue to increase the areas managed without use of herbicides. Whilst we manage to recruit several volunteer parties annually and dedicate staff time to ragwort removal this is simply not enough to address the current volume within the available time window.
- 3.12 Please note that we have several other grassland sites (e.g., Pewley Downs, Shalford Common, Effingham Common, Merrow Downs) where we already achieve reduction of controllable species to a level where chemical control is not required. However, some areas remain vulnerable to outside seed sources

depending on land management by adjacent landowners and nutrient input from outside sources.

Oak Processionary Moth Control

- 3.13 Oak Processionary Moth (OPM) is a legally controllable species that presents a hazard to human health. Guildford Borough Council has set up a risk-based management regime that involves removal of OPM nests by hand from infected oak trees. We have taken this approach to minimise the significant impact of pesticide use on non-target species. Focussing on nest removal on areas of high risk to human health does not achieve the national target to fully eradicate this species. The Forestry Commission continues their own programme of OPM control in the Borough, including Council Land, using pesticides and biological controls that impact on non-target species. Nest removal by hand is currently not considered appropriate to fulfil the legal requirement of Statutory Plant Health notices.
- 3.14 Guildford Borough Council is part of the OPM Innovation Group to enable research into alternative methods of control without using pesticides, that has significantly contributed to national guidance to enable changes in legislation.

Playground areas

- 3.15 Guildford Borough Council is implementing a new jet washing contract with the intention of jet washing play areas more frequently with the aim to stop using glyphosate in play areas. This includes removing edging stones in play areas where the safe fall surface meets the grass and will also stop the weeds growing between the edging stones and the safe fall surface and prevent shrinkage reducing the number of repairs required.

Merrow Golf Course

- 3.16 We and the Golf Course Management are working in Partnership with Merrow Residents Association, Butterfly Conservation and Surrey Wildlife Trust to improve the conservation management of Merrow Golf Course which is a major part of Merrow Downs' chalk grassland habitat. This includes aiming to reduce use of fertilisers and chemicals in the management of the golf course.

Contract with Surrey County Council

- 3.17 On behalf of SCC, we are contractually obliged and responsible for the application of Glyphosate along the borough's highways and footways. We currently contract this out to a company called Complete Weed Control. To ensure every effort is made to minimise the amount of chemical applied they utilise spraying units mounted on the front of a purpose-built vehicle with sensors deployed to detect the presence of individual weeds and accurately apply the correct amount of herbicide. Complete Weed Control also apply glyphosate to invasive species on highway verges.

- 3.18 The agency agreement for footpath and kerbside treatment is due for renewal in April 2022. We are reviewing this agreement with SCC and aim to agree a joint management approach to explore the efficiency, effectiveness, and implications of alternative control methods with the specific aim of reducing or eliminating Glyphosate use in highway applications.

Exploration of alternative methods for weed control

- 3.19 Guildford Borough Council is exploring alternative methods including inviting suppliers to carry out demonstrations of alternative methods on areas of land we control. For example, a demonstration at Stoke Park to electrocute weeds which is labour intensive and poses a fire risk. Whilst these methods have proven to be effective for small scale use in certain areas, continued improvements of technology are required (and are being made) to enable larger scale use. It should be recognised that new methods will require additional initial capital cost and an ongoing increase in revenue cost.
- 3.20 We currently use herbicides and pesticides in conjunction with cultural and mechanical methods to reduce the amount being used. We use the Nomix total droplet control system which reduces the amount of Glyphosate used by up to 70%.

<https://www.nomixenviro.co.uk/index.php/products/what-is-total-droplet-control-tdc>.

- 3.21 Methods explored are electrocution, acidic vinegar, and hot foam. It is acknowledged that hot foam currently provides the most effective alternative, but there are significant issues to consider regarding the required high-water use and the logistics of providing the water supply. It is anticipated new technologies and equipment will resolve some of these issues and will make this technology viable over time.
- 3.22 It will take time to explore all alternatives and understand the financial and operational implications. Please see appendices 3, 4, and 5 for further details on current use and alternative methods.

4. Proposed actions in 2022 towards a pesticide free Guildford

- 4.1 The Council considered its formal response to the petition Make Guildford Pesticide-Free, which was agreed as follows at the Council meeting on 7 December 2021:

“This Council acknowledges the work that officers have already undertaken to minimise chemical use and to explore alternative methods of weed control. We also recognise that the current Chemical Minimisation Policy, whilst still relevant, needs review.

The Council aims to stop using chemicals and believes that the approach to be taken should be to phase out their use as quickly as is practicable, recognising that at present it may not always be possible to eliminate their use altogether.

The Council aspires to becoming a pesticide and herbicide free borough (to the greatest extent possible), following an agreed three-year phase-out plan, and accordingly feels a detailed chemical action plan should be developed that includes continued and public commitment to:

- existing chemical reduction actions
- exploring alternatives
- communication
- educating site users and managing expectations
- establishing a working group involving partners including the Pesticides Action Network and the Guildford Environmental Forum to facilitate alternative approaches
- Collaborating on the phasing-out of pesticide use with SCC and Waverley Borough Council (who have already adopted a similar policy)
- Incorporating the Council's chemical action plan in all relevant contracts.

To that end, the Council therefore

RESOLVES: That the Executive be requested to urgently consider and approve the proposed chemical reduction measures in 2022 set out in Appendix 6 to the report submitted to the Council, and to commit the Council to working with SCC in developing a joint pesticide policy.”

4.2 The Actions are outlined in Appendix 6 and include the following

- i. No chemical use within playparks by 1 August 2022, following the procurement process of a new jet washing contract.
- ii. No use of Glyphosate except for specified invasive and/or noxious weeds and tree root removal on our parks, sports pitches, heritage and countryside area from 1 January 2022. In any use we will commit to firstly consider and then use alternative methods where practical and viable and where chemical, including glyphosate, is used we will use the minimum amount of chemical necessary for an effective treatment. We will specify these species in the chemical, pesticide, and fertiliser policy.
- iii. New chemical, pesticide and fertiliser policy and action plan by 1 June 2022 for approval by the Executive.

We propose to resource and develop a detailed chemical action plan that commits to the continued reduction of chemicals. This action plan should include continued commitment to

- existing chemical reduction actions
 - to exploring alternatives
 - communication
 - educating site users and manage expectations
 - working with partners to facilitate alternative approaches
- iv. We recognise the current written policy, whilst still relevant, needs review. Officers propose that the new chemical, pesticide and fertiliser policy and action plan is prioritised so that impacts (financially, staffing levels,

contractor availability, other environmental impacts) can be fully addressed.

- v. It should be recognised that each area of application will have a different solution, existing use of chemicals balances other constraints and limitations and often the use of chemicals is driven by public expectations of maintenance standards. Investing in the development of a detailed action plan with a committed timetable will ensure we can manage public expectations and be clear and open on the implications.
- vi. An officer working group, hosted by Surrey Wildlife Trust and supported by the Pesticide Action Network (PAN), has been set up to enable a joined- up approach between the Surrey Authorities.
- vii. As part of the review of the Agency agreement due for renewal in April 2022, to negotiate and seek to agree with the Highways Authority (SCC) a joint initiative to explore, assess and implement, if a method is found to be both effective and efficient, other methods of highway weed control with the specific aim of minimising or eliminating the use of Glyphosate over the term of the agreement.

5. Financial Implications

- 5.1 A detailed cost assessment is required for each individual area of chemical application, and this will need to be considered in the context of other environmental impacts rather than cost alone.
- 5.2 Whilst alternative methods are tested, in most cases an increase in labour cost is required to provide the current level of service standards.
- 5.3 It should be noted that in some areas of application, for example removal of ragwort, sufficient skilled labour force at the correct time of the year may not be available even if financial resources are sufficient.
- 5.4 The financial implications as a result of implementing the actions for 2022 in Appendix 6 of this report are estimated as follows:
 - i. **No use of Glyphosate except for specified application areas:** Use is currently limited outside of specified areas, using methods such as additional mulch and hand weeding, eliminating use outside of these areas is feasible within existing resources.
 - ii. **Review of the road verge management contract:** Extra resources required to implement a different and potentially more expensive approach would need to be funded by SCC as the client and we expect that this will be incorporated within their emerging policies.
 - iii. **No chemical use within playparks:** Additional estimated cost of £15,000 to £30,000. This is based on two pressure wash treatments per annum. An additional capital cost to repair mechanical damage is estimated at £15,000 per annum.
 - iv. **Manual Oak processionary moth control:** The target of non-chemical intervention at Merrow Downs is currently estimated at £6,000 per

annum. At current infestation levels this is similar to the estimates for chemical control and is currently covered under the existing control programme. The cost is dependent on the level of infestation and is expected to increase.

- v. **Adoption of new Policy and development of Action Plan:** Additional business support required to allow re-allocation of existing resources. Estimated. £12,000 (based on two days a week).
- vi. **Trials of alternatives to chemicals:** A detailed cost assessment is required for each alternative and will be included in the proposed action plan. It is expected cost neutral alternative methods would become available over time. Manual weed removal is currently the only viable alternative in most cases, and this is reflected in the cost estimates.

5.5 Future pathway to eliminate Glyphosate and other chemicals were possible

A detailed cost assessment is required for each alternative and will be included in the proposed action plan. It is expected cost neutral alternative methods would become available over time. Manual weed removal is currently the only viable alternative in most cases, and this is reflected in the cost estimates.

The Pesticide Action Network supports a phased approach to ensure new ways of working can be delivered sustainably.

Going forward to apply this standard to current application areas effective alternative methods will require an increased amount of site attendance and labour cost and may use more expensive chemicals, more fuel or more water. The specified areas of Glyphosate use are listed in Appendix 2 - Current land management activities.

The financial implications and increased labour and plant resources required to stop Glyphosate use completely in these areas with current available alternatives are estimated in the table below.

Location	Likely resource	Potential Start	Annual Cost
Hard Surface management (GBC housing land)	4 operatives, 2 vehicles for 6mths PA	2023	£65-70,000
Grassland (obstacle surrounds) management	2 operatives and 1 vehicle 9mths PA	2023	£45-50,000
Shrub Beds	4 operatives and 2 vehicles 9mths PA	2024	£90-100,000
Controllable Plants	2 operatives and 1 vehicle 6-8 mths	2024	£30-50,000
Scrub Removal	Contractors	2024	£10-15,000
Sports Pitches and other specialised areas of vegetation management.	6 operatives and 3 vehicles PA	2025	£200,000

Following this pathway would require future growth bids as set out below:

Year	Cumulative revenue cost
2023 (April)	£110,000- £120,000
2024 (April)	£240,000 - £285,000
2025 (April)	£440,000-£485,000

It should be noted in some areas, the non-use of glyphosate may result in reduced standards which may in turn lead to additional demand or complaints and therefore costs in other areas, such as customer services. In addition, some alternative methods, such as hand removal are very labour intensive and come with some health and safety risks, such as interaction with traffic and repetitive strain type injuries.

- 5.6 The service currently acts as a contractor to a number of external customers. The use of chemicals and Glyphosate is important in achieving a competitive price for land management in these contracts. Current contracts outside of the Surrey agreement are worth in the region of £100,000. Without chemical use in these contracts, we may become uncompetitive and lose the contracts or have to operate at a loss.
- 5.6 Officers recommend the development of an action plan for approval by the Executive. The purpose of the action plan is to explore and outline the financial (and other) implications of the steps the Council intends to take. The development of the action plan will require reallocation of existing resources.

6. Legal Implications

- 6.1 The motion carried at the Council meeting on 7 December 2021 will need to be referred to the Executive for a final decision. This report refers the motion to the Executive.
- 6.2 The Council currently uses chemicals to fulfil legal requirements such as control of species, statutory habitat management functions and reduction of risk to the public.
- 6.3 Officers recommend the development of an action plan for approval by the Executive. The purpose of the action plan is to explore and outline the legal (and other) implications of the steps that the Council intends to take.

7. Human Resource Implications

- 7.1 There are no immediate human resource implications arising from this report.
- 7.2 Proposed further actions will be outlined in the proposed action plan which will consider human resource implications arising from individual actions.

8. Equality and Diversity Implications

- 8.1 Public authorities are required to have due regard to the aims of the Public Sector Equality Duty (Equality Act 2010) when making decisions and setting policies.
- 8.2 This duty has been considered in the context of this report and it has been concluded that there are no equality and diversity implications arising directly from this report.
- 8.3 No Equality Impact assessments (EIA) have been conducted in relation to the subject matter raised by the petition.

9. Climate Change/Sustainability Implications

- 9.1 The proposed Action Plan will identify the sustainability implications. The reduction in chemical use has obvious environmental benefits. The realisation of those benefits in practice will need to be assessed on a case-by-case basis when looking at alternative methods. Benefits should be assessed, for example against additional need to remove arisings and impact of invasive species on priority habitats.

10. Summary of Options:

- 10.1 The following options are available to the Executive:
- Officers recommend implementing the actions as proposed in Appendix 6. This option is consistent with the resolution by full Council
 - Part implementation of the proposed actions: Officers believe the proposed options are deliverable in the short term. The proposed action plan will identify further options and implications (financially, legal and environmentally)
 - Do nothing: This option will include the continued delivery of the Council's current chemical policy; however it would not be consistent with the agreed resolution by full Council.

11. Background Papers

None.

12. Appendices

Appendix 1: Current Parks and Countryside Peat and chemical minimisation policy

Appendix 2: Current Land Management activities that use chemicals

Appendix 3: Areas of weed control

Appendix 4: Glyphosate use

Appendix 5: Acetic acid assessment

Appendix 6: Proposed chemical reduction measures in 2022

Appendix 7: Petition Submitted 4 August 2021