



**London Borough of Lewisham**

**&**

**Glendale Grounds Management**

**Integrated Weed Management in Amenity**

**Spaces and Public Realm**

**Policy**

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# 1. Introduction

This policy has been created using the format developed by Parks for London in partnership with the 'Amenity Forum' primarily for Local Authorities and other organisations as a generic policy framework to underpin the development of integrated weed management plans (IWMPs).

The use of herbicides to manage weeds is of increasing concern to the public amid a growing amount of evidence of the harmful health impacts of chemical herbicides and a high level of awareness of an impending ecological crisis, alongside the well-publicised climate emergency.

- Integrated control is the control of weeds by a combination of horticultural, mechanical, thermal, biological and chemical methods.
- Integrated control does not mean no use of herbicides; it is about exploring other options before selecting herbicides to reduce, or even eliminate, herbicide use where possible.

Furthermore, the use of herbicides is regulated by the [Plant Protection Products \(Sustainable Use\) Regulations 2012](#) which aims to reduce “the risks and impacts of pesticide use on human health and the environment and promoting the use of... alternative approaches or techniques such as non-chemical alternatives to pesticides.” The [UK National Action Plan for the Sustainable Use of Pesticides](#) establishes a framework for action to achieve the sustainable use of pesticides.

Detailed information about integrated weed management can be found in the [Reference Guide for Integrated Weed Management in Amenity Spaces and Public Realm](#).

## **Reference Guide for Integrated Weed Management in Amenity Spaces and Public Realm**

This reference guide has therefore been produced as an interactive pdf document to help landowners and managers to prepare Integrated Weed Management Plans (IWMPs). Users can navigate the guide using the tabs and links to other useful resources. The guide covers what weeds are and why, in certain circumstances, we need to manage them. It explains the different methods of managing weeds and explores how these different methods should be considered to create IWMPs.

The guide covers the range of horticultural, mechanical, thermal and biological solutions for managing weeds alongside chemical control. Legislation regulating the use of herbicides requires all users to assess the options for control so that herbicide use is minimised. The guide is designed to help you to consider the options available in the least harmful way to people, water, wildlife and the wider environment. Finally, it describes the process of preparing detailed integrated weed management plans and includes templates for a range of specific landscape uses. The templates have been produced in Google Documents, which can be accessed on any mobile device.

## 2. Policy objectives

The London Borough of Lewisham & Glendale Grounds Management is committed to reducing and minimising the use of chemical herbicides to manage weeds.

This policy summarises how we will reduce and minimise the use of chemical herbicides through an Integrated Weed Management (IWM) approach and sets out the alternative methods we will use. The objective is to use chemical herbicides as a last resort and only when there are no other cost-effective or reasonable alternatives. It aims to ensure that the least harmful methods of weed control are used, so that the risk of adverse impacts on public health the natural environment are kept to the absolute minimum and the use of herbicides meets all relevant regulations.

## 3. Responsibilities

The implementation of this policy is the responsibility of every member of staff working for or on behalf of the London Borough of Lewisham & Glendale Grounds Management. This applies not just to personnel who have direct responsibility for managing amenity spaces or public realm but also to staff in supervisory or management roles. The policy also applies to any organisation or individual who is contracted to work on land owned and managed by the London Borough of Lewisham & Glendale Grounds Management.

## 4. Integrated weed management policy statement

1. The London Borough of Lewisham & Glendale Grounds Management will comply with this policy with respect to the management, maintenance and improvement of all amenity spaces and public realm it owns or is responsible for.

2. Integrated Weed Management Plans (IWMP) will be prepared and regularly reviewed. The overarching plan should include implementation plans for sites, landscape types or specific invasive weed problems It should include a full year's management plan that identifies the sequence of interventions throughout the year with approximate timings (see Section 5 of the [Reference Guide for Integrated Weed Management in Amenity Spaces and Public Realm](#)).
3. The management of species of weed identified as invasive<sup>1</sup>, will be prioritised to prevent them spreading to other locations or causing damage to protected sites or assets, such as wildlife sites or heritage buildings.
4. The toleration of weeds or the use of non-chemical methods for the control or eradication of weeds will always be considered first to ensure that chemical methods are only used where necessary.
5. Where chemical control methods are deemed necessary, we will consider the safest, most appropriate and effective product available; and will regularly review the market for most environmentally friendly products.
6. Where chemical herbicides are used, we will use techniques and methods which are highly targeted, selective and proven to be effective against a specific weed problem.
7. We will maintain a detailed record of the use of chemical herbicides, including information relating to when and how much herbicide was applied. An annual audit will be made of these records to assess whether reductions in the frequency and quantities of use of chemical herbicide can be achieved, including the use of more selective and targeted methods or the increased use of non-chemical methods.
8. Areas treated with chemical herbicides will be assessed prior to application to ensure the minimum area required for effective treatment and control of a specific weed problem is achieved.
9. The area to be treated will be signposted 48 hours in advance of the application process, and signage will remain for a minimum of 8 hours following application.
10. All personnel handling and applying chemical herbicides will be made aware of the specific constraints and sensitives of the sites and locations where they are working, including public use and the presence of features which could be subject to harm.
11. This policy will be communicated and promoted to all services within our organisation to any organisations or third parties that work in our amenity spaces and public realm, and to the public who use our amenity spaces and public realm.
12. We will regularly monitor and evaluate all methods currently used to manage weeds to review, refine, update and improve our IWMP.

## 5. Assessment of implementing the policy

### a. Compliance and governance implications

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<sup>1</sup> <https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants>

The adverse impact of adopting the policy with respect to compliance and governance issues is assessed as LOW.

The policy ensures that the London Borough of Lewisham & Glendale Grounds Management is compliant with existing legislation and government policy, as well as being able to respond effectively to any new legislation which may emerge

It also ensures the London Borough of Lewisham & Glendale Grounds Management is fully in control and directing an ongoing commitment to reducing the use of herbicides. This ensures it is able to withstand scrutiny and challenge over increased concerns about the environmental and health effects of such products. It also enables the London Borough of Lewisham & Glendale Grounds Management to demonstrate it has a robust risk-assessment based process in place to protect itself from avoidable legal liabilities, and its reputation as a responsible public body.

## **b. Financial implications**

The adverse impact of adopting the policy with respect to cost is assessed as LOW-MEDIUM.

Chemical herbicides can offer a cost effective, quick and easy solution to problems with weeds, but this needs to be weighed against the potential harmful impacts which may have other cost-implications in the longer term.

Minimising the quantities of chemical herbicide being used may limit any future adverse financial impact by reducing the London Borough of Lewisham & Glendale Grounds Management's long-term financial exposure to costs against it for harm to the environment or public health.

Furthermore, increasing regulatory control for the use of such products may increase the costs of using herbicides, training personnel to use them safely and safely storing and disposing of herbicide-based products.

Many non-chemical methods for weed control are becoming more mainstream and more widely available, therefore reducing their cost.

## **c. Sustainability implications**

The adverse impact of adopting the policy with respect to sustainability is assessed as LOW.

Adopting this policy is likely to reduce the amount of chemical herbicides used, and change the way weeds are managed across the London Borough of Lewisham & Glendale Grounds Management, particularly as innovations in machinery and good practice are adopted. This is likely to result in positive environmental outcomes.

As some of the innovative methods for non-chemical weed control rely on the use of petrol or diesel-powered machinery or generators, their increased use in amenity spaces and public realm could contribute to a net increase in local air pollution and a higher carbon footprint. However, much of this machinery is being gradually replaced with battery-operated components that will address the adverse air quality impacts.

## 6. Appendix:

# Legislation relating to weeds and pesticide use

### Weeds

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#### **Wildlife and Countryside Act 1981 (as amended)**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69205/wildlife-countryside-act.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69205/wildlife-countryside-act.pdf)

Section 14 of the Wildlife and Countryside Act 1981 makes it an offence, liable to a fine, to plant or otherwise cause to grow in the wild, certain specified weeds. However, it may be a potential defense to prove that all reasonable steps were taken to prevent these plants growing in the wild. Specified weeds under the Act include giant hogweed, Himalayan balsam and Japanese knotweed.

#### **Town and Country Planning Act 1990 (England and Wales)**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/11491/319798.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11491/319798.pdf)

Section 215 (England & Wales) empowers local authorities to serve notice on owners or occupiers of land to control weeds that are considered harmful to the amenity of the surrounding area. Failure to take appropriate action may be liable to a fine, or alternatively the local authority may recover costs incurred in employing a third party to take the appropriate action.

#### **The Weeds Act 1959**

<http://www.legislation.gov.uk/ukpga/Eliz2/7-8/54/contents>

The Weeds Act 1959 empowers the Department of Environment, Food and Rural Affairs (DEFRA) or its subsidiary bodies to serve notice requiring an occupier of land to take action to prevent the spread of certain specified weeds. Action under the Act is pursued by DEFRA specifically when agricultural land is threatened by these specified weeds. DEFRA may also elect to have a third party undertake any necessary action and recover costs from the occupier. Specified weeds under the Weeds Act 1959 are Spear Thistle, Creeping Thistle, Curled Dock, Broadleaved Dock and Common Ragwort.

**Note:** The Weeds Act was enacted to prevent a build-up of particular weeds that could have an adverse impact on agricultural production. The Weeds Act should not provide an excuse for the use of herbicides in amenity spaces and the public realm unless there is a build-up of weeds close to areas of agricultural production that are likely to have an impact on crop yields if allowed to spread.

## Pesticide Use

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### **Plant Protection Products (Sustainable Use) Regulations 2012**

<http://www.legislation.gov.uk/ukxi/2012/1657/contents/made>

This states that the use of pesticides must be kept to levels that are economically and ecologically justified and reduce or minimise the risks to human health or the environment.

The regulations also require:

- All users of chemical herbicides to have a certificate of competence
- A continued requirement for anyone who uses a pesticide to take “reasonable precautions” to protect human health and the environment
- A continued obligation to confine pesticide application to the target area
- Continued requirements in relation to storage, handling and disposal
- Specific measures to protect water
- Requirement to minimise use in specific areas (roads, railways, very permeable surfaces or other infrastructure close to surface and groundwater; sealed surfaces with a high risk of run-off to surface water and sewage systems; areas used by the public or vulnerable groups; in the close vicinity of healthcare facilities; in conservation areas)
- Requirement for those who purchase products for professional use to ensure the end user holds an appropriate certificate

### **Control of Pesticide Regulations (COPR) 1986**

<https://www.legislation.gov.uk/ukxi/1986/1510/contents/made>

This UK regulation requires that all operators who wish to apply pesticides must hold the appropriate statutory ‘NPTC’ certificates for the various applicators that they intend to use – the commonest certifications are PA1 and PA6 for handheld applicators (knapsack sprayers).

### **Control of Substances Hazardous to Health Regulations (COSHH) 2002**

<https://www.hse.gov.uk/nanotechnology/coshh.htm>

This is the law that regulates the occupational use of substances hazardous to health within the UK, which all herbicides are classified under. It aims to ensure that the correct control measures are in place to reduce the risk of harm from exposure to hazardous substances. This also covers the correct and safe storage of chemicals, including herbicides.

### **Water Framework Directive 2000**

[https://ec.europa.eu/environment/water/water-framework/index\\_en.html](https://ec.europa.eu/environment/water/water-framework/index_en.html)

This Directive relates to the protection of water-based environments, including groundwater and drinking water. To reduce or remove the risks of polluting such water environments, the directive states that future weed management strategies must integrate a larger and wider number of practices that do not rely solely on the use of chemical herbicides to deliver the sustainable control of weeds.

### **EU Glyphosate License 2017**

[https://ec.europa.eu/food/plant/pesticides/glyphosate\\_en](https://ec.europa.eu/food/plant/pesticides/glyphosate_en)

The current status is that the manufacture and sale of products based on or containing glyphosate will continue to be approved by the EU until December 2022, when further reassessment will be made.

