

From: Peter Silverman
Sent: 03 July 2013 18:13
To: 'freda.rashdiXXXhighways.gsi.gov.uk'
Cc: STORMONT, John
Subject: Meeting Follow Up

Freda,

It was good to meet you earlier today at the meeting with Stephen Hammond. I felt quite privileged to be in such august company.

I made one or two points which, let's say, you felt needed substantiating. So here goes.

Firstly please action this [link to the relevant page on my web site](#)

M40 – I claimed no physical checks of litter were made by the Agency

As you will see from the M40 AREA 30 section of the page none of the inspection reports for the period Jan 1 – Sept 30 2012 involved any physical inspections of cleanliness by the Agency. Also, you will see from the exchange with the Treasury Solicitor that in the 12 months to 16th May 2012 no litter inspections of Junction 1 of the M40 were made by the Agency.

M25 - I said the monthly "Environmental Amenity Index" audits made by the Agency used more relaxed definitions of the litter grades than the Litter Code

Lower down on the page you will see that the Agency / Connect Plus definition of Grade B is "*Not much (litter) apart from a few items*".

In the Litter Code it is "*predominantly free of litter and refuse apart from some **small items***".

An area of verge with a few cigarette packets/ paper cups (a few "not small" items) would qualify as a B using the audit's definition but would be unacceptable using the LC definition.

Similarly for Grade C we have "*Quite a lot with build ups*" instead of "*Widespread distribution of litter and /or refuse with minor accumulations*".

To me "build ups" contain more litter than "minor accumulations".

Also, the Agency / Connect Plus definitions only refer to "litter" whereas the Code refers to "litter and refuse". This implies that discarded traffic cones, hub caps and fridges (one was left seemingly for years in the undergrowth on the M40) would not impact on the grading.

Also, how can a single grade assessment be made of a whole kilometre? What if there are several patches of grade C but the rest is reasonably clean. Is it a "C" or is it averaged to a "B". If it is the latter then you have a problem. The land would not have been "kept clear of litter" as required in EPA S89 but would have been assessed as satisfactory. Is there any guidance given to inspectors on this and, if so, could you share it with me?

The page also looks at other shortcomings with the process – slip roads, consistently the most littered parts of a motorway, seem to be omitted - the contractor is given advance notice of an impending inspection – litter and refuse down embankments would not be seen from the vantage point taken by the inspectors.

Cleansing standards

You mentioned that the Agency had consistent standards. It would be very helpful to have a statement of what these are.

Stephen Hammond said that he would enquire about the M40 inspection regime and, I think, also my claims about the lax inspection regime on the M25. You may therefore want to make him aware of the points I have made.

Could you please let me have Matt's contact details?

Freda, I hope this is of help and look forward to hearing back from you and hopefully meeting again.

Kind regards,

Peter Silverman

www.cleanhighways.co.uk