



A27 Clean Up Campaign
20 Spring Meadow
Uckfield, East Sussex
TN22 1FB
13.8.2019

The Rt. Hon. Grant Shapps MP,
Secretary of State for Transport,
Department for Transport,
Great Minster House,
33 Horseferry Road,
London SW1P 4DR.

Dear Mr Shapps,

Cleansing Responsibility for the A27 in East and West Sussex, through to the A3(M)

We are a group of highly concerned and committed East and West Sussex residents who, with specialist help from Clean Highways, have come together to highlight and tackle the problem of roadside litter and debris along the major A27 trunk road.

We are working closely with each of the local authorities involved and, together with them and the local Members of Parliament, request that you use your powers to transfer responsibility for all cleaning of the A27 to Highways England, and thereafter ensure that the road is maintained to a high standard, with appropriate enforcement action being taken against Highways England and their contractors if they fail in this regard.

This letter has been endorsed by the following Councils and MPs:

Adur and Worthing District Council
Arun District Council
Brighton & Hove City Council
Chichester District Council
Lewes District Council
Wealden District Council
Polegate Town Council
Stephen Lloyd, MP for Eastbourne
Maria Caulfield, MP for Lewes
Lloyd Russell-Moyle, MP for Brighton Kemptown

The Current Arrangements and Issues

The A27 is classed as an All Purpose Trunk Road (APTR), part of the National Strategic Road Network, managed by Highways England (HE) and funded by Central Government. This recognises that its prime function is to move traffic across the nation rather than to serve local interests.



The condition of this road with regard to cleansing has noticeably deteriorated in recent years. We note specifically:

- (1) There has been a significant increase in accumulated roadside litter from not only items jettisoned from cars but also plastic sheeting and industrial waste from trade vehicles and uncleared debris resulting from traffic accidents.
- (2) There is a notable amount of equipment which has been abandoned by highways contractors including metal stands, signs and cones – ultimately all at the expense of the public purse.
- (3) Additionally there has been a marked reduction in the sweeping of the carriageway itself with deep deposits in many places of roadside grit as well as plastic pieces that have been shredded during cutting of vegetation.

Each local authority along the route approaches the cleaning task differently, with differing priorities and staff resources, and differing approaches to health and safety. Some areas are easier to clean than others so the cumulative effect is that standards vary with wide patches of appalling litter and others less so. Nevertheless all authorities experience the same systemic problems whereby they have responsibility for cleaning but are dependent on the contractors employed by HE for the necessary road closures and vegetation cutting. Equally all authorities have limited funds to carry out cleaning with no centrally allocated funding for this function despite this being a national trunk road.

Overall this has led to the condition of the A27 attracting an increasing volume of complaints from not only local residents but also domestic and foreign tourists. It is an eyesore to all who travel along the route. The degradation of the plastic and general rubbish is a threat to local wildlife and causes blockages to roadside drainage channels. It enters nearby cornfields and can be combine harvested into the hay used for animal feed. Furthermore, we can only assume that shredded particles of plastic are making their way off the roadsides into water courses and adding to the global problem of plastic in the world's oceans. This reflects very poorly on the country and on local and national government; many other developed countries seem to be able to keep their own cities and roads so much cleaner than ours.

Local authorities, politicians and residents alike recognise that we have a failed service which needs to be addressed urgently. The difficulties of having to negotiate with HE's contractors the partial or full closure of the carriageway, and the very significant cost to local authorities of so doing, have resulted in budgets being insufficient to maintain adequate cleaning to the level required by statute under S89(2) of the Environmental Protection Act 1990. Not all authorities are equally affected but in some areas cleaning has not been undertaken for almost three years which clearly demonstrates that current practices and policy are not working.

The alternative under the current situation – cleaning the road when closed for other purposes – has largely proved impractical on a regular basis due to the difficulty of co-ordinating between the local authority and HE's contractors. This poor level of co-ordination has led to HE contractors strimming vegetation prior to litter picking by the local authority which severely hampers the cleaning task and, as mentioned above, must be a significant route for micro plastics to enter the environment.



Finally, and perhaps of most concern, the current situation brings about a responsibility gap whereby no one party can be held responsible for the bad and deteriorating conditions seen alongside this road, with each party able to blame the other for the problems and the public left with no adequate means of progressing complaints.

It is for all these reasons that the consensus amongst councils is to request you to use your powers under Section 86(11) of the Environmental Protection Act 1990 to transfer responsibility for cleansing the A27 to HE.

The Case for Change

It is undoubtedly the case that increased efficiencies would be achieved by combining all aspects of road maintenance under HE. Specialist teams protected by blocking vehicles or planned lane closures could move seamlessly from one local council area to the next without the need for liaison between different bodies with differing priorities. This could be done on a continuous and repetitive basis to make maximum use of the capital assets employed thereby achieving regular and frequent cleaning.

HE through its contractors would have total control over the necessary traffic management measures and the cleansing/vegetation control operations, co-ordinating these efficiently with other planned maintenance operations. Crucially, members of the public would have certainty as to where to address any concerns. We would suggest that DBFO Area 29 of the A1(M)/A14 demonstrates very well how a stretch of APTR maintained by specialist contractors under the control of HE can be a very much better solution to the UK's litter problem than the current approach taken along the A27.

Provided that there is clarity over the standards to be achieved (as already set out very clearly under S89(2) of the Environmental Protection Act 1990) and effective oversight of the work, with penalties imposed for failings, then a transfer of responsibility for cleansing to HE can only have a positive impact on the environment of this very special part of the country, much of which is within the South Downs National Park.

We are not alone in our thoughts on this subject as the transfer of responsibility for the cleansing of APTRs such as the A27 back to HE has been under consideration for some time:

- (1) In their 2009 Road Side Litter Research Strategy prepared for the Highways Agency, the consultants Atkins recommended that this transfer of responsibility would lead to increased effectiveness and efficiency.
- (2) In May 2015 the Communities and Local Government Select Committee in their report on Litter and fly-tipping in England recommended that “the Government make the Highways Agency responsible for cleaning trunk roads and make the necessary budget adjustments”.



- (3) In May 2018 Roads Minister Jesse Norman MP asked the Department for Transport to assess what additional funds would need to be made available to introduce a transfer of responsibility for the removal of litter on trunk roads from local authorities to Highways England.
- (4) In April 2019, Councillor Linington of Lewes District Council wrote to you requesting that HE take over responsibility for litter clearance on the A27. Your Department is considering the options (Jesse Norman MP's response to Councillor Linington of 23 May 2019 refers).

Funding

The local authorities who have Highways England APTRs passing through their areas do not receive any additional funding from central government to cover the costs of cleaning them. We therefore request that the additional funds required in order to transfer responsibility to HE should be met by central government without any claw-back from the local authorities.

Moving Forward

Given the deplorable state of cleanliness of large stretches of the A27 and the impact this has on the well-being of local communities we would ask that you exercise your powers to transfer responsibility to HE as a matter of some urgency. This is in line with the commitments made in the "Litter Strategy for England: First Annual Report" of July 2018

We would be pleased to meet with you and your team at short notice to discuss this request in more detail. In the meantime you may wish to review the content of the A27 Clean Up Campaign Facebook page at <https://www.facebook.com/A27-Clean-Up-Campaign-344758659476055/>.

You will see that we are a very committed group who will not rest until we have a satisfactory outcome to this A27 litter problem; with many of our social media posts being 'liked', 'shared' and viewed in excess of 20,000 times, we have clear evidence this is a subject which causes deep concern across our region.

Yours sincerely



On behalf of Neil Kerridge and Janet Prendiville, Co-Chairs A27 Clean Up Campaign and Peter Silverman MA MSc, Clean Highways

Cc: All MPs and Council Leaders for East and West Sussex and Havant plus Chris Heaton-Harris MP, George Freeman MP, Baroness Vere of Norbiton, Theresa Villiers MP, Therese Coffey MP, George Eustice MP, Zac Goldsmith MP, Rishi Sunak MP, Michael Gove MP, Marcus Jones MP, James Brokenshire MP, Lord Gardiner of Kimble, MPs on the Housing, Communities and Local Government Committee, MPs on the Transport Committee, Prince Harry, Duke of Sussex, john.read@cleanupbritain.org, litter@defra.gov.uk, Kamal.Panchal@local.gov.uk