Trowbridge Town Council

Working for your Community

Pesticide Policy

Trowbridge Town Council
Version: October 2025
Adopted: October 2025

UPDATE TIMELINE

Reference Number	Version	Owner	Approval Date	Review Date
38	V1	Director of Estates, Assets & Operations	October 2025	October 2026

Pesticide Policy - The use of Pesticides for Grounds Maintenance

Approved: October 2025
Review Date: October 2026

Introduction

Trowbridge Town Council (TTC) aims to provide a high standard of grounds maintenance for all of its sites. These sites include parks, recreation grounds, environmental sites, open spaces, cemeteries and play areas.

To achieve these high standards, Trowbridge Town Council and contractors employed by TTC use pesticides. This included herbicides, fungicides, and insecticides, collectively known as “pesticides.” It is the aim of the Council to stop using pesticides, by a phased reduction of use on its land.

This policy for the use of pesticides identifies how we propose to reduce, monitor and control the use of pesticides, using alternative methods wherever possible.

Why do we still use pesticides at all?

Although every effort will be made to use non-chemical control, there will still be some areas where alternative methods are not currently available or effective. Wherever this is the case, integrated control will be practised wherever possible, i.e., a combination of cultural and pesticide use, to resolve a problem with the least effect on the environment.

One of the main areas where pesticides will still be used will be for maintaining fine turf areas such as bowling greens. However, this use will be minimised and alternative methods used as a first choice where possible.

The use of pesticides will be permitted for the control of tree stump regrowth. Fungicides, to prevent and remove fungal attacks on grass, will be permitted due to necessity. However, grounds maintenance improvements such as increased aeration/ brushing will continue to be increased in our grounds maintenance specifications to reduce the occurrence of fungal attack and therefore, reduce the need for fungicide application.

Herbicide has frequently been used to prevent damage when cutting to trees and headstones in cemeteries and church yards it is also widely used along walls and fences. Alternative methods will be sought where possible. However, they may still be used to prevent damage to memorials in cemeteries and churchyards.

Selective herbicides will be permitted for use on fine turf and sports pitches to control broadleaf weeds. Selective weed killing will only take place where there is weed growth affecting the use of the area for sports and will not be applied when there is not a weed problem. However, hand weeding where possible will always be encouraged.

The maintenance of hard surfaces such as paths, garage blocks, highway weeds etc, on a large scale, will still require the use of herbicide. However, when this operation is carried out, weeds will be

individually targeted (reduced – volume spraying) by the applicator, therefore considerably reducing the amount of herbicide used, and preventing any excess herbicide being lost into the environment "blanket treatment" i.e., spray applied to cover the area, whether weeds were present or not will not be carried out on our sites.

The only other occasion where pesticides will be applied is for one-off tasks. This may include where there is a particular weed problem with a shrub bed, where an area of land has to be cleared of perennial weeds for a particular purpose, or where an invasive weed, such as Japanese knotweed, Parrots Feather, Giant Hogweed, Hemlock Water Dropwort etc must be controlled.

On all these occasions, a pesticide will only be used if no alternative non pesticide option is suitable.

Environmental Considerations

The use of pesticides can have a devastating effect on our environment and its biodiversity. When used on hard surfaces, such as pavements, there is a possibility of run off or residues which can contaminate water courses and contaminate aquatic wildlife. When used on soft surfaces, such as vegetation or grass swards, there is a possibility of spray drift and contamination of adjacent areas.

Alternatives to Pesticide use

A. Nonchemical methods of pest / vegetation control will be used as a first choice wherever possible. The number of alternatives is currently limited, however, with a growing trend towards reduced pesticide use, and with current concerns over the use of Glyphosate based products, it is likely that the number of alternatives will increase significantly in the future.

B. A selection of alternative control methods is shown below:

Method	Use	Advantages	Disadvantages
Hot Foam	Weeds in hard surfaces Moss on hard surfaces and play area safety surfacing, Grass growth around trees, non-chemical graffiti removal.	Foam holds hot water against plant. Pesticide free. Can be used in all weather. Kills 95% of targeted weeds.	New technology –needs refinement. Expensive to purchase Additional cost of plant oil extract, Diesel consumption and pollution.
Hot Water / Steam	Weeds in hard surfaces,	Lower initial purchase cost.	Requires more treatments as heat is not held onto the plant.

	play area surfacing, non-chemical graffiti removal.		Diesel consumption and pollution.
Propane / Flame gun	Weeds on hard surfaces	Relatively cheap to purchase	Health and Safety Risks. Not particularly effective.
Manual Weeding	Weeds in general	Very effective if done well. Low set up costs (excluding labour).	Very time consuming. Requires large amount of labour which adds to the cost.
Mulching – bark and or membrane.	Weed control within shrub borders, under trees etc.	Improves appearance of the site and retains moisture in the soil to aid plant growth.	Can be labour intensive. May be expensive depending on supply of material
Mowing and hand pulling	Undesirable weeds in sensitive natural habitats	No licence required and no damage to the environment	Can be labour intensive to carry out and expensive for disposal of specific species
Vinegar based solutions	Weeds in hard surfaces	No licence required for application.	Has been trialled but has not been effective. Strong smell can give operator headache.
Annual Flower Mix Planting	Planting around trees and fence/wall lines	Helps pollinators, provides a safe boundary between the obstacle and the grass being cut.	Can be a little expensive.

Pesticide Free sites

The reasons for wishing to go pesticide free are numerous, but include:

- Contamination of local water supplies
- The potential impact of pesticides on human health, the environment,
- biodiversity and pollinator populations
- Public concern

The aim of creating pesticide free sites is to create areas which are safe for children, adults, and wildlife. When weed or pest control is needed, only environmentally friendly solutions will be used.

TTC will endeavour to keep the Trowbridge Park and all children's play areas pesticide free.

What pesticides will we use

We will continuously review the pesticides that we have to still use, taking into account trade literature reports and advisory reports from various bodies such as the Health and Safety Executive.

Instances where the use of a pesticide *may* still be required after nonchemical methods have been found to be unsuitable will include:

- Control of weeds such as knot weed, Hemlock Water, Dropwort, and Hog weed
- Control of weeds where no other solution currently exists i.e. sports turf weeds
- Control of weed growth on highways, hard standings, and some housing areas.

Glyphosate

There is currently particular concern regarding Glyphosate weed killers, which are widely used on hard surfaces and to clear vegetative sites.

Glyphosate is a broad-spectrum translocated herbicide. Glyphosate is absorbed through the plants leaves, into the plant roots. All products containing Glyphosate have to be registered and approved by the European Pesticides Commission. Glyphosate was re-registered 2023 for a further 10 years until 2033. As part of this approval extension, the Commission also presented some recommendations to be considered by member states. One of these recommendations were *to minimise the use of the substance (glyphosate) in public parks, public playgrounds, and gardens"*

How will we limit the effects of the pesticides that we do to use?

When approving and applying pesticides, we will:

- Use the most efficient method of application.
- Where possible, not apply a blanket cover of chemical.
- Ensure that spare pesticides/containers are disposed of safely in an approved manner.
- Ensure that spray equipment is washed out in a safe manner according to the approved method, to safeguard the environment.
- Ensure that the application method is approved for the product used.
- NOT use any pesticides in pesticide free areas.

Who will apply pesticides?

Any person applying a pesticide to the Councils land will hold a Certificate of Competence (irrespective of age), as issued by the NPTC, appropriate to the type of equipment/spraying technique to be used. Copies of these certificates will be made available to the Council as evidence of competence.

Pesticide applications, subject to approval, may be made by the following:

- Directly employed staff
- Grounds Maintenance Contractors
- Specialist Contractors

All applications will be made in line with the Code of Practice for Using Plant Protection Products.

Legal Requirement

Where it is necessary for pesticides to be applied on Council maintained and owned land, these will be applied in such a way that it conforms fully with the latest Health and Safety Legislation (primarily the Health and Safety at Work etc Act 1974 (HSWA)) and Pesticide Legislation (The Plant Protection Products (Sustainable Use) Regulations 2012 & Control of Pesticides (Amended) Regulations 1997).

The Plant Protection Products (Sustainable Use) Regulations 2012 states that:

- precautions are taken to protect human health and the environment
- the application is confined to the area intended to be treated; and when used in public spaces that the amount used and frequency of use is as low as is reasonably practicable
- suitable alternative methods of control are considered and used where appropriate to help minimise your use of chemicals
- Pesticides will only be used in accordance with the statutory listings on the product label
- Prior to application, full Risk Assessments/COSHH Assessments will be carried out, and a data sheet for the pesticide will be read and complied with
- All those involved in approving/applying pesticides will be made aware of this Pesticide Policy

How will we monitor the use of pesticides on our sites

- Detailed and accurate spraying records will be kept
- Contractors will be required to submit a proposed spraying sheet for approval prior to any pesticide being applied. This will describe the type of pesticide to be used, active ingredient, trade name, area where the pesticide is to be applied, rate of application, calibration, safety considerations proposed date of application, operative who will be applying the pesticide etc
- A report will also be supplied to officers after application, confirming the above details, and including additional information such as weather conditions
- The following records will also be kept and retained as required:
    I. Environmental Assessments.
    II. Local Environment Risk Assessment for Pesticides (LERAP).
    III. COSHH Assessments.
    IV. Stock Control Records.