

Independents *for* Herefordshire



Date: 5 May 2026

Political Group Consultation Response: Draft Highway Safety Inspection Manual (2026) and Briefing on Reactive Highway Maintenance

This response is intended to assist officers and the Cabinet Member by identifying the principal strengths, gaps, risks and areas for improvement arising from the draft **Highway Safety Inspection Manual**, the accompanying presentation, and the points raised by councillors during the political group consultation briefing.

At the outset, we recognise the considerable work that has gone into revising the previous Highway Maintenance Plan and into aligning the document with the commencement of the new Public Realm Service contract. The move to retitle the document as a **Highway Safety Inspection Manual** is sensible and should help clarify its purpose. The effort to simplify defect categories and shorten response times for higher-risk defects is also welcome in principle. The draft reflects the national shift toward a **risk-based** approach to highway safety inspection and away from rigid dimensional intervention levels, and that direction of travel is broadly supported.

However, the consultation discussion also highlighted a number of important operational, governance, communication and strategic issues. In our view, the draft is **credible in principle**, but it requires strengthening if it is to command confidence among members, parish councils and the public, and if it is to operate consistently and defensibly in practice.

1. Overall position on the proposed approach

We support the broad intention of the revised manual:

- to focus the document more clearly on safety inspection;
- to simplify the previous category structure;
- to move to a 24-hour response for Category 1 defects;
- to apply a risk-based methodology across the network;
- and to recognise the needs of all users, including vulnerable road users.

These are all positive changes.

That said, the consultation discussion made clear that the key question is no longer whether the council has a risk-based document, but whether that document will produce **consistent, transparent and strategically coherent decisions on the ground**. The draft manual currently places significant reliance on inspector judgement, but does not yet provide enough confidence about how that judgement will be calibrated, quality assured, explained to councillors and residents, and linked into wider maintenance planning.

For that reason, our response is not one of opposition to the proposed approach, but of urging officers to strengthen the document and the supporting operating model before or alongside implementation.

2. Strong elements in the draft

There are several features that should be retained and built upon.

First, the manual rightly reflects the principles of *Well-managed Highway Infrastructure* and avoids a simplistic dependence on fixed defect dimensions. As was discussed in the briefing, fixed thresholds can fail to reflect the actual risk posed to cyclists, motorcyclists, pedestrians, wheelchair users and others. A risk-based system should be better able to identify defects that are dangerous because of **location, context and user type**, not merely because of depth or size.

Second, the move to a **single 24-hour Category 1 response** is a meaningful improvement on the previous arrangement, particularly where serious hazards exist off the A and B road network. The previous distinction between certain route types and all other locations created understandable confusion and could be difficult to defend publicly.

Third, the draft takes a more **whole-network** view than many traditional highway plans, including carriageways, active travel routes, PROW, drainage, vegetation, signs, barriers and other assets. That is a strength and reflects the reality that safety defects are not confined to potholes.

Fourth, the document does at least recognise the importance of **training, competence and standard setting**, including the need for comparative exercises between inspectors. That acknowledgement is important and should remain central to implementation.

3. Main concerns arising from the draft and consultation

a) Over-reliance on subjective inspector judgement

The biggest concern arising from both the document and the briefing is the extent to which the approach depends on individual judgement at inspection level.

Members repeatedly raised inconsistency between locality stewards, with similar defects apparently treated differently across areas or over time. That concern is particularly significant because the council is choosing not to use fixed intervention dimensions. That approach can be supported, but only if there is a very strong supporting framework for consistency.

We therefore ask officers to strengthen the manual and its supporting documents by setting out more clearly:

- how inspectors will be calibrated against each other;
- how often consistency checks will take place;
- how disagreement between inspectors will be resolved;
- how decisions will be audited;
- and whether there will be worked examples or photo-based defect guidance to support more consistent categorisation.

Biannual moderation is a start, but in a judgement-led system it may not be sufficient on its own. This is one of the most important areas for improvement.

b) Assurance that vulnerable users are genuinely reflected in practice

The discussion around longitudinal defects, trenches, rutting, cycle safety and motorbike risk was especially important. The manual states that all users, including vulnerable users, are considered, and officers gave reassurance on this point during the briefing. However, councillors' lived experience suggests that this has not always translated into practice on the ground.

We therefore recommend that the manual or accompanying operational guidance include more explicit examples of defects that may pose a particular risk to:

- cyclists and motorcyclists;
- pedestrians in high-footfall areas;
- wheelchair and mobility scooter users;
- visually impaired users;
- and equestrians where relevant.

If the authority wishes to demonstrate that it is not car-centric in its defect assessment, it should show that clearly in its examples, training and published explanation.

c) Inspection frequency, climate resilience and lower-order roads

Members also made a strong point about whether annual inspection on lower-order routes remains sufficient given the impact of climate change, heavier rainfall and more rapid deterioration. This is a strategic issue as much as an operational one.

The manual allows inspection frequencies to be varied on a risk basis, which is welcome, but it is not yet clear what triggers that change in practice. We suggest that officers set out more explicitly how they will identify routes requiring more frequent inspection, for example due to:

- repeated weather-related failure;
- repeated reactive repairs;
- drainage issues;
- increased user complaints;
- or changes in traffic patterns.

Without this, there is a risk that lower-order roads become effectively complaint-led between annual inspections, which may not be sufficient in a rural county.

d) Transparency and explainability

A recurring issue raised during the briefing was the lack of transparency when some defects are repaired and others nearby are not, or when an issue is said to have been passed to another team without visible outcome.

The simplification to Category 1, 2 and 3 may help operationally, but it will not on its own resolve public frustration unless there is better communication of:

- why a defect falls into one category rather than another;
- what the 28-day response actually means;
- how grouped defects are treated;
- what happens when a defect is temporary rather than permanently repaired;
- and how members and residents can track reported issues.

The proposed member portal and improved customer journey are positive steps and should be prioritised. We would also strongly support the production of a short plain-English summary for members, parish councils and residents explaining the approach in accessible terms.

e) Utility defects and cross-team accountability

Councillors were right to challenge the treatment of utility reinstatement defects and other issues passed between teams. Whatever the underlying responsibility for cost recovery, the highway authority retains the duty to keep the highway safe.

We therefore recommend that the manual or supporting guidance make clear that where a third-party or utility-related defect presents a safety risk, the authority will ensure that risk is mitigated or the defect made safe within the relevant timescale, while separately pursuing the responsible party for reinstatement or cost recovery.

More broadly, the concerns raised about issues disappearing into an “asset team black hole” point to the need for clearer internal ownership, escalation and feedback. A safety inspection system will only retain credibility if defects do not disappear into organisational silos.

4. Governance concerns

One of the most significant issues in the presentation was the proposal to delegate operational control of key aspects of the manual to the Major Contracts Programme Director, including inspection frequency, competence and standard setting, defect categories, risk assessment and defect remedial actions.

We understand the desire for flexibility, particularly during mobilisation of the new contract. However, these are not merely technical matters: they go directly to service levels, public safety, legal defensibility and the council’s Section 58 position.

We therefore urge officers to distinguish more clearly between:

- minor operational updates that may reasonably be delegated;
- and material changes to defect categories, risk assessment principles, response times or inspection standards, which should come back through a formal governance route.

At minimum, there should be transparent reporting of any such changes and a clear threshold for when member approval is required.

5. Strategic and financial issues above the draft plan

The briefing also highlighted several issues that sit above the manual itself, but which are essential to the credibility of the approach.

Most importantly, there needs to be a clearer account of how **reactive maintenance intelligence feeds into planned maintenance and capital renewal**. Members rightly questioned how persistent defect clusters, repeated patching, drainage failure and complaint history influence resurfacing and other planned interventions. This should be more clearly set out in the wider asset management framework and in member communications.

Similarly, there is a need for clearer visibility of:

- the annual and in-year planned maintenance programme;

- how revenue and capital budgets are being used;
- how reactive spend is tracked against budget;
- and how members can understand the relationship between available funding and the service standards being proposed.

If the council is promising faster responses, better transparency is needed on the financial and programme implications of those commitments.

6. Suggested improvements

In summary, we ask officers to consider the following improvements before final adoption or as part of the implementation package:

1. Strengthen the consistency framework for inspectors, including more frequent moderation, clearer audit arrangements and practical worked examples.
2. Provide explicit examples of how defects affecting cyclists, pedestrians and disabled users will be assessed.
3. Clarify how inspection frequencies will be varied in response to climate-related deterioration and repeat failures.
4. Publish a plain-English summary of the approach for members, parish councils and the public.
5. Ensure the member portal provides meaningful defect tracking and visible status updates.
6. Clarify safety-first handling of utility and third-party defects.
7. Improve cross-team escalation and feedback arrangements where issues are referred beyond locality stewards.
8. Narrow and clarify delegated powers over future changes to the manual.
9. Better explain the link between reactive maintenance data and forward planned maintenance programmes.
10. Tighten the drafting of the final manual to remove ambiguities, formatting issues and inconsistencies.

7. Conclusion

The proposed manual is a constructive step forward and contains several welcome improvements, especially the clearer safety focus, simplified category structure and faster response to the highest-risk defects. However, the consultation process has shown that the key challenge lies not in the broad concept but in **delivery, consistency, transparency, governance and strategic integration**.

If those issues are addressed, the revised approach has the potential to provide a more intelligible and effective basis for highway safety inspection under the new contract. If they are not, there is a risk that the council will retain many of the same frustrations experienced under the current system, albeit under a revised set of labels.

For that reason, we encourage officers to treat the points raised in the consultation not as objections to the direction of travel, but as important guidance on what will be required to make the new approach credible, trusted and workable in practice.

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Submitted on behalf of the Independents for Herefordshire