

Appendix F - Highway Defect Investigation Levels

Brent compared with other London Highway Authorities

1.0 Executive Summary

A review of published Highway Safety Inspection Policies from London highway authorities shows that Brent's investigatory levels are typical of the majority of London boroughs operating a risk-based approach under the UK Roads Liaison Group's *Well-managed Highway Infrastructure* Code of Practice.

The benchmarking indicates:

- Brent is aligned with the most common 20mm footway intervention level
- Brent uses a relatively low 20mm carriageway threshold adjacent to kerbs and cycle lanes, reflecting higher risk to vulnerable road users.
- Brent's 30mm general carriageway threshold is more interventionist than many boroughs that now use 40mm.
- Several authorities have increased intervention levels over recent years because of financial pressures and adoption of risk-based maintenance policies.

2.0 London Borough of Brent Benchmarking Against Other London Highway Authorities

Benchmark Indicator	Brent	London Benchmark	Assessment
Footway Investigation Level	20 mm	20–25 mm	□ Typical
General Carriageway Investigation Level	30 mm	30–40 mm	□ More proactive than average
Kerbside / Cycle Lane Threshold	20 mm	Usually 20–40 mm	□ Better than most
Risk-Based Assessment	Yes	Standard Practice	□ Compliant
Hierarchy Based Inspection Frequencies	Yes	Standard Practice	□ Compliant
Well-managed Highway Infrastructure Code Compliance	Yes	Expected	□ Fully Compliant

Data taken from published Highway Safety Inspection Policies.

2.1 London Borough Benchmarking

Borough	Footways (mm)	Carriageways (mm)	Kerbs/Cycle Lanes	Overall Position
Brent	20	30	20	Above Average
Camden	20	30	Risk Based	Comparable
Westminster	20	50	Risk Based	Less Intervention
Hackney	20	40	Risk Based	Less Intervention
Southwark	25	40	Risk Based	Less Intervention
Tower Hamlets	25	40	Lower at Crossings	Less Intervention
Redbridge	20	40	20	Comparable
Hillingdon	20	40	Lower on Cycle Routes	Comparable
City of London*	15	25	Very Low	More Intervention*

2.2 How Brent Compares

Footways - The majority of London boroughs now investigate defects once they exceed approximately 20mm. Brent's 20mm investigatory level is therefore consistent with:

- Camden
- Hackney
- Hillingdon
- Redbridge
- Westminster

Only a small number of authorities have adopted higher thresholds of 25mm, while the former City of London policy of 15mm is now regarded as unusually interventionist and was reviewed because it had become unaffordable compared with neighbouring authorities.

The Benchmark Position is that Brent sits firmly within the London average.

Carriageways Greater variation exists between authorities. Many boroughs now use:

- 40 mm
- 40–50 mm
- dynamic risk assessment

Examples include:

Borough	Threshold
Brent	30 mm
Camden	30 mm
Hackney	40 mm
Redbridge	40 mm
Hillingdon	40 mm
Tower Hamlets	40 mm
Westminster	50 mm

This means Brent investigates more defects than many authorities before considering the dynamic risk assessment.

2.3 Brent's Lower Threshold at the Kerb

One notable feature of Brent's policy is the 20mm threshold within approximately 1.5 metres of the kerb line and in cycle lanes. This reflects increased risk from:

- cyclists
- motorcyclists
- parked vehicles
- vehicles crossing the defect while turning
- drainage channels

Only a minority of authorities explicitly specify this lower threshold in their published policies, although several use reduced thresholds at crossings, cycle facilities or other higher-risk locations.

2.4 Trend Across London

Since adoption of the *Well-managed Highway Infrastructure Code*, authorities have generally moved away from fixed national standards towards:

- risk-based inspections
- dynamic risk assessment
- local investigatory levels
- prioritisation according to available funding

This has resulted in many councils increasing their nominal intervention levels while continuing to inspect regularly and assess wider risk factors. The City of London has explicitly acknowledged that neighbouring boroughs had adopted higher intervention levels due to funding pressures.

2.5 Brent Compared with London Average

Measure	Brent	Typical London Borough
Footway defects repaired from	20 mm	20–25 mm
Carriageway defects repaired from	30 mm	40 mm

Kerbside defects	20 mm	Often 40 mm unless risk dictates
Cycle lane defects	20 mm	Usually risk assessed
Overall intervention level	Relatively proactive	Moderate

Why This Matters

Lower investigation levels generally mean:

- ✓ More defects identified
- ✓ More repairs undertaken
- ✓ Lower likelihood of deterioration
- ✓ Reduced exposure to highway claims

However:

- ✗ Increased revenue costs
- ✗ Greater pressure on maintenance budgets
- ✗ More defects requiring programming

Brent has chosen a relatively proactive position compared with many London authorities.

2.6 Alignment with National Guidance

Requirement	Brent
Risk-based inspections	✓
Highway hierarchy	✓
Dynamic risk assessment	✓
Local investigatory levels	✓
Code of Practice compliant	✓
Asset management approach	✓

2.7 Key Messages

Strengths

- Brent investigates carriageway defects at lower levels than many London authorities.
- Brent uses a 20 mm threshold for footways, consistent with mainstream London practice.
- Brent applies lower intervention levels adjacent to kerbs and cycle lanes, recognising the greater risk to vulnerable road users.

- The Council's inspection policy is fully aligned with the *Well-managed Highway Infrastructure* Code of Practice.

Challenges

- Lower intervention levels generate higher repair volumes.
- Demand continues to exceed available maintenance funding.
- Medium-priority defects may remain outstanding where higher-risk repairs must take precedence.

2.8 Overall Benchmark Assessment

Area	Rating
London Comparison	□ Above Average
Resident Safety	□ Strong
Compliance	□ Excellent
Asset Management	□ Good Practice
Value for Money	□ Good

Measure	Brent Position
Footway threshold	Typical London practice
General carriageway threshold	More interventionist than many boroughs
Kerbside pothole threshold	More proactive than most
Risk-based inspection	Fully aligned with national Code
Overall highway safety standard	Comparable with leading London authorities

Conclusion

Benchmarking against published Highway Safety Inspection Policies from London highway authorities indicates that Brent's investigatory levels are consistent with mainstream London practice.

The Council applies a 20mm intervention level for footway trip hazards, matching the approach adopted by many neighbouring authorities.

For carriageways, Brent generally investigates defects at 30mm, which is more interventionist than a number of authorities that now apply 40mm or higher thresholds.

Brent also applies a lower 20mm threshold adjacent to kerbs and within cycle lanes, reflecting the increased risk to cyclists and other vulnerable road users. Overall, Brent's policy demonstrates a balanced, risk-based approach that aligns with national guidance while maintaining comparatively proactive standards for higher-risk defects.