



CABINET

7.30 pm	Wednesday 7 July 2021	Council Chamber - Town Hall
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Members 9: Quorum 3

Councillor Damian White (Leader of the Council), Chairman

Cabinet Member responsibility:

Councillor Dilip Patel

Deputy Cabinet Memembr for Business Recovery

Councillor Robert Benham

Cabinet Member for Education, Children & Families

Councillor Osman Dervish

Cabinet Member for Environment

Councillor Joshua Chapman

Cabinet Member for Housing

Councillor Jason Frost

Cabinet Member for Health & Adult Care Services

Councillor Roger Ramsey

Cabinet Member for Finance & Property

Councillor Viddy Persaud

Cabinet Member for Public Protection and Safety

Andrew Beesley
Head of Democratic Services

For information about the meeting please contact:

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Webcast

**Please note that this meeting will be webcast.
Members of the public who do not wish to appear
in the webcast will be able to sit in the balcony,
which is not in camera range.**

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Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

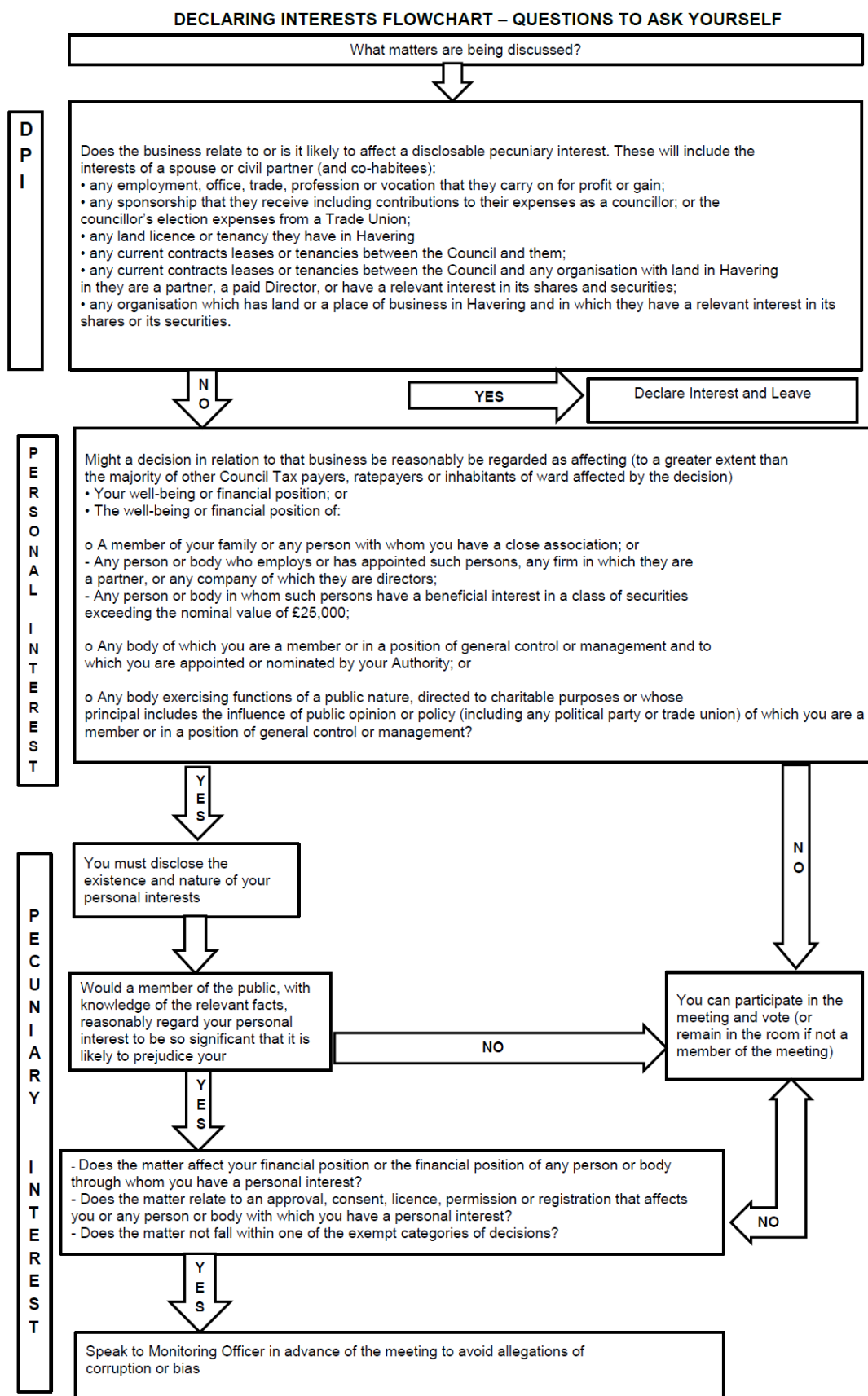
Reporting means:-

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- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.



AGENDA

1 ANNOUNCEMENTS

On behalf of the Chairman, there will be an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

2 APOLOGIES FOR ABSENCE

(if any) - receive

3 DISCLOSURES OF INTEREST

Members are invited to disclose any interests in any of the items on the agenda at this point of the meeting. Members may still disclose an interest in an item at any time prior to the consideration of the matter.

4 MINUTES

To approve as a correct record the minutes of the meeting held on 17 March 2021, and to authorise the Chairman to sign them.

5 CONSIDERATION OF THE REPORT OF A TOPIC GROUP - COVID-19 PANDEMIC COMMAND RESPONSE TOPIC GROUP (Pages 1 - 18)

Cabinet will give consideration to this Topic Group report at the request of the Overview and Scrutiny Board, pursuant to Executive Procedure Rules paragraph 6(e).

6 DECISION TO INCREASE ALLOWANCES AND BENEFITS FOR IN-HOUSE FOSTER CARERS. (Pages 19 - 42)

7 DECISION TO BEGIN A CONSULTATION IN RESPECT OF HAVERING'S STREET TRADING POLICY (Pages 43 - 200)

8 EAST LONDON JOINT RESOURCES AND WASTE STRATEGY - APPROVAL OF PUBLIC CONSULTATION (Pages 201 - 302)

9 EXCLUSION OF THE PRESS AND PUBLIC

The report included in agenda item 10 contains exempt documents, namely Appendices 1 to 4 inclusive. Cabinet will consider whether the public and press should be excluded from the meeting on the grounds that it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public were present during that item there would be disclosure to them of exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972; and, if it is decided to exclude the public and press on those grounds, Discussion of public papers can be transacted in public. Cabinet to resolve accordingly on the motion of the Chairman in relation to discuss on exempt matters.

10 PUBLIC REALM TRANSFORMATION- NEW OPERATING MODEL (Pages 303 - 376)

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REPORT OF THE OVERVIEW AND SCRUTINY BOARD

Cabinet: 7 July 2021

OVERVIEW AND SCRUTINY BOARD: COVID-19 PANDEMIC COMMAND RESPONSE TOPIC GROUP

At its meeting on 10 March 2021, the Overview and Scrutiny Board agreed to submit to Cabinet the report of the Covid-19 Pandemic Command Response topic group. The report is attached and, in accordance with Overview and Scrutiny Procedure Rule 11, Cabinet is RECOMMENDED to:

- 1. Consider the attached report of the Overview and Scrutiny Board: Covid-19 Pandemic Command Response Topic Group**
- 2. Agree whether to accept the topic group's recommendations a – f as shown in the attached report and to give reasons if Cabinet does not wish to accept any or all of the recommendations.**

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Overview & Scrutiny Board

REPORT

Subject Heading:

REPORT OF THE COVID-19 PANDEMIC
COMMAND RESPONSE TOPIC GROUP

SLT Lead:

Andrew Beesley – Head of Democratic
Services and Statutory Scrutiny Officer

Report Author and contact details:

Andrew Beesley – Head of Democratic
Services
Andrew.beesley@onesource.co.uk

Policy context:

Overview & Scrutiny

Financial summary:

None in this covering report

The subject matter of this report deals with the following Council Objectives

Communities making Havering	[X]
Places making Havering	[X]
Opportunities making Havering	[X]
Connections making Havering	[X]

SUMMARY

This report contains the findings and recommendations that have emerged after the Topic Group scrutinised the topic selected by the Committee in October 2020.

There are no financial, legal or HR implications attached to this covering report.

RECOMMENDATION

That Members:

1. Note the report of the Covid-19 Pandemic Response Topic Group (attached);
2. Consider and decide whether to refer the recommendations of the Topic Group to a meeting of the Cabinet;

REPORT DETAIL

At its meeting in October 2020, the Overview & Scrutiny Board agreed to establish a Topic Group to review the impact of the COVID pandemic and the Council's emergency planning response to it.

Attached is a copy of the Topic Group's report. The report includes details of the research that it undertook in reaching the conclusions set out.

REPORT OF OVERVIEW & SCRUTINY BOARD COVID-19 PANDEMIC COMMAND RESPONSE TOPIC GROUP

BACKGROUND

At its meeting on 13 October 2020, Overview & Scrutiny Board commissioned a number of Topic Groups to review the impact of the COVID pandemic and the Council's response to it.

The terms of review for this Topic Group was the Council's response to the COVID pandemic; specifically, the emergency planning arrangements and communication strategy.

The Group established a timetable to review relevant documents and to meet virtually with members of staff and public section partner agencies.

The membership of the Topic Group consisted of Councillors Keith Darvill (Chairman), Ray Morgon, Christine Smith and Linda Hawthorn.

The Group met on four occasions and has now concluded its review; identifying recommendations and findings which are detailed in this report.

THE SCOPE OF THE REVIEW

Overview & Scrutiny Board recognised that the scope of the pandemic was such that commissioning a single Topic Group to assess its impact and the preparedness of the Council in responding to it was unrealistic. It therefore established three separate Topic Groups charged with exploring specific areas of interest.

The focus for this Topic Group concerned the Council's emergency planning arrangements and the operation of its Command Structure. It therefore concentrated on the following key areas:

1. Review the Council's influenza-pandemic plan and develop an understanding of the Council's Command structure. Challenge and review planning assumptions contained within the plan (was the response proportionate to the risk);
2. Understand and explore the relationship between the Command structure and the Borough Resilience Forum;
 - a. With reference to the Community Resilience Development Framework, was there sufficient support for individuals identified at being of greatest risk? How are we doing it and what worked well/not so well (lessons learnt)
 - b. Promotion of the pandemic plans/Command responses into Member organisations from the business and voluntary sector. How was it communicated and were there any areas for improvement?

- c. Was the Resilience Plan tested pre-Covid? If so, what were the improvements gleaned from it?
3. Communication roles between Command, the Resilience Forum and elected Members. How the council communicated government guidance on responding to the pandemic and impacts on service provision.

METHODOLOGY

The Group agreed that the list of people to be interviewed would comprise the following members of staff -

Andrew Blake-Herbert	Chief Executive and Strategic Gold Command
Dr Mark Ansell	Director for Public Health and Tactical Silver Command
Robert South	Director for Children's Services
Trevor Cook	Assistant Director for Education, Learning & Achievement
Gareth Nicholson	Assistant Director for Customer and Communications
Trevor Meers	Corporate & Community Resilience Manager
Lilly Pannifer	Emergency Planning Officer

The Topic Group also met with a pool of representatives from the Borough Resilience Forum. The Topic Group recognised the pressures faced by wider cohort of representatives and delayed matters until the pressure of the third lockdown was beginning to ease. This delayed the reporting of the Topic Group's findings however Members considered it necessary to delay until this aspect of the review had been completed.

A Member survey would be conducted to establish the extent of understanding and awareness of the authority's emergency planning powers.

From the outset, Topic Group Members appreciated the scale of the pandemic and the impact its longevity was having on the operation of Council services. Members quickly established that conducting a review mid-pandemic would have its limitations, not only the availability of key contributors but also the fluid nature of the evolving emergency response to it. Members therefore focussed on specific areas where tangible differences could be made which would not impede the ability of those charged with emergency planning powers to undertake their statutory duties.

TIMETABLE FOR REVIEW

Members were hoping to complete the review within as short a timescale as possible. It was recognised however that it would be a challenge given the ongoing nature of the pandemic and the impact of changing restrictions on the availability of key contributors.

Members were however grateful for the commitment of staff to the review, many of whom were integral to the pandemic effort and prioritised the review above other competing matters.

THE REVIEW

The notes of the meetings and discussion are listed as background papers. Set out under the heading **RECOMMENDATIONS / CONCLUSIONS** are the key issues that emerged from the scrutiny.

MEETINGS

The Topic Group met virtually on four occasions.

The first session that took place reviewed the Council's emergency plan arrangements for responding to a pandemic. The associated emergency plans are restricted documents and not available for public consumption. Accordingly, the notes of that meeting are restricted also.

At the second meeting, the Topic Group received a detailed presentation from the Assistant Director for Customer and Communications, setting out the Council's strategy for communicating its response to the pandemic.

At the third meeting, the Topic Group met virtually with senior officers involved in the Council's Command structure. The session focused on the implementation of the emergency plans and the operational impact the pandemic on the Council's operations and its response to it.

At its final meeting, the Topic Group met with representatives from the Borough's Resilience Forum to better understand how public sector bodies had co-operated to respond to the pressures exerted by the pandemic.

The Topic Group also observed a virtual meeting of the Council's Tactical Silver Group, the notes from which are exempt from public disclosure. Attendance at the virtual meeting was to assist Topic Group members in their understanding of how the Council was responding to the pandemic. It was not a meeting commissioned by the Topic Group and Members took no active part in the meeting.

REVIEW OF PAPERS / DOCUMENT SUBMISSIONS

The Topic Group has carefully reviewed the documents and presentations provided to it as part of the scrutiny, many of which are exempt from public disclosure. The notes from meetings undertaken as part of the review have also been adapted such as not to reveal exempt information.

FINDINGS

1. Influenza-type Pandemic emergency planning and the operation of the Command Structure

- The rapid transition into an emergency planning situation and the mobilisation of the associated pandemic plans and Command Structure demonstrated to the Topic Group that emergency planning was firmly embedded practice in the Council. This was demonstrated by examples such as the rapid rollout of the smart working from home initiative, the scaling up of Operational Bronze Command Response Groups, and the shielding call response effort.
- Testing of emergency plans is undertaken as a routine practice. The current emergency plans were tested in April 2019. This reinforces the above statement that emergency planning arrangements are well established amongst the officer cohort.
- The redeployment of staff to support frontline services was critical in supporting the pandemic relief effort, particularly in areas such as shielding calls, test and trace, and the Operations Hub.
- Staff working from home and the rapid rollout of laptops as part of the smart working programme had contributed in part to a reduction in staff absenteeism rates.
- Feedback from a councillor survey established that understanding amongst the cohort around emergency planning and the Council's civil contingencies responsibilities was limited.
- The scale and longevity of the pandemic has exceeded all previous pandemic planning scenarios. For example, lockdown restrictions had not previously featured in any pandemic planning. Emergency plans have therefore been modified throughout key stages of the pandemic, however the core of the Command Structure and the governance framework which supports it has remained intact and effective.
- Government changes in local and national restrictions have often come at such short notice that the ability for council services to respond, adapt and implement has been a considerable challenge. The most notable example has been in schools where the landscape through the course of the pandemic has changed considerably. The Topic Group had confidence in the communication channels that existed to ensure that messages were clearly communicated between the council, schools and parents, the relationship between the latter two being particularly important. Topic Group Members were however concerned at the volume of short notice changes introduced by the Government and the disruptive impact this had on parents, pupils and school staff.
- The Topic Group recognised the effort and commitment of the Chief Executive and his senior management colleagues in ensuring openness and transparency in COVID-related during decision-making

through the pandemic. This was reflected in the results of the Member survey. The Topic Group is however concerned by the timeliness of decision-making and that many of the executive decisions produced were retrospective and therefore added little in the way of added value for Members.

- The results from the Member survey indicated a mix response when the question was posed as to whether civil contingencies responsibilities were understood amongst the cohort.
- Concern about long term impact for staff mental wellbeing with the extended period of remote working and the long working hours experienced by some. Recognised the pastoral support available to staff, coupled with frequent internal communications on how best to cope through the pandemic.
- Concern that there was insufficient reporting of how the pandemic had impacted on business as usual activities and how that was being monitored.
- The long term impact of the pandemic on the Council's finances and how it would meet the costs in future years.
- Reflection on how the emergency plans stood up to the pandemic and what has worked well and what needs to change for future such emergencies is essential and should incorporate input from Members.

2. Understand and explore the relationship between the Command structure and the Borough Resilience Forum

- The importance of collaborative working across public sector agencies in order to break down a silo mentality for the benefit of the public.
- The critical role the Council's Emergency Planning team play in supporting other public sector organisations.
- That the bodies which comprise the Forum often cover a much wider geographical area. The extent of the pandemic has put those resources under considerable strain.
- External communication messages by public sector organisations needs to be monitored by the Forum. There were concerns about consistency of messaging and ensuring that there were targeted comms which focussed on matters of local relevance.
- The frequency in changes to legislation afforded limited opportunity for organisations to make operational changes resulting in confusion around matters such as enforcement and best practice.

3. Communication roles between Command, the public and elected Members. How the council communicated government guidance on responding to the pandemic and impacts on service provision.

- The Topic Group were impressed with the effectiveness of the “DoingMyBit” campaign, noting that it received national recognition through a Bronze Award in the Public Service Communications Excellence Awards 2020
- The creation of a Bronze Command Sub-Group dedicated solely to communications was important in co-ordinating and delivering key messages and service updates.
- The importance and effectiveness of social media as a proactive communication tool for the dissemination of Government guidance and legislation. The Council’s website was important for providing accurate and up-to-date information on changes to Council services.
- The Topic Group noted with interest the introduction of targeted advertising campaign through mobile Ad-vans and billboards, however they were unsure as to the effectiveness of such methods. There was a wider concern about how communication campaigns were evaluated for the effectiveness and how it could inform future campaign strategies.
- More traditional communication methods such as a borough-wide letter drop remained in order to ensure coverage for more hard to reach sections of the community who did not have access to technology.
- There was a correlation between targeted campaigns such as mass testing with subsequent uptake in the number of tests being administered.
- Noted with interest the diverse age range of visitor numbers through the Council’s various social media channels, with Facebook being particularly popular.
- Almost a quarter of all households in the borough are signed up to receive the Living bulletin email.
- The importance of updated internal communications for staff. Particularly support and wellbeing given remote working and isolation experienced by some.
- As community leaders there is little opportunity for Members to report issues of local importance to the Council other than through the same channels as residents, or indeed for Members to undertake that role on behalf of the Council.

RECOMMENDATIONS / CONCLUSIONS

- 1. On behalf of the members of the Topic Group and the Overview & Scrutiny Board, to thank all Council staff, public and voluntary sector bodies and for their dedication and commitment in responding to the pandemic.**
- 2. The Topic Group was assured that emergency planning and awareness and understanding of the Council's emergency plans, including the Influenza Pandemic and Excess Deaths Plans, were firmly established practices amongst those who had responsibility for such matters.**

That the Council had tested its emergency plans less than 12 months prior to the pandemic stood it in good stead for the impending pandemic. The preparedness was exemplified by the continuation of key council services such as waste collection, registration services, and children and adult social care services. That also extended to the support offered to public sector partners through the Resilience Forum and the excellent work undertaken by the Emergency Planning Team.

Furthermore, the mobilisation of the smart working programme enabling staff to work remotely and the redeployment of staff unable to work from home to support critical initiatives such as shielding calls for the vulnerable and the operation of the distribution hub exemplified the Council's preparedness for the pandemic.

There was however concern regarding the impact of the pandemic on business as usual activities and how such matters were being formally reported and monitored by Members.

The establishment of a dedicated Bronze Communications Group was effective in co-ordinating messaging to the public and other key stakeholders such as businesses and voluntary groups. There was clear and consistent messaging for the most part in respect of impact on local services, public health messages around testing and vaccination and support that was available through initiatives such as business grants and rate relief. Where there was inconsistent messaging (eg. parking charges), it caused confusion to the public and Councillors alike.

The Topic Group is concerned about the impact to the Council's finances and will monitor closely the strategy to offset the significant loss of income incurred over the past 12 months.

- 3. Where The Topic Group considered improvements could be made to emergency planning and the response to the pandemic was in respect of the role of Elected Members. The intention here is to**

recognise that civil contingencies responsibilities rest largely with professional officers who are trained and experienced in responding to emergencies. Members do however play a key role as community leaders. It is the view of the Topic Group that their resource and expertise has not been utilised to its fullest extent. The following recommendations are therefore proposed:

- a. That Members receive annual mandatory training on the Council's Civil Contingencies responsibilities and emergency plans, including as part of the Member induction process.
- b. That guidance be issued to Members on their roles and responsibilities during a local or national emergency.
- c. That the governance arrangements around decision-making using civil contingencies powers and the issuing of special urgency decisions be explained with a report presented to a future meeting of the Council's Governance Committee.
- d. Support the continuation of All Member Briefings in the event of a local or national emergency.
- e. That consideration be given to establishing a dedicated communication channel for Members to inform the Council of live issues experienced in local communities during an emergency.
- f. That Overview & Scrutiny and the wider Council membership be involved in any lessons learnt initiatives as part of the pandemic plan review, including a review of the Council's emergency plans.

ACKNOWLEDGEMENTS

The Topic Group Members wish to place on record their thanks for the very positive approach displayed by members of staff during the course of this review.

Background Papers

Topic Group meetings notes:

19 October 2020

5 November 2020

12 November 2020

24 February 2021

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Covid-19 Pandemic Response Topic Group – Member survey

BACKGROUND

As part of its review into the Council's response to the Covid pandemic, the Topic Group conducted a survey of Council Members to establish their understanding and awareness of the authority's emergency planning powers.

The survey consists of the following three questions:

- 1. You have a knowledge of the Council's responsibilities under the Civil Contingencies Act 2004?**
- 2. You have been kept informed of the Council's response to the pandemic?**
- 3. You found the regular All Member Briefings on COVID led by the Chief Executive to be useful and informative?**

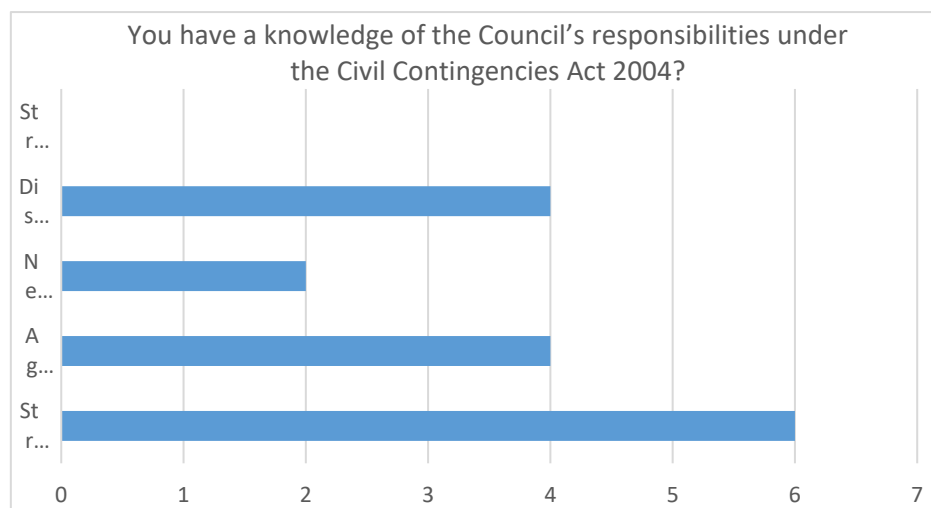
Members were also afforded the opportunity to provide comments in respect of the questions posed.

DETAIL

A total of 16 responses were received (response rate of 29.6%)

Question 1. - You have a knowledge of the Council's responsibilities under the Civil Contingencies Act 2004?

In respect of Question 1, 6 of the 16 respondents selected 'Strongly Agree.' The next popular response was shared equally between 'Agree' and 'Disagree' (4 each). Of the 16 responses received, none were marked as 'Strongly Disagree.'

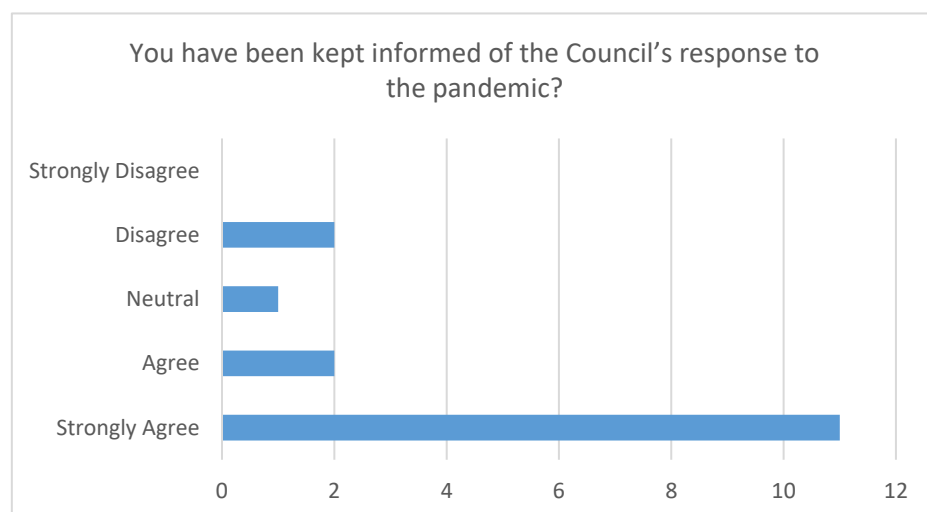


Q2 - You have been kept informed of the Council's response to the pandemic?

In respect of Question 2, the overwhelming majority of Councillors agreed or strongly agreed that they had been kept informed of the Council's response to the pandemic. Only 2 of the 16 responses received disagreed with that statement.

Member's comments revealed that the Leader's external bulletins, which are sent to the residents on a weekly basis, were an important form of communication for keeping both residents and Councillors informed. However, some Councillors have requested that the bulletin focuses on more localised statistics as opposed to National data as this already readily available across in the public domain.

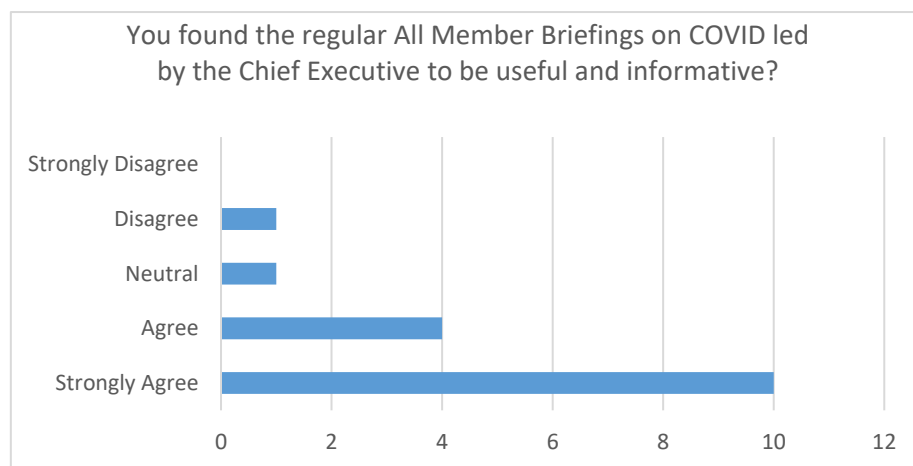
Two Councillors commented on the role of Councillors in the Council's pandemic response, with one requesting that Ward Councillors play a greater role during the pandemic response as Leaders. The other Councillor felt that opposition Councillors have been deliberately excluded from the process by the Chief Executive and the Leader.



Q3. You found the regular All Member Briefings on COVID led by the Chief Executive to be useful and informative?

Similarly to the results of the previous question, the overwhelming majority Councillors considered that the Chief Executive's All Member Briefings have been useful and informative, with all but two Members voting for either *strongly agree* or *agree*.

However, again it was noted that information delivered during these briefings should be more localised. Furthermore, some Councillors commented that the briefings have lost speed since the autumn with there being only two in the past two months.



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CABINET

Subject Heading:

Increased allowances and benefits for in-house foster carers

Cabinet Member:

Councillor Robert Benham, Deputy Leader, Lead Member for Children and Learning.

SLT Lead:

Robert South, Director, Children's Services

Report Author and contact details:

Ian Elliott, Head of Innovation and Improvement ian.elliott@havering.gov.uk

Policy context:

Ensuring sufficient quality in-house foster care for children in care

Financial summary:

Refer to "cost impact of new rates" on p5.

Is this a Key Decision?

Yes. Significant effect on two or more wards.

When should this matter be reviewed?

January 2022

Reviewing OSC:

Children and Learning OSSC

The subject matter of this report deals with the following Council Objectives

Communities making Havering
Places making Havering
Opportunities making Havering
Connections making Havering

[X]
[]
[]
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SUMMARY

1. As corporate parents our ambition is to recruit and retain the best foster carers to provide the best possible care for our Looked After children. This decision proposes to improve our offer to prospective and existing carers, by increasing some specific allowances to “in-house” foster carers, in addition to providing additional benefits such as council tax exemption, complimentary access to leisure facilities at borough leisure centres, free parking and free green bin collections for all in-house carers.

RECOMMENDATIONS

2. It is recommended to increase both the support and the financial incentives provided to ‘in-house’ carers in order to increase retention of our in-house foster carers by:
 - a. increasing the financial allowances as set out in Appendix 1 and improve a comprehensive wrap-around support package as covered in this report;
 - b. approve Havering resident foster carers as a class subject to Council Tax Relief from 1 April 2021.
 - c. approve the amendment to the Council Tax Discretionary Policy to include Havering foster carers with effect from 1 April 2021
 - d. providing complimentary access to the borough’s leisure centres for in-house carers and children in their care;
 - e. waiving free green bin refuse collection charges; and
 - f. offer free parking in resident bays and council carparks borough-wide, this will not include paid for parking bays.

REPORT DETAIL

Background

3. As corporate parents our ambition is to recruit and retain the best foster carers to provide the best possible care for our Looked After children. In 2020 the borough published a new Corporate Parenting strategy, a key priority in which is to keep children in our care within (or as close to) the borough as possible.
4. Our “in-house” foster carers are central to our aims to secure the best possible outcomes for children in our care. The rates and benefits provided to the carers who care for some children are no longer attractive in the competitive market and as such the borough is experiencing difficulty recruiting new carers and retaining existing.

5. This decision proposes to improve our offer to prospective and existing carers, by increasing some specific rates, in addition to providing additional benefits such as council tax exemption, complimentary access to leisure facilities at borough leisure centres, free parking and free green bin collections for all in-house carers resident in the borough.

Current position

6. There are limited options when children come into our care and “in-house” fostering is the preferred option because it enables children to remain close to their connections and for the borough to support them (and their carer family). However, options of in-house care have been limited in the last two years due to the number of foster carers entering, the ageing cohort of existing carers, carers supporting young people post their 18th birthday (known as Staying Put) and the number of carers exiting.
7. In spite of a concerted effort to improve the offer to carers, some fostering families choose to no longer care for children and the COVID pandemic has had a profound effect on this. The success and need for Staying Put arrangements has increased and is likely to increase, thus reducing the number of available “in-house” carers further.
8. When assessing a family as foster carers for a child in our care, the needs and age of the children play a role. Carers are provided with a weekly allowance dependent on that need, along a five-point scale and age phase (0-10 year old and 10 years and over). The number of in-house carers in April 2020 was 79 and the figure remained the same in March 2021, at 79 as some new carers were recruited and others ceased.
9. The borough operates in a competitive market, to attract and retain “in-house” carers. Whilst the number of referrals to Children’s Social Care has increased consistently over recent years, the number of Looked After Children has remained broadly consistent over the last five years, thanks to our early help interventions. We currently have a lower “rate per 10,000” Looked After Children than our statistical and London neighbours, but we can reasonably expect for this number to increase as we exit the global pandemic.
10. The Face To Face Pathways innovation programme worked to stabilise the foster care home environment for those children and young people whose needs would have ordinarily been met by Independent Fostering Agencies (IFAs). An independent report into the programme by the University of Bedfordshire (commissioned by the Department for Education) was published in the summer of 2020. It found that by adapting in-care provision to support systemically trained and intensively supported foster carers, the programme was able to stabilise care for children with complex needs and avoid the need to move children to residential care.
11. The allowance paid to Pathways carers under the above scheme was increased in 2017 to be more competitive. The evaluation report into the innovation programme concluded that the programme was successful in reducing the need

for residential care in the IFA market for children with more pronounced need, particularly with those under 10 years of age.

Alternative options to “in-house” care

12. The options available when a child comes into care, aside from in-house care, include:

- Friends and Family Support (Connected Carers), often a preferred option because this delivers better outcomes for the child, who remains with relatives connected to the family, while accessing support and training via the Fostering team.
- Independent Fostering Agencies (IFAs) are commissioned using a Pan London Framework, where base rates have been negotiated. We have successfully reduced our use of IFAs over the last three years, largely connected to the Face To Face Pathways innovation programme as noted above and currently utilise around 60 places at any one time. Alongside, the spend paid to IFAs has decreased by a third in the last three years. We have seen an increase in the number of over 13 year olds cared for by IFAs in the last year, as in-house options have decreased, in part impacted by carers supporting young adults post-18 years under Staying Put Arrangements as noted above.
- Residential care is the most expensive option and required where there are greater needs and a specialist assessment required or there is not appropriate availability in other types of provision. Again, the average age of children in residential care is now approximately 13-15 and our use of residential has increased during this year.

13. With a likely increase in the number of carers being required as we exit the pandemic, alongside a stagnation of the net number of in-house carer numbers throughout 2020, the costs to the borough could rise significantly over 2021-22 as we would increasingly rely on the IFA market. Use of an IFA on average results in an additional annual cost of approximately £24,000 per child to the local authority (based on average data from 2019-20 financial year).

Proposals

14. In spite of concerted efforts to recruit and retain, the borough is no longer competitive as a destination for potential carers at levels 1-3. Many new carers come via word of mouth and feedback from the Havering Foster Carers Association is that our offer is no longer preferable to other boroughs and the independent sector. The borough is not unique in this challenge; Ofsted published a national report in November 2020 noting that recruitment of in-house carers was a significant difficulty for all the local authorities and agencies used in their study. The shortage of suitable carers was the most significant barrier to making a good match with the child and ultimately a successful caring place for them.

15. By increasing both the support provided and financial incentives to carers we aim to reduce future costs of the service by increasing the number of in-house options, as well as ensuring that in-house foster carers have the financial resources to provide the best care possible for children in their care. This decision seeks to increase retention of our in-house foster carers resident in the borough by:

- providing them with more financial resource and stability;
- a comprehensive wrap-around support package;
- reduction in Council Tax;
- complimentary access to the borough's leisure centres for in-house carers and children in their care;
- free green bin refuse collection; and
- free parking in resident bays and council car parks throughout the borough (with maximum stay / return restrictions).

16. This decision proposes that we increase our rates at level 1, 2 and 3 for all age groups by between 25%- 40%. This increase will enable the authority to become financially competitive in the foster care market and ensure existing foster carers remain with the borough. Additionally, increasing these rates will attract experienced carers who may be registered with IFAs in Havering and neighbouring boroughs.

17. As seen from the data below, Havering is no longer competitive in our level 1, 2 and 3 rates whereas our specialist level 4 and 5 rates remain somewhat competitive with other local authorities.

18. We currently have a critical shortage of fostering available in spite of an increase in enquiries. Due to a lack of capacity of in-house carers, children are cared for by external IFAs and this on average results in an additional annual cost of approximately £24,000 per child (based on average data from 2019-20 financial year). As such, an increase of in-house capacity of ten new carers would result in a minimum yearly cost avoidance of approximately £240,000 (minimum, because carers may be eligible to care for more than one child).

19. Cost reduction would be achieved if young people are moved from IFA arrangements to in-house (either the same carer or to an in-house carer family). However our progress to recruit in-house carers (other than Family and Friends) has not enabled us to achieve these goals.

Comparison with other Local Authorities

20. Data was collected from six geographically close boroughs, and five are shown in the graphs listed in Appendix 1 to this report. As seen from Table 1 and Figure 2, 3 and 4 in Appendix 1, Havering is currently the lowest paying at all levels and at all age ranges when compared to the other local authorities.

21. For example where foster carers are looking after 0 – 10 year old children, Havering's level 3 rate in this age group is between £315 - £338 per week. This means that Havering is around £57 per week below the average at level one, £99 below level two and £185 below at level three.

22. Carers with a child in their care aged 11 – 15 can expect to receive between £332 per week at level one in Havering to £383 at level three, this is a difference of £51, whereas Borough E has a difference in rates from level one to three of £200. The increase between Havering's level one, two and three rates are closer than other neighbouring boroughs.
23. The local authorities in benchmarking also show an increase of up to twice Havering's increase between levels one, two and three. This is again lower than the level one rate of our competitors. For 16+ years, Havering is £63 per week below the average at level one and £117 at level two.
24. From the data, it can be seen that Havering's rates at specific levels are not financially competitive which is consistent with the feedback from the Havering Foster Care Association consultations of late 2019 and early 2020.
25. This decision proposes that we increase our rates at level 1, 2 and 3 for all age groups by 25% - 40%. This increase will enable the authority to become financially competitive in the foster care market and ensure existing foster carers remain with the borough and additionally attract experienced carers who may be registered with IFAs in Havering and neighbouring boroughs.

Cost impact of new rates

26. Based on the current cohort of carers receiving levels 1, 2 and 3, the total estimated additional cost of the increase proposed would be £408,044 per year. Refer to table 3 in Appendix 1 for a detailed breakdown.
27. These costs would offset exponentially more costly IFA which are on average £24,000 per year more expensive.
28. The investment in rates will be returned over six years as follows. The Children's directorate plans to use £408,000 of the demographic growth already allocated to the budget for 2021/22 to fund this proposal.

Fostering In house Strategy	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
MTFS Permanent Growth	408							408
MTFS Saving (Budget reduction)	(120)	(24)	(48)	(48)	(48)	(48)	(72)	(408)
Total	288	(24)	(48)	(48)	(48)	(48)	(72)	0

Foster carers transferring from an IFA to Havering

29. Increasing our rates could incentivise foster carers currently registered with IFAs to transfer to Havering. This would reduce costs significantly. Two recent examples are listed in the table below and detail can be found in the case studies in Appendix 1.

Savings made when foster carers transferred to Havering from an IFA

Foster carers	Savings/month	Savings/year
A	£2,000	£24,000
B	£5,200	£62,400

Council Tax Relief for Foster Carers

30. The Service propose that resident in-house foster carers (excluding family and friends) registered with Havering, are treated as a class eligible for Council Tax relief under Section 13A(1)(c) of the Local Government Finance Act 1992.
31. The Council Tax Discretionary Policy has been updated in accordance with this proposal and is attached at Appendix 2.
32. This is consistent with our Corporate Parenting responsibilities and an incentive that has already been introduced in many areas in England, such as Southwark Council and more recently Thurrock Council who are also one of many competitors in the fostering market.
33. Southwark Council implemented their policy in 2015 to provide up to 100% Council Tax relief for all of their resident foster carers. Thurrock Council will be implementing full relief from Council Tax for foster carers from 1 April 2021. Redbridge Council foster carers receive a twice-yearly bonus payment of up to 80% of the Council Tax they have paid in the previous six months.
34. Currently, there are 79 in-house foster carers registered with Havering Council. If the wraparound support package proposed in this report is approved, the number of foster carers is likely to increase.
35. To illustrate the effect on the Collection Fund, the table below sets out the cost of providing full Council Tax relief to foster carers over a five year period. A Council Tax Band D average of £1,893.30 is assumed per household for Year 1 to Year 5. The actual cost will depend upon future decisions on the level of Council Tax and Adult Social Care precept.

Estimated cost to the Collection Fund for Council Tax relief to foster carers							
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
No. of foster carers	84	85	87	89	91	93	96
CTax per foster carer	£1,893	£1,893	£1,893	£1,893	£1,893	£1,893	£1,893
Annual Cost	£159,037	£160,931	£164,717	£168,504	£172,290	£176,077	£181,757
Cumulative Cost	£159,037	£319,968	£484,685	£653,189	£825,479	£1,001,556	£1,183,313

Complimentary access to Havering leisure centres via Everyone Active

36. The benefits of exercise are well established and the borough's corporate parenting responsibility (which has health as a key component) extends to those who care for our children. The mental and physical health of young people is a priority and the council's delivery partner, Everyone Active, will grant complimentary access to the borough's leisure centres to the borough's foster carers (during times they have children in care placed with them). This opportunity in partnership Everyone Active extends to the borough's swimming pools, leisure centres, and Sapphire Ice and Leisure. Everyone Active recognise the vulnerability of children in care and aim to create a positive impact on the communities in which they work. This initiative is a clear example of corporate social responsibility and a critical contribution to the borough's most vulnerable children and young people.

Parking and garden waste service

37. Other local authorities have implemented subsidised parking for In-house foster carers commonly referred to as a Carer's Permit, allowing foster carers to park in specific areas for free or by paying a small monthly/yearly fee. For example, Waltham Forest offer a free carers permit if the person is a registered foster carer who lives within a controlled parking zone (CPZ), allowing the carers to commute and park easily within other CPZs in the borough. Barking and Dagenham also operate a carers permit which provides free parking in 'residential permit holders only', which costs £83.50 for 6 months or £125 for 12 months. Based on the Havering Heroes scheme, we propose to implement a similar scheme where foster carers resident in Havering have free parking in resident bays and council car parks borough-wide, with no maximum stay implications. The "carers permit" will not be permitted for use in paid for parking bays on street.

38. The permit will be issued annually by the e-permits system and be valid for the financial year it is implemented for. For example, if a permit is applied for in June it will be valid from June to 31st March.

39. Evidence of being a resident foster carer will be required in order for the application to be agreed.

40. A carer's permit for foster carers does not currently exist so no income loss will be applicable for this new permit. Consistent with aiming to be the best corporate parents and to offer incentives to residents to become carers, we are proposing to implement an exemption on garden waste services. The current charge for 2020/21 is £50.60 per bin, with an annual current cost for 80 carers of £4,048.

41. The exception will be issued annually and be valid for the financial year it is implemented for. For example, if an exception is applied for in June it will be valid from June to 31st March.

42. Evidence of being a resident foster carer will be required in order for the application to be agreed.

43. The service has assessed tonnage implications and costs for this scheme. These will be negligible at 22 tons a year based on 80 foster carers per annum.

Wrap-around Support

44. Alongside the allowances and financial incentives discussed above we are confident that our support package to carers remains amongst the best in the country. We have adopted systemic practice training for carers and a dedicated support group for the “Pathways Carers” who care for those children with the most need is in place. We are implementing non-violent resistance training for carers and there are two Advanced practitioner supervising Social Workers supporting carers and a dedicated Family therapist.
45. Other planned developments include: 24/7, 365 days per year bespoke out of hours support, engagement activities for households via the Havering Foster Carers Association, training and support with professional development and support in meeting the multicultural/religious needs of children. These initiatives and incentives are being delivered by our core services, from existing budgets.

REASONS AND OPTIONS

Reasons for the decision:

46. This decision proposes to improve our offer to prospective and existing foster carers, by increasing some specific rates, in addition to providing additional benefits such as council tax reduction, complimentary access to leisure facilities at borough leisure centres, free parking and free green bin collections for all in-house carers. The proposals in this report will enable the borough to compete better in the foster carer market and make the borough a destination of choice for local foster carers.

Other options considered:

47. Other options considered:

Option 1: Do nothing.

This option is not recommended as doing nothing will mean fewer in-house carers and higher reliance on the independent market, where costs are dictated by competition. Alongside, outcomes for children in our care would not be as strong and likely to impact at the borough’s next Ofsted inspection.

IMPLICATIONS AND RISKS

Financial implications and risks:

48. This decision proposes that we increase our rates at level 1, 2 and 3 for all age groups by 25% - 40%. The proposed scenario of fee increases it is an invest to save scheme with a financial impact of c£408k per year and potential payback over 7 years (please see table below). Yearly investment return is calculated as a £24k yearly average of fee reductions per case transferring from IFAs to Havering. Incorporating the proposed benefits to foster carers will have an adverse financial impact of £1,211k over the next 7 years, £1,183k on Council Tax budget and £28k on Parking and Garden Waste Management, which will be covered fully by corporate budget.

Fostering In house Strategy	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Investment of approved MTFS growth budget	408							408
Return on foster care cases-CHI Budget	-120	-24	-48	-48	-48	-48	-72	-408
Cases Transferring from IFAs to Havering	5	1	2	2	2	2	3	17
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Garden waste service	4	4	4	4	4	4	4	28
Complimentary access to Havering leisure centres via Everyone Active	(tbc)	(tbc)	(tbc)	(tbc)	(tbc)	(tbc)	(tbc)	
Overall Impact	292	-20	-44	-44	-44	-44	-68	28

49. The actual yearly investment return figures will depend on:

- existing cases transferred from external agency to internal house foster placements
- and, as many as possible new placements placed directly with in house foster carers.

50. The specific financial impact of the access to the leisure facilities cannot at present be quantified. Similarly the loss of income from the parking permit proposal would depend on the uptake.

51. The increases in fees will make the in house foster scheme in the borough more competitive and attractive. This, in turn, will translate in more foster carers and attractive placements and will potentially mitigate the financial risk of increased costs due to fees and benefits given to foster carers. The impact of the proposal on the costs of the service will be reviewed as part of the council's financial monitoring process.

Collection fund -impact on Council tax collection

52. The exemption for foster carers is estimated to result in a reduction of the council tax as follows:

Council Tax Exemption	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Council Tax Exemption	159	161	165	168	172	176	182	1,183

53. The exemption will result in a reduced council tax base which is used each year when calculating the annual council tax product.

Legal implications and risks:

54. The Council has duties to ensure that, so far as possible, children it looks after must be placed near their home and that their education or training is not disrupted (s 22C (8) Children Act 1989). The proposals in this Report seek to ensure that the Council can meet this statutory duty.

55. The proposal to increase the premium to attract more suitable foster carers is lawful.

56. The Council does have a discretion to reduce or exempt certain categories of persons liable to pay Council Tax pursuant to s 13 A (1) (c) Local Government Finance Act 1992. This and the other proposed steps to waive charges such as for waste collection, access to leisure and parking are within the Council's discretion as long as they are exercised reasonably and they comply with the Equality Act 2014 including the public sector equality duty.

Human Resources implications and risks:

57. The recommendations made in this report do not give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

Equalities implications and risks:

58. The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex/gender, and sexual orientation.

59. The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

Health and Wellbeing implications and Risks

Havering Council is committed to improving the health and well-being of all residents including those most vulnerable. Majority of children coming into foster care are vulnerable children who may have suffered loss, neglect, abuse or abandonment which will have negatively impacted on their health and wellbeing, particularly their mental wellbeing.

60. The proposed support and financial incentives to in house foster carers aimed at better retention of experienced carers, attraction of new carers and avoidance of reliance on more expensive Independent Fostering Agencies (IFAs) is likely to impact positively on health and wellbeing of fostered children by ensuring a bigger pool of foster carers to match successfully with the children and provision of longer term stable environment which is necessary to support the development and progress of fostered children.

BACKGROUND PAPERS

[Havering: Face to Face Pathways Final evaluation report, July 2020](#)
[Bostock, L., Khan, M., Munro, E.R., Lynch, A., Baker, C., Newlands, F. and Antonopoulou, V. Tilda Goldberg Centre for Social Work and Social Care, University of Bedfordshire.](#)

Cabinet 7 July 2021 Fostering Allowances Appendix 1

Table 1. Current levels of allowance to Havering foster carers and proposed increases.

0-10 Years	Current (0-4 years / 4-10 years)	Suggested Increase	% increase	Proposed Figure	A-E (min - max)
Level 1	£264 - £287	£90	28.50%	£354	£299 - £379
Level 2	£289 - £312	£110	32.70%	£399	£345 - £460
Level 3	£315 - £338	£110	30.20%	£425	£499 - £510
Level 4	£500	Unchanged	Unchanged	£500	£497 - £679
Level 5	£607	Unchanged	Unchanged	£607	£694 - £1179
11-16 Years					
Level 1	£332	£130	39.20%	£462	£404 - £473
Level 2	£357	£135	37.80%	£492	£450 - £578
Level 3	£383	£130	33.90%	£513	£/ - £604
Level 4	£568	Unchanged	Unchanged	£568	£560 - £723
Level 5	£675	Unchanged	Unchanged	£675	£785 - £1,223
16+ Years					
Level 1	£382	£95	24.90%	£477	£395 - £487
Level 2	£407	£100	24.60%	£507	£450 - £607
Level 3	£433	£100	23.10%	£533	£/ - £657
Level 4	£643	Unchanged	Unchanged	£643	£602 - £740
Level 5	£750	Unchanged	Unchanged	£750	£807 - £1,237

Fig 1. Total number of looked after children from 2014-20

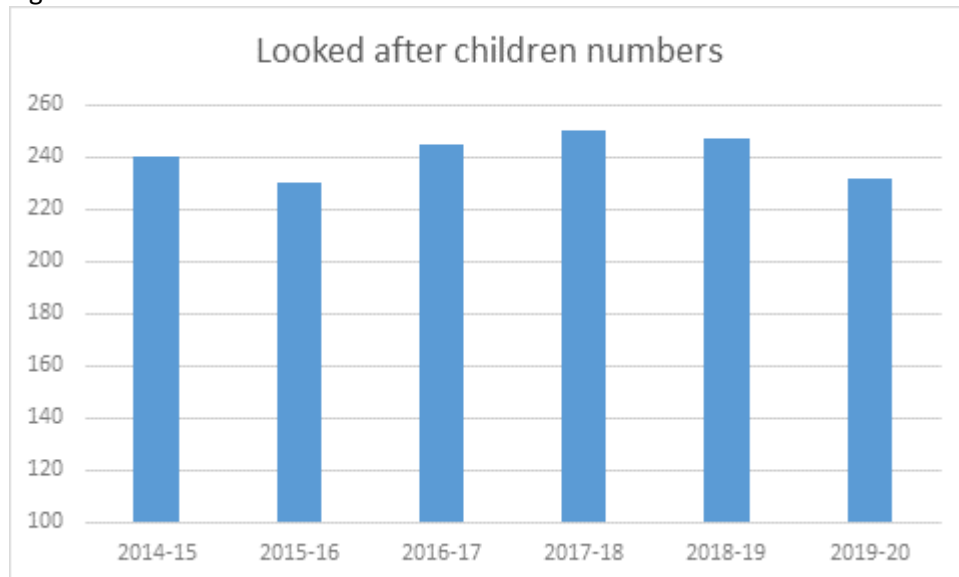


Fig 2. In-house fostering allowances for 0-10 year-olds

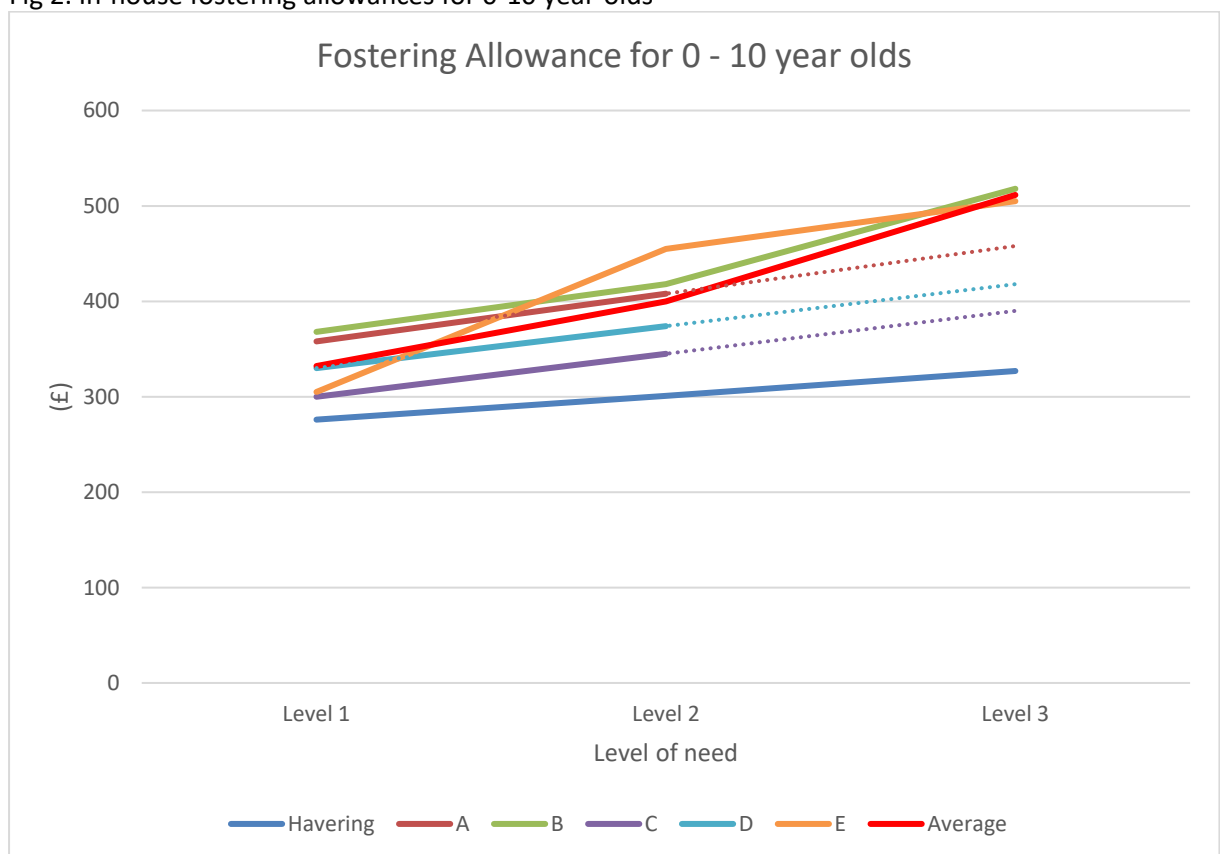


Fig 3. In-house fostering allowances for 11-15 year olds

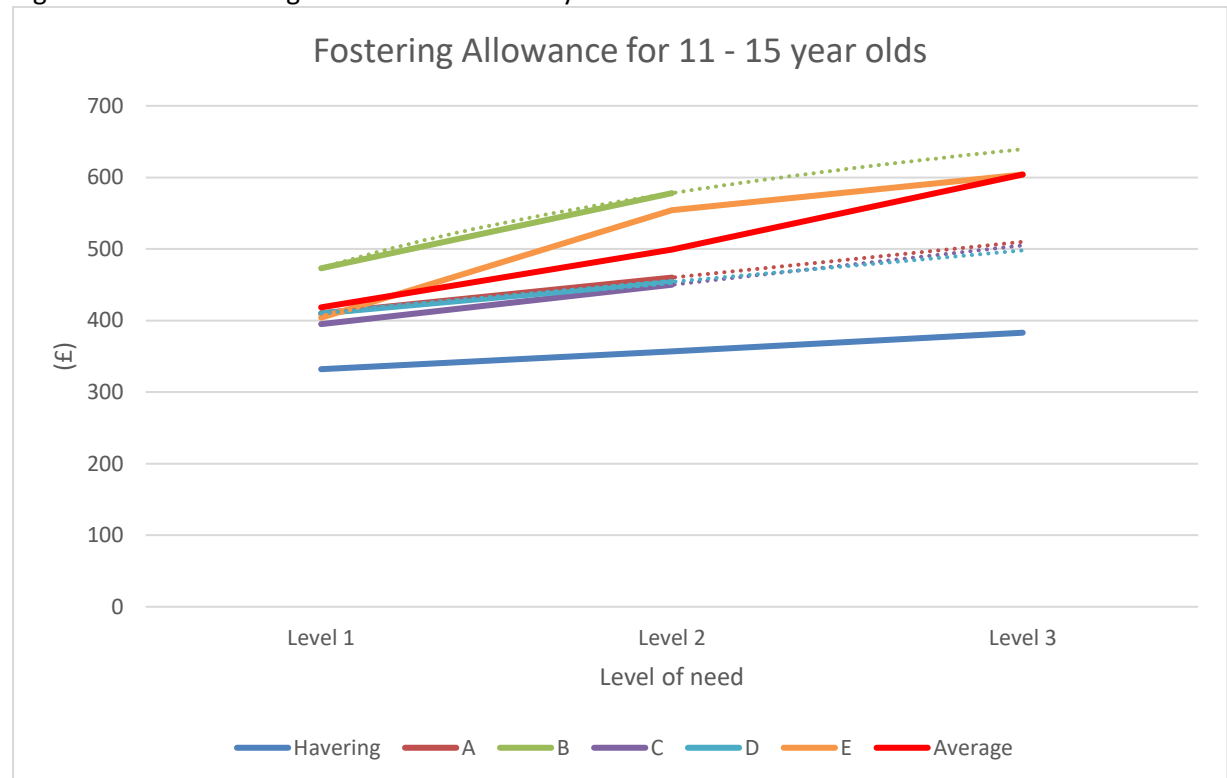


Fig 4. In-house fostering allowances for 16+

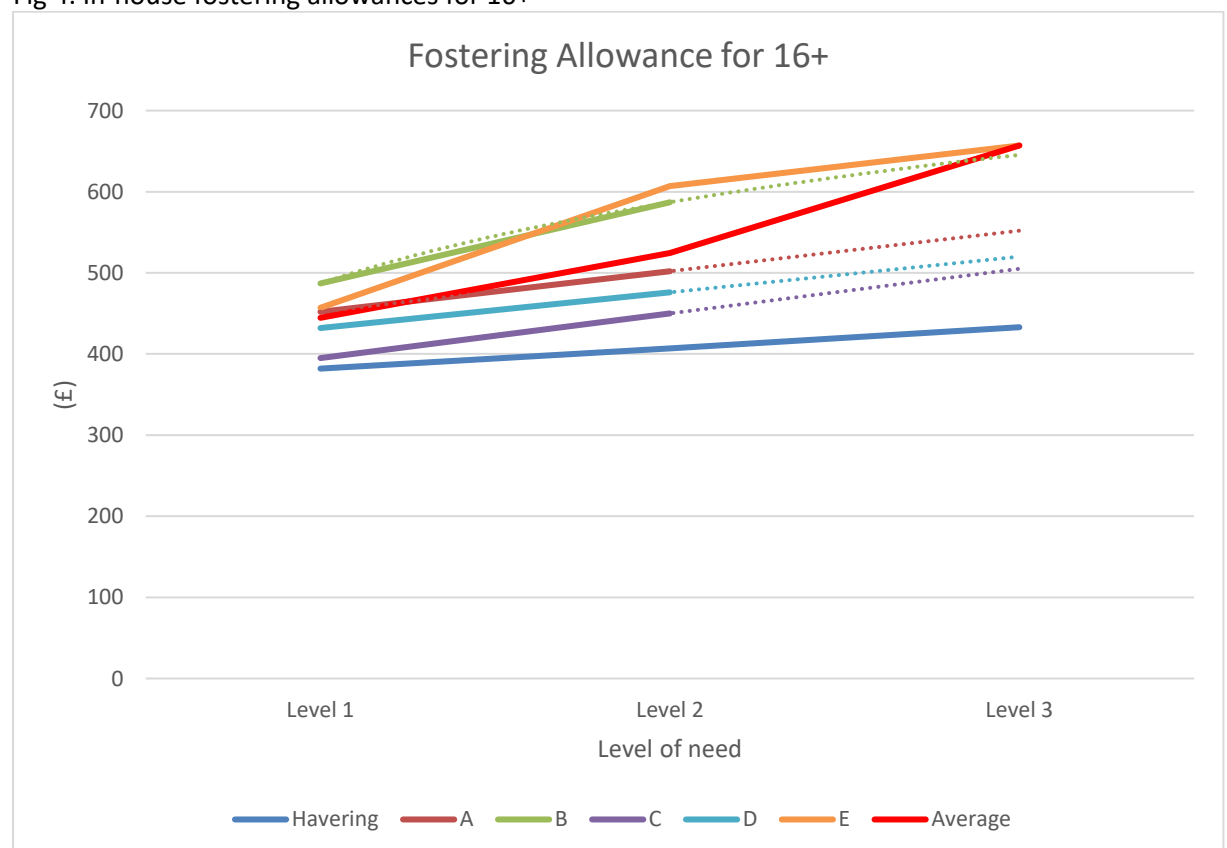


Table 2. Summary table of levels of need and the allowances paid

	Havering	A	B	C	D	E	Average
0-4 and 5-10 years							
Level 1	£264-£287	£347-£368	£357-£379	£300	£319-£341	£299-£310	£324-£340
Level 2	£289-312	£397-£418	£407-£429	£345	£363-£385	£449-£460	£392-£407
Level 3	£315-£338		£507-£529			£499-£510	£503-£520
Level 4	£500	£497-£518	£657-£679				£577-£599
Level 5	£607		£1,157-£1,179		£694-£716		£926-£948
11-15 years							
Level 1	£332	£410	£473	£395	£410	£404	£418
Level 2	£357	£460	£578	£450	£454	£554	£499
Level 3	£383					£604	£604
Level 4	£568	£560	£723				£642
Level 5	£675		£1,223		£785		£1,004
16+ years							
Level 1	£382	£452	£487	£395	£432	£457	£445
Level 2	£407	£502	£587	£450	£476	£607	£524
Level 3	£433					£657	£657
Level 4	£643	£602	£740				£671
Level 5	£750		£1,237		£807		£1,022

Table 3. Table showing the cost impact of proposed rates.

	Level 1	Level 2	Level 3	Total current cost per week	Cost with proposed figures per week	Additional cost
Current Number of Children	Age 0 - 10					
	18	8	13	£11,847	£15,089	£3,242 p/w
	Age 11 - 15					
	10	5	6	£7,716	£10,158	£2,442 p/w
	Age 16 +					
	5	6	11	£9,127	£11,290	£2,163 p/w
			Total Weekly	£28,690	£36,537	£7,847
			Total Yearly	£1,491,880	£1,899,924	£408,044

Table 4. Savings made when foster carers transferred to Havering from an IFA

Foster carers	Savings/month	Savings/year
A	£2000	£24,000
B	£5200	£62,400

Case studies: transferring from IFA to Havering

Foster carers A came from an IFA to Havering in September 2019 after feeling unsupported by their agency. They care for three Havering children (aged 10, 12, 15) under a long term fostering arrangement. Since coming over to Havering the savings from the IFA fees equates to £2,000 per month. The children will be in placement until 18 and the saving is ongoing. As a result of this positive experience Carers A felt able to recommend Havering to Carers B who they knew. Support, training and supervision was a feature of the conversations and the high level of support and the structure of supervision and training was a significant factor in them electing to foster with Havering.

Foster carers B were with an IFA. In February 2020, Havering placed with a Havering child 15 year old with a very high level of need and this was a costly placement. Throughout the year discussions were held with the carers to become Havering in-house carers and the assessment started in the same month and they were approved in January 2021. The monthly saving on the placement will be £5,200 per month or £62,400 per year.

Moreover, the carers have in placement a long-term foster child from another borough, which provides an income of £3,000 per month and they have another spare bedroom that will be occupied in due course.

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onesource Directorate

Exchequer & Transactional Services Directorate

Council Tax & Benefits Services



Council Tax Discretionary Reduction Policy

Policy updated	Policy updated by
December 2018	Head of Service, Collections & Recovery Manager
April 2020	Head of Service
April 2021	Head of Service

1. Introduction

Under section 13A of the Local Government Finance Act 1992 (LGFA 1992), the Council has discretion to reduce the amount of Council Tax payable that is not covered by statutory discounts and exemptions. This discretion can be exercised in relation to particular classes of case or by determining an individual case. The reduction can be for a specific period of time and the liability can be reduced by any amount the Council thinks fit.

In particular, the Council has the discretion to reduce the amount of Council Tax an individual person is liable to pay by any amount ranging from nil to 100% and for any period.

Since January 2018, Havering Care Leavers aged between 18 and 24 years were made a class of people who can be considered for a further reduction under this policy.

With effect from April 2021, Havering Foster Carers (excluding family and friends) have also been as another class of people who can be considered for a further reduction under this policy.

Under the Act, there is no right of appeal against the Council's use of discretionary powers; however, the Council will accept a customer's request for a further review of its decision as outlined further below in this document.

There are financial implications in that the cost of any reduction will be a direct cost to the Council. The cost of any local council tax reduction will, therefore, have to be met by the rest of the council tax payers in the borough.

Whilst each claim will be looked at individually, prudence should also be exercised and the impact of acceptance should be determined. For example, if one customer's case is accepted in a given situation, it may cause a 'snowball effect', which would mean that the Council must consider all such cases as this would affect the budget and other council tax payers.

2. Purpose

The purpose of this policy is to specify how this Council will operate the scheme and to indicate the factors that will be considered when deciding if a council tax reduction can be made. The aim is to treat all claimants equally when administering the scheme.

3. How to claim a Council Tax Reduction

Requests for reductions in Council Tax liability will be required from the taxpayer, their advocate/appointee or a recognised third party acting on their behalf. The request should specify the reasons the customer requires a reduction.

In considering whether a reduction should be made, the Council Tax & Benefits Service may request reasonable evidence to verify the information on which the request is based. Information regarding financial, personal or property status may also be provided as supporting evidence to the request.

The application shall be treated as relating to the year in which it was made unless extenuating circumstances have been provided.

The Council may request any reasonable evidence in support of an application including household finances, personal or property status to evidence the request.

Where further information is required, it will be reasonable to allow 14 days for its return. Collection or recovery proceedings will be suspended during this time.

Where it is appropriate, customers may also be advised to seek budgeting advice and assistance from Money Advice or other equivalent online service providers, the Citizens Advice Bureau, Welfare Rights Agencies and our own Customer Services in order to help gain evidence to support their request.

The Council Tax & Benefits Service may in any circumstances verify information or evidence provided by the customer by contacting third parties or other organisations.

4. Guidance

The Council will consider using its powers to reduce council tax liability for any case or class of case and treat all applications on their individual merit.

Ordinarily, the Council would expect there to be exceptional circumstances to justify a reduction and that the reduction would normally only be intended as short term assistance and should not be considered as a way of reducing council tax liability indefinitely.

The following guidance will be considered:

- There must be evidence of financial hardship or personal circumstances, which are exceptional and justify a reduction in council tax liability.
- The Council must be satisfied that the customer has taken reasonable steps to resolve their situation prior to the application for a reduction.
- The Council's finances will allow for a reduction to be made.
- The customer's eligibility for Council Tax Support has been considered and maximised.

- The customer's eligibility for welfare benefit has been considered and they have claimed all the benefits they are entitled to.
- All other eligible discounts, exemptions and reliefs have been awarded.
- The amount of council tax outstanding must not be the result of deliberate non-payment or negligence.
- It is reasonable to award a reduction having regard to the interests of other local council tax payers.
- The customer does not have access to other assets that could be used to pay the council tax.
- The customer has shown effort to discharge the council tax liability
- In order to target support effectively the focus may be on certain disadvantaged groups such as young people up to the age of 25 years leaving care in the transition to adult life, people with disabilities or mental health issues.

This guidance is not an exhaustive list. Instances where a customer is in a situation not noted within these guidelines will not mean their application should be dismissed. Each application will be evaluated upon its own merit and individual circumstances.

5. The Effect of a Council Tax Reduction

In making a council tax reduction, consideration will be given to achieving the following:

- Protecting the public purse and maintaining financial budgets
- Helping customers to help themselves
- No increase in council tax for resident taxpayers

6. The Amount and Period of the Council Tax Reduction

The amount of the reduction should not normally exceed a 12-month period or the end of the current financial year in which the request is made. The customer should make another application if they require a further reduction in their council tax.

The amount of council tax reduction at one time does not guarantee that a further reduction will be made later even if the customer's circumstances remain the same. The Council will not fetter its discretion in making one decision on an application with regard to a later claim by the same customer.

The value of the reduction should not exceed the value of the council tax owed.

The period of the council tax reduction should not be retrospective unless significant evidence or information is provided to warrant backdating a reduction.

If after awarding a council tax discretionary reduction there is a reduction in liability arising from a council tax band reduction or council tax support for example, the level of payment under S13A(1)(c) LGFA 1992 shall be reduced accordingly.

7. Class of People for Reduction

Care leavers

Since 1 April 2018 discretionary payment has been awarded to Havering's care leavers aged between 18 and 25 years old and who are liable for Council Tax in Havering. Care leavers are identified by the Council, to be eligible the care leaver must be liable for Council Tax and are being supported by Havering Council. Care leavers from out of the borough would not be eligible.

Discretionary payment will be considered after all other reductions have been awarded where there is a balance left to pay. Discretionary payment will be awarded up to the end of each financial year or on the care leavers 25th birthday whichever is the earlier.

Section 13A(1)(c) of the Local Government Finance Act 1992 allows the Council to reduce the amount to pay but not to amend the named person of who is liable to pay Council Tax.

Foster Carers

From April 2021, Havering Foster Carers (excluding family and friends) who live in Havering and are actively fostering, will be eligible for a discretionary payment. Those eligible would need to complete a new application form every financial year. The Havering Foster Carers class will not include those individuals who are fostering for adoption, friends and family, family link and respite carers.

Foster carers living in Havering who currently have a child/children placed with them can apply for the discretionary payment with effect from 1 April 2021. Subject to a successful review with Children's Services, a Discretionary payment will be awarded from 1 April to 31 March each financial year, upon receipt of a fully completed application form available on the Council's website. A new application would need to be completed each financial year. Foster carers who currently do not have a child/children in place, would be able to apply as soon as they do have a child/children in place.

Discretionary payment will cease from the date that the foster care is no longer available to foster children or is removed from the Council's foster carers register.

8. Making and challenging decisions for a Council Tax Reduction

The procedure for determining individual applications will require the Principal Officer (fourth tier officer or above) in the Council Tax & Benefits Service, to review the application and make a recommendation to the Head of Council Tax & Benefits.

The report will record the effect on other taxpayers, financial or otherwise, and will include whether:

- It will be likely that the majority of local residents will, on the balance of probabilities, agree with the decision.
- The Council's finances will allow for the reduction to be made

The Head of Council Tax & Benefits will determine whether a payment will be made and the amount of the reduction. The Council will notify a customer of its decision in writing within one month of the date the application is received.

Whilst under the Local Government Finance Act 1992, there is no right of appeal against the Council's use of discretionary powers; the Council will accept a request from a customer to review its decision within one calendar month of the date of the letter informing the customer of the decision.

The review will be undertaken by the Director of Exchequer & Transactional Services and the decision given in writing within one month of the date on which the request is received.

There is no entitlement to withhold the payment of Council Tax pending the determination of an application for a reduction or request for a review. Receipt of an application for relief will not negate the taxpayer's obligation to pay the council tax.

In the event the customer is still aggrieved following the Service Director review, the third stage of the Corporate Complaints' Procedure will be invoked.

Where a council tax support claimant is still aggrieved following a decision to refuse a further council tax reduction, the claimant may be referred to the Valuation Tribunal.

9. Fraud

The Council is committed to challenging fraud in all its forms. Any applicant who tries to fraudulently claim a council tax reduction by falsely declaring their circumstances, providing a false statement or evidence in support of their application, may have committed an offence under the Theft Act 1968.

Any cases where the Council suspects that this has occurred will be investigated and subject to the actions available within the Council's Anti-Fraud policy, this may lead to the commencement of criminal proceedings against suspected fraudsters.



CABINET	
Subject Heading:	Decision to Consult on Havering's Street Trading Policy
Cabinet Member:	Councillor Viddy Persaud Lead Member for Public Protection and Safety
SLT Lead:	Barry Francis Director of Neighbourhoods
Report Author and contact details:	Louise Watkinson Group Manager Public Protection 01708 432771 Keith Bush Public Protection Manager Licensing & Trading Standards 01708 433425
Policy context:	The Street Trading Policy has been produced. A decision is required to consult with residents and businesses on the proposed new Policy.
Financial summary:	It is anticipated that the cost of the consultation will be less than £10,000, which is currently budgeted for and will be funded from existing budgets. The budget identified is A26210.641640
Is this a Key Decision?	Significant impact on two or more Wards
When should this matter be reviewed?	June 2021
Reviewing OSC:	Towns and Communities

The subject matter of this report deals with the following Council Objectives

Communities making Havering

[X]

Places making Havering
Opportunities making Havering
Connections making Havering

[X]
[X]
[]

SUMMARY

1.1 Havering adopted Street Trading in 1999 as part of its Environment Strategic Policy. Following natural changes in the borough since the adoption of the relevant provisions of the London Local Authorities Act 1990 (as amended) in 1999 a new Policy is now required for street trading in the borough.

1.2 A Street Trading Policy enables the authority to control various factors such as

- **Economic promotion**
- **Public order and decency**
- **Prevention of crime and disorder**
- **Public safety**
- **Effective traffic and pedestrian progress on the highway**

1.3 Before the authority can introduce a new Street Trading Policy there is a requirement under the London Local Authorities Act 1990 to consult on the proposed policy.

RECOMMENDATIONS

2.1 Cabinet is recommended to:

Authorise the commencement of a 10 week public consultation on a draft Street Trading Policy beginning on 1st September 2021.

REPORT DETAIL

3.1 Havering adopted Street Trading in 1999 as part of its Environment Strategic Policy. Following natural changes in the borough since the adoption of the relevant provisions of the London Local Authorities Act 1990 (as amended) in 1999 a new Policy is now required for street trading in the borough.

3.2 A decision is required to begin a consultation with the public before the Policy can be adopted. This will allow the council to regulate street trading effectively across the borough.

3.3 It is intended that this consultation follow the standard public consultation format and that additional direct consultation be focused on business users.

3.4 In accordance with the London Local Authorities Act 1990 we will also consult with the Commissioner of Police of the Metropolis, existing street trading licence holders or bodies representing them, Highways, British Railways Board, London Regional Transport, Network Rail Infrastructure Limited and Transport for London

3.5 A copy of the draft Street Trading Policy to be consulted on is included as Appendix 1

3.6 The United Kingdom is currently experiencing a public health emergency as a result of the COVID 19 pandemic. Current provision has been made by the Government to allow for specific street trading, namely the sale and service of food and drink adjoining a premise, until September 2021, by virtue of the Business and Planning Act 2020.

3.7 Other activities such as licensed pitches and shop front goods will still be covered by the London Local Authorities Act 1990 (as amended) and subject to this policy once adopted. However many aspects of street trading including the provision of tables and chairs will not take effect until the Business and Planning Act 2020 comes to an end.

Details of the proposed policy for consultation

4.1 Havering adopted the London Local Authorities Act in 1999 to deal with problems caused by some street vendors. The council would now look to publish a new street trading policy to provide a level playing field for all businesses wishing to use the highway for trade, and to ensure that regulated use meets with our approach to street licensing.

4.2 Local authorities may regulate street trading activities and apply local controls in their area. A street trading policy enables the authority to control various factors such as;

- economic promotion,
- public order and decency,
- prevention of crime and disorder,
- public safety and
- effective traffic and pedestrian progress on the highway.

4.3 The policy is intended to provide a framework for the Council to administer and regulate street trading to ensure a consistent approach is taken. It also serves as a reference for licence holders, relevant stakeholders and enforcement officers as to the Councils intended vision and approach to street trading activities.

4.4 Street trading activities are regulated by Part 3 of the London Local Authorities Act 1990 (as amended) which provides local authorities in London with an authorisation process to control the following activities;

- **Street Trading Pitches**
- **Tables and Chairs on the Highway**
- **Shop Front Displays**
- **Advertising Boards**

4.5 In order to establish this policy, Havering will need to follow guidelines to consult and allow representation on the following:

- **Havering Street Trading Policy** – the decision making process requires a 28 day consultation. A copy of the draft policy is included as Appendix 1.
- **Conditions** – this requires a statutory 28-day public consultation and notification to existing license holders and any bodies representing them before passing regulation. Draft conditions are included in an Appendix B in the draft policy document itself.
- **Designated Streets** – this requires a statutory 28-day public consultation preceding resolution by council, followed by a 28-day notice published before coming into force. The proposed designated streets are included in Appendices 2A and 2B.
- **Fees** –there is a statutory requirement for a 28 day public consultation, publicising how fees are derived, and direct consultation with current license holders or their representatives preceding resolution by council. This is then followed by a 28 day public notice of the decided fees and notice to licensees or their representatives. Details on the proposed fees and how they were derived is included in Appendix 3.

4.6 It is proposed to process the separate areas for consultation concurrently where appropriate.

4.7 The Council has powers to designate a street as a 'licence street' and can prescribe the types of commodities or services that will be authorised by a licence. The designated streets at present represent parts of Romford Town Centre, and some isolated pitches around the borough. They do not include the other town centres or commercial areas. There are therefore large parts of the borough that are unable to be licensed under the existing regime. This is particularly restrictive for premises with outside seating, shop front goods and those that use A-boards.

4.8 This policy seeks to differentiate designated streets into the following categories:

- **Pitches.** The number of proposed pitches remains limited to areas where there is adequate space on the highway to accommodate them.
- **Other activities such as tables and chairs, shop front goods and A-boards.** In order to capture all business use premises the business rates database was used to identify all traders that could avail themselves of this part of the licensing regime. The list of these designated streets is extensive however it is the most effective way of ensuring that all premises are included whilst also excluding residential premises.

As with all applications they will be subject to an application and consultation process which will ensure that sites are suitable for the proposed use.

4.9 The council may appoint further streets to those already designated by varying or passing a resolution under s24(1) London Local Authorities Act 1990, provided that they:

- (a) before passing a designating resolution, consult with the Commissioner of Police of the Metropolis on their proposal; and
- (b) before rescinding or varying a designating resolution, consult with the licence holders trading in the street in question, or a body or bodies representative of them, on their proposal.

4.10 The statutory time period for the overall consultation process is not less than 28 days in advance of the date of the resolution.

4.11 The council may determine charges in the aggregate across one or more years to recover the associated costs of administration and enforcement of the licences. The authority must both notify licence holders in advance with a statement as to how these have been calculated, and publish a notice of proposed charges.

4.12 The statutory consultation period for representations to be made is 28 days from publication of the notice.

4.13 Although the statutory consultation period is only 28 days is proposed to undertake a longer consultation as this is a new policy and to ensure that as many views as possible can be considered. The consultation will begin on 1st September 2021 for a period of 10 weeks. The date may be subject to change depending on the status of the pandemic at the time.

4.14 The consultation will be conducted using an online survey promoted through:

- Advertising on the local authority website
- Direct mailing to interested parties and statutory consultees
- Social media messaging
- Posters in public buildings
- Local newsletters including the Living magazine and Business Briefing newsletter

4.15 Representations will also be accepted by email to the licensing mailbox and written representations can be sent by post to the Town Hall.

4.16 In accordance with the London Local Authorities Act 1990 it is intended to consult with the Commissioner of Police of the Metropolis, existing street trading licence holders or bodies representing them, Highways British Railways Board, London Regional Transport, Network Rail Infrastructure Limited and Transport for London.

4.17 It is also intended to consult with interested parties which will include, other council departments, trade groups, businesses, residents and groups representing people who may be affected by the proposed changes such as charitable organisations and disability advocates.

4.18 All comments will be carefully considered and amendments to the policy will be made if appropriate.

4.19 The Street Trading Policy will then go to Full Council for final approval and for a resolution to designate further identified streets for legal street trading.

4.20 Following the passing of a resolution by council, a notice must be published for not less than 28 days.

4.21 The Street Trading Policy includes provision for enforcement by way of Fixed Penalty Notices. This option was not available in 1999, and provides a more efficient way of dealing with non-compliance than lengthy prosecution. The use of FPNs can run alongside existing sanctions and discretion can be used to prosecute if this seems to be the most effective mechanism given the circumstances. London Councils set the fixed penalty levels as part of their statutory duty for all London authorities.

4.22 Human Resources implications have been identified in terms of the capacity to process the anticipated number of applications; this has been assessed as equating to approximately 24 weeks work, which is roughly half an FTE.

4.23 This is discussed and analyzed in the risks and implications, which can be found further in this document.

4.24 At this stage, the decision required is to commence a consultation. There is no immediate proposal to appoint staff to manage the consultation. This can be met within existing staffing levels.

4.25 The service is currently reviewing its licensing processes and systems to see if efficiencies can be found through automation and reprioritisation of workloads, this could significantly mitigate the necessity for additional staffing.

Key Documents:

Appendix 1 Draft Street Trading Policy

Appendix 2A Proposed Streets for Designation: Pitches

Appendix 2B Proposed Streets for Designation: Shop Fronts, Tables and Chairs and A-Boards

Appendix 3 Proposed Fees and Charges

Appendix 4 Equalities & Health Impact Assessment

REASONS AND OPTIONS

5 Reasons for the decision:

5.1 Havering adopted Street Trading in 1999 as part of its Environment Strategic Policy. Following natural changes in the borough since the adoption of the relevant provisions of the London Local Authorities Act 1990 (as amended) in 1999 a new Policy is now required for street trading in the borough.

5.2 The policy is intended to provide a framework for the Council to administer and regulate street trading to ensure a consistent approach is taken. It also serves as a reference for licence holders, relevant stakeholders and enforcement officers as to the Councils intended vision and approach to street trading activities.

5.3 Before the authority can introduce a new Street Trading Policy there is a requirement under the London Local Authorities Act 1990 to consult on the proposed policy.

6 Other options considered:

6.1 Option 1 - Not to adopt a Street Trading Policy

This was rejected, as it would encourage unregulated activity which would leave Havering streets looking untidy and unattractive, and would make the streets difficult to maintain and keep safe for pedestrians.

This would also leave the borough with potentially unmanageable street trading issues.

IMPLICATIONS AND RISKS

7 Financial implications and risks:

7.1 It is anticipated that the cost of the consultation will be less than £10,000 which is budgeted for and will be met from existing budgets. The budget identified is A26210.641640. Fees will be set on a cost recovery basis to cover the costs of processing licence applications.

7.2 The fee levels are intended to provide full cost recovery of all street trading licensing functions including the preparation, consultation and publication of the Street Trading Policy. Fees may be aggregated over more than one year, and may be varied during the aggregation period chosen. Accounts in excess or deficit at the

end of this stated period are legally required to be shown to be carried forward for the purposes of Street Trading Licensing.

8 HUMAN RESOURCES IMPLICATIONS AND RISKS (AND ACCOMMODATION IMPLICATIONS WHERE RELEVANT)

8.1 There will be a requirement for further staff to implement, license and enforce this legislation if uptake is as expected, as the additional requirements cannot be met from existing staff resources.

Licence type	Estimated number per annum	Hours per application	Total hours
Street Trading/Shop Fronts	50	10	500
Pitches AM	6	14	84
Pitches PM	6	20	120
A Boards	50	2	100
Temporary Markets	5	2	10
Hearings	6	7	42
			856 hours

8.2 856 hours at 36 hours per week equates to approximately 24 weeks work which is approximately half an FTE.

8.3 Current licensing officers are on grade 7. Their salary at top of their scale 34 is £39,575. With on costs this comes to £49,998. (Assuming a 2% increase from the previous year).

8.4 The service would therefore require an expansion of the salary budget of £24,507.50 to deal with the increase in demand. The service is currently reviewing its licensing processes and systems to see if efficiencies can be found by automating some of the processes. By increasing automation it may be that the salary needed to be funded could be reduced.

8.5 Any recruitment/resourcing activity that was needed would take place in accordance with Council policies.

9 Legal implications and risks:

9.1 Consultation with affected parties regarding the designation of streets, the introduction of conditions and the variation of fees is mandatory under The London Local Authorities Act 1990 ("The Act"). Any failure to implement the procedures set out in the Act could result in a legal challenge against the Council.

9.2 A Consultation exercise should be carried out in a proportionate, fair, and inclusive manner following the principles in *Gunning*. The principles are that consultation must take place when the proposal is still at a formative stage, sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response, adequate time must be given for consideration and response to allow consultees to comment meaningfully and the responses must conscientiously be taken into account by the decision maker.

9.3 Inclusion of Fixed Penalty Notice mechanism

Sections 15-18 of the London Local Authorities Act 2004 sets out the process of how Fixed Penalty Notices are applied in respect of offences related to street trading as set out in Schedule 2 of the Act. Officer delegations under the Constitution must be updated.

Street trading without a licence is an offence under Section 38 of the Act which carries a maximum fine not exceeding level 3 on the standard scale, Section 34 of the Act sets out further offences. Any prosecution will be carefully considered in line with the Code of Crown Prosecutors.

9.4 Consultation for variation / new designation of licenced streets for street trading

9.4.1 Under s24 of the Act to the council must consult with the Commissioner of Police of the Metropolis and licence holders or a body representing them before varying the designated streets. A draft resolution must be published with advice on how to make representations to the council for no less than 28 days before the date that resolution is to be passed.

9.4.2 The resolution to designate or vary the designation of licenced streets will specify the day that this is to take effect.

9.4.3 The council will publish a notice in a local newspaper for 2 consecutive weeks. The first of these publications must not be less than 28 days before the specified effective (appointed) date.

9.5 Consultation for variation of fees

9.5.1 The procedure for consultation is set out at s.32(7) - (10) of The Act. Before determining the charges the council must give notice of the proposed charges to licence holders or to a body or bodies representative of them and publish a notice of the proposed charges in a local newspaper. The notice must be accompanied by a statement showing how the proposed charges have been calculated. Licence holders and body representatives can request further information regarding the calculations. A notice must specify a reasonable period (not less than 28 days from

the date of publication of the newspaper), within which written representations can be made to the council.

9.5.2 If further information regarding the calculation of the fees is made within the 28-day period, that period will be extended until the Council has complied with the request.

9.5.3 The Council must consider the representations and make a determination. Once that has been made, the decision to set the fee level must be notified to the licence holders and body representatives. It must also be advertised in the newspaper again

9.6 Consultation for variation / new standard conditions for street trading

9.6.1 Under s27 of the Act the council may make regulations prescribing standard conditions which they may attach to the licence when granted or renewed.

Before making the regulations the council must publish a notice of their intention to do so in a local newspaper. The notice must contain a draft of the resolution and state that representations may be made in writing to the council not less than 28 days after the publication of the notice. The council must consult the licence holders or a body or bodies representative of them.

9.6.2 After the council have considered those representations they may make the regulations and must notify the licence holders or a body or bodies representative of them of the making of those regulations.

9.7 Right of Appeal

9.7.1 A right of appeal is open to current licensees regarding the variation of conditions of a license by regulation, or as an objection to fees. Variation or revocation of these cannot take place before the end of the appeal period of 3 months from the published notice regarding variation / fees.

9.7.2 It is recognised that there has not been enforcement of non-licensed tables and chairs previously. Consideration has been given to the potential impact of any grounds for claims under promissory and proprietary estoppel. Where the council has not given an undertaking not to enforce against individuals previously then estoppel is not feasible in this case; where land has been used, the council has not given reason for any trader to believe they have ownership or legal interest in the land.

10. Equalities implications and risks:

10.1 The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

10.2 The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

10.3 It is both Council policy and recently renewed SLT direction/expectation that EqHIAs (Equality and Health Impact Assessments) are carried out when appropriate and in sufficient time to enable informed decision-making. As a basic rule, one should be undertaken whenever staff, service users, or the wider public are impacted by decisions or the intended or planned activity

10.4 An EqHIA has been drafted and is included at Appendix 4. We will collect information during the consultation however it is anticipated that the policy if adopted will have a positive effect on the streets and pavements in the borough by controlling the use of the pavement to allow good access for all people using it. Consideration will be given to the predominant socio-economic status of the business operators affected by this policy change.

10.5 What are the potential impacts?

The potential identified impacts of this change that may affect service users with protected characteristics are:

- Maintain clearance for pedestrians and wheeled conveyances on the highway for users with and without mobility restrictions.
- Confirm which areas can have tables and chairs and that this complies with Planning requirements, providing a level playing field for all businesses.
- Potential uptake unknown and could mean that outside seating is not available for customers at some premises. It is likely that other premises would be available. Details of uptake rate were sought from neighbouring local authorities operating comparable schemes, but as discussed above, this was very variable.

10.6 *Who is likely to be affected?*

- Businesses – many businesses already operate with tables and chairs on the highway. While this is an offence outside of the designated licensing area, this has not been enforced under the London Local Authorities Act in recent times. Businesses will now be required to pay for use of the highway or may be subject to a fixed penalty notice. The types of business affected range from multi-site chain pubs and restaurants to small independent cafes with a much lower turnover.
- Residents and visitors using the highway – Setting standards for using tables and chairs the highway will ensure that we are able to maintain clearance for pedestrians and persons using wheelchairs and pushchairs and prams.
- Residents and visitors using the licensed premises – some residents and visitors may choose to sit outside due to steps preventing them accessing some eateries and restaurants. These residents may be affected with regards to their choices if some businesses choose not to pay for licences.
- Smokers* - residents and visitors may choose to sit outside to smoke or vape. ONS data has been reviewed to take account of the percentage of the population who smoke, and what the breakdown by protected characteristics is. The data from 2018 shows that 14.4% of the population in England smoke, of which 16% were male and 13% were female; of these that the highest proportion worked in manual and routine occupations (25% of these workers compared to 10% of those in managerial and professional roles) which is likely to be indicative of lower income earners; and that the highest prevalence of smoking according to ethnicity is among Polish nationals, followed by persons defining themselves as mixed race. There is a higher rate of smokers among unemployed, and those with no qualifications. Data on all protected characteristics were available via this data set.
- Local authority – staff will be required to undertake new works and licensing schemes, and we will need to ensure this can be met without negatively impacting on current staff resource and wellbeing.

10.7 The consultation should take account of the varied population using outdoor seating in cafes and restaurants, and of the diversity of business owners to ensure that all persons are appropriately and effectively consulted.

*Source for Equalities Data: Adult Smoking Habits in the UK: 2018 Office of National Statistics

11 Health and Wellbeing implications and Risks

11.1 The decision to consult does not give rise to health and wellbeing implications.

11.2 The Street Trading Policy allows for licences to be reviewed and conditions imposed on an individual basis. This allows for consideration of other surrounding residents and pedestrians.

11.3 The policy requires that the applicant complies with all other legal and council requirements regarding food hygiene registration, food storage, waste disposal, planning, footway accessibility, and similar. The individual application can be granted with conditions that can be used to take account of potential nuisance to residents, businesses or other highway users. The policy requires applicants to state how their use of the highway will improve the aesthetic, promoting a more positive surrounding and with potential for greening that could contribute to air quality schemes.

11.4 The policy provides for the use of temporary licensing where previous problems have occurred or to allow any potential issues to be identified on a new previously unlicensed site.

11.5 At the implementation of the proposed policy, The Business and Planning Act 2020 will have allowed a simple process for businesses to use the highway to allow for social distancing of customers. When the Street Trading Policy is proposed to come into effect in 2021 it is not known at this time what the requirements will be with respect to Covid-19 or any further unknown public health issues. The policy has been written to cover the administrative elements and it is proposed that the required public health and safety elements could be managed within this policy.

Appendices:

Appendix 1 Draft Street Trading Policy

Appendix 2A Proposed Streets for Designation: Pitches

Appendix 2B Proposed Streets for Designation: Shop Fronts, Tables and Chairs and A-Boards

Appendix 3 Proposed Fees and Charges

Appendix 4 Equalities & Health Impact Assessment

BACKGROUND PAPERS

None



Haverling

L O N D O N B O R O U G H

Statement of Street Trading Policy 2021-2024

Document Control

Document details

Title	Street Trading Policy 2021-2024
Version number	<i>V4.0</i>
Status	draft
Author	Oisin Daly
Lead officer	Andrew Blake Herbert
Approved by	Full council
Review date	<i>2024</i>
Supersedes	<i>Street Trading Policy</i>
Target audience	<i>Applicants, Residents, Licensing Committee, Councillors.</i>
Related to	

Version history

Version	Status	Date	Dissemination/Change
V1.0	<i>Initial draft</i>	<i>02nd July 2020</i>	
V2.0		<i>10th July 2020</i>	Amendment to designated streets – removal as appendix and inclusion to be published
V3.0		<i>03rd August 2020</i>	Further amendments as advised by legal
V4.0		<i>18th December 2020</i>	Further amendments as advised by legal

Approval history

Version	Status	Date	Approved by

Equality Impact Assessment record

Date	Completed by	Review date
2/6/2020	Nichola Lund	2/6/2023

DRAFT

The Statement of Street Trading Policy of London Borough of Havering the Licensing Authority for the London Borough of Havering. Prepared in accordance with the London Local Authorities Act 1990 (amended).

The policy is determined for a three year period commencing(tbc)

DRAFT

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1. Introduction

1.1 Havering adopted the London Local Authorities Act 1990 in 1999 to deal with problems caused by some street vendors.

Local Authorities may regulate street trading activities and apply local controls in their area. For the purposes of controlling street trading in the London Borough of Havering, the Council has previously adopted the relevant provisions of the 'London Local Authorities Act (as amended)'. A Street Trading Policy enables the authority to control various factors such as

- **Economic promotion**
- **Public order and decency**
- **Prevention of crime and disorder**
- **Public safety**
- **Effective traffic and pedestrian progress on the highway.**

1.2 This policy is intended to provide a framework for the Council to administer and regulate street trading to ensure a consistent approach is taken. It also serves as a reference for licence holders, relevant stakeholders and enforcement officers as to the Council's intended vision and approach to street trading activities.

1.3 In the development of this policy, the Council has consulted with licence holders, partner agencies and other stakeholders

1.4 Street trading activities are regulated by Part 3 of the London Local Authorities Act 1990 (as amended) which provides Local Authorities in London with an authorisation process to control the following activities;

- **Street Trading Pitches**
- **Tables and Chairs on the Highway**
- **Shop Front Displays**
- **Advertising Boards**

1.5 The Council has powers to designate a street as a 'licence street' and can prescribe the types of commodities or services which will be authorised by a licence.

2. Alternative Legislation

2.1 This policy relates to street trading. Licence holders should be aware that they may also be required to comply with alternative legislation.

2.2 Licence holders should consider whether their activities are likely to require authorisation and/or compliance with other regulatory regimes, including and not restricted to:

Planning, Building Control, Food Safety, Health & Safety, Control of Waste, Highway Obstruction, Trading Standards, Late Night Refreshment/ Entertainment/ Alcohol Licensing etc.

3. Eligibility and Suitability Criteria for Applicants

3.1 Applicants must be aged seventeen or older.

3.2 The Council will assess the suitability of the applicant on a case-by-case basis and may have regard to any relevant enforcement history concerning the applicant and/or the location of the proposed street trading.

4. Types of Authorisation

4.1 The authority has chosen to licence the following activities:

- **Pitches**
- **Shop Front Displays**
- **Tables and Chairs**
- **A-Boards**

4.1.1 Nothing in the Street Trading Policy will override the right of any person to make an application under the Act and have that application considered on its individual merits. Equally, nothing in the draft Street Trading Policy will undermine the right of any person to make representations to an application, or seek a review of a licence where there is a legal power to do so

4.2 Pitch applications

4.2.1 The Council will require details of the vehicle or stall set up being proposed. There will be an opportunity to give this information within the application form however, it may also be appropriate for the applicant to provide photographs or site plans of the proposed installations.

4.2.2 Applicants should first ensure that their proposed location is included in the list of designated streets, this can be found on the authority's website or available on request.

4.2.3 Applicants must also provide evidence of permission on the location if on private land.

4.2.4 Applicants must also submit a detailed statement of their proposed activities.

4.3 Shop front display applications

4.3.1 The Council may authorise shop front displays in the area directly outside a shop. The applicant will usually make an application in whole metres from the boundary of the shop frontage, however in some circumstances, it may be appropriate to issue licences for a portion of a metre. This will be dependent upon the availability of space and level of footfall in the surrounding area.

4.4 Tables and chairs applications

4.4.1 Licences for tables and chairs will contain standard conditions, this includes requiring the licence holder to create a temporary barrier around the trading area.

4.4.2 The applicant may be asked to provide full details of the barriers and the tables and chairs; this may include photographs.

4.4.3 Details of the type of furniture to be placed on the highway should also be included in the application form.

4.4.4 When applying for a licence applicants may wish to consider limiting the hours during which the licence may be utilised, this may reduce the impact on local residents from noise emanating from the licensed area.

4.4.5 In addition to the above, for applications for shop front and / or tables and chairs licences, consultation and advertisement will take the form of a "Notice of Application" which must be placed in the window of the relevant premises – so that it can be easily seen from outside. The notice will be at least A4 in size and must be in place and easily visible from the outside throughout the consultation period.

4.5 A-Board applications

4.5.1 The council may authorise that a premises may have up to two A-Boards situated directly outside their premises within one metre of the premises. For the purpose of this policy the boundary of the premises may include any area licensed for street trading such as tables and chairs outside a restaurant. A-Boards should be no larger than A1 excluding any frame and legs.

4.6 Permanent and temporary licences

Permanent licences

4.6.1 A permanent licence will usually be issued to applicants for A-Board, Pitch, Shop Front and Tables and Chairs licences and will be valid for up to three years.

4.6.2 In some circumstances, the Council may decide to issue a temporary licence to a new trader, or to a trader renewing a licence where there have been issues with enforcement.

Temporary Licences

4.6.3 Temporary licences will be issued to applicants for pitch licences where the trade is only proposed for one day to six months, or where the trading activity is part of an event or promotion. Temporary Licences will also be available to applicants of A-Board, Pitch, Shop Front and Tables and Chairs licences who may wish to trade seasonally or for short periods of time. For example, where a business is going to be sold and a licence is only required for a short time; a seasonal extension to accommodate trade at specific times of the year.

5. Fees

5.1 Street Trading licence fees will be set and reviewed from time to time by the Council and any changes to those fees will be advertised in accordance with the provisions of the London Local Authorities Act 1990 (as amended).

5.2 The fees are licence fees and are only applicable to licences granted. The fee only becomes payable on **grant or renewal** of the licence. Where a licence is refused for any reason, a full refund will be given to the applicant.

5.3 Where a licence is revoked for reasons beyond the licence holder's control, for example, where the highway has been redeveloped and there is no longer sufficient space for the trading activity to take place or where the Council has introduced a ban on certain commodities that were previously licensed, the Council will offer a partial refund of the licence fee. This will be calculated on a pro-rata basis in whole months. Should the licence have been utilised for a period of six months or more then no refunds shall be issued.

5.4 Where a licence has been revoked for reasons within the control of the licence holder, the Council will not issue a refund of the street trading licence fee.

6. Application Requirements

6.1 The Council will require the following submissions to be made in respect of applications, in line with the legislation:

- a) Full name, home address and date of birth of the applicant;
- b) The location of the proposed street trading activity including the days and times;
- c) The description of goods and/or services offered for sale;
- d) Proof of permission to trade from the landowner or a statement from the applicant if he is the landowner;
- e) One passport style photograph of the applicant;
- f) Proof of public liability insurance (minimum £5 million).

6.2 In addition to those legislative requirements, the Council will also seek the following information from the applicant:

- a) Details of any installations needed to carry out the street trading activity for example, a vehicle, shop front display units, tables and chairs;
- b) The names and addresses of the applicants nominated assistants;
- c) The name and address of a person nominated for succession of the licence.

6.3 Unless there is a specific need to do so, the Council will not routinely require any further submissions from applicants.

6.4 Specific licence types will require the applicant to supply the Council with specific information. Most of this will be contained within the application form.

7. Community/Charity Trading Licences

7.1 Community/Charity trading licences will be issued to organisations that are not carrying out trading activity for the purpose of making a profit on an occasional or temporary basis. Whilst the activity may be legally regarded as Street Trading activity, the overall purpose may be non-commercial, and the Council may apply a 'light touch' to the application process.

7.2 The Council will consider individual applications for Community/Charity trading licences on a case-by-case basis and acceptance will be assessed in the following circumstances:

- Fundraising activities,
- Promotion of charity or other local cause,
- Promotion of community services.

7.3 The licences will be applied for in the same way as Temporary Street Trading Licences.

7.4 The Council may also consider the grant of a waiver or reduction of the licence fee where requested.

8. Consultation

8.1 Upon receipt and acceptance of an application, the Council will carry out a consultation with the Council's Highways Service, the Council's Enforcement Officers, the Council's Planning Department and the local police. The Council's Food Safety team will be consulted where the application is proposing to trade in food items. Applications will also be displayed on the Council's website.

8.2 The purpose of the consultation is to seek assurances that the applicant's proposals satisfy the requirements of the legislation and that they are suitable to be licensed. Through the consultation process, certain discretionary grounds for refusal or modification of applications may be identified.

8.3 For Permanent and Temporary Street Trading Licences, the consultation period will last for twenty-eight consecutive days starting with the day after the application has been received.

8.4 For Community/Charity Trading Licences, the consultation will be for a minimum of five consecutive days starting with the day after the application was received.

9. Assessing consultation feedback and objections

9.1 Where the Council receives feedback or an objection to an application consultation, it will carefully consider whether that feedback/objection may influence the Council's discretionary decision-making powers.

9.2 The Council will not consider any feedback or objections where they are determined to be; frivolous, vexatious or repetitious. Such objections are considered not 'relevant'. This decision in this respect will be delegated to the Deputy Chief Executive and Corporate Director for Residents Services who may sub delegate the matter to an appropriate senior officer.

10. Decision Making

10.1 Each application will be assessed on its merits.

10.2 The Council has powers to consider a wide range of matters on which to refuse street trading licences. Any decisions made upon these grounds will be evidenced and justified after careful investigation into any responses received to the consultation process. The Council's decision-making powers are split between mandatory and discretionary grounds for refusal.

10.3 Certain grounds for refusal may also present themselves through the application process. Where these grounds are identified, the applicant will be offered the opportunity to amend the application before it is determined.

10.4 The mandatory grounds for refusal are:

- a) The applicant is under the age of seventeen.
- b) The proposed trading location is not within a designated licence street.
- c) The applicant is proposing to sell goods or services which the Council has resolved to ban.
- d) There is not enough physical space within the proposed trading location and any trading activity would have an adverse impact on the surrounding area by causing obstructions to persons or vehicles using the street.
- e) The applicant has made an application to trade in a location which does not satisfy the definition of a 'street' for the purposes of the legislation.

10.5 The determination of applications where no relevant adverse feedback has been received during the consultation period, will be made by Officers delegated for the purpose.

10.6 The discretionary grounds for refusal are:

- a) There are enough street traders in the area offering the same or similar goods to those of the applicant.
- b) The applicant is unsuitable to hold a licence.
- c) The applicant has previously demonstrated misconduct or unscrupulous behaviour whilst being the holder of a street trading licence.
- d) The applicant has failed to comply with the terms or failed to pay a fee of a street trading licence.
- e) The applicant has failed to propose suitable measures for the storage of perishable items when street trading is not taking place.
- f) The applicant of a shop front licence is proposing to sell goods or offer services which are not sold or offered for sale within that shop.
- g) The applicant is not the owner/occupier of a shop outside which a shop front trading licence is sought.

10.7 Where relevant adverse feedback has been received within the consultation period and discretionary grounds for refusal have been identified, the Council's Licensing Sub-Committee will be tasked with making determinations. Where applications are heard by the Licensing Sub-Committee, the Sub-Committee may exercise its discretion on accepting late objections if they are relevant and where there are demonstrable mitigating circumstances for being submitted outside the consultation period.

10.8 Where grounds for refusal do exist, the Council may still award a licence, but this could be a modification from what was originally applied for. For example, it may be appropriate to reduce the days/times of trading activity, to reduce the size of the proposed trading area or add conditions.

10.9 In accordance with the EU (Provision of Services) Regulations, tacit consent will apply to street trading licence applications if no grounds for refusal are identified through the consultation process within twenty-eight days following receipt of a valid application. In all cases where a Licensing Sub-Committee hearing is required, the applicant will be notified.

10.10 The planning and licensing regimes are separated to avoid duplication and inefficiency and licensing committees are not bound by the decisions made by a planning committee. In addition, the grant of a licence does not supersede the requirement to obtain planning permission where planning permission is required.

11. Hearings

11.1 Where the Licensing Sub-Committee is to consider grounds for refusal of a licence application, Officers will aim to convene a hearing within twenty working days following the end of the consultation period or as soon as reasonably practicable.

11.2 Where a street trading licence is being considered for revocation, the Council is required to afford the licence holder an opportunity to address the Licensing Sub-Committee. The Council will give at least twenty-one days' notice of any revocation proceedings being brought against the trader.

11.3 The Licensing Sub-Committee constituted for the purpose of determining street trading licences shall be made up from Members of the Licensing Committee as constituted under the Licensing Act 2003.

11.4 Applicants will normally be notified of the decision on the day of the hearing and can expect a written decision within five working days of the decision.

11.5 In certain circumstances, the Licensing Sub-Committee may defer their decision, or they may adjourn a hearing. This will be dependent upon the severity and complexity of the case before them and it may be appropriate to gather additional information to aid the decision-making process.

12. Appeals

12.1 Any person aggrieved by the Council's decision to refuse or revoke a street trading licence may lodge an appeal to the Magistrates Court within twenty-one days of receipt of the written decision notice following the outcome of the Licensing Sub-Committee.

12.2 All decision notices will contain full details of the appeal rights including how to lodge an appeal. Applicants for temporary licences do not have any appeal rights, notwithstanding statutory rights to seek Judicial Review proceedings.

13. Conditions and Standards for Licence Holders

13.1 The Council expects all licence holders to carry out their trading activities in accordance with the conditions imposed upon it.

13.2 When the Council issues a street trading licence, it shall include the following:

- a) The trading address to which the licence relates;
- b) The full name of the licence holder;
- c) The size and location of the licensed trading area;
- d) The commodities/services authorised by the licence;
- e) Any non-standard conditions relating to the licence;

13.3 In addition to the above information, the Council will also impose standard conditions on all street trading licences. Standard conditions will be reviewed from time to time. The standard conditions can be found at Appendix B.

13.4 The Council may add additional conditions or amend standard conditions to a licence. Any additional conditions shall be based on an application submitted and with the written consent of the applicant prior to the grant of any licence.

14. Duration of Licences

14.1 The Council has powers to issue permanent licences for up to three years and temporary licences for up to six months.

14.2 The Council will normally issue permanent licences for three years. Temporary licences are issued for periods from one day to six months.

15. Offences

Sections 34 & 38 of The Act outline the offences, which include:

- a) Failure to comply with the street trading terms and conditions
- b) Making a false statement in connection with an application
- c) Obstruction of an authorised officer of the Council
- d) Failure to produce a valid street trading licence

16. Enforcement and review action

16.1 The decision to use enforcement action will be taken on a case-by-case basis. The action taken, which may be immediate, will be proportionate to the seriousness and nature of the non-compliance.

16.2 Factors that will be taken into consideration include, but are not limited to:

- a. The risk that the non-compliance poses to the safety, health or welfare of the public at large or to individuals;
- b. Evidence suggests that there was pre-meditation in the commission of an alleged offence;
- c. The alleged offence involved a failure to comply in full or in part with the requirements of this policy and / or the terms of the street trading licence;
- d. There is a history of previous warnings or the commission of similar offences;
- e. Aggravated circumstances such as obstruction of an officer or negative conduct;

- f. If the alleged offence, though not serious itself, is widespread in the area in which it is committed;
- g. The gravity of an alleged offence, taken together with the seriousness of any actual or potential harm;
- h. There has been a repetition of a breach that was subject to a formal caution or issue of a Fixed Penalty Notice;
- i. False information has deliberately been supplied and/or intention to deceive.
- j. The local authority enforcement policy.

16.3 The Council may take the following types of enforcement action (in no particular order):

- a) Verbal/written warnings – e.g., a contravention and / or where Officer Contact has not resolved the contravention;
- b) Simple cautions;
- c) Licence revocation e.g. where fees go unpaid, a breach of a licence condition; conduct of the licence holder etc.
- d) Fixed Penalty Notices;
- e) Prosecution.

16.4 Where grounds for revocation have been identified, the case will be considered by a Licensing Sub-Committee in the form of a licence review hearing.

16.5 Any decision to prosecute will be made in accordance with the Code for Crown Prosecutors. Information concerning non-compliance may be shared with other enforcement agencies. Any such action will only be undertaken in the public interest and compliant with General Data Protection Regulations.

16.6 Fixed Penalty fine levels are determined by London Councils by statute.

16.7 Officers will regularly inspect street trading areas to ensure compliance with the licence terms and conditions i.e., the trader is only trading in the licensed pitch area. In addition, complaints of unlicensed street trading will also be investigated.

16.8 The Council will not issue any street trading licence until the requisite fee has been paid. Licensees should note that non-payment of any fees or charges due to the Council in connection with the street trading licence would render any existing licence liable to revocation.

17. Renewals

17.1 When a permanent street trading licence is due to expire, the Council will notify the licence holder three months in advance of this date and invite a renewal application.

17.2 Renewal applications must be submitted to the Council at least two months prior to the date of expiry.

17.3 Licence holders can expect to provide the same information as would be required for a new licence, however, if nothing has changed since the licence was granted, the Council may resolve not to require certain documentation i.e., photograph of the applicant, landowners permission etc.

17.4 In addition to the above, for applications for the renewal of shop front and / or tables and chairs licences, consultation and advertisement will take the form of a "Notice of Application" which must be placed in the window of the relevant premises – so that it can be easily seen from outside. The notice will be at least A4 in size and must be in place and easily visible from the outside throughout the consultation period.

17.5 Renewal applications are also subject to the same consultation requirements as new applications and the Council may identify grounds for refusal during that process.

17.6 Where discretionary grounds for refusal have been identified, the application will be determined by the Licensing Sub-Committee; a hearing will be arranged as soon as reasonably practicable.

17.7 If a licence is due to expire and the Council has not determined the renewal application, the trader may be allowed to continue trading during the interim period. This will usually be allowed save for circumstances where the trader has been subject to enforcement action or other reasons where the Council may not wish for the licence to continue during this period. Each case will be considered on its own merits and on a case-by-case basis.

18. Variations

18.1 Whilst not specifically addressed in the street trading legislation, the Council will allow traders to apply for variations to their licences within the duration of the licence. Variations may include, but not limited to; the size of the trading area; the authorised trading times; the authorised commodities; the conditions imposed upon the licence.

18.2 Variations must be applied for, using the appropriate form and will be subject to the same consultation process as for new and renewal applications.

18.3 A processing fee will be charged and should accompany the application. Where a variation is sought for an increase in a shop front display area, the fee for any additional metres will be charged as well as the processing fee.

18.4 Where the variation is administrative, e.g. change of licence holder's address; change of assistant's details, a lesser processing fee will be charged.

18.5 Where grounds to revoke a licence have been identified, the Council may, instead, choose to vary the licence by imposing additional conditions or making restrictions on the licensed area or times. Any such variations will be imposed by the Licensing Sub-Committee when considering a case for forced revocation/variation.

19. Succession

19.1 The legislation allows 'Succession rights' which allow the licensed trader to nominate a relative whom he desires the licence be granted to under the following circumstances;

- a) When the licence holder dies;
- b) When the licence holder retires, having reached the normal age for retirement;
- c) When the licence holder advises the Council that owing to ill health, he is unable to continue to operate the licence.

19.2 The Council will consider the circumstance of the individual trader when assessing succession rights. Officers can provide advice on these rights and it is advised that the trader seeks their own independent legal advice on the matters involved before any assumptions about the entitlement can be made. Holders of temporary licences are not entitled to succession rights.

20. Lapsing of Street Trading Licences

20.1 A Street trading licence will automatically lapse where permission to trade from the landowner ceases.

20.2 Where the Council is the owner of the land upon which the street trading activity is taking place, the Council may withdraw permission to trade where there are exceptional circumstances to justify a decision for example, street works and or/redesign of a street where it would no longer be possible to maintain the trading area.

21. Designation of Licence Streets

21.1 If the Council considers that street trading should be allowed or licensed in any area, it may pass a resolution designating any further street or part of a street as a licence street under Section 24 of the Act. In deciding if a street or site should be designated for street trading, the following may be considered:

- a. The presence of any existing or planned street furniture;
- b. The proximity and nature of any road junctions and pedestrian crossing points;
- c. The number of street trading sites already licensed in the vicinity;
- d. Whether the proposed site for designation would impact on accessibility for members of the public i.e., pedestrians, pushchairs, wheelchairs etc.
- e. Whether the safety of the public will be put at increased risk;
- f. Whether the proposed site will leave the recommended clearance of two metres clear passage between the trading area and the edge of the kerb or footway;
- g. Whether there will be a negative impact on the character or appearance of the area.

21.2 Before the Council makes a resolution to designate streets for licensed trading it will consult with The Commissioner of Police of the Metropolis, existing licensees and their body representatives as well as those in the streets which are to form part of the new designation resolution.

21.3 The Council will then advertise its intention to make a resolution to designate certain streets in a local newspaper. The notice will contain a draft resolution and indicate that representations should be made within 28 days of the date of publication.

21.4 As soon as practicable after the expiration of the 28 days, the Council will consider the representations and then pass a resolution if it thinks fit. The resolution will make reference to a date when the resolution is to have effect, this being not before 28 days after the resolution is passed.

21.5 After the resolution is passed, the Council will advertise in the local newspaper for two consecutive weeks that the resolution has been passed and when it is to take effect. The first of these advertisements shall appear **not later** than 28 days before the day specified in the resolution for the coming into force of the designation.

21.6 A street does not have to be designated as a licence street for street trading purposes where a temporary street trading licence is issued.

21.7 For traders wishing to trade on a street which is not designated, the Council is open to considering new locations where designation has not previously been made. In these circumstances, the trader will be required to submit full plans of their proposals to the Council for consideration.

21.8 Designation of new streets will not normally be considered for streets with parking restrictions and/or a speed limit of 40mph or more.

21.9 A list of current licence streets can be found on the authority's website or available on request.

22. Exemptions

22.1 The Council recognises that certain trading activities do not constitute street trading and are therefore exempt from the licensing regime. The following exemptions are outlined in the legislation:

- a) A person trading as a 'Pedlar' under the authority of a pedlar's certificate granted under the Pedlars Act 1871, provided that the trading is only carried out 'house to house';
- b) Trading as part of a street market – these are licensed by the Council under a separate statutory regime;
- c) Trading in a trunk road picnic area;

- d) Trading as a news vendor;
- e) Trading by a rounds man delivering milk and/or other perishable goods;
- f) Charity collections;
- g) The selling or offering for sale goods or services on private land adjacent to a shop provided that the trade forms part of the normal business of that shop. For example; a fruit/vegetable display outside a grocers shop or tables and chairs for diners outside a café.

23. Commodities

23.1 Applications for street trading licences must be made in accordance with the Council's approved list of commodities and banned commodities (Included as Appendix A). The Council will consider commodities that are not on the approved list at its own discretion.

23.2 The Council may amend this list in order to ensure fair trading opportunities to all traders in the relevant area. The Council may, from time to time, ban certain commodities in certain areas where there is a need to do so. If the Authority amends the list of banned commodities, a twenty-one day consultation with traders will be held in the affected area prior to a decision being made.

Appendix A

Commodities Category	Commodity
Clothing	<ul style="list-style-type: none"> • Women's clothing • Gents clothing • Children's clothing • Baby wear • Sportswear • Clothing accessories i.e. hats scarves, ties, belts etc • Underwear/Nightwear • Footwear/slippers • Other items (must be specified)
Flowers	<ul style="list-style-type: none"> • Cut flowers and plants • Uncut flowers and plants • Artificial flowers • Flower accessories i.e. pots, food, hanging baskets etc. • Seasonal i.e. Christmas Trees, Holly, Mistletoe etc • Other items (must be specified)
Fruit & Vegetables	<ul style="list-style-type: none"> • Raw fruit/vegetables • Other items (must be specified)
Food	<ul style="list-style-type: none"> • Pre-packed groceries • Dried fruit, seeds, pulses, beans etc • Cheese and dairy • Meat/fish • Bread/cakes • Deli food i.e. olives, pickles, nuts etc • Confectionary • Other items (must be specified)
Household goods	<ul style="list-style-type: none"> • Cleaning products • Laundry products • Cleaning utensils • Plastic storage and accessories e.g. crates, boxes etc • Light bulbs • Other items (must be specified)
Toiletries & Cosmetics	<ul style="list-style-type: none"> • Toiletries • Hair products

	<ul style="list-style-type: none"> • Make-up • Perfume • Other items (must be specified)
Kitchen/Dining	<ul style="list-style-type: none"> • Cookware • Serve ware • Glassware • Table wear • Other items (must be specified)
Soft furnishings	<ul style="list-style-type: none"> • Cushions & throws • Bedding • Curtains & blinds • Rugs & mats • Dining linen • Other items (must be specified)

Appendix B

Standard terms and conditions for licences:

Street trading licences

1. Pitch size

The licensed area must be within the dimensions specified on the licence, or any relevant pitch limits marked out on the ground by the council. An awning may be permitted to extend 30 cm (12 inches) at the front of the trading area, but no articles are to be suspended from the awning beyond the permitted trading area.

2. Commodities / items to be traded or sold

Only those commodities or groups of specified on the licence may be sold from the licensed street trading pitch.

3. Notices and Advertisements

No advertisement shall be displayed on the licensed trading area for goods, commodities or services other than those licensed for sale or provided on that licensed trading area.

All advertisements shall be located within the licensed pitch and shall occupy no more than 10% of the surface area of each side of the stall. Advertisements on low screens, aprons or valances below table top level shall occupy no more than 10% of each panel.

The name of the stall and goods or services on offer shall only be displayed:

- (i) In the case of a kiosk or mobile stall, on a frieze or similar designed high-level place that is equivalent to a fascia sign on a shop front.
- (ii) In the case of a gazebo, tensioned stall roof or umbrella with a valance, on the valance or on a board inside the stall.

No advertisement shall be displayed on the licensed pitch that relates to any goods, commodities or services other than those offered for sale or provided on that pitch.

No advertisements comprising of three-dimensional representations of products (such as, but not limited to, replica ice cream cones, coffee cups or chocolate bars), shall be displayed on the stall

No free-standing advertisements shall be located outside of the pitch area.

No notices shall be displayed in the licensed pitch that would restrict a consumer's statutory rights, such as "No refunds" or "No returns".

4. Days and times of trading or business

Trading may only take place on the days and during the times specified on the licence. The council shall advise traders of any extension of trading times for specified trading periods when and as relevant.

5. Refuse or waste

It is the trader's responsibility to ensure that all litter and waste generated by their licensed activity is collected for recycling or disposal, in ways that are compliant with legislation. This can mean storage in suitable bins or containers within the licensed area until collection can take place by a registered carrier of waste. To prevent blockages, odours or nuisance to others, road gullies or surface water drains may not be used for the disposal of food based liquid wastes or other noxious substances.

6. Street cleanliness

The trader must keep the immediate licensed area and the area within 5 metres in any direction from the licensed area, free of any wastes or spillages resulting from the trading activity, throughout the trading day. When trading is finished or upon leaving the site the trader/market operator must leave it in a clean condition.

7. Display of licence

The licence must be shown at all times, in a prominent position, so that it can be easily read

8. Safety of equipment

Electrical equipment should be tested by a competent person at intervals recommended by the competent person. Records should be kept of all inspections and tests together with any defects and/or remedial works, so as to demonstrate compliance.

9. Using a mains voltage electrical supply

Traders using a mains electrical supply must have consent from the council before seeking installation from an electricity supplier. Where relevant, the trader and the electricity supplier will be required to provide the council with certification for the safety of the electricity supply.

10. Interference with electrical supplies

A trader will be subject to suspension of a licence if they tamper with, or use an electricity supply belonging to the council without a prior arrangement to do so. A trader causing damage to any council installation or equipment will be required to pay the full cost of any repair or replacement.

11. Pitch equipment, or trading stalls

Pitch equipment or stalls should be easily and quickly assembled and removed. The council reserves the right to inspect for stability and safety and to ensure that they are fit for purpose. Any obviously dangerous item must be made safe or immediately removed on request by the council. It is the trader's responsibility to ensure that items and structures are put up and taken down safely, are properly designed, well sited and in a good, clean condition.

12. Nature and Type of Receptacle

The licence holder shall only trade from a receptacle that has been approved by the Licensing Service and that is set-up in accordance with the approved design and layout. The licence holder shall maintain their receptacle to minimise any deterioration in its appearance following the approval by the Licensing Service and shall remove any defacement from their receptacle as soon as is reasonably practicable.

Receptacles used for the sale of food shall be maintained and regularly cleaned to ensure that food is protected from risk of contamination.

13. Size and Set-up of Stall

The trading area shall not exceed the dimensions specified on the licence and where applicable, any pitch limits marked on the ground, except during immediate re-stocking of the stall. The width of the pitch at the Bayswater Road and Green Park Exhibition shall be eighteen inches from the back edge of the footway

All goods, containers and other articles shall be contained within the licensed pitch area and height and shall not project beyond.

The licence holder shall not connect any part of their stall, advertisements or goods for sale to any other stall or to any electricity bollard, socket pillar, lamp post or other street furniture, except for an electric cable connected to an electrical supply point.

No barriers shall be used on or around a licensed pitch unless specific consent for their use has been obtained from the Council

14. General Conduct

Any trader and/or any assistants employed by them shall conduct themselves in a decent manner and ensure that all members of the community and council officers are fairly treated and shown courtesy and respect. Trading activities should not give rise to noise inappropriate to the area or cause other nuisance

The licence holder and their assistants shall not engage in any criminal activity or anti-social behaviour and, in particular, shall not engage in the following at the pitch:

- (i) Indecent behaviour towards the public or other licence holders;
- (ii) Acts of violence against any person (including other licence holders) or property and/or the attempt or threat of such acts;
- (iii) Verbal abuse and/or aggression displayed towards any person;
- (iv) Intimidation of any other licence holder;
- (v) Touching, moving or interfering with another licence holder's stall.

15. Production of licences on request

All licensed traders shall produce their licence when requested to do so by an authorised officer the council or a police officer.

16. Notification of location for storage of food commodities, pitch equipment, or trading stalls etc.

Traders in foodstuffs must notify the council in writing of any change of address or addresses at which the pitch equipment stalls etc (the “receptacles”) and any commodities are stored. Such notice must be given within 7 days of the change. Checks may be made to confirm details and suitability

17. Sale of Food

No trading shall take place that involves the sale of food unless the licence holder is complying with all current food safety and food standards legislation.

If authorised to sell food, the licence holder shall provide a First Aid box on their stall that is readily available for use at all times that they are trading.

16. Employment of children

A licensed trader shall not employ any person under the age of 17 years in any capacity in the course of his trade or business.

17. Portable generators

Generators shall be positioned so that they do not present problems for other street users or traders. Generators shall be checked and certified for safety and shall be erected in a secure location with adequate barriers to prevent interference by members of the public.

17. Assistance to council officers

A trader shall give immediate assistance to council officers when requested to do so. In dealing with an emergency, this might mean moving a stall or equipment away from the area, quickly.

18. Gas cylinders

The use of gas cylinders is permitted only where;

- a) Traders have checked the valves and hoses of gas cylinders for defects before bringing them into the licensed market place, and;
- b) The cylinders are in safe working order

Additional tables & chairs licences

1. The grant of a tables and chairs trading licence does not give any approval or consent which may be needed under any other legislation other than under the Act(s).
2. A copy of the tables and chairs licence must to be displayed in the window of the licensed premises. The copy licence is to be displayed so as to be clearly visible and legible from the street.
3. Only those commodities sold in the relevant shop premises can be served under the tables and chairs licence.
4. Only those services provided within the relevant shop premises can be provided in the licensed area where a licence permits tables and chairs to be placed on the street.
5. Temporary barriers of an approved type must be in place around the trading area during licensed hours and the same must be removed outside of the hours permitted by the licence
6. A tables and chairs licence is not transferable.

Additional Shop front licences

1. A copy of the shop front trading licence must to be displayed in the window of the premises outside which trading is permitted. The copy licence is to be displayed so as to be clearly visible and legible from the street.
2. Monetary exchange or payment cannot be made in the licensed street trading pitch.
3. The dimensions of a licensed street trading pitch shall be such that a minimum of 2m clear of any obstruction shall be maintained on the public highway for the safe pass, re-pass and free flow of pedestrian and vehicular traffic.
4. No equipment, stall, container, or display or tables(s) or chair(s) shall at any time be permitted to obstruct an entrance or exit to any adjacent premises or to any part of the building to which the licence applies that is under separate occupation.
5. A shop front trading licence is not transferable.
6. Only those commodities sold in shop premises can be displayed outside premises provided they are not excluded items as defined in these regulations.
7. Only that equipment, stall, container, or display or tables(s) or chair(s) and containers which is suitable and fit for purpose and approved by the council shall be used by the licence holder and assistants for shop front trading or ancillary to shop front trading.
8. The following items may not form part of the commodities displayed under a shop front licence:

- A. Alcoholic beverages, tobacco and tobacco products
- B. Lottery tickets, phone cards, raffles, tombola and/or other games of chance
- C. Medicines, drugs and other prescribed substances
- D. Cooked or uncooked meat or fish of any kind
- E. New and used cars and motorcycles
- F. Pets and livestock
- G. Containers of liquid petroleum gas (LPG) including any that are fully or partly discharged or emptied
- H. Explosives, including fireworks
- I. Goods considered by the council to pose a health and safety risk to the public. i.e., cooking

9. Items that are likely to cause damage the street or street furniture may not be used.

10. An awning may be permitted to extend up to a maximum of 30 cm (12 inches) at the front of the licensed shop front pitch but no articles are to be suspended from the awning beyond the permitted area. Additionally, the placement of the awning must permit safe pass and re-pass by pedestrian traffic.

11. Any standalone canopies, such as umbrellas at tables and chairs, must be secured and removed in high winds and be covered by traders liability insurance. Standalone canopies must not protrude beyond the boundary of the licensed area.

A-Board Licences

1. Only the number of A-Boards listed on the licence may be erected outside the premises at any one time.

2. A-Boards must remain within one metre of the boundary wall of the premises or the licensed area of any street trading licence.

3. A-Boards must allow at least two metres clear passage if erected on the public highway.

Appendix C

Definitions of street trading

‘Street trading’ is defined in the legislation as

- a) The selling or the exposure or offering for sale, any article (including living things); and*
- b) The purchasing or offering to purchase any ticket; and*
- c) The supplying or offering to supply any service in a street for gain or reward*

‘Street’ is defined in the legislation as;

- a) Any road or footway;*
- b) Any other area, not being within permanently enclosed premises, within 7 metres of any road or footway to which the public obtain access without payment*
 - i) Whether or not they need the consent of the owner or occupier and*
 - ii) If they do, whether or not they have obtained it*
- c) Any part of such road, footway or area;*
- d) Any part of housing development provided or maintained by a local authority under part ii of the Housing Act 1985.*

Appendix 2 A

Havering Street Trading Policy - Designated Streets: Pitches

Street	Postcode
Straight Road Gallows Corner	RM3
Hilldene Avenue	RM3 5NF
Market Place Romford	RM1
Arcade Place Romford	RM1
O/S South Essex Crematorium Ockendon Road	RM14 2UY
Justums Lane J/W Crow Lane	RM7 0HJ
South Street	RM1
North Street	RM1
Exchange Street	RM1
High Street	RM1
Angel Way	RM1
Ferry lane	RM13
Lamsom Rd	RM13
Bampton Rd	RM3

Havering Street Trading Policy - Designated Streets: Temporary Pitches

Street	Postcode
Straight Road Gallows Corner	RM3
Hilldene Avenue	RM3 5NF
Market Place Romford	RM1
Arcade Place Romford	RM1
O/S South Essex Crematorium Ockendon Road	RM14 2UY
Justums Lane J/W Crow Lane	RM7 0HJ
South Street	RM1
North Street	RM1
Exchange Street	RM1
High Street	RM1
Angel Way	RM1
Ferry lane	RM13
Lamsom Rd	RM13
Bampton Rd	RM3
Station Rd	RM14

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Appendix 2 B

Havering Street Trading Policy - Designated Streets: Shop Fronts, Tables and Chairs and A-Boards

Prem Type	addr1	addr2	postcode
Computer Centre and Premises	1 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	1 BALGORES LANE	GIDEA PARK	RM2 5JR
SHOP AND PREMISES	1 BALGORES SQUARE	GIDEA PARK	RM2 6AU
SHOP AND PREMISES	1 BILLET LANE	HORNCHURCH	RM11 1TS
SHOP AND PREMISES	1 BLENHEIM COURT	NORTHOLT WAY	RM12 5RX
SHOP AND PREMISES	1 BROADWAY PARADE	HORNCHURCH	RM12 4RS
STORE AND PREMISES	1 BROADWAY PARADE	UNIT C R/O	RM12 4RS
SHOP AND PREMISES	1 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
SHOP AND PREMISES	1 CHASE CROSS ROAD	ROMFORD	RM5 3PJ
STALL AND PREMISES	1 CHASE CROSS ROAD (ADJ)	ROMFORD	RM5 3PJ
SHOP AND PREMISES	1 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	1 COLLIER ROW ROAD	ROMFORD	RM5 3NP
SHOP AND PREMISES	1 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	1 CROWN PARADE	UPMINSTER ROAD SOUTH	RM13 9BD
SHOP AND PREMISES	1 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	1 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	1 GRANGE ROAD	HAROLD HILL	RM3 7DU
SHOP AND PREMISES	1 GREAT GARDENS ROAD	HORNCHURCH	RM11 2BB
SHOP AND PREMISES	1 HACTON PARADE	CENTRAL DRIVE	RM12 6EL
SHOP AND PREMISES	1 HAROLD COURT ROAD	ESSEX HOUSE	RM3 0YU
SHOP AND PREMISES	1 HIGHFIELD LINK	CHASE CROSS	RM5 3DH
SHOP AND PREMISES	1 LAURIE WALK (H3)	ROMFORD	RM1 3RT
Health Centre and Premises	1 LITTLE GAYNES LANE	UPMINSTER	RM14 2JP
SHOP AND PREMISES	1 NORTH STREET	HORNCHURCH	RM11 1RL
SHOP AND PREMISES	1 OAK ROAD	HAROLD WOOD	RM3 0PH
SHOP AND PREMISES	1 OCKENDON ROAD	UPMINSTER	RM14 2DN
SHOP AND PREMISES	1 OLD MILL PARADE	VICTORIA ROAD	RM1 2HU
SHOP AND PREMISES	1 PARK LANE	HORNCHURCH	RM11 1BB
PUBLIC HOUSE AND PREMISES	1 PETERSFIELD AVENUE	WILLIAM THE CONQUEROR	RM3 9PB
SHOP AND PREMISES	1 ST NICHOLAS AVENUE	HORNCHURCH	RM12 4PT
SHOP AND PREMISES	1 STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	1 STATION PARADE	VICTORIA ROAD	RM1 2JA
SHOP AND PREMISES	1 STATION PARADE	THE BROADWAY	RM12 5AB

SHOP AND PREMISES	1 STATION ROAD	GIDEA PARK	RM2 6BX
SHOP AND PREMISES	1 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	1 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	1 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	1 TADWORTH PARADE	THE BROADWAY	RM12 5AS
STORE AND PREMISES	1 TUDOR COURT	(REAR OF)	RM3 0AE
SHOP AND PREMISES	1 TUDOR COURT	HAROLD COURT ROAD	RM3 0AE
SHOP AND PREMISES	1 TUDOR COURT (ADJ)	HAROLD COURT ROAD	RM3 0AE
SHOP AND PREMISES	1 WESTERN ROAD	GROUND FLOOR	RM1 3LD
SHOP AND PREMISES	1 WRITTLE WALK	RAINHAM	RM13 7XB
Computer Centre and Premises	10 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	10 ATLANTA BOULEVARD	GROUND FLOOR	RM1 1TB
SHOP AND PREMISES	10 BREWERY WALK	ROMFORD	RM1 1AU
SHOP AND PREMISES	10 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	10 CARLTON ROAD	GIDEA PARK	RM1 5AA
SHOP AND PREMISES	10 CHASE CROSS ROAD	ROMFORD	RM5 3PR
SHOP AND PREMISES	10 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	10 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	10 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	10 HEDLEY CLOSE	YOUTH ZONE	RM1 1AH
SHOP AND PREMISES	10 HOG HILL ROAD	COLLIER ROW	RM5 2DH
SHOP AND PREMISES	10 MOOR LANE	CRANHAM	RM14 1EB
SHOP AND PREMISES	10 NORTH STREET	HORNCHURCH	RM11 1QX
SHOP AND PREMISES	10 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	10 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	10 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	10 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	10 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	10 WILLOW PARADE	MOOR LANE	RM14 1DZ
SHOP AND PREMISES	100 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
SHOP AND PREMISES	100 COLLIER ROW ROAD	ROMFORD	RM5 2BA
SHOP AND PREMISES	100 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	100 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	100 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	100 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	100 SOUTH STREET	ROMFORD	RM1 1RX
RESTAURANT AND PREMISES	101 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	101 FRONT LANE	CRANHAM	RM14 1XN
SUPERSTORE AND PREMISES	101 HIGH STREET	HORNCHURCH	RM11 1TX
SHOP, WORKSHOP AND PREMISES	101 NEW ROAD	RAINHAM	RM13 9EX
SHOP AND PREMISES	101 NORTH STREET	ROMFORD	RM1 1EU
SHOP AND PREMISES	101 UPMINSTER ROAD	HORNCHURCH	RM11 3XB
SHOP AND PREMISES	101-105 BALGORES LANE	GIDEA PARK	RM2 6BT

SHOP AND PREMISES	10-12 LAURIE WALK	ROMFORD	RM1 3RT
CAR SHOWROOM AND PREMISES	10-12 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	10-12 SOUTH END ROAD	RAINHAM	RM13 7XH
SHOP AND PREMISES	10-12 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	10-15 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	102 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
SHOP AND PREMISES	102 COLLIER ROW ROAD	ROMFORD	RM5 2BA
SHOP AND PREMISES	102 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	102 NORTH STREET	HORNCHURCH	RM11 1SU
STORE AND PREMISES	102 NORTH STREET R/O	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	102 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	102 SOUTH STREET	ROMFORD	RM1 1RX
BANK AND PREMISES	102-104 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	103 BRENTWOOD ROAD	ROMFORD	RM1 2SB
SHOP AND PREMISES	103 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
STORE AND PREMISES	103 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	103 UPMINSTER ROAD	HORNCHURCH	RM11 3XB
STORE AND PREMISES	103 VICTORIA ROAD	(REAR OF)	RM1 2LX
SHOP AND PREMISES	103 VICTORIA ROAD	ROMFORD	RM1 2LX
SHOP AND PREMISES	103 WENNINGTON ROAD	RAINHAM	RM13 9TH
SHOP AND PREMISES	104 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
SHOP AND PREMISES	104 COLLIER ROW ROAD	ROMFORD	RM5 2BA
SHOP AND PREMISES	104 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	104 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	104 NORTH STREET	ROMFORD	RM1 1DA
SHOP AND PREMISES	104 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
RESTAURANT AND PREMISES	104-106 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	105 BRENTWOOD ROAD	ROMFORD	RM1 2SB
SHOP AND PREMISES	105 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	105 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	105 NORTH STREET	ROMFORD	RM1 1EU
SHOP AND PREMISES	105 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	105 VICTORIA ROAD	ROMFORD	RM1 2LX
SHOP AND PREMISES	105-107 UPMINSTER ROAD	HORNCHURCH	RM11 3XB
PUBLIC HOUSE AND PREMISES	105-111 SOUTH STREET	SLUG & LETTUCE	RM1 1NX
SHOP AND PREMISES	106 COLLIER ROW ROAD	ROMFORD	RM5 2BA
SHOP AND PREMISES	106 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	106 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	106 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	106 NORTH STREET	ROMFORD	RM1 1DA
SHOP AND PREMISES	106 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
HEALTH CENTRE AND PREMISES	106-120 SOUTH END ROAD	SOUTH HORNCHURCH HEALTH CENTRE	RM13 7XR
SHOP AND PREMISES	106B NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	107 COLLIER ROW ROAD	ROMFORD	RM5 2AT
SHOP AND PREMISES	107 CORBETS TEY ROAD	UPMINSTER	RM14 2AH

SHOWROOM AND PREMISES	107 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	107 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP, STORE AND PREMISES	107 VICTORIA ROAD	ROMFORD	RM1 2LX
SHOP AND PREMISES	107(N) MUNGO PARK ROAD	RAINHAM	RM13 7PP
HAIRDRESSING SALON AND PREMISES	107(S) MUNGO PARK ROAD	(R/O)	RM13 7PP
SHOP AND PREMISES	107(S) MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	108 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SH
Shop and Premises	108 COLLIER ROW ROAD	ROMFORD	RM5 2BB
SHOP AND PREMISES	108 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	108 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	108 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	108 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	108 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
CLUB AND PREMISES	108 SOUTH STREET	PT 1ST FLR	RM1 2AP
SHOP AND PREMISES	108 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AB
SHOP AND PREMISES	109 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
PUBLIC HOUSE AND PREMISES	109 HIGH STREET	FATLING & FIRKIN	RM11 1TX
SHOP AND PREMISES	109 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	109 RAINHAM ROAD	RAINHAM	RM13 7QX
SHOP AND PREMISES	109 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	109 VICTORIA ROAD	ROMFORD	RM1 2LX
Computer Centre and Premises	11 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	11 BILLET LANE	HORNCHURCH	RM11 1TS
SHOP AND PREMISES	11 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	11 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
Shop and Premises	11 CLOCKHOUSE LANE	ROMFORD	RM5 3PH
SHOP AND PREMISES	11 COLLIER ROW ROAD	ROMFORD	RM5 3NP
SHOP AND PREMISES	11 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	11 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	11 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	11 LOCKWOOD WALK	ROMFORD	RM1 3RH
SHOP AND PREMISES	11 NORTH STREET	HORNCHURCH	RM11 1RL
SHOP AND PREMISES	11 PARK LANE	HORNCHURCH	RM11 1BB
SHOP AND PREMISES	11 SOUTH STREET	ROMFORD	RM1 1NJ
SHOP AND PREMISES	11 STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	11 STATION ROAD	GIDEA PARK	RM2 6BX
SHOP AND PREMISES	11 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	11 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	11 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	11 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS

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SHOP AND PREMISES	11 VICTORIA ROAD	ROMFORD	RM1 2JT
SHOP AND PREMISES	11 WESTERN ROAD	(UNIT GL16)	RM1 3LD
SHOP AND PREMISES	11 WILLOW PARADE	MOOR LANE	RM14 1DZ
SHOP AND PREMISES	110 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SH
SHOP AND PREMISES	110 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	110 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	110 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	110 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	110 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	110 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	110A-112 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	111 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	111 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	111 RAINHAM ROAD	RAINHAM	RM13 7QX
SHOP AND PREMISES	111 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	111-113 HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	11-11B OAK ROAD	HAROLD WOOD	RM3 0PH
SHOP AND PREMISES	11-15 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	112 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SH
SHOP AND PREMISES	112 COLLIER ROW ROAD	ROMFORD	RM5 2BB
SHOP AND PREMISES	112 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	112 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	112 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
Shop and Premises	112-116 SOUTH STREET	GND FLOOR	RM1 1RX
Store and Premises	112-116 SOUTH STREET	1ST - 4TH FLRS	RM1 1RX
Store and Premises	112-116 SOUTH STREET	BSMNT	RM1 1RX
SHOP AND PREMISES	112A NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	113 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	113 RAINHAM ROAD	RAINHAM	RM13 7QX
SHOP AND PREMISES	113 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	113 WENNINGTON ROAD	RAINHAM	RM13 9TH
SHOP AND PREMISES	113-115 CORBETS TEY ROAD	UPMINSTER	RM14 2AA
PUBLIC HOUSE AND PREMISES	113-117 SOUTH STREET	THE WORLD'S END	RM1 1NX
SHOP AND PREMISES	114 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SH
SHOP AND PREMISES	114 COLLIER ROW ROAD	ROMFORD	RM5 2BB
SHOP AND PREMISES	114 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	114 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
STORE AND PREMISES	114-116 ARDLEIGH GREEN ROAD	REAR OF	RM11 2SH
SHOP AND PREMISES	114-116 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	115 HIGH STREET	HORNCHURCH	RM11 1TX
HOTEL AND PREMISES	115 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	115 MUNGO PARK ROAD	RAINHAM	RM13 7PP
STORE AND PREMISES	115 MUNGO PARK ROAD	(R/O)	RM13 7PP
SHOP AND PREMISES	115 RAINHAM ROAD	RAINHAM	RM13 7QX

CAR SHOWROOM AND PREMISES	115 SOUTHEND ARTERIAL ROAD	HONDA (UK) CARS	RM3 0XJ
SHOP AND PREMISES	115 VICTORIA ROAD	ROMFORD	RM1 2LX
SHOP AND PREMISES	115 WENNINGTON ROAD	RAINHAM	RM13 9TH
SHOP AND PREMISES	115-117 ABBS CROSS LANE	HORNCHURCH	RM12 4XR
SHOP AND PREMISES	116 COLLIER ROW ROAD	ROMFORD	RM5 2BB
SHOP AND PREMISES	116 NORTH STREET	GND FLR FRONT	RM1 1DL
SHOP AND PREMISES	116 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	116-118 HIGH STREET	HORNCHURCH	RM12 4UH
PUBLIC HOUSE AND PREMISES	117 AVON ROAD	THE GOLDEN CRANE	RM14 1RQ
SHOP, OFFICE AND PREMISES	117 BELGRAVE AVENUE	GIDEA PARK	RM2 6PS
SHOP AND PREMISES	117 CORBETS TEY ROAD	UPMINSTER	RM14 2AA
SHOP AND PREMISES	117 HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	117 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	117 VICTORIA ROAD	ROMFORD	RM1 2LX
SHOP AND PREMISES	117 WENNINGTON ROAD	RAINHAM	RM13 9TH
RETAIL WAREHOUSE AND PREMISES	117-133 NORTH STREET	ROMFORD	RM1 1ER
SHOP AND PREMISES	118 COLLIER ROW ROAD	ROMFORD	RM5 2BB
STORE AND PREMISES	118 HIGH STREET	(REAR OF)	RM12 4UH
SHOP AND PREMISES	118 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	118 NORTH STREET	ROMFORD	RM1 1DL
RESTAURANT AND PREMISES	118 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	118 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	119 ABBS CROSS LANE	HORNCHURCH	RM12 4XR
SHOP AND PREMISES	119 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	119 BELGRAVE AVENUE	GIDEA PARK	RM2 6PS
SHOP AND PREMISES	119 CORBETS TEY ROAD	UPMINSTER	RM14 2AA
CLUB HOUSE AND PREMISES	119 CROSS ROAD	MAWNEYS	RM7 8EA
SHOP AND PREMISES	119 HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	119 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	119 RAINHAM ROAD	TESCO EXPRESS	RM13 7QX
SHOP AND PREMISES	119 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP, STORE AND PREMISES	119 VICTORIA ROAD	ROMFORD	RM1 2LX
SHOP AND PREMISES	119 WENNINGTON ROAD	RAINHAM	RM13 9TH
SHOP AND PREMISES	119-121 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	119-129 ST MARYS LANE	UPMINSTER	RM14 2QB
SHOP AND PREMISES	11A STATION ROAD	COSTA COFFEE	RM14 2SJ
SHOP AND PREMISES	12 - 14 WESTERN ROAD	MORRIS PASTIES CAFE	RM1 3JT
Computer Centre and Premises	12 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	12 CARLTON ROAD	GIDEA PARK	RM2 5AA
SHOP AND PREMISES	12 CHASE CROSS ROAD	ROMFORD	RM5 3PR
SHOP AND PREMISES	12 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP, OFFICE AND PREMISES	12 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH

SHOP AND PREMISES	12 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOP AND PREMISES	12 MOOR LANE	CRANHAM	RM14 1EB
SHOP AND PREMISES	12 NORTH STREET	HORNCHURCH	RM11 1QX
SHOP AND PREMISES	12 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	12 SOUTH STREET	ROMFORD	RM1 1NJ
SHOP AND PREMISES	12 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	12 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	12 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	12 THE ARCADE	FARNHAM ROAD	RM3 8ED
SHOP AND PREMISES	12 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	12 WILLOW PARADE	MOOR LANE	RM14 1DZ
SHOP AND PREMISES	120 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SH
SHOP AND PREMISES	120 COLLIER ROW ROAD	ROMFORD	RM5 2BB
SHOP AND PREMISES	120 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	120 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	120 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	120 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
BANK AND PREMISES	120-126 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	120-126 HIGH STREET	BOOTS AT	RM12 4UH
SHOP AND PREMISES	120A HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	121 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	121 BELGRAVE AVENUE	GIDEA PARK	RM2 6PS
SHOP AND PREMISES	121 HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	121 HORNCHURCH ROAD	HORNCHURCH	RM12 4SY
SHOP AND PREMISES	121 MAWNEY ROAD	ROMFORD	RM7 7BH
SHOP AND PREMISES	121 MUNGO PARK ROAD	RAINHAM	RM13 7PP
PUBLIC HOUSE AND PREMISES	121 NORTH STREET	THE CHEQUERS	RM11 1ST
SHOP AND PREMISES	121 WENNINGTON ROAD	RAINHAM	RM13 9TH
RESTAURANT AND PREMISES	121-123 CORBETS TEY ROAD	UPMINSTER	RM14 2AA
SHOP AND PREMISES	12-13 BROADWAY PARADE	HORNCHURCH	RM12 4RS
TENNIS COURTS/CLUBS	12-14 CONISTON AVENUE	UPMINSTER	RM14 3XR
SHOP AND PREMISES	12-14 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	12-16 HIGH STREET	ROMFORD	RM1 1HR
LAND USED FOR CAR SALES AND PREMISES	12-16 HOG HILL ROAD	COLLIER ROW	RM5 2DH
SHOP AND PREMISES	122 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SH
SHOP AND PREMISES	122 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	122 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
CAFE AND PREMISES	122 UPMINSTER ROAD	HORNCHURCH	RM12 6PL
PUBLIC HOUSE AND PREMISES	122 VICTORIA ROAD	THE VICTORIA	RM1 2LX
SHOP AND PREMISES	122-124 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	123 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	123 BELGRAVE AVENUE	ROMFORD	RM2 6PS
SHOP AND PREMISES	123 CHERRY TREE LANE	RAINHAM	RM13 8TT
SHOP AND PREMISES	123 HORNCHURCH ROAD	GROUND FLOOR FRONT	RM12 4SY
SHOP AND PREMISES	123 MAWNEY ROAD	ROMFORD	RM7 7BH
SHOP AND PREMISES	123 MUNGO PARK ROAD	RAINHAM	RM13 7PP

SHOP AND PREMISES	123 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	123 WENNINGTON ROAD	RAINHAM	RM13 9TH
SHOP AND PREMISES	123-125 HIGH STREET	HORNCHURCH	RM11 1TX
STORE AND PREMISES	123-125 VICTORIA ROAD	(REAR OF)	RM1 2LX
SHOP AND PREMISES	124 COLLIER ROW ROAD	ROMFORD	RM5 2BB
SHOP AND PREMISES	124 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	124 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
PUBLIC HOUSE AND PREMISES	125 ABBS CROSS LANE	THE COMPASSES	RM12 4XR
SHOP AND PREMISES	125 ALBANY ROAD	HORNCHURCH	RM12 4AQ
SHOP AND PREMISES	125 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	125 BELGRAVE AVENUE	GIDEA PARK	RM2 6PS
SHOP AND PREMISES	125 CORBETS TEY ROAD	UPMINSTER	RM14 2AA
SHOP AND PREMISES	125 HORNCHURCH ROAD	HORNCHURCH	RM12 4SY
SHOP AND PREMISES	125 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP, WORKSHOP YARD & PREMISES	125 NEW ROAD	RAINHAM	RM13 8ES
SHOP AND PREMISES	125 WENNINGTON ROAD	RAINHAM	RM13 9TH
RESTAURANT AND PREMISES	125-129 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	126 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	126 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	127 ABBS CROSS LANE	HORNCHURCH	RM12 4XT
SHOP AND PREMISES	127 ALBANY ROAD	HORNCHURCH	RM12 4AQ
SHOP AND PREMISES	127 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	127 BELGRAVE AVENUE	GIDEA PARK	RM2 6PS
SHOP AND PREMISES	127 HORNCHURCH ROAD	HORNCHURCH	RM12 4SY
SHOP AND PREMISES	127 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	127 NEW ROAD	RAINHAM	RM13 8HH
SHOP AND PREMISES	127 WENNINGTON ROAD	RAINHAM	RM13 9TR
SNOOKER CLUB AND PREMISES	127-133 HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	127-133 HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	128 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	128 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	128 PETERSFIELD AVENUE	HAROLD HILL	RM4 9PH
SHOP AND PREMISES	128 UPMINSTER ROAD	HORNCHURCH	RM12 6PL
SHOP AND PREMISES	128A UPMINSTER ROAD	HORNCHURCH	RM12 6PL
STORE AND PREMISES	129 ABBS CROSS LANE	STORE R/O	RM12 4XT
SHOP AND PREMISES	129 ABBS CROSS LANE	HORNCHURCH	RM12 4XT
SHOP AND PREMISES	129 ALBANY ROAD	HORNCHURCH	RM12 4AQ
SHOP AND PREMISES	129 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	129 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	129 NEW ROAD	RAINHAM	RM13 8ES
SHOP AND PREMISES	129 WENNINGTON ROAD	RAINHAM	RM13 9TR
CLUB AND PREMISES	129-133 HORNCHURCH ROAD	GROUND FLOOR	RM12 4SY
SHOP AND PREMISES	1-3 & 7 ANGEL WAY	MAWNEYS	RM1 1JH
Computer Centre and Premises	13 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	1-3 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JR

SHOP AND PREMISES	13 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
SHOP AND PREMISES	13 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	13 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	13 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	13 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	13 HIGH STREET	ROMFORD	RM1 1JU
BANK AND PREMISES	1-3 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	13 NORTH STREET	HORNCHURCH	RM11 1RL
SHOP AND PREMISES	1-3 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	13 QUADRANT ARCADE	ROMFORD	RM1 3ED
STORE AND PREMISES	1-3 SALAMONS WAY	TPF AT	RM13 9UL
Bank and Premises	1-3 SOUTH STREET	BST GND & MEZZ FLRS AT	RM1 1XB
SHOP AND PREMISES	13 SOUTH STREET	ROMFORD	RM1 1NS
SHOP AND PREMISES	13 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	13 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	13 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	1-3 THE ARCADE	FARNHAM ROAD	RM3 8ED
SHOP AND PREMISES	13 THE LIBERTY	(GL15B)	RM1 3RL
SHOP AND PREMISES	1-3 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	13 VICTORIA ROAD	ROMFORD	RM1 2JT
CAFE AND PREMISES	1-3 WENNINGTON ROAD	RAINHAM	RM13 9DZ
SHOP AND PREMISES	13 WESTERN ROAD	ROMFORD	RM1 3LP
SHOP AND PREMISES	130 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	130 PARK LANE	HORNCHURCH	RM11 1BE
SHOP AND PREMISES	130 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	130 UPMINSTER ROAD	HORNCHURCH	RM12 6PL
SHOP AND PREMISES	130-132 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	131 ALBANY ROAD	HORNCHURCH	RM12 4AQ
SHOP AND PREMISES	131 AVON ROAD	UPMINSTER	RM14 1RQ
Superstore and Premises	131 HIGH STREET	LIDL	RM11 1TP
SHOP AND PREMISES	131 MUNGO PARK ROAD	RAINHAM	RM13 7PP
SHOP AND PREMISES	131 NEW ROAD	RAINHAM	RM13 8ES
SHOP AND PREMISES	131 WENNINGTON ROAD	RAINHAM	RM13 9TR
SHOP AND PREMISES	131-133 ABBS CROSS LANE	HORNCHURCH	RM12 4XT
Shop and Premises	131-133 GOOSHAYS DRIVE	LIDL	RM3 8AE
SHOP AND PREMISES	131-133 ST MARYS LANE	UPMINSTER	RM14 2SH
RESTAURANT AND PREMISES	13-15 STATION LANE	GROUND FLOOR	RM12 6JL
SHOP AND PREMISES	13-15 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
BANK AND PREMISES	13-17 COLLIER ROW ROAD	ROMFORD	RM5 3NP
SHOP AND PREMISES	131A HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	132 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	132 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	132 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	132 SOUTH STREET	ROMFORD	RM1 1TE
SHOP AND PREMISES	132 UPMINSTER ROAD	HORNCHURCH	RM12 6PR

SHOP AND PREMISES	133 ALBANY ROAD	HORNCHURCH	RM12 4AQ
SHOP AND PREMISES	133 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP & PREMISES	133 NEW ROAD	RAINHAM	RM13 8ES
SHOP AND PREMISES	133 WENNINGTON ROAD	RAINHAM	RM13 9TR
SHOP AND PREMISES	133A HIGH STREET	HORNCHURCH	RM11 1TX
SHOP AND PREMISES	134 COLLIER ROW LANE	ROMFORD	RM5 3DU
SHOP AND PREMISES	134 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	134 HORNCHURCH ROAD	HORNCHURCH	RM11 1DP
CAR SHOWROOM AND PREMISES	134 LONDON ROAD	ROBIINS & DAY	RM7 9DD
SHOP AND PREMISES	134 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	134 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	134 SOUTH STREET	GROUND FLOOR	RM1 1TE
SHOP AND PREMISES	134 UPMINSTER ROAD	HORNCHURCH	RM12 6PR
SHOP AND PREMISES	134-136 PARK LANE	HORNCHURCH	RM11 1BE
SHOP AND PREMISES	135 ALBANY ROAD	HORNCHURCH	RM12 4AQ
SHOP AND PREMISES	135 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	135 HIGH STREET	HORNCHURCH	RM11 3YD
SHOP AND PREMISES	135 HORNCHURCH ROAD	GND FLR	RM12 4SZ
SHOP AND PREMISES	135 NEW ROAD	RAINHAM	RM13 9EB
SHOP, STORE AND PREMISES	135 NORTH STREET	ROMFORD	RM1 1ED
SHOP AND PREMISES	135 WENNINGTON ROAD	RAINHAM	RM13 9TR
SHOP AND PREMISES	136 COLLIER ROW LANE	ROMFORD	RM5 3DU
BANK AND PREMISES	136 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	136 HILLVIEW AVENUE	HORNCHURCH	RM11 2DL
SHOP AND PREMISES	136 HORNCHURCH ROAD	HORNCHURCH	RM11 1DP
SHOP AND PREMISES	136 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	136 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	136 SOUTH STREET	GROUND FLOOR	RM1 1TE
SHOP AND PREMISES	136-138 UPMINSTER ROAD	HORNCHURCH	RM12 6PL
SHOP AND PREMISES	137 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	137 HIGH STREET	HORNCHURCH	RM11 3YD
SHOP AND PREMISES	137 HORNCHURCH ROAD	HORNCHURCH	RM12 4TB
SHOP AND PREMISES	137 WENNINGTON ROAD	RAINHAM	RM13 9TR
SHOP AND PREMISES	137-141 NORTH STREET	ROMFORD	RM1 1ED
PUBLIC HOUSE AND PREMISES	137-141 SOUTH STREET	BENTLEYS	RM1 1PL
CAR SHOWROOM AND PREMISES	137-143 LONDON ROAD	ROMFORD	RM7 9QH
SHOP AND PREMISES	138 COLLIER ROW LANE	ROMFORD	RM5 3DU
SHOP AND PREMISES	138 HILLVIEW AVENUE	HORNCHURCH	RM11 2DL
SHOP AND PREMISES	138 HORNCHURCH ROAD	HORNCHURCH	RM11 1DP
SHOP AND PREMISES	138 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	138 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	138 RUSH GREEN ROAD	RUSH GREEN	RM7 0QA
SHOP AND PREMISES	138-140 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	138-140 PARK LANE	HORNCHURCH	RM11 1BE
SHOP AND PREMISES	139 AVON ROAD	UPMINSTER	RM14 1RQ
STORE AND PREMISES	139 DEVONSHIRE ROAD	UNIT 1	RM12 4LW
SHOP AND PREMISES	139 HIGH STREET	HORNCHURCH	RM11 3YD

SHOP AND PREMISES	139 ST MARYS LANE	UPMINSTER	RM14 2UB
SHOP AND PREMISES	139A WENNINGTON ROAD	RAINHAM	RM13 9TR
SHOP AND PREMISES	139B WENNINGTON ROAD	RAINHAM	RM13 9TR
Computer Centre and Premises	14 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
STORE, WORKSHOP AND PREMISES	14 BRIDGE CLOSE	ROMFORD	RM7 0AU
SHOP AND PREMISES	14 BROADWAY	RAINHAM	RM13 9YW
SHOP AND PREMISES	14 CHASE CROSS ROAD	ROMFORD	RM5 3PS
SHOP AND PREMISES	14 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	14 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	14 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOP AND PREMISES	14 LAURIE WALK (N8)	ROMFORD	RM1 3RT
SHOP AND PREMISES	14 MORAY WAY	ROMFORD	RM1 4YD
SHOP AND PREMISES	14 NORTH STREET	HORNCHURCH	RM11 1QX
CAR WASH AND PREMISES	14 RAINHAM ROAD	RAINHAM	RM13 7RR
SHOP AND PREMISES	14 RONEO CORNER	HORNCHURCH	RM12 4TN
Restaurant and Premises	14 SOUTH STREET	ROMFORD	RM1 1RA
SHOP AND PREMISES	14 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	14 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	14 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	14 THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	14 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
RESTAURANT & PREMISES	14 VICTORIA ROAD	UNITS 1 & 2 AT	RM1 2JH
SHOP AND PREMISES	140 COLLIER ROW LANE	ROMFORD	RM5 3DU
SHOP AND PREMISES	140 HILLVIEW AVENUE	HORNCHURCH	RM11 2DL
SHOP AND PREMISES	140 HORNCHURCH ROAD	HORNCHURCH	RM11 1DP
SHOP AND PREMISES	140 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	140 SOUTH STREET	ROMFORD	RM1 1TE
SHOP AND PREMISES	140 UPMINSTER ROAD	UPMINSTER	RM12 6PL
RESTAURANT AND PREMISES	140-142 RUSH GREEN ROAD	RUSH GREEN	RM7 0QA
SHOP AND PREMISES	141 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	141 HIGH STREET	HORNCHURCH	RM11 3YD
SHOP AND PREMISES	141 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	142 BALGOES LANE	GIDEA PARK	RM2 6BP
SHOP AND PREMISES	142 COLLIER ROW LANE	ROMFORD	RM5 3DU
SHOP AND PREMISES	142 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	142 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	142 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	142 STATION LANE	HORNCHURCH	RM12 6LT
SHOP AND PREMISES	142-144 HILLVIEW AVENUE	HORNCHURCH	RM11 2DL
SHOP AND PREMISES	143 AVON ROAD	UPMINSTER	RM14 1RQ
STORE AND PREMISES	143 CROW LANE	CROW METALS DISTRIBUTION YARD AT	RM7 0ES
HAIRDRESSING SALON AND PREMISES	143 CROW LANE	ROMFORD	RM7 0ES

SHOP AND PREMISES	143 HEATH PARK ROAD	AMAZON DRY CLEANERS	RM2 5XA
STORE AND PREMISES	143 HEATH PARK ROAD	(REAR OF)	RM2 5XA
SHOP AND PREMISES	143 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	143 HIGH STREET	HORNCHURCH	RM11 3YD
SHOP AND PREMISES	143 NORTH STREET	ROMFORD	RM1 1ED
PUBLIC HOUSE AND PREMISES	143 SOUTH STREET	THE GOOSE	RM1 1NX
SHOP AND PREMISES	143 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	143C HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	143F HEATH PARK ROAD	ROMFORD	RM2 5XJ
SHOP AND PREMISES	144 BALGORES LANE	GIDEA PARK	RM2 5JR
SHOP AND PREMISES	144 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
CAR SHOWROOM, WORKSHOP AND PREMISES	144 LONDON ROAD	VICKERS (LAKESIDE) LIMITED	RM7 9QU
SHOP AND PREMISES	144 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	144 RUSH GREEN ROAD	RUSH GREEN	RM7 0PX
SHOP AND PREMISES	144 SOUTH STREET	ROMFORD	RM1 1SX
SHOP AND PREMISES	144 STATION LANE	HORNCHURCH	RM12 6LT
SHOP AND PREMISES	144 UPMINSTER ROAD	UPMINSTER BRIDGE STATION	RM12 6PL
SHOP AND PREMISES	144-146 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	145 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	145 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	145 HIGH STREET	HORNCHURCH	RM11 3YD
CAFE AND PREMISES	145 LONDON ROAD	GROUND FLOOR	RM7 9QH
SHOP AND PREMISES	145 RAINHAM ROAD	RAINHAM	RM13 7RB
SHOP AND PREMISES	145 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	145 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	145A RAINHAM ROAD	RAINHAM	RM13 7RB
SHOP AND PREMISES	146 BALGORES LANE	GIDEA PARK	RM2 6BP
SHOP AND PREMISES	146 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	146 RUSH GREEN ROAD	RUSH GREEN	RM7 0QA
SHOP AND PREMISES	146 UPMINSTER ROAD	UPMINSTER	RM14 2RB
SHOP AND PREMISES	146-148 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	147 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	147 CHURCH ROAD	HAROLD WOOD	RM3 OSD
SHOP AND PREMISES	147 HEATH PARK ROAD	ROMFORD	RM2 5XJ
SHOP AND PREMISES	147 HIGH STREET	HORNCHURCH	RM11 3YD
Shop and Premises	147 RAINHAM ROAD	RAINHAM	RM13 7RB
SHOP AND PREMISES	147 SOUTH STREET	ROMFORD	RM1 1PL
SHOP AND PREMISES	147 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	147 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	148 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	148 NORTH STREET	ROMFORD	RM1 1DL
SHOP AND PREMISES	148 UPMINSTER ROAD	UPMINSTER	RM14 2RB
Shop and Premises	148C BALGORES LANE	GIDEA PARK	RM2 6BP
Shop and Premises	148D BALGORES LANE	GIDEA PARK	RM2 6BP

SHOP AND PREMISES	149 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	149 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	149 RAINHAM ROAD	RAINHAM	RM13 7RB
SHOP AND PREMISES	149 SOUTH STREET	ROMFORD	RM1 1PL
SHOP AND PREMISES	149 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	149 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
CAR SALES SITE AND PREMISES	14A HOG HILL ROAD	COLLIER ROW	RM5 2DH
RETAIL WAREHOUSE AND PREMISES	14A THE BREWERY SHOPPING CENTRE	WATERLOO ROAD	RM1 1AU
SHOP AND PREMISES	14B COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	15 & 16 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	15 (F2) - 17 (F3) THE LIBERTY	ROMFORD	RM1 3RL
Computer Centre and Premises	15 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	15 BILLET LANE	HORNCHURCH	RM11 1TS
SHOP AND PREMISES	15 BOXMOOR ROAD	COLLIER ROW	RM1 2SH
SHOP AND PREMISES	15 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
SHOP AND PREMISES	15 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	15 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	15 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	15 FARNHAM ROAD	HAROLD HILL	RM3 8ED
Shop and Premises	15 HAINAULT ROAD	ROMFORD	RM5 3AA
PUBLIC HOUSE AND PREMISES	15 HIGH STREET	THE BITTER END	RM1 1JU
SHOP AND PREMISES	15 MILD MAY ROAD	ROMFORD	RM7 7DA
SHOP AND PREMISES	15 OAK ROAD	HAROLD WOOD	RM3 0PH
SHOP AND PREMISES	15 SOUTH STREET	ROMFORD	RM1 1NS
SHOP AND PREMISES	15 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	15 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	15 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	15 SUTTONS LANE	HORNCHURCH	RM12 6RD
SHOP AND PREMISES	15 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	15 THE PARADE	COLCHESTER ROAD	RM3 0AQ
SHOP AND PREMISES	15 VICTORIA ROAD	ROMFORD	RM1 2JT
SHOP AND PREMISES	150 BALGORES LANE	GIDEA PARK	RM2 6BP
SHOP AND PREMISES	150 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	150 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	150 UPMINSTER ROAD	UPMINSTER	RM14 2RB
STORE AND PREMISES	150 UPMINSTER ROAD	(REAR OF)	RM14 2RB
SHOP AND PREMISES	151 AVON ROAD	UPMINSTER	RM14 1RQ
SHOP AND PREMISES	151 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	151 HIGH STREET	HORNCHURCH	RM11 3YD
SHOP AND PREMISES	151 OLDCHURCH ROAD	ROMFORD	RM7 0BD
SHOP AND PREMISES	151 SOUTH STREET	ROMFORD	RM1 1PL
SHOP AND PREMISES	151 ST MARYS LANE	GND FLOOR	RM14 3BL
SHOP AND PREMISES	151 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA

SHOWROOM AND PREMISES	151-153 NORTH STREET	ROMFORD	RM1 1ED
SHOP AND PREMISES	15-15A MAWNEY ROAD	ROMFORD	RM7 7HL
SHOP AND PREMISES	152 BALGORES LANE	GIDEA PARK	RM2 6BP
SHOP AND PREMISES	152 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	152 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
RETAIL WAREHOUSE AND PREMISES	152 SOUTHEND ARTERIAL ROAD	TOPPS TILES	RM3 0BZ
SHOP AND PREMISES	152 UPMINSTER ROAD	UPMINSTER	RM14 2RB
STORE, OFFICE AND PREMISES	153 BILLET LANE	HORNCHURCH	RM11 1UR
SHOP AND PREMISES	153 HIGH STREET	HORNCHURCH	RM11 3YD
SHOP, OFFICE AND PREMISES	153 OLDCHURCH ROAD	ROMFORD	RM7 0BD
SHOP AND PREMISES	153 SOUTH STREET	ROMFORD	RM1 1PL
SHOP AND PREMISES	153 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	153 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	153-155 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	154 BALGORES LANE	GND & 1ST FLRS	RM2 6BP
SHOP AND PREMISES	154 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	154 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	154 RAINHAM ROAD	RAINHAM	RM13 7SA
SHOP AND PREMISES	154 UPMINSTER ROAD	UPMINSTER	RM14 2RB
SHOP AND PREMISES	155 BILLET LANE	HORNCHURCH	RM11 1UR
SHOP AND PREMISES	155 HIGH STREET	HORNCHURCH	RM11 3YD
SHOP AND PREMISES	155 NORTH STREET	ROMFORD	RM1 1ED
CAFE AND PREMISES	155 OLDCHURCH ROAD	ROMFORD	RM7 0BD
SHOP AND PREMISES	155 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	155 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	155-159 SOUTH STREET	ROMFORD	RM1 1PL
SHOP AND PREMISES	156 BALGORES LANE	GIDEA PARK	RM2 6BP
SHOP AND PREMISES	156 HORNCHURCH ROAD	GROUND FLOOR	RM11 1QH
LAND USED FOR CAR SALES & PREMISES	156 NEW ROAD	CAR SALES SITER ADJ	RM13 8RS
SHOP AND PREMISES	156 UPMINSTER ROAD	UPMINSTER	RM14 2RB
SHOP AND PREMISES	156-158 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	156C HORNCHURCH ROAD	GROUND FLOOR	RM11 1QH
SHOP AND PREMISES	157 BILLET LANE	HORNCHURCH	RM11 1UR
SHOP AND PREMISES	157 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	157 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	157, HIGH STREET	HORNCHURCH	RM11 3YD
SHOP AND PREMISES	158 BALGORES LANE	GIDEA PARK	RM2 6BS
STORE AND PREMISES	158 CROW LANE	UNIT 3 R/O	RM7 0ES
SHOP AND PREMISES	158 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	158 STATION LANE	HORNCHURCH	RM12 6LS
SHOP AND PREMISES	158 UPMINSTER ROAD	UPMINSTER	RM14 2RB
SHOP AND PREMISES	159 HIGH STREET	GROUND FLOOR	RM11 1YD
SHOP AND PREMISES	159 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	159 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
CAR SHOWROOM AND PREMISES	159-161 BILLET LANE	HORNCHURCH	RM11 1UR
SHOP AND PREMISES	15C SWAN WALK	UNIT GL	RM1 3EE

Computer Centre and Premises	16 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	16 BROADWAY	RAINHAM	RM13 9YW
SHOP AND PREMISES	16 CARLTON ROAD	GIDEA PARK	RM2 5AA
SHOP AND PREMISES	1-6 DENBAR PARADE	EASTERN AVENUE WEST	RM7 8AA
SHOP AND PREMISES	16 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	16 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOP AND PREMISES	16 LAURIE WALK (N9)	ROMFORD	RM1 3RT
SHOP AND PREMISES	16 MORAY WAY	ROMFORD	RM1 4YL
SHOP AND PREMISES	16 NORTH STREET	HORNCHURCH	RM11 1QX
SHOP AND PREMISES	16 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	16 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	16 SOUTH STREET	ROMFORD	RM1 1RA
SHOP AND PREMISES	16 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	16 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	16 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	16 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	16 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	160 BALGOES LANE	GIDEA PARK	RM2 6BS
SHOP AND PREMISES	160 HEATH PARK ROAD	ROMFORD	RM2 5XA
SHOP AND PREMISES	160 ST MARYS LANE	UPMINSTER	RM14 3BS
SHOP AND PREMISES	160 UPMINSTER ROAD	UPMINSTER	RM14 2RB
Shop and Premises	160-162 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	160-164 HIGH STREET	HORNCHURCH	RM12 6QX
SHOP AND PREMISES	161 HIGH STREET	HORNCHURCH	RM11 3XS
CAR SHOWROOM AND PREMISES	161 LONDON ROAD	ROMFORD	RM7 9QH
SHOP AND PREMISES	161 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	161 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
Shop and Premises	16-18 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	162 BALGOES LANE	GIDEA PARK	RM2 6BS
SHOP AND PREMISES	162 COLLIER ROW LANE	ROMFORD	RM5 3BH
SHOP AND PREMISES	162 HEATH PARK ROAD	ROMFORD	RM2 5XL
SHOP AND PREMISES	162 RUSH GREEN ROAD	(INCLUDING 80 DAGENHAM ROAD)	RM7 0JU
SHOP AND PREMISES	162 ST MARYS LANE	UPMINSTER	RM14 3BS
SHOP AND PREMISES	162 STATION LANE	HORNCHURCH	RM12 6LS
SHOP AND PREMISES	162 UPMINSTER ROAD	UPMINSTER	RM14 2RB
SHOP AND PREMISES	162-166 SOUTH STREET	UNIT 1	RM1 1SU
SHOP AND PREMISES	162-166 SOUTH STREET	UNIT 3 AT	RM1 1SX
SHOP AND PREMISES	163 BILLET LANE	HORNCHURCH	RM11 1UR
SHOP AND PREMISES	163 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	163 MAWNEY ROAD	TESCOS EXPRESS	RM7 8AB
SHOP AND PREMISES	163 SOUTH STREET	ROMFORD	RM1 1PL

SHOP AND PREMISES	163 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	163 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	164 BALGORES LANE	GIDEA PARK	RM2 6BS
SHOP AND PREMISES	164 COLLIER ROW LANE	ROMFORD	RM5 3EA
SHOP AND PREMISES	164 HEATH PARK ROAD	ROMFORD	RM2 5XL
SHOP AND PREMISES	164 MAIN ROAD	ROMFORD	RM2 5HS
VEHICLE REPAIR WORKSHOP AND PREMISES	164 MAWNEY ROAD	MOTOR FITTERS AT	RM7 7BE
CAR SALES SITE & PREMISES	164 MAWNEY ROAD	SALES AT	RM7 7BE
VEHICLE REPAIR WORKSHOP AND PREMISES	164 MAWNEY ROAD	MOT SERVICE STATION AT	RM7 7BE
CAR WASH AND PREMISES	164 MAWNEY ROAD	CAR WASH AT	RM7 7BE
SHOP AND PREMISES	164 MAWNEY ROAD	KIOSK AT	RM7 7BE
SHOP AND PREMISES	164 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	164 ST MARYS LANE	UPMINSTER	RM14 3BS
SHOP AND PREMISES	164 STATION LANE	HORNCHURCH	RM12 6LS
SHOP AND PREMISES	164 UPMINSTER ROAD	UPMINSTER	RM14 2RB
SHOP AND PREMISES	164-166 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	164-168 COLLIER ROW ROAD	ROMFORD	RM5 2BD
SHOP AND PREMISES	164B UPMINSTER ROAD	UPMINSTER	RM14 2RB
SHOP AND PREMISES	165 HIGH STREET	HORNCHURCH	RM11 3XS
CLUB AND PREMISES	165 NEW ROAD	SILVER HALL SOCIAL CLUB	RM13 8SH
SHOP AND PREMISES	165 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	165 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	165-167 SOUTH STREET	ROMFORD	RM1 1PS
SHOP AND PREMISES	166 BALGORES LANE	GIDEA PARK	RM2 6BS
STORE AND PREMISES	166 BALGORES LANE	REAR OF	RM2 6BS
SHOP AND PREMISES	166 COLLIER ROW LANE	ROMFORD	RM5 3EA
SHOP AND PREMISES	166 HEATH PARK ROAD	ROMFORD	RM2 5XP
SHOP AND PREMISES	166 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	166 SOUTH END ROAD	RAINHAM	RM13 7XR
SHOP AND PREMISES	166 ST MARYS LANE	UPMINSTER	RM14 3BS
Shop and Premises	166 UPMINSTER ROAD	CO-OP	RM14 2RB
SHOP AND PREMISES	166-166A MAIN ROAD	ROMFORD	RM2 5AW
SHOP AND PREMISES	167 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	167 NEW ROAD	RAINHAM	RM13 8SH
SHOP AND PREMISES	167 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	167 WHITCHURCH ROAD	HAROLD HILL	RM3 9AA
SHOP AND PREMISES	168 BALGORES LANE	GIDEA PARK	RM2 6BS
SHOP AND PREMISES	168 COLLIER ROW LANE	ROMFORD	RM5 3EA
SHOP AND PREMISES	168 HEATH PARK ROAD	ROMFORD	RM2 5XP
RESTAURANT AND PREMISES	168 HIGH STREET	UNIT 2	RM12 6QU
RESTAURANT AND PREMISES	168 HIGH STREET	HORNCHURCH	RM12 6QU
RESTAURANT AND PREMISES	168 HIGH STREET	UNIT 4	RM12 6QU
SHOP AND PREMISES	168 HORNCHURCH ROAD	HORNCHURCH	RM11 1QH
SHOP AND PREMISES	168 MAIN ROAD	ROMFORD	RM2 5HS

SHOP AND PREMISES	168 MAWNEY ROAD	ROMFORD	RM7 8BU
STORE AND PREMISES	168 NEW ROAD	UNIT 11	RM13 8RS
STORE AND PREMISES	168 NEW ROAD	1ST FLOOR UNIT 1 AT	RM13 9RS
SHOP AND PREMISES	168 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	168 SOUTH END ROAD	RAINHAM	RM13 7XR
SHOP AND PREMISES	168-170 SOUTH STREET	ROMFORD	RM1 1TR
SHOP AND PREMISES	168A MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	168B MAIN ROAD	GROUND FLOOR	RM2 5HS
SHOP AND PREMISES	168B RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	168C MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	169 EASTERN AVENUE EAST	RISE PARK PARADE	RM1 4NT
SHOP AND PREMISES	169 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	169 NEW ROAD	RAINHAM	RM13 8SH
Shop and Premises	169 SOUTH STREET	ROMFORD	RM1 2AP
SHOP AND PREMISES	169 ST MARYS LANE	UPMINSTER	RM14 3BS
SHOP AND PREMISES	17 A & B QUADRANT ARCADE	ROMFORD	RM1 3ED
Computer Centre and Premises	17 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	17 BOXMOOR ROAD	COLLIER ROW	RM5 2SH
SHOP AND PREMISES	17 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	17 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
STORE AND PREMISES	1-7 DURY FALLS CLOSE	BT	RM11 3AX
SHOP AND PREMISES	17 ELM PARADE	ELM PARK AVENUE	RM12 4SA
STORE AND PREMISES	17 ESSEX ROAD	STORE FRONTING R/O	RM7 8BE
STORE AND PREMISES	17 ESSEX ROAD	MAWNEYS	RM7 8BE
POST OFFICE AND PREMISES	17 FARNHAM ROAD	HAROLD HILL	RM3 8ED
Shop and Premises	17 HAINAULT ROAD	COLLIER ROW	RM5 3AA
SHOP AND PREMISES	17 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	17 HIGH STREET	ROMFORD	RM1 1JU
Hairdressing Salon	17 ORCHARD ROAD	ROMFORD	RM7 8HR
SHOP AND PREMISES	17 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	17 SOUTH STREET	GROUND FLOOR	RM1 1NJ
SHOP AND PREMISES	17 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	17 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	17 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	17 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	17 SUTTONS LANE	HORNCHURCH	RM12 6RD
SHOP AND PREMISES	17 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	17 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
Shop and Premises	17 VICTORIA ROAD	ROMFORD	RM1 2JT
SHOP AND PREMISES	170 COLLIER ROW LANE	ROMFORD	RM5 3EA
SHOP AND PREMISES	170 COLLIER ROW ROAD	GROUND FLOOR	RM5 2BD
SHOP AND PREMISES	170 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU

SHOP AND PREMISES	170 SOUTH END ROAD	RAINHAM	RM13 7XR
SHOP AND PREMISES	171 EASTERN AVENUE EAST	RISE PARK PARADE	RM1 4NT
SHOP AND PREMISES	171 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	171 SOUTH STREET	ROMFORD	RM1 1PS
SHOP AND PREMISES	171 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	171 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	17-18 THE BROADWAY	ELM PARK	RM12 4RN
Shop and Premises	17-19 BILLET LANE	HORNCHURCH	RM11 1TS
SHOP AND PREMISES	17-19 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	17-19 STATION LANE	HORNCHURCH	RM12 6JL
SHOWROOM AND PREMISES	172 COLLIER ROW LANE	ROMFORD	RM5 3EA
SHOP AND PREMISES	172 COLLIER ROW ROAD	ROMFORD	RM5 2BD
SHOP AND PREMISES	172 HIGH STREET	& 1ST FLOOR 172-180 HIGH STREET	RM12 6QP
SHOWROOM AND PREMISES	172 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	172 MAWNEY ROAD	ROMFORD	RM7 8BU
SHOP AND PREMISES	172 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	172 SOUTH END ROAD	RAINHAM	RM13 7XR
SHOP AND PREMISES	172 ST MARYS LANE	UPMINSTER	RM14 3BT
SHOP AND PREMISES	172-174 SOUTH STREET	ROMFORD	RM1 1TR
SHOP AND PREMISES	173 EASTERN AVENUE EAST	RISE PARK PARADE	RM1 4NT
SHOP AND PREMISES	173 MAWNEY ROAD	ROMFORD	RM7 8BX
SHOP AND PREMISES	173 SOUTH STREET	ROMFORD	RM1 1PS
SHOP AND PREMISES	173 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	173 STATION LANE	HORNCHURCH	RM12 6LL
BANK AND PREMISES	173-175 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	174 COLLIER ROW ROAD	ROMFORD	RM5 2BD
SHOP AND PREMISES	174 HIGH STREET	HORNCHURCH	RM12 6QP
LAUNDERETTE AND PREMISES	174 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	174 MAWNEY ROAD	ROMFORD	RM7 8BU
SHOP AND PREMISES	174 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	174 SOUTH END ROAD	RAINHAM	RM13 7XR
RESTAURANT AND PREMISES	174 ST MARYS LANE	UPMINSTER	RM14 3BT
CAR SHOWROOM AND PREMISES	17-45 LONDON ROAD	ROMFORD	RM7 9DB
SHOP AND PREMISES	175 EASTERN AVENUE EAST	RISE PARK PARADE	RM1 4NT
SHOWROOM, WORKSHOP AND PREMISES	175 OLDCHURCH ROAD	ROMFORD	RM7 0BD
SHOP AND PREMISES	175 SOUTH STREET	ROMFORD	RM1 1PS
SHOP AND PREMISES	175 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	175 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	176 COLLIER ROW ROAD	ROMFORD	RM5 2BD
SHOP AND PREMISES	176 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	176 HILLdene AVENUE	HAROLD HILL	RM3 8DB
SHOP AND PREMISES	176 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	176 SOUTH STREET	ROMFORD	RM1 1BW

SHOP AND PREMISES	176 ST MARYS LANE	UPMINSTER	RM14 3BT
SHOP AND PREMISES	176-176A MAWNEY ROAD	ROMFORD	RM7 8BU
SHOP AND PREMISES	176-178 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	177 EASTERN AVENUE EAST	RISE PARK PARADE	RM1 4NT
SHOP AND PREMISES	177 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	177 LONDON ROAD	ROMFORD	RM7 9DD
SHOP AND PREMISES	177 SOUTH STREET	ROMFORD	RM1 1PS
SHOP AND PREMISES	177 SQUIRRELS HEATH LANE	GIDEA PARK	RM11 2DX
SHOP AND PREMISES	177 ST MARYS LANE	UPMINSTER	RM14 3BL
SHOP AND PREMISES	177 STATION LANE	HORNCHURCH	RM12 6LL
STORE AND PREMISES	177-181 HORNCHURCH ROAD	UNIT 7	RM12 4TE
SHOP AND PREMISES	178 COLLIER ROW ROAD	ROMFORD	RM5 2BD
RESTAURANT AND PREMISES	178 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	178 HILLdene AVENUE	HAROLD HILL	RM3 8BD
SHOP AND PREMISES	178 MAWNEY ROAD	ROMFORD	RM7 8BU
SHOP AND PREMISES	178 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
SHOP AND PREMISES	178 ST MARYS LANE	UPMINSTER	RM14 3BT
SHOP AND PREMISES	179 EASTERN AVENUE EAST	RISE PARK PARADE	RM1 4NT
RESTAURANT AND PREMISES	179 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	179 NEW ROAD	RAINHAM	RM13 8SH
SHOP AND PREMISES	179 SHEPHERDS HILL	IVY LODGE FARM	RM3 0NR
SHOP AND PREMISES	179 SOUTH STREET	ROMFORD	RM1 1PS
SHOP AND PREMISES	179 SQUIRRELS HEATH LANE	GIDEA PARK	RM2 6DP
SHOP AND PREMISES	179 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	179 STATION LANE	GND FLOOR	RM12 6LL
CAR SHOWROOM AND PREMISES	179-181 LONDON ROAD	ROMFORD	RM7 9DD
FITNESS CENTRE AND PREMISES	17A VICTORIA ROAD	ROMFORD	RM1 2JT
STORE, WORKSHOP AND PREMISES	18 ALBERT ROAD	(REAR OF)	RM1 2PJ
Computer Centre and Premises	18 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
CLUB AND PREMISES	18 CARLTON ROAD	GIDEA PARK	RM2 5AA
SHOP AND PREMISES	18 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	18 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	18 NORTH STREET	HORNCHURCH	RM11 1QX
HOTEL AND PREMISES	18 REPTON DRIVE	GIDEA PARK	RM2 5LP
SHOP AND PREMISES	18 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	18 SOUTH STREET	ROMFORD	RM1 1RA
SHOP AND PREMISES	18 STATION PARADE	THE BROADWAY	RM12 5AB
BANK AND PREMISES	18 STATION ROAD	UPMINSTER	RM14 2SJ

SHOP AND PREMISES	18 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	18 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
HAIRDRESSING SALON AND PREMISES	180 COLLIER ROW LANE	ROMFORD	RM5 3EA
SHOP AND PREMISES	180 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	180 HILLdene AVENUE	HAROLD HILL	RM3 8DB
SHOP AND PREMISES	180 HORNCHURCH ROAD	GROUND FLOOR	RM11 1QL
SHOP AND PREMISES	180 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
BANK AND PREMISES	180-182 MAIN ROAD	ROMFORD	RM2 5HS
SHOP AND PREMISES	181 CHERRY TREE LANE	RAINHAM	RM13 8TU
SHOP AND PREMISES	181 HIGH STREET	HORNCHURCH	RM11 3XS
SHOWROOM AND PREMISES	181 SOUTH STREET	ROMFORD	RM1 1PS
SHOP AND PREMISES	181 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	181 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	18-19 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	18-19 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	182 HILLdene AVENUE	HAROLD HILL	RM3 8DB
SHOP AND PREMISES	182 HORNCHURCH ROAD	(FRONT)	RM11 1QL
STUDIOS AND PREMISES	182 HORNCHURCH ROAD	(REAR)	RM11 1QL
SHOP AND PREMISES	182 SOUTH STREET	ROMFORD	RM1 1TR
SHOP AND PREMISES	182-184 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	183 CHERRY TREE LANE	RAINHAM	RM13 8TU
SHOP AND PREMISES	183 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	183 LONDON ROAD	ROMFORD	RM7 9DD
SHOP AND PREMISES	183 SOUTH STREET	GROUND FLOOR	RM1 1PS
SHOP AND PREMISES	183 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	183 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	184 HILLdene AVENUE	HAROLD HILL	RM3 8BD
SHOP AND PREMISES	184 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	184 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	184-186 SOUTH STREET	ROMFORD	RM1 1TR
SHOP AND PREMISES	185 CHERRY TREE LANE	RAINHAM	RM13 8TU
SHOP AND PREMISES	185 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	185 LONDON ROAD	ROMFORD	RM7 9DD
SHOP AND PREMISES	185 SOUTH STREET	ROMFORD	RM1 1QA
SHOP AND PREMISES	185 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	185 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	185B HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	186 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	186 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	186 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	186 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	186-188 HILLdene AVENUE	HAROLD HILL	RM3 8DB
SHOP AND PREMISES	187 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	187 HIGH STREET	HORNCHURCH	RM11 3XS
SHOP AND PREMISES	187 LONDON ROAD	ROMFORD	RM7 9DD
SHOP AND PREMISES	187 NEW ROAD	RAINHAM	RM13 8SH
SHOP AND PREMISES	187 SOUTH STREET	ROMFORD	RM1 1QA

SHOP AND PREMISES	187 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	187 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	188 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	188 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	188 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	188 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	188 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BH
SHOP AND PREMISES	189 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
RESTAURANT AND PREMISES	189 HIGH STREET	HORNCHURCH	RM11 3XT
SHOP AND PREMISES	189 LONDON ROAD	ROMFORD	RM7 9DD
SHOP AND PREMISES	189 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	189 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	18A STATION LANE	HORNCHURCH	RM12 6NJ
HAIRDRESSING SALON AND PREMISES	18A-18B QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	18B STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	19 BOXMOOR ROAD	ROMFORD	RM5 2SH
RESTAURANT AND PREMISES	19 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	19 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	19 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	19 FARNHAM ROAD	HAROLD HILL	RM3 8ED
KIOSK AND PREMISES	19 LAURIE WALK (N13)	ROMFORD	RM1 3RT
SHOP AND PREMISES	19 MCINTOSH ROAD	ROMFORD	RM1 4JU
SHOP AND PREMISES	19 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	19 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	19 SUTTONS LANE	HORNCHURCH	RM12 6RD
SHOP AND PREMISES	19 THE BROADWAY	HORNCHURCH	RM12 4RW
SHOP AND PREMISES	19 THE LIBERTY (F4)	ROMFORD	RM1 3RL
SHOP AND PREMISES	19 THE PARADE	COLCHESTER ROAD	RM3 0AQ
STORE AND PREMISES	19 THE PARADE	STORE R/O	RM3 0AQ
SHOP AND PREMISES	19 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	19 VICTORIA ROAD	ROMFORD	RM1 2JT
SHOP AND PREMISES	190 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	190 HIGH STREET	HORNCHURCH	RM12 6QP
STORE AND PREMISES	190 HORNCHURCH ROAD	UNIT 1 R/O	RM11 1QL
SHOP AND PREMISES	190 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
STORE AND PREMISES	190 HORNCHURCH ROAD	UNITS 2 & 3 R/O	RM11 1QL
SHOP AND PREMISES	190 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	190 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BH
BANK AND PREMISES	190-194 HILLdene AVENUE	HAROLD HILL	RM3 8BD
SHOP AND PREMISES	191 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	191 LONDON ROAD	ROMFORD	RM7 9DJ
CAFE AND PREMISES	191 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	191 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	191-193 NORTH STREET	ROMFORD	RM1 1DU

SHOP AND PREMISES	192 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	192 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	192 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	192 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	192 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BH
Computer Centre and Premises	19-20 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	19-20 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	19-21 STATION ROAD	HAROLD WOOD	RM3 0BT
SHOP AND PREMISES	193 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	193 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	193 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	193 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BB
SHOP AND PREMISES	194 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
RESTAURANT AND PREMISES	194 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	194 HORNCHURCH ROAD	HORNCHURCH	RM11 1QL
SHOP AND PREMISES	194 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BH
SHOP AND PREMISES	194 WENNINGTON ROAD	RAINHAM	RM13 9UU
PUBLIC HOUSE AND PREMISES	194-204 MAIN ROAD	THE ARCHERS	RM2 5HA
SHOP AND PREMISES	195 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
RESTAURANT AND PREMISES	195 HIGH STREET	HORNCHURCH	RM11 3XT
SHOP AND PREMISES	195 NEW ROAD	RAINHAM	RM13 8SJ
SHOP AND PREMISES	195 NORTH STREET	ROMFORD	RM1 1DT
SHOP AND PREMISES	195 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	195 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	196 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	196 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	196 HILLdene AVENUE	HAROLD HILL	RM3 8DB
SHOP AND PREMISES	196 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BH
SHOP AND PREMISES	196 WENNINGTON ROAD	RAINHAM	RM13 9UU
SHOP AND PREMISES	197 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	197 RUSH GREEN ROAD	(INC 82-84 DAGENHAM ROAD)	RM7 0PX
SHOP AND PREMISES	197 SOUTH STREET	ROMFORD	RM1 1QA
SHOP AND PREMISES	197 ST MARYS LANE	UPMINSTER	RM14 3BU
RESTAURANT AND PREMISES	197-201 HIGH STREET	HORNCHURCH	RM11 3XT
STORES AND PREMISES	198 CROW LANE	ROMFORD	RM7 0ES
SHOP AND PREMISES	198 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	198 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	198 HILLdene AVENUE	HAROLD HILL	RM3 8DB
SHOP AND PREMISES	198 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BH
SHOP AND PREMISES	198 WENNINGTON ROAD	RAINHAM	RM13 9UU

SHOP AND PREMISES	199 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	199 SOUTH STREET	ROMFORD	RM1 1TR
SHOP AND PREMISES	199 ST MARYS LANE	GROUND FLOOR	RM14 3BU
SHOP AND PREMISES	199 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	199-201 RUSH GREEN ROAD	RUSH GREEN	RM7 0JR
SHOP AND PREMISES	199-205 LONDON ROAD	ROMFORD	RM7 9DJ
SHOP AND PREMISES	19A BOXMOOR ROAD	COLLIER ROW	RM5 2SH
HALL AND PREMISES	19A SEYMER ROAD	ROMFORD	RM1 4LA
SHOP AND PREMISES	19A STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	19A THE PARADE	COLCHESTER ROAD	RM3 0AQ
KIOSK AND PREMISES	1A BUTTS GREEN ROAD	HORNCHURCH	RM11 2JR
SHOP AND PREMISES	1A ST LAWRENCE ROAD	UPMINSTER	RM14 2UN
SHOP, STORE AND PREMISES	1A SUTTONS LANE	HORNCHURCH	RM12 6RJ
SHOP AND PREMISES	1A THE ARCADE	FARNHAM ROAD	RM3 8ED
SHOP AND PREMISES	1A WESTLAND AVENUE	HORNCHURCH	RM11 3SD
Shop and Premises	1B ARCADE PLACE	ROMFORD	RM1 1RS
BANQUETING SUITE AND PREMISES	1ST FLR FARINGDON GROVE	FARINGDON AVENUE	RM3 8TD
Computer Centre and Premises	2 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	2 ATLANTA BOULEVARD	GROUND FLOOR	RM1 1TB
SHOP AND PREMISES	2 BALGOES SQUARE	GIDEA PARK	RM2 6AU
RESTAURANT AND PREMISES	2 BERTHER ROAD	HORNCHURCH	RM11 3HS
SHOP AND PREMISES	2 BLENHEIM COURT	NORTHOLT WAY	RM12 5RX
SHOP AND PREMISES	2 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	2 CARLTON ROAD	GIDEA PARK	RM2 5AA
Shop and Premises	2 CELTIC FARM ROAD	ROSS MCKINLEY ACCOUNTANTS	RM13 9GP
Shop and Premises	2 CELTIC FARM ROAD	F&A CONSTORTIUM LTD	RM13 9GP
SHOP AND PREMISES	2 CHASE CROSS ROAD	ROMFORD	RM5 3PR
SHOP AND PREMISES	2 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	2 CROWN PARADE	UPMINSTER ROAD SOUTH	RM13 9BD
SHOP AND PREMISES	2 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	2 ELMER GARDENS	RAINHAM	RM13 7BS
SHOP AND PREMISES	2 ESSEX GARDENS	HORNCHURCH	RM11 3EH
SHOP AND PREMISES	2 FARINGDON AVENUE	ROMFORD	RM3 8SG
SHOP AND PREMISES	2 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOP AND PREMISES	2 HACTON PARADE	CENTRAL DRIVE	RM12 6EL
GUEST HOUSE AND PREMISES	2 HAVERING ROAD	ROMFORD	RM1 4QU
SHOP, STORE AND PREMISES	2 HOG HILL ROAD	COLLIER ROW	RM5 2DH
SHOP AND PREMISES	2 LAURIE WALK (H14)	ROMFORD	RM1 3RT
SHOP AND PREMISES	2 MOOR LANE	CRANHAM	RM14 1EB
SHOP AND PREMISES	2 MORAY WAY	ROMFORD	RM1 4YD
SHOP AND PREMISES	2 OCKENDON ROAD	UPMINSTER	RM14 2DN

SHOP, STORE AND PREMISES	2 OLD MILL PARADE	VICTORIA ROAD	RM1 2HU
SHOP AND PREMISES	2 PARK LANE	HORNCHURCH	RM11 1BB
SHOP AND PREMISES	2 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	2 SOUTH END ROAD	RAINHAM	RM13 7XH
SHOP AND PREMISES	2 STATION PARADE	VICTORIA ROAD	RM1 2JA
SHOP AND PREMISES	2 STATION ROAD	GIDEA PARK	RM2 6BX
SHOP AND PREMISES	2 SUTTONS LANE	(ADJACENT)	RM12 6RD
SHOP AND PREMISES	2 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	2 THE ARCADE	FARNHAM ROAD	RM3 8EB
SHOP, STORE AND PREMISES	2 THE PARADE	COLCHESTER ROAD	RM3 0AQ
SHOP AND PREMISES	2 TUDOR COURT	HAROLD COURT ROAD	RM3 0AE
SHOP AND PREMISES	2 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
STORE AND PREMISES	2 WALDEN AVENUE	STORE ADJ	RM13 8DS
SHOP AND PREMISES	2 WRITTLE WALK	RAINHAM	RM13 7XB
HALL AND PREMISES	20 ATHELSTAN ROAD	HAROLD WOOD	RM3 0QB
SHOP AND PREMISES	20 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	20 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	20 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	20 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	20 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	20 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	20 SOUTH STREET	ROMFORD	RM1 1RA
SHOP AND PREMISES	20 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	20 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	20 TADWORTH PARADE	THE BROADWAY	RM12 5AS
STORE AND PREMISES	20 THE BROADWAY	(BASEMENT)	RM12 4RW
Shop and Premises	20 THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	20 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
HALL & PREMISES	200 ELM PARK AVENUE	1ST FLOOR CO-OPERATIVE BUILDING	RM12 4SD
SHOP AND PREMISES	200 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	200 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BH
SHOP AND PREMISES	200-202 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	201 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	201 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	201-203 STATION LANE	HORNCHURCH	RM12 6LL
STORE AND PREMISES	201B CROW LANE	ROMFORD	RM7 0ES
SHOP AND PREMISES	202 HIGH STREET	HORNCHURCH	RM12 6QP
Shop and Premises	202 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP AND PREMISES	20-22 NORTH STREET	HORNCHURCH	RM11 1QX
Concrete Batching Plant, Workshop and Premises	20-22 SALAMONS WAY	RAINHAM	RM13 9UL
SHOP AND PREMISES	202-204 LYNDHURST DRIVE	HORNCHURCH	RM11 1JW

VEHICLE REPAIR WORKSHOP AND PREMISES	20-28 LONDON ROAD	ROMFORD	RM7 9RB
SHOP AND PREMISES	203 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	203 NORTH STREET	ROMFORD	RM1 4QB
SHOP AND PREMISES	203 RUSH GREEN ROAD	RUSH GREEN	RM7 0JR
SHOP AND PREMISES	203 ST MARYS LANE	UPMINSTER	RM14 3BU
Store and Premises	203-203A HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	204 - 206 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	204 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	204 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
Shop and Premises	205 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	205 CHERRY TREE LANE	RAINHAM	RM13 8TU
CLUB HOUSE AND PREMISES	205 HIGH STREET	HORNCHURCH	RM11 3XT
SHOP AND PREMISES	205 NORTH STREET	ROMFORD	RM2 6QD
SHOP AND PREMISES	205 RUSH GREEN ROAD	RUSH GREEN	RM7 0JR
SHOP AND PREMISES	205 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	205 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	206 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	206 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP AND PREMISES	206 LYNDHURST DRIVE	HORNCHURCH	RM11 1JW
SHOP AND PREMISES	206 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	207 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
SHOP AND PREMISES	207 CHERRY TREE LANE	RAINHAM	RM13 8TU
SHOP AND PREMISES	207 NORTH STREET	ROMFORD	RM1 4QA
SHOP AND PREMISES	207 ST MARYS LANE	UPMINSTER	RM14 3BU
SHOP AND PREMISES	207 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	208 - 212 ELM PARK AVENUE	HORNCHURCH	RM12 4SD
SHOP AND PREMISES	208 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	208 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP AND PREMISES	208 LYNDHURST DRIVE	HORNCHURCH	RM11 1JW
SHOP, OFFICE AND PREMISES	208 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	209 CHERRY TREE LANE	RAINHAM	RM13 8TU
SHOP AND PREMISES	209 CROW LANE	ROMFORD	RM7 0ES
SHOP AND PREMISES	209 STATION LANE	1ST FLR	RM12 6LL
SHOP AND PREMISES	209 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	209-211 NORTH STREET	ROMFORD	RM1 4QA
SHOP AND PREMISES	209-213 ST MARYS LANE	UPMINSTER	RM14 3BU
Computer Centre and Premises	20A AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	21 BILLET LANE	HORNCHURCH	RM11 1TS
SHOP AND PREMISES	21 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	21 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	21 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	21 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	21 LAURIE WALK N14	ROMFORD	RM1 3RT
STORE, OFFICE AND PREMISES	21 RICHMOND ROAD	ROMFORD	RM1 2DX

SHOP AND PREMISES	21 STATION PARADE	THE BROADWAY	RM12 5AB
BANK AND PREMISES	21 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	21 SUTTONS LANE	HORNCHURCH	RM12 6RD
Shop and Premises	21 THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	21 THE LIBERTY (F5)	ROMFORD	RM1 3RL
SHOP AND PREMISES	21 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	21 VICTORIA ROAD	ROMFORD	RM1 2JT
SHOP AND PREMISES	210 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	210 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP AND PREMISES	210 LYNDHURST DRIVE	HORNCHURCH	RM11 1JW
SHOP, WORKSHOP AND PREMISES	210 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	211 CHERRY TREE LANE	RAINHAM	RM13 8TU
SHOP AND PREMISES	211 PETTITS LANE NORTH	ROMFORD	RM1 4NU
SHOP AND PREMISES	211 STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	212 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	212 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP AND PREMISES	212 MAIN ROAD	GND FLR	RM2 5HA
Computer Centre and Premises	21-22 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	21-22 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	21-23 NORTH STREET	ROMFORD	RM1 1EU
SHOP AND PREMISES	21-23 SOUTH STREET	ROMFORD	RM1 2NJ
SHOP AND PREMISES	213 PETTITS LANE NORTH	ROMFORD	RM1 4NU
SHOP AND PREMISES	213 STATION LANE	HORNCHURCH	RM12 6LL
SHOP AND PREMISES	213C PETTITS LANE NORTH	ROMFORD	RM1 4NU
STORE AND PREMISES	214 HIGH STREET	HORNCHURCH	RM12 6QP
SHOP AND PREMISES	214 HORNCHURCH ROAD	HORNCHURCH	RM12 6TE
SHOP AND PREMISES	214 MAIN ROAD	GND FLR	RM2 5HA
SHOP AND PREMISES	215 NORTH STREET	ROMFORD	RM1 4QA
SHOP AND PREMISES	215 PETTITS LANE NORTH	ROMFORD	RM1 4NU
SHOP AND PREMISES	215 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BB
SHOP AND PREMISES	215A NORTH STREET	ROMFORD	RM1 4QA
SHOP AND PREMISES	216 HORNCHURCH ROAD	HORNCHURCH	RM12 6TE
SHOP, OFFICE AND PREMISES	216-218 MAIN ROAD	ROMFORD	RM2 5HH
SHOP AND PREMISES	217 NORTH STREET	ROMFORD	RM1 4QA
SHOP AND PREMISES	217 PETTITS LANE NORTH	ROMFORD	RM1 4NU
SHOP AND PREMISES	217 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BB
SHOP AND PREMISES	218 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SUPERSTORE AND PREMISES	218 ST MARYS LANE	UPMINSTER	RM14 3BT
SHOP AND PREMISES	219 NORTH STREET	ROMFORD	RM1 1QA
SHOP AND PREMISES	219 PETTITS LANE NORTH	ROMFORD	RM1 4NU
SHOP AND PREMISES	219 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
HALL AND PREMISES	21A EASTERN ROAD (R/O)	ROMFORD	RM1 3NH
SHOP AND PREMISES	22 BROADWAY	RAINHAM	RM13 9YW

SHOP AND PREMISES	22 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	22 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	22 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	22 LAURIE WALK (N5)	ROMFORD	RM1 3RT
SHOP AND PREMISES	22 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	22 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	22 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	22 THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	22 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	220 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP, OFFICE AND PREMISES	220 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	221 NORTH STREET	ROMFORD	RM1 4QA
SHOP AND PREMISES	221 PETTITS LANE NORTH	ROMFORD	RM1 4NU
Shop and Premises	221 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BB
SHOP AND PREMISES	222 NORTH STREET	ROMFORD	RM1 4QD
SHOP AND PREMISES	222-224 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
RESTAURANT AND PREMISES	222-224 SOUTH STREET	ROMFORD	RM1 2AD
POST OFFICE AND PREMISES	22-24 SOUTH STREET	ROMFORD	RM1 1RA
SHOP AND PREMISES	22-24 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	22-24 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	223 PETTITS LANE NORTH	ROMFORD	RM1 4NU
Shop and Premises	223 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9BB
STORE AND PREMISES	224-226 ABBS CROSS LANE	STORE AT R/O	RM12 4NA
SHOP AND PREMISES	226 ABBS CROSS LANE	HORNCHURCH	RM12 4NA
SHOP AND PREMISES	226 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP AND PREMISES	226A SOUTH STREET	GROUND FLOOR	RM1 2AD
SHOP AND PREMISES	226B SOUTH STREET	GROUND FLOOR	RM1 2AD
SHOP AND PREMISES	228 ABBS CROSS LANE	HORNCHURCH	RM12 4NA
SHOP AND PREMISES	228 HORNCHURCH ROAD	HORNCHURCH	RM11 1QJ
SHOP AND PREMISES	229 ST MARYS LANE	UPMINSTER	RM14 3BX
Computer Centre and Premises	23 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	23 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	23 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	23 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
Fitness Centre and Premises	23 DANES ROAD	UNIT H, AVENIR WORKS	RM7 0HL
SHOP AND PREMISES	23 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	23 LAURIE WALK N15	ROMFORD	RM1 3RT
SHOP AND PREMISES	23 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	2-3 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	23 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	23 SUTTONS LANE	HORNCHURCH	RM12 6RD

SHOP AND PREMISES	23 THE BROADWAY	GND FLR	RM12 4RW
STORE AND PREMISES	23 THE BROADWAY	BST	RM12 4RW
SHOP AND PREMISES	23 THE LIBERTY (F6)	ROMFORD	RM1 3RL
SHOP AND PREMISES	23 THE PARADE	COLCHESTER ROAD	RM3 0AQ
SHOP AND PREMISES	23 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
CAR SALES LAND AND PREMISES	232 RUSH GREEN ROAD	RUSH GREEN	RM7 0LA
SHOP AND PREMISES	233A ELM PARK AVENUE	HORNCHURCH	RM12 4RX
RESTAURANT AND PREMISES	234 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	236 BALGORES LANE	GIDEA PARK	RM2 6BS
SHOP AND PREMISES	236 MAIN ROAD	ROMFORD	RM2 5HA
STORE, OFFICE AND PREMISES	237-239 CHASE CROSS ROAD	ROMFORD	RM5 3XL
SHOP AND PREMISES	238 BALGORES LANE	GIDEA PARK	RM2 6BS
SHOP AND PREMISES	238-240 MAIN ROAD	ROMFORD	RM2 5HA
SHOP AND PREMISES	23A GOBIONS AVENUE	CHASE CROSS	RM5 3SS
Computer Centre and Premises	24 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	24 BROADWAY	RAINHAM	RM13 9YW
SHOP AND PREMISES	24 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	2-4 EASTERN ROAD	GRD FLR UNIT 2B	RM1 3PJ
SHOP AND PREMISES	2-4 EASTERN ROAD	GRD FLR UNIT 2A	RM1 3PJ
SHOP AND PREMISES	24 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	24 MARKET PLACE	ROMFORD	RM1 3EP
SHOP AND PREMISES	24 MARKET PLACE (R/O)	KINGS ARMS YARD	RM1 3AB
SHOP AND PREMISES	24 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	24 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	2-4 SOUTH STREET	BASEMENT	RM1 1RA
SHOP AND PREMISES	2-4 SOUTH STREET	GROUND FLOOR	RM1 1RA
SHOP AND PREMISES	24 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	2-4 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	24 THE BROADWAY	ELM PARK	RM12 4RS
SHOP AND PREMISES	24 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	24 VICTORIA ROAD	ROMFORD	RM1 2JH
Leisure Centre and Premises	24 WESTERN ROAD	SAPPHIRE ICE & LEISURE	RM1 3JT
SHOP AND PREMISES	242 MAIN ROAD	ROMFORD	RM2 5EU
SHOP AND PREMISES	24-25 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	24-26 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	244 MAIN ROAD	ROMFORD	RM2 5EU
SHOP AND PREMISES	246 MAIN ROAD	ROMFORD	RM2 5EU
RESTAURANT AND PREMISES	248 MAIN ROAD	ROMFORD	RM2 5EU
CLUB HOUSE AND PREMISES	249 BRENTWOOD ROAD	ROMFORD	RM1 2RL

CAR SHOWROOM AND PREMISES	249 LONDON ROAD	ROMFORD	RM7 9NB
SHOP AND PREMISES	25 BOXMOOR ROAD	COLLIER ROW	RM5 2SH
SHOP AND PREMISES	25 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	25 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	25 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	25 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	25 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	25 LAURIE WALK (N16)	ROMFORD	RM1 3RT
CLUB HOUSE AND PREMISES	25 NORTH STREET	HORNCHURCH	RM11 1RS
SHOP AND PREMISES	25 SOUTH STREET	ROMFORD	RM1 1NJ
SHOP AND PREMISES	25 STATION PARADE	THE BROADWAY	RM12 5AB
RESTAURANT AND PREMISES	25 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	25 STATION ROAD	HAROLD WOOD	RM3 0BT
SHOP AND PREMISES	25 SUTTONS LANE	HORNCHURCH	RM12 6RD
SHOP AND PREMISES	25 THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	25 THE LIBERTY UNIT (F7)	ROMFORD	RM1 3RL
SHOP AND PREMISES	25 TURPIN AVENUE	COLLIER ROW	RM5 2PU
SHOP AND PREMISES	25 UPMINSTER ROAD	HORNCHURCH	RM11 3UX
HEALTH CENTRE AND PREMISES	250 COLLIER ROW LANE	ROMFORD	RM5 3NJ
SHOP, WORKSHOP AND PREMISES	250 UPMINSTER ROAD NORTH	RAINHAM	RM13 9JL
CAR SHOWROOM AND PREMISES	251 LONDON ROAD	ROMFORD	RM7 9NJ
HEALTH CENTRE AND PREMISES	252 ABBS CROSS LANE	HORNCHURCH	RM12 4YG
SHOP AND PREMISES	252 UPMINSTER ROAD NORTH	(GROUND FLOOR)	RM13 9JL
SHOP AND PREMISES	25-27 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
Shop and Premises	25-29 MARKET PLACE	GND FLR	RM1 3AB
SHOP AND PREMISES	253 BRENTWOOD ROAD	ROMFORD	RM2 5ST
SHOP AND PREMISES	256 RUSH GREEN ROAD	RUSH GREEN	RM7 0LA
SHOP AND PREMISES	257 CHASE CROSS ROAD	ROMFORD	RM5 3XS
SHOP AND PREMISES	257 LONDON ROAD	ROMFORD	RM7 9NJ
SHOP AND PREMISES	259 CHASE CROSS ROAD	ROMFORD	RM5 3XS
SHOP AND PREMISES	259 LONDON ROAD	ROMFORD	RM7 9NJ
SHOP AND PREMISES	25A CORBETS TEY ROAD	UPMINSTER	RM14 2AP
STORE AND PREMISES	25B THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	25B UPMINSTER ROAD	HORNCHURCH	RM11 3UX
SHOP AND PREMISES	26 BROADWAY	RAINHAM	RM13 9YW
SHOP AND PREMISES	26 ELM PARADE	ELM PARK AVENUE	RM12 4SA
SHOP AND PREMISES	26 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	26 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	26 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	26 STATION LANE	HORNCHURCH	RM12 6NJ

SHOP AND PREMISES	26 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	26 STATION ROAD	GND FLOOR	RM14 2UB
Shop and Premises	26 STATION ROAD	UNIT 4 AT	RM14 2UB
SHOP AND PREMISES	26 THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	26 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	26 VICTORIA ROAD	ROMFORD	RM1 2JH
SHOP AND PREMISES	261 CHASE CROSS ROAD	ROMFORD	RM5 3XS
SHOP AND PREMISES	261 LONDON ROAD	ROMFORD	RM7 9NJ
Computer Centre and Premises	26-27 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	26-28 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	26-28 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	263 CHASE CROSS ROAD	ROMFORD	RM5 3XS
SHOP AND PREMISES	263 LONDON ROAD	ROMFORD	RM7 9NJ
SHOP AND PREMISES	26-30 SOUTH STREET	ROMFORD	RM1 1RA
SHOP AND PREMISES	264 LONDON ROAD	ROMFORD	RM7 9NA
CAFE AND PREMISES	265 CHASE CROSS ROAD	ROMFORD	RM5 3XL
SHOP AND PREMISES	265 LONDON ROAD	ROMFORD	RM7 9DD
SHOP AND PREMISES	265A CHASE CROSS ROAD	ROMFORD	RM5 3XL
SHOP AND PREMISES	266 BRENTWOOD ROAD	ROMFORD	RM1 2SU
SHOP AND PREMISES	267 LONDON ROAD	ROMFORD	RM7 9NJ
SHOP AND PREMISES	268-272 NORTH STREET	ROMFORD	RM1 4QD
DENTAL SURGERY AND PREMISES	269 BRENTWOOD ROAD	ROMFORD	RM2 5ST
SHOP AND PREMISES	269 LONDON ROAD	ROMFORD	RM7 9NJ
SHOP AND PREMISES	27 BOXMOOR ROAD	COLLIER ROW	RM5 2SH
SHOP AND PREMISES	27 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	27 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	27 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	27 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	27 LAURIE WALK (N17)	ROMFORD	RM1 3RT
SHOP AND PREMISES	27 PARK LANE	HORNCHURCH	RM11 1BD
SHOP AND PREMISES	27 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	27 SOUTH STREET	ROMFORD	RM1 1NJ
SHOP AND PREMISES	27 STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	27 STATION PARADE	THE BROADWAY	RM12 5AB
RESTAURANT AND PREMISES	27 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	27 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	27 THE BROADWAY	ELM PARK	RM12 4RW
Shop and Premises	27 THE LIBERTY (F8)	GND FLR	RM1 3RL
Store and Premises	27 THE LIBERTY (F8)	1ST FLR	RM1 3RL
SHOP AND PREMISES	27 UPMINSTER ROAD	HORNCHURCH	RM11 3UX
RESTAURANT AND PREMISES	270 CHERRY TREE LANE	RAINHAM	RM13 8TX
SHOP AND PREMISES	270 HORNCHURCH ROAD	HSL	RM11 1PZ
SHOP AND PREMISES	270 HORNCHURCH ROAD	DREAMS LTD	RM11 1PZ
SHOP AND PREMISES	271 LONDON ROAD	ROMFORD	RM7 9NJ
RESTAURANT AND PREMISES	272 HORNCHURCH ROAD	HORNCHURCH	RM12 4SY
STORE AND PREMISES	27-29 NORTH STREET	ROPNER BST	RM11 1RS

SHOP AND PREMISES	273 LONDON ROAD	ROMFORD	RM7 9NJ
SHOP AND PREMISES	275 LONDON ROAD	ROMFORD	RM7 9DD
SHOP AND PREMISES	277 LONDON ROAD	ROMFORD	RM7 9DD
CAR SHOWROOM AND PREMISES	279-289 LONDON ROAD	GLYN HOPKINS LTD	RM7 9NJ
SHOP AND PREMISES	27A STATION LANE	HORNCHURCH	RM12 6JL
STORE AND PREMISES	27B THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	28 BROADWAY	RAINHAM	RM13 9YW
STORE AND PREMISES	28 BROADWAY	REAR OF	RM13 9YW
SHOP AND PREMISES	28 CORBETS TEY ROAD	UPMINSTER	RM14 2AD
SHOP AND PREMISES	28 HIGH STREET	ROMFORD	RM1 1JL
CLUB AND PREMISES	28 MAWNEY ROAD	ROMFORD	RM7 7HB
SHOP AND PREMISES	28 NORTH STREET	ROMFORD	RM1 1BA
SHOP AND PREMISES	28 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	28 RONEO CORNER	HORNCHURCH	RM12 4TN
Shop and Premises	28 STATION LANE	HORNCHURCH	RM12 6JR
SHOP AND PREMISES	28 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	28 THE BROADWAY	ELM PARK	RM12 4RW
SHOP AND PREMISES	28 VICTORIA ROAD	ROMFORD	RM1 2JH
HEALTH CENTRE AND PREMISES	28-30 GUBBINS LANE	HAROLD WOOD	RM3 0QA
SHOP AND PREMISES	284 BRENTWOOD ROAD	ROMFORD	RM2 5TA
SHOP AND PREMISES	286 BRENTWOOD ROAD	ROMFORD	RM2 5TA
SHOP AND PREMISES	288 BRENTWOOD ROAD	ROMFORD	RM2 5TA
Computer Centre and Premises	28A AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	28A STATION PARADE	THE BROADWAY	RM12 5AA
Computer Centre and Premises	28B AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	28B STATION PARADE	THE BROADWAY	RM12 5AB
Computer Centre and Premises	28C AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
STORE AND PREMISES	28C STATION ROAD	UPMINSTER	RM14 2SJ
Computer Centre and Premises	29 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
STORE, OFFICE AND PREMISES	29 BATES ROAD	HAROLD WOOD	RM3 0JH
SHOP AND PREMISES	29 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	29 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
STORE AND PREMISES	29 HEATON WAY	ROMFORD	RM3 7EU
SHOP AND PREMISES	29 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	29 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	29 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	29 STATION LANE	HORNCHURCH	RM12 6JL
BANK AND PREMISES	29 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	29 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	29 THE BROADWAY	ELM PARK	RM2 4RW
SHOP AND PREMISES	29 UPMINSTER ROAD	HORNCHURCH	RM11 3UX
SHOP AND PREMISES	290 BRENTWOOD ROAD	ROMFORD	RM2 5TA

RESTAURANT AND PREMISES	290 NORTH STREET	CARAWAY LOUNGE	RM5 3AB
SHOP AND PREMISES	29-31 LAURIE WALK	ROMFORD	RM1 3RT
SHOP AND PREMISES	29-31 SOUTH STREET	ROMFORD	RM1 1NJ
BANK AND PREMISES	29-31 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
CAR SHOWROOM AND PREMISES	299-307 COLLIER ROW LANE	ROMFORD	RM5 3BL
SHOP AND PREMISES	29A STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	2A MOOR LANE	CRANHAM	RM14 1EB
SHOP AND PREMISES	2A THE ARCADE	FARNHAM ROAD	RM3 8ED
Gymnasium & Premises	2A VICARAGE ROAD	1ST & 2ND FLRS RODWELL HOUSE	RM12 4AT
SHOP AND PREMISES	2B MOOR LANE	CRANHAM	RM14 1EB
SHOP AND PREMISES	2B MORAY WAY	ROMFORD	RM1 4YD
STORE AND PREMISES	2C PARK LANE	HORNCHURCH	RM11 1BB
SUPERSTORE AND PREMISES	2C SUTTONS LANE	HORNCHURCH	RM12 6RJ
Store and Premises	2ND FLR 69A SOUTH STREET	ROMFORD	RM1 1NL
HALL AND PREMISES	3 ALBERT ROAD	ROMFORD	RM1 2PD
STORE AND PREMISES	3 ALBERT ROAD (R/O)	ROMFORD	RM1 2PD
RESTAURANT AND PREMISES	3 ARCADE PLACE	ROMFORD	RM1 1RS
Computer Centre and Premises	3 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	3 BALGORES LANE	GIDEA PARK	RM2 5JR
SHOP AND PREMISES	3 BALGORES SQUARE	GIDEA PARK	RM2 6AU
SHOP AND PREMISES	3 BLENHEIM COURT	NORTHOLT WAY	RM12 5RX
SHOP AND PREMISES	3 BOXMOOR ROAD	COLLIER ROW	RM5 2SH
SHOP AND PREMISES	3 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	3 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
SHOP AND PREMISES	3 CHASE CROSS ROAD	ROMFORD	RM5 3PJ
RESTAURANT AND PREMISES	3 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
STORE AND PREMISES	3 COLLIER ROW ROAD	BST	RM5 3NP
SHOP AND PREMISES	3 COLLIER ROW ROAD	ROMFORD	RM5 3NP
SHOP AND PREMISES	3 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	3 CROWN PARADE	UPMINSTER ROAD SOUTH	RM13 9BD
STORE AND PREMISES	3 CROWN PARADE R/O	UPMINSTER ROAD SOUTH	RM13 9BD
SHOP AND PREMISES	3 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	3 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	3 GRANGE ROAD	HAROLD HILL	RM3 7DU
RESTAURANT AND PREMISES	3 LAURIE WALK (H4)	ROMFORD	RM1 3RT
SHOP AND PREMISES	3 MILDWAY ROAD	ROMFORD	RM7 7DA
SHOP AND PREMISES	3 NORTH STREET	HORNCHURCH	RM11 1RL
SHOP AND PREMISES	3 OCKENDON ROAD	UPMINSTER	RM14 2DN
SHOP AND PREMISES	3 OLD MILL PARADE	VICTORIA ROAD	RM1 2HU
SHOP AND PREMISES	3 STATION LANE	HORNCHURCH	RM12 6JL
Shop and Premises	3 STATION PARADE	VICTORIA ROAD	RM1 2JA

SHOP AND PREMISES	3 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	3 STATION ROAD	GIDEA PARK	RM2 6BX
SHOP AND PREMISES	3 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	3 SUTTONS LANE	HORNCHURCH	RM12 6RD
SHOP AND PREMISES	3 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	3 THE PARADE	COLCHESTER ROAD	RM3 0AQ
SHOP AND PREMISES	3 TUDOR COURT	HAROLD COURT ROAD	RM3 0AE
SHOP AND PREMISES	3 VICTORIA ROAD	ROMFORD	RM1 2JT
SHOP AND PREMISES	3 WILLOW PARADE	FRONT LANE	RM14 1DY
SHOP AND PREMISES	30 ALBERT ROAD	ROMFORD	RM11 2PJ
Computer Centre and Premises	30 AND 30A AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	30 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	30 CORBETS TEY ROAD	UPMINSTER	RM14 2AD
RESTAURANT AND PREMISES	30 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	30 LONDON ROAD	ROMFORD	RM7 9RB
SHOP AND PREMISES	30 NORTH STREET	ROMFORD	RM1 1BH
SHOP, STORE AND PREMISES	30 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	30 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	30 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	30 VICTORIA ROAD	ROMFORD	RM1 2JH
Kiosk and Premises	300 HORNCHURCH ROAD	TRAVEL MONEY AT	RM12 4TW
Shop and Premises	300 HORNCHURCH ROAD	TESCO MOBILE AT	RM12 4TW
Restaurant and Premises	300 HORNCHURCH ROAD	HARRIS AND HOOLE AT	RM12 4TW
Shop and Premises	300 HORNCHURCH ROAD	VISION EXPRESS AT	RM12 4TW
Hypermarket and Premises	300 HORNCHURCH ROAD	HORNCHURCH	RM12 4TW
Shop and Premises	300 HORNCHURCH ROAD	PHOTO EXPERT AT 300	RM12 4TW
HAND CAR WASH & PREMISES	300 HORNCHURCH ROAD	HORNCHURCH	RM11 1PY
STORE AND PREMISES	300 UPMINSTER ROAD NORTH	RAINHAM	RM13 9JR
Health Centre and Premises	300 UPPER RAINHAM ROAD	MAYLANDS HEALTH CENTRE	RM12 4EQ
Pharmacy and Premises	300 UPPER RAINHAM ROAD	MAYLANDS PHARMACY	RM12 4EQ
KIOSK AND PREMISES	300B HORNCHURCH ROAD	TIMPSONS AT TESCO EXTRA	RM12 4TW
SHOP AND PREMISES	302 BRENTWOOD ROAD	ROMFORD	RM2 5TA
SHOP AND PREMISES	302 ST MARYS LANE	UPMINSTER	RM14 3HL
Shop and Premises	30-32 STATION LANE	HORNCHURCH	RM12 6JR
SHOP AND PREMISES	30-36 MARKET PLACE	ROMFORD	RM1 3AB
Shop and Premises	304 ST MARYS LANE	GND FLR FRONT	RM14 3HL
VEHICLE WORKSHOP AND PREMISES	306 ST MARYS LANE	WORKSHOP AT THE REAR OF	RM14 3HL

SHOP AND PREMISES	306 ST MARYS LANE	GND FLOOR	RM14 3HL
SHOP AND PREMISES	307 HORNCURCH ROAD	HORNCURCH	RM12 4TQ
BUILDERS MERCHANT AND PREMISES	307-309 SOUTH STREET	ROMFORD	RM1 2BB
SHOWROOM	308 ST MARYS LANE	UPMINSTER	RM14 3HL
SHOP AND PREMISES	309 COLLIER ROW LANE	ROMFORD	RM5 3ND
SHOP AND PREMISES	309 HORNCURCH ROAD	HORNCURCH	RM12 4TQ
Computer Centre and Premises	31 AND 31A AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
PUBLIC HOUSE AND PREMISES	31 BROADWAY	THE ANGEL INN	RM13 9YW
SHOP AND PREMISES	31 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	31 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	31 STATION LANE	HORNCURCH	RM12 6JL
SHOP AND PREMISES	31 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	31 UPMINSTER ROAD	HORNCURCH	RM11 3UX
SHOWROOM AND PREMISES	310 ST MARYS LANE	UPMINSTER	RM14 3HL
LAND USED FOR DISPLAY	310 UPMINSTER ROAD NORTH	RAINHAM	RM13 9RY
SHOP AND PREMISES	311-313 COLLIER ROW LANE	ROMFORD	RM5 3ND
SHOP AND PREMISES	311-315 HORNCURCH ROAD	HORNCURCH	RM12 4TQ
SHOWROOM AND PREMISES	312-314 ST MARYS LANE	UPMINSTER	RM14 3HS
SHOP AND PREMISES	31-32 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	31-33 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	31-37 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	314A COLLIER ROW LANE	ROMFORD	RM5 3NL
SHOP AND PREMISES	316 COLLIER ROW LANE	ROMFORD	RM5 3NL
CLUB HOUSE AND PREMISES	316 ST MARYS LANE	UPMINSTER	RM14 3HL
SHOP AND PREMISES	317 BRENTWOOD ROAD	ROMFORD	RM2 5SX
SHOP AND PREMISES	317 HORNCURCH ROAD	HORNCURCH	RM12 4TX
SHOP AND PREMISES	319 BRENTWOOD ROAD	ROMFORD	RM2 5SX
SHOP AND PREMISES	319 HORNCURCH ROAD	HORNCURCH	RM12 4TT
Computer Centre and Premises	32 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	32 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	32 CORBETS TEY ROAD	UPMINSTER	RM14 2AD
SHOP AND PREMISES	32 LONDON ROAD	ROMFORD	RM7 9RB
HOTEL AND PREMISES	32 MAWNEY ROAD	ROMFORD	RM7 7HB
SHOP AND PREMISES	32 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	32 RONEO CORNER	HORNCURCH	RM12 4TN
SHOP AND PREMISES	32 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	32 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	320 COLLIER ROW LANE	ROMFORD	RM5 3NL
SHOWROOM AND PREMISES	321 CORBETS TEY ROAD	UPMINSTER	RM14 2DF
SHOP AND PREMISES	321 HORNCURCH ROAD	HORNCURCH	RM11 1DP
SHOP AND PREMISES	322 COLLIER ROW LANE	ROMFORD	RM5 3NL
SHOP AND PREMISES	32-34 HIGH STREET	ROMFORD	RM1 1HR
BANK AND PREMISES	32-38 SOUTH STREET	ROMFORD	RM1 1NJ

SHOP AND PREMISES	329 UPMINSTER ROAD NORTH	(REAR OF)	RM13 9JR
SHOP AND PREMISES	329 UPMINSTER ROAD NORTH	ULUS STORES AT	RM13 9JR
Computer Centre and Premises	33 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	33 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	33 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	33 LAURIE WALK	ROMFORD	RM1 3RT
HOTEL AND PREMISES	33 MAIN ROAD	ROMFORD	RM1 3DD
SHOP AND PREMISES	33 STATION LANE	HORNCHURCH	RM12 6NN
SHOP AND PREMISES	33 STATION ROAD	HAROLD WOOD	RM3 0BS
SHOP AND PREMISES	33 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	33 THE LIBERTY	(N2)	RM1 3RL
SHOP AND PREMISES	33 UPMINSTER ROAD	HORNCHURCH	RM11 3UX
SHOP AND PREMISES	33 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	33-35 SOUTH STREET	ROMFORD	RM1 1NJ
PUBLIC HOUSE AND PREMISES	33-37 CORBETS TEY ROAD	THE CRUMPLED HORN	RM14 2AJ
Computer Centre and Premises	34 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	34 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	34 CORBETS TEY ROAD	UPMINSTER	RM14 2AD
SHOP, STORE AND PREMISES	3-4 HACTON PARADE	CENTRAL DRIVE	RM12 6EL
SHOP AND PREMISES	34 LONDON ROAD	ROMFORD	RM7 9RB
SHOP AND PREMISES	34 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	34 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	34 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	34 VICTORIA ROAD	ROMFORD	RM1 2JH
Shop and Premises	3-4 WRITTLE WALK	RAINHAM	RM13 7XB
SPORTS GROUND AND PREMISES	3-41 CROW LANE (R/O)	ROMFORD	RM7 0ES
STORE AND PREMISES	35 ALBERT ROAD	ROMFORD	RM1 2PS
Computer Centre and Premises	35 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	35 COLLIER ROW ROAD	ROMFORD	RM5 3NP
STORE AND PREMISES	35 CROW LANE (R/O)	UNIT 2	RM7 0EP
SHOP AND PREMISES	35 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	35 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP STORE AND PREMISES	35 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	35 MAWNEY ROAD	ROMFORD	RM7 7HL
CLUB AND PREMISES	35 MAYLANDS AVENUE	(R/O)	RM12 5BB
SHOP AND PREMISES	3-5 OAK ROAD	HAROLD WOOD	RM3 0PH
Shop and Premises	3-5 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	35 STATION ROAD	HAROLD WOOD	RM3 0BS
SHOP AND PREMISES	35 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	35 UPMINSTER ROAD SOUTH	SMART MOVE	RM13 9YS

SHOP AND PREMISES	35 VICTORIA ROAD	ROMFORD	RM1 2LH
SHOP AND PREMISES	35-37 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	359 UPMINSTER ROAD NORTH	RAINHAM	RM13 9RY
CLUB AND PREMISES	36 AND 38 NORTH STREET	OPIUM LOUNGE	RM1 1BH
SHOP AND PREMISES	36 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	36 CORBETS TEY ROAD	UPMINSTER	RM14 2AD
SHOP AND PREMISES	36 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	36 LONDON ROAD	ROMFORD	RM7 9RB
RESTAURANT AND PREMISES	36 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	36 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	36 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	36 VICTORIA ROAD	ROMFORD	RM1 2JH
SHOP AND PREMISES	36-36A STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	364 BRENTWOOD ROAD	ROMFORD	RM2 5TD
SHOP AND PREMISES	366 BRENTWOOD ROAD	ROMFORD	RM2 5TD
SHOP AND PREMISES	367-369 SOUTH END ROAD	HORNCHURCH	RM12 5NA
SHOP AND PREMISES	368 BRENTWOOD ROAD	ROMFORD	RM2 5TD
SHOP AND PREMISES	36C UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
RESTAURANT AND PREMISES	3-7 BILLET LANE	HORNCHURCH	RM11 1TS
SHOP AND PREMISES	37 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	37 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	37 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	37 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	37 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	3-7 HIGHFIELD LINK	CHASE CROSS	RM5 3DH
SHOP AND PREMISES	37 MAWNEY ROAD	ROMFORD	RM7 7HL
SHOP AND PREMISES	37 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	37 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	370 BRENTWOOD ROAD	ROMFORD	RM2 5TD
SHOP AND PREMISES	371A SOUTH END ROAD	HORNCHURCH	RM12 5NA
SHOP AND PREMISES	371B SOUTH END ROAD	HORNCHURCH	RM12 5NA
SHOP & PREMISES	372 BRENTWOOD ROAD	ROMFORD	RM2 5TD
SHOP AND PREMISES	37-39 STATION ROAD	HAROLD WOOD	RM3 0BS
SHOP AND PREMISES	374 BRENTWOOD ROAD	ROMFORD	RM2 5TD
SHOP AND PREMISES	37-43 SOUTH STREET	ROMFORD	RM1 1NJ
Shop and Premises	378-392 BRENTWOOD ROAD	ROMFORD	RM1 5TD
SHOP AND PREMISES	38 CORBETS TEY ROAD	UPMINSTER	RM14 2AD
SHOP AND PREMISES	38 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	38 LONDON ROAD	ROMFORD	RM7 9RB
SHOP AND PREMISES	38 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	38 THE BROADWAY	ELM PARK	RM12 4RN
CAR SHOWROOM AND PREMISES	38-40 FRONT LANE	CRANHAM	RM14 1XW
SHOP AND PREMISES	38-42 MARKET PLACE	ROMFORD	RM1 3ER

SHOP AND PREMISES	38A UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	39 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	39 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	39 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	39 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	39 STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	39 TENNYSON ROAD	HAROLD HILL	RM3 7AH
SHOP AND PREMISES	39 THE BROADWAY	ELM PARK	RM12 4RN
Shop and Premises	39 UPMINSTER ROAD SOUTH	GROUND FLOOR & PART BASEMENT	RM13 9YS
SHOP AND PREMISES	39 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	39-41 THE LIBERTY	(N20-N21)	RM1 3RL
SHOP AND PREMISES	39-45 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	395-405 BRENTWOOD ROAD	UNIT 1	RM2 5TH
SHOP AND PREMISES	39A HIGH STREET	ROMFORD	RM1 1JL
Shop and Premises	3A LHS TADWORTH PARADE	HORNCHURCH	RM12 5BA
Shop and Premises	3A RHS TADWORTH PARADE	HORNCHURCH	RM12 5BA
Computer Centre and Premises	4 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	4 BALGORES SQUARE	GIDEA PARK	RM2 6AU
SHOP AND PREMISES	4 BLENHEIM COURT	NORTHOLT WAY	RM12 5RX
SHOP AND PREMISES	4 BREWERY WALK	THE BREWERY SHOPPING CENTRE	RM1 1AU
Store and Premises	4 BRIDGE CLOSE	ROMFORD	RM7 0AU
SHOP AND PREMISES	4 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	4 CARLTON ROAD	GIDEA PARK	RM2 5AA
SHOP AND PREMISES	4 CELTIC FARM ROAD	RAINHAM	RM13 9GP
Shop and Premises	4 CHASE CROSS ROAD	GND FLOOR	RM5 3PR
SHOP AND PREMISES	4 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	4 CROWN PARADE	UPMINSTER ROAD SOUTH	RM13 9BD
SHOP AND PREMISES	4 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	4 ELMER GARDENS	RAINHAM	RM13 7BS
SHOP AND PREMISES	4 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	4 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	4 HOG HILL ROAD	COLLIER ROW	RM5 2DH
SHOP AND PREMISES	4 LAURIE WALK (H13)	ROMFORD	RM1 3RT
HALL AND PREMISES	4 MIRFIELD CLOSE	SCOUTS HALL	RM3 8RW
SHOP AND PREMISES	4 MORAY WAY	ROMFORD	RM1 4YD
SHOP AND PREMISES	4 NORTH STREET	HORNCHURCH	RM11 1QX
SHOP AND PREMISES	4 OCKENDON ROAD	UPMINSTER	RM14 2DN
SHOP AND PREMISES	4 OLD MILL PARADE	VICTORIA ROAD	RM1 2HU

SHOP AND PREMISES	4 PARK LANE	HORNCHURCH	RM11 1BB
HEALTH CENTRE AND PREMISES	4 PETTITS LANE	ROMFORD	RM1 4HL
SHOP AND PREMISES	4 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	4 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	4 SOUTH END ROAD	RAINHAM	RM13 7XH
SHOP AND PREMISES	4 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	4 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	4 STATION PARADE	VICTORIA ROAD	RM1 2JA
SHOP AND PREMISES	4 STATION ROAD	GIDEA PARK	RM2 6BX
BANK AND PREMISES	4 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	4 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	4 THE ARCADE	FARNHAM ROAD	RM3 8EB
SHOP AND PREMISES	4 THE PARADE	COLCHESTER ROAD	RM3 0AQ
SHOP AND PREMISES	4 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	4/5 TUDOR COURT	HAROLD COURT ROAD	RM3 0AE
SHOP AND PREMISES	40 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	40 CORBETS TEY ROAD	UPMINSTER	RM14 2AB
SHOP AND PREMISES	40 HAINAULT ROAD	GRD FLR	RM5 3AL
SHOP AND PREMISES	40 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	40 LONDON ROAD	ROMFORD	RM7 9RB
HEALTH CENTRE AND PREMISES	40 MAIN ROAD	COMMUNITY DRUG ADVICE SERVICE (R/O	RM1 3BS
HEALTH CENTRE AND PREMISES	40 MAIN ROAD	(R/O)	RM1 3BS
GYM AND PREMISES	40 NORTH STREET	GROUND FLOOR NORTH	RM11 1QX
SHOP AND PREMISES	40 SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	40 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	40 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	40 VICTORIA ROAD	ROMFORD	RM1 2JH
RESTAURANT AND PREMISES	40-44 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	40-44 STATION LANE	GROUND FLOOR & PART 1ST FLOOR	RM12 6NB
SHOP AND PREMISES	41 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	41 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	41 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	41 HIGH STREET	ROMFORD	RM1 1JL
FITNESS CENTRE AND PREMISES	41 MARKET PLACE	1ST FLR	RM1 3AB
CLUB AND PREMISES	41 MYRTLE ROAD	HAROLD HILL	RM3 8XS
SHOP AND PREMISES	41 NEW ROAD	RAINHAM	RM13 8DR
SHOP AND PREMISES	41 STATION ROAD	HAROLD WOOD	RM3 0BS
SHOP AND PREMISES	41 THE BROADWAY	ELM PARK	RM12 4RN

SHOP AND PREMISES	41 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	41 VICTORIA ROAD	ROMFORD	RM1 2LH
SHOP AND PREMISES	41 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	411 UPMINSTER ROAD NORTH	THE BAKERS	RM13 9SA
SHOP AND PREMISES	411 UPMINSTER ROAD NORTH	RAINHAM	RM13 9SA
RESTAURANT AND PREMISES	41-43 STATION LANE	HORNCHURCH	RM12 6JT
SHOP AND PREMISES	41-43 TENNYSON ROAD	HAROLD HILL	RM3 7AH
SHOP AND PREMISES	41-49 STATION ROAD	UPMINSTER	RM14 2SX
SHOP AND PREMISES	417 UPMINSTER ROAD NORTH	RAINHAM	RM13 9SA
SHOP AND PREMISES	41A HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	42 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	42 CORBETS TEY ROAD	UPMINSTER	RM14 2AB
SHOP AND PREMISES	42 HIGH STREET	ROMFORD	RM1 1HR
RESTAURANT AND PREMISES	42 LONDON ROAD	ROMFORD	RM7 9RB
SHOP AND PREMISES	42 SOUTH STREET	ROMFORD	RM1 2AP
SHOP AND PREMISES	42 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	42 THE BROADWAY	ELM PARK	RM12 4RN
SHOP AND PREMISES	42 VICTORIA ROAD	ROMFORD	RM1 2JH
SHOWROOM AND PREMISES	42-44 FRONT LANE	CRANHAM	RM14 1XW
SHOP AND PREMISES	42-44 SQUIRRELS HEATH LANE	GIDEA PARK	RM2 6DP
SHOP AND PREMISES	42A MAWNEY ROAD	THE BARBERS	RM7 7HT
SHOP AND PREMISES	43 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	43 COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	43 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	43 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	43 HIGH STREET	ROMFORD	RM1 1JL
RESTAURANT AND PREMISES	43 MAIN ROAD	RAPHAELS RESTAURANT	RM2 5JA
MARKET AND PREMISES	43 MARKET PLACE	ROMFORD	RM1 3AB
GUEST HOUSE AND PREMISES	43 MONTROSE GUEST HOUSE	DUNTON ROAD	RM1 4AD
CAR SALES SITE AND PREMISES	43 NEW ROAD	PAPERA MOTORS	RM13 8DR
SHOP AND PREMISES	43 STATION ROAD	HAROLD WOOD	RM3 0BS
SHOP AND PREMISES	43 THE LIBERTY (G12A)	ROMFORD	RM1 3RL
SHOP AND PREMISES	43 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	43 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	43-46 LICHFIELD TERRACE	CRANHAM	RM14 3JX
SHOP AND PREMISES	43B COLLIER ROW ROAD	ROMFORD	RM5 3NR
SHOP AND PREMISES	44 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	44 CORBETS TEY ROAD	UPMINSTER	RM14 2AB
SHOP AND PREMISES	44 FARNHAM ROAD	HAROLD HILL	RM3 8DX
RESTAURANT AND PREMISES	44 HIGH STREET	HORNCHURCH	RM12 4UN

SHOP AND PREMISES	44 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	44 LONDON ROAD	ROMFORD	RM7 9RB
SHOP AND PREMISES	44 SOUTH STREET	ROMFORD	RM1 2AP
SHOP AND PREMISES	44 VICTORIA ROAD	ROMFORD	RM1 2JH
SHOP AND PREMISES	44-46 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	45 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	45 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	4-5 HARE HALL LANE	GIDEA PARK	RM2 6BD
SHOP AND PREMISES	45 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	45 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	45 STATION ROAD	HAROLD WOOD	RM3 0BS
STORE AND PREMISES	45 SUTTONS LANE	UNIT G ADJ 45	RM12 6RJ
SHOP AND PREMISES	45 TENNYSON ROAD	HAROLD HILL	RM3 7AH
SHOP AND PREMISES	45 THE LIBERTY	(G12B)	RM1 3RL
SHOP AND PREMISES	45 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
PUBLIC HOUSE AND PREMISES	45 WHEATSHEAF ROAD	WHEATSHEAF	RM1 2HD
SHOP AND PREMISES	45-45B MAWNEY ROAD	ROMFORD	RM7 7HT
SHOP AND PREMISES	45-47 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	45-47 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	45-47 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	45A MAWNEY ROAD	MAWNEY SECURITY	RM7 7HL
SHOP AND PREMISES	46 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	46 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOWROOM AND PREMISES	46 FRONT LANE	CRANHAM	RM14 1XW
SHOP AND PREMISES	46 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	46 SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	46 VICTORIA ROAD	SHOP AT CENTREVIEW COURT	RM1 2JH
SHOP AND PREMISES	46-48 BRENTWOOD ROAD	ROMFORD	RM1 2EP
POST OFFICE AND PREMISES	46-48 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOWROOM AND PREMISES	46-52 LONDON ROAD	ROMFORD	RM7 9QX
SHOP AND PREMISES	47 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	47 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	47 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	47 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	47 STATION ROAD	HAROLD WOOD	RM3 0BS
SHOP AND PREMISES	47 SUTTONS LANE	HORNCHURCH	RM12 6RJ
SHOP AND PREMISES	47 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
STORE AND PREMISES	47-49 AMBERLEY WAY	MR NUGENT R/O	RM7 8BT
SHOP & PREMISES	47-49 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	48 CORBETS TEY ROAD	UPMINSTER	RM14 2AB
SHOP AND PREMISES	4-8 ESSEX GARDENS	HORNCHURCH	RM11 3EH
SHOP AND PREMISES	48 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOP AND PREMISES	48 NORTH STREET	ROMFORD	RM1 1BH
RESTAURANT AND PREMISES	48 STATION LANE	GROUND FLOOR	RM12 6NB

SHOP AND PREMISES	48 STATION ROAD	UPMINSTER	RM14 2TR
		SHOP AT CENTREVIEW COURT	
SHOP AND PREMISES	48 VICTORIA ROAD		RM1 2JH
PUBLIC HOUSE AND PREMISES	48-50 HIGH STREET	JJ MOONS	RM12 6QU
SHOP AND PREMISES	48-50 SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	49 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	49 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	49 HIGH STREET	ROMFORD	RM1 1JL
RESTAURANT AND PREMISES	49 HIGH STREET	HORNCHURCH	RM11 1TP
HAND CAR WASH AND PREMISES	49 NEW ROAD	HAND CAR WASH	RM13 8DY
SHOP AND PREMISES	49 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	49 SUTTONS LANE	HORNCHURCH	RM12 6RJ
SHOP AND PREMISES	49 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	49 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	49-51 GAYNES PARK ROAD	UPMINSTER	RM14 2HL
SHOP AND PREMISES	49A STATION ROAD	HAROLD WOOD	RM3 OBS
CAR SALES SITE AND PREMISES	49B NEW ROAD	RAINHAM	RM13 8DY
SHOP AND PREMISES	4A BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	5 - 7 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	5 A HIGH STREET	HORNCHURCH	RM11 1TP
Computer Centre and Premises	5 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	5 BALGORES LANE	GIDEA PARK	RM2 5JR
STORE AND PREMISES	5 BIRKBECK ROAD	ADJ	RM7 0QR
SHOP AND PREMISES	5 BLENHEIM COURT	NORTHOLT WAY	RM12 5RX
SHOP AND PREMISES	5 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	5 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JR
CAFE AND PREMISES	5 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
SHOP AND PREMISES	5 CHASE CROSS ROAD	ROMFORD	RM5 3PJ
SHOP AND PREMISES	5 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	5 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	5 CROWN PARADE	UPMINSTER ROAD SOUTH	RM13 9BD
SHOP AND PREMISES	5 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	5 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	5 GRANGE ROAD	HAROLD HILL	RM3 7DU
SHOP AND PREMISES	5 HACTON PARADE	CENTRAL DRIVE	RM12 6EL
GYM / FITNESS SUITES	5 HIGH STREET	(1ST FLOOR)	RM1 1NP
SHOP AND PREMISES	5 LAURIE WALK (H5)	ROMFORD	RM1 3RT
SHOP AND PREMISES	5 MARGARET ROAD	HEATH PARK	RM2 5SH
PUBLIC HOUSE AND PREMISES	5 MARKET PLACE	MULLIGANS	RM1 3AB
SHOP AND PREMISES	5 NORTH STREET	HORNCHURCH	RM11 1RL
SHOP AND PREMISES	5 OCKENDON ROAD	UPMINSTER	RM14 2DN
SHOP AND PREMISES	5 OLD MILL PARADE	VICTORIA ROAD	RM1 2HU

SHOP AND PREMISES	5 STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	5 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	5 STATION PARADE	VICTORIA ROAD	RM1 2JA
SHOP AND PREMISES	5 STATION ROAD	GIDEA PARK	RM2 6BX
SHOP AND PREMISES	5 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	5 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	5 SUTTONS LANE	HORNCHURCH	RM12 6RD
SHOP AND PREMISES	5 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	5 THE ARCADE	FARNHAM ROAD	RM3 8ED
SHOP AND PREMISES	5 THE PARADE	COLCHESTER ROAD	RM3 0AQ
SHOP AND PREMISES	5 VICTORIA ROAD	ROMFORD	RM1 2JT
Hairdressing Salon and Premises	5 WORDSWORTH CLOSE	HAROLD HILL	RM3 7PD
SHOP AND PREMISES	5 WRITTLE WALK	RAINHAM	RM13 7XB
SHOP AND PREMISES	50 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	50 CORBETS TEY ROAD	UPMINSTER	RM14 2AB
SHOP AND PREMISES	50 NORTH STREET	ROMFORD	RM1 1BH
RESTAURANT AND PREMISES	50 STATION ROAD	UPMINSTER	RM14 2TR
SHOP AND PREMISES	50-52 VICTORIA ROAD	ROMFORD	RM1 2LH
SHOP AND PREMISES	51 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	51 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	51 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
RESTAURANT AND PREMISES	51 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	51 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	51 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	51 SUTTONS LANE	HORNCHURCH	RM12 6RJ
SHOP AND PREMISES	51 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	51 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	51-53 STATION ROAD	UPMINSTER	RM14 2SX
SHOP AND PREMISES	51-55 LONDON ROAD	ROMFORD	RM7 9QA
SHOP AND PREMISES	52 COLLIER ROW LANE	ROMFORD	RM5 3BB
SHOP AND PREMISES	52 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	52 CORBETS TEY ROAD	UPMINSTER	RM14 2AB
SHOP AND PREMISES	52 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	52 STATION ROAD	UPMINSTER	RM14 2TU
SHOP AND PREMISES	52-52A SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	52-54 HIGH STREET	HORNCHURCH	RM12 4UN
SHOP AND PREMISES	53 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	53 COLLIER ROW LANE	ROMFORD	RM5 3BD
RESTAURANT AND PREMISES	53 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	53 GAYNES PARK ROAD	UPMINSTER	RM14 2HL
SHOP AND PREMISES	53 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
HALL AND PREMISES	53 GUBBINS LANE	HAROLD WOOD	RM3 0PU
SHOP AND PREMISES	53 HIGH STREET	ROMFORD	RM1 1JL
SHOP AND PREMISES	53 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	53 SUTTONS LANE	HORNCHURCH	RM12 6RJ
SHOP AND PREMISES	53 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS

SHOP AND PREMISES	53 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	53-55 SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	54 ABBS CROSS LANE	HORNCHURCH	RM12 4XW
SHOP AND PREMISES	54 COLLIER ROW LANE	ROMFORD	RM5 3BB
SHOP AND PREMISES	54 LONDON ROAD	ROMFORD	RM7 9QX
SHOP AND PREMISES	54 NORTH STREET	ROMFORD	RM1 1BH
SHOP AND PREMISES	54 SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	54 ST MARYS LANE	UPMINSTER	RM14 2QT
SHOP, OFFICE AND PREMISES	54 STATION ROAD	UPMINSTER	RM14 2TU
CLUB HOUSE AND PREMISES	54 WESTERN ROAD	ROMFORD	RM1 3LP
SHOP AND PREMISES	54-56 BRENTWOOD ROAD	ROMFORD	RM1 2EP
PUBLIC HOUSE AND PREMISES	54-56 COLLIER ROW ROAD	COLLEY ROWE INN	RM5 3PA
GUEST HOUSE AND PREMISES	54-56 MAWNEY ROAD	ROMFORD	RM7 7HT
SHOP AND PREMISES	54-56 VICTORIA ROAD	ROMFORD	RM1 2JH
SHOP AND PREMISES	55 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	55 COLLIER ROW LANE	ROMFORD	RM5 3BD
SHOP AND PREMISES	55 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	55 GAYNES PARK ROAD	UPMINSTER	RM14 2HL
SHOP AND PREMISES	55 GOBIONS AVENUE	CHASE CROSS	RM5 3SS
SHOP AND PREMISES	55 HIGH STREET	ROMFORD	RM1 1JL
RESTAURANT, OFFICE AND PREMISES	55 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	55 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	55 SUTTONS LANE	HORNCHURCH	RM12 6RJ
SHOP AND PREMISES	55 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	56 COLLIER ROW LANE	ROMFORD	RM5 3BB
SHOP AND PREMISES	56 LONDON ROAD	ROMFORD	RM7 9QX
SHOP AND PREMISES	5-6 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	56 SOUTH STREET	ROMFORD	RM1 2AP
SHOP AND PREMISES	56 ST MARYS LANE	UPMINSTER	RM14 2QP
SHOP AND PREMISES	56 STATION LANE	HORNCHURCH	RM12 6NB
SHOP AND PREMISES	56-72 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	5-7 BOXMOOR ROAD	COLLIER ROW	RM5 2SH
SHOP AND PREMISES	5-7 COLLIER ROW ROAD	ROMFORD	RM5 3NP
SHOP AND PREMISES	57 GAYNES PARK ROAD	UPMINSTER	RM14 2HL
SHOP AND PREMISES	57 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	5-7 SOUTH STREET	ROMFORD	RM1 1NJ
SHOP AND PREMISES	57 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	57 SUTTONS LANE	HORNCHURCH	RM12 6RJ
SHOP AND PREMISES	57 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP AND PREMISES	57-59 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	57-65 LONDON ROAD	GRD FLR	RM7 9QA
SHOP AND PREMISES	58 COLLIER ROW LANE	ROMFORD	RM5 3BB
RESTAURANT AND PREMISES	58 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	58 LONDON ROAD	ROMFORD	RM7 9QX
RESTAURANT AND PREMISES	58 SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	58 STATION LANE	HORNCHURCH	RM12 6NB
Shop and Premises	58 STATION ROAD	UPMINSTER	RM14 2TD
SHOP AND PREMISES	58 VICTORIA ROAD	ROMFORD	RM1 2JH

SHOP AND PREMISES	59 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	59 CHIPPENHAM ROAD	HAROLD HILL	RM3 8HL
SHOP AND PREMISES	59 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	59 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	59 STATION ROAD	UPMINSTER	RM14 2SU
SHOP AND PREMISES	59 WHITE HART LANE	COLLIER ROW	RM7 8JB
SHOP, WORKSHOP AND PREMISES	5C & R/O 5 TUDOR COURT	HAROLD COURT ROAD	RM3 0AE
SHOP AND PREMISES	6 ATLANTA BOULEVARD	GROUND FLOOR	RM1 1TB
SHOP AND PREMISES	6 BLENHEIM COURT	NORTHOLT WAY	RM12 5RX
SHOP AND PREMISES	6 BROADWAY	RAINHAM	RM13 9YN
RESTAURANT AND PREMISES	6 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	6 CARLTON ROAD	GIDEA PARK	RM2 5AA
Shop and Premises	6 CHASE CROSS ROAD	GND FLOOR	RM5 3PR
SHOP AND PREMISES	6 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	6 CROWN PARADE	UPMINSTER ROAD SOUTH	RM13 9BD
SHOP AND PREMISES	6 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	6 ELMER GARDENS	RAINHAM	RM13 7BS
SHOP AND PREMISES	6 HACTON PARADE	CENTRAL DRIVE	RM12 6EL
SHOP, STORE AND PREMISES	6 HOG HILL ROAD	COLLIER ROW	RM5 2DH
RADIO STATION & PREMISES	6 LAURIE WALK (H12)	ROMFORD	RM1 3RT
SHOP AND PREMISES	6 MARLBOROUGH ROAD	MAWNEYS	RM7 8AJ
SHOP AND PREMISES	6 MOOR LANE	CRANHAM	RM14 1EB
SHOP AND PREMISES	6 MORAY WAY	ROMFORD	RM1 4YD
SHOP AND PREMISES	6 NORTH STREET	HORNCHURCH	RM11 1QX
SHOP AND PREMISES	6 OCKENDON ROAD	UPMINSTER	RM14 2DN
SHOP AND PREMISES	6 OLD MILL PARADE	VICTORIA ROAD	RM1 2HU
SHOP AND PREMISES	6 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	6 SOUTH END ROAD	RAINHAM	RM13 7XH
SHOP AND PREMISES	6 SOUTH STREET	ROMFORD	RM1 1RA
SHOP AND PREMISES	6 ST MARYS LANE	UPMINSTER	RM14 2QT
SHOP AND PREMISES	6 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	6 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	6 STATION PARADE	VICTORIA ROAD	RM1 2JA
SHOP AND PREMISES	6 STATION ROAD	GIDEA PARK	RM2 6BX
BAR AND PREMISES	6 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	6 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	6 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	6 THE ARCADE	FARNHAM ROAD	RM3 8ED
SHOP AND PREMISES	6 THE PARADE	COLCHESTER ROAD	RM3 0AQ
SHOP AND PREMISES	6 WILLOW PARADE	MOOR LANE	RM14 1DZ
SHOP AND PREMISES	60 BRENTWOOD ROAD	ROMFORD	RM1 2EP
SHOP AND PREMISES	60 COLLIER ROW LANE	ROMFORD	RM5 3BB
SHOP AND PREMISES	60 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	60 LONDON ROAD	ROMFORD	RM7 9QX
SHOP AND PREMISES	60 STATION LANE	HORNCHURCH	RM12 6NB

Shop and Premises	60 STATION ROAD	GROUND FLOOR	RM14 2TD
SHOP AND PREMISES	60 VICTORIA ROAD	ROMFORD	RM1 2JH
STORE AND PREMISES	60, SOUTH END ROAD	UNITS 1 & 2 R/O	RM13 7XJ
SHOP AND PREMISES	60-62 SOUTH STREET	ROMFORD	RM1 1RB
RESTAURANT AND PREMISES	60-66 UPMINSTER ROAD		
	SOUTH	RAINHAM	RM13 9AA
SHOP, STORE AND PREMISES	61 ATHELSTAN ROAD	HAROLD WOOD	RM3 0QD
SHOP AND PREMISES	61 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	61 CHIPPENHAM ROAD	HAROLD HILL	RM3 8HL
SHOP AND PREMISES	61 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	61 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	61 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
SHOP AND PREMISES	61 STATION ROAD	UPMINSTER	RM14 2SU
SHOP AND PREMISES	6-10 HIGH STREET	ROMFORD	RM1 1HR
SHOP AND PREMISES	61-63 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	62 COLLIER ROW LANE	ROMFORD	RM5 3BB
SHOP AND PREMISES	62 COLLIER ROW ROAD	ROMFORD	RM5 3PA
SHOP AND PREMISES	62 STATION LANE	HORNCHURCH	RM12 6NB
STORE AND PREMISES	62 STATION ROAD	STORE R/O	RM14 2SJ
SHOP AND PREMISES	62 STATION ROAD	UPMINSTER	RM14 2TD
RESTAURANT AND PREMISES	62 VICTORIA ROAD	ROMFORD	RM1 2JH
SHOP AND PREMISES	622 UPPER BRENTWOOD ROAD	GIDEA PARK	RM2 6HS
SHOP AND PREMISES	624 UPPER BRENTWOOD ROAD	GIDEA PARK	RM2 6HS
SHOP AND PREMISES	626 UPPER BRENTWOOD ROAD	GIDEA PARK	RM2 6HS
SHOP AND PREMISES	628 UPPER BRENTWOOD ROAD	GIDEA PARK	RM2 6HS
SHOP AND PREMISES	63 & 65 STATION LANE	HORNCHURCH	RM12 6JU
SHOP AND PREMISES	63 ATHELSTAN ROAD	HAROLD WOOD	RM3 0QB
SHOP AND PREMISES	63 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	63 CHIPPENHAM ROAD	HAROLD HILL	RM3 8HL
SHOP AND PREMISES	63 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	63 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
SHOP AND PREMISES	63 STATION ROAD	UPMINSTER	RM14 2SU
BANK AND PREMISES	630 UPPER BRENTWOOD ROAD	GIDEA PARK	RM2 6HS
SHOP AND PREMISES	64 BRENTWOOD ROAD	ROMFORD	RM1 2EP
SHOP AND PREMISES	64 STATION ROAD	UPMINSTER	RM14 2TD
SHOP AND PREMISES	64 VICTORIA ROAD	ROMFORD	RM1 2JH
PUBLIC HOUSE AND PREMISES	64-68 HIGH STREET	HORNCHURCH	RM12 4UW
SHOP AND PREMISES	65 ATHELSTAN ROAD	HAROLD WOOD	RM3 0QD
Shop and Premises	65 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JS
SHOP AND PREMISES	65 CHASE CROSS ROAD	ROMFORD	RM5 3PL
SHOP AND PREMISES	65 CHIPPENHAM ROAD	HAROLD HILL	RM3 8HL
SHOP AND PREMISES	65 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	65 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
SHOP AND PREMISES	65 PARK LANE	HORNCHURCH	RM11 1BH

SHOP AND PREMISES	65 STATION ROAD	UPMINSTER	RM14 2SU
SHOP AND PREMISES	65 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP, OFFICE AND PREMISES	65A WINGLETYE LANE	HORNCHURCH	RM11 3AT
Kitchen	65B LONDON ROAD	KITCHEN AT 1ST FLR	RM7 9QA
SHOP AND PREMISES	65C WINGLETYE LANE	HORNCHURCH	RM11 3AT
DANCE SCHOOL AND PREMISES	66 ALBERT ROAD	ROMFORD	RM1 2PP
SHOP AND PREMISES	66 DAGENHAM ROAD	RUSH GREEN	RM7 0BX
SHOP AND PREMISES	66 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
SHOP AND PREMISES	66 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	66 STATION ROAD	UPMINSTER	RM14 2SU
SHOP AND PREMISES	66 VICTORIA ROAD	ROMFORD	RM1 2LA
Cafe and Premises	66-68 BRENTWOOD ROAD	ROMFORD	RM1 2EP
SHOP, OFFICE AND PREMISES	67 ATHELSTAN ROAD	HAROLD WOOD	RM3 0QD
Beauty Salon And Premises	67 BUTTS GREEN ROAD	SUITE 3 AT	RM11 2JS
SHOP AND PREMISES	67 FARNHAM ROAD	HAROLD HILL	RM3 8ED
CLUB AND PREMISES	67 MAIN ROAD	ROMFORD	RM2 5EH
SHOP AND PREMISES	67 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
Shop and Premises	67 SOUTH STREET	GROUND FLOOR	RM1 1NL
SHOP AND PREMISES	67 STATION LANE	HORNCHURCH	RM12 6NB
SHOP AND PREMISES	67 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP AND PREMISES	67-69 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	67-69 VICTORIA ROAD	ROMFORD	RM1 2LT
SHOP AND PREMISES	67A FARNHAM ROAD	HAROLD HILL	RM3 8ED
Computer Centre and Premises	6-8 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	68 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	6-8 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOP AND PREMISES	68 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
SHOP AND PREMISES	68 NORTH STREET	ROMFORD	RM1 1DA
SHOP AND PREMISES	68 SOUTH STREET	ROMFORD	RM1 1RB
SHOP AND PREMISES	68 STATION ROAD	UPMINSTER	RM14 2TD
SHOP AND PREMISES	68 VICTORIA ROAD	ROMFORD	RM1 2LA
SHOWROOM AND PREMISES	69 BUTTS GREEN ROAD	HORNCHURCH	RM11 2LD
SHOP AND PREMISES	69 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	69 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	69 FRONT LANE	CRANHAM	RM14 1XL
Shop and Premises	69 SOUTH STREET	GROUND FLOOR	RM1 1NL
SHOP AND PREMISES	69 STATION LANE	HORNCHURCH	RM12 6JU
SHOP AND PREMISES	69 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP AND PREMISES	7 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	7 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JR
SHOP AND PREMISES	7 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
SHOP AND PREMISES	7 CHASE CROSS ROAD	ROMFORD	RM5 3PJ
SHOP AND PREMISES	7 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	7 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
SHOP AND PREMISES	7 CROWN PARADE	UPMINSTER ROAD SOUTH	RM13 9BD

SHOP AND PREMISES	7 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	7 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	7 GRANGE ROAD	HAROLD HILL	RM3 7DU
SHOP AND PREMISES	7 HACTON PARADE	CENTRAL DRIVE	RM12 6EL
SHOP AND PREMISES	7 HARE HALL LANE	GIDEA PARK	RM2 6BD
SHOP AND PREMISES	7 HIGH STREET	HORNCHURCH	RM11 1TP
SHOP AND PREMISES	7 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	7 NORTH STREET	HORNCHURCH	RM11 1RL
SHOP AND PREMISES	7 OAK ROAD	HAROLD WOOD	RM3 0PH
SHOP AND PREMISES	7 PARK LANE	HORNCHURCH	RM11 1BB
SHOP AND PREMISES	7 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	7 STATION PARADE	VICTORIA ROAD	RM1 2JA
SHOP AND PREMISES	7 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	7 STATION ROAD	HAROLD WOOD	RM3 0BP
SHOP AND PREMISES	7 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	7 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	7 SUTTONS LANE	HORNCHURCH	RM12 6RD
SHOP AND PREMISES	7 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	7 THE LIBERTY(E4)	ROMFORD	RM1 3RL
SHOP AND PREMISES	7 WILLOW PARADE	MOOR LANE	RM14 1DZ
VEHICLE REPAIR WORKSHOP AND PREMISES	70 BRENTWOOD ROAD	ROMFORD	RM1 2EP
SHOP AND PREMISES	70 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	70 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
SHOP AND PREMISES	70 NORTH STREET	ROMFORD	RM1 1DA
SHOP AND PREMISES	70 RAINHAM ROAD	RAINHAM	RM13 7RL
KIOSK AND PREMISES	70 SOUTH STREET	KIOSK 2 AT	RM1 1RX
KIOSK AND PREMISES	70 SOUTH STREET	KIOSK 1 AT	RM1 2RX
PUBLIC HOUSE AND PREMISES	70 STATION ROAD	THE JUNCTION	RM14 2TD
SHOP AND PREMISES	70 VICTORIA ROAD	ROMFORD	RM1 2LA
SHOP AND PREMISES	70-74 HIGH STREET	HORNCHURCH	RM12 4UW
SHOP AND PREMISES	71 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	71 FAIRVIEW AVENUE	RAINHAM	RM13 9RL
SHOP AND PREMISES	71 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	71 FRONT LANE	CRANHAM	RM14 1XL
SHOP AND PREMISES	71 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	71 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	71 VICTORIA ROAD	ROMFORD	RM1 2LT
SHOP AND PREMISES	71 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP AND PREMISES	7-11 HIGH STREET	ROMFORD	RM1 1JU
SHOP AND PREMISES	7-11 LAURIE WALK (H6-H8)	ROMFORD	RM1 3RT
SHOP AND PREMISES	7-11 THE ARCADE	FARNHAM ROAD	RM3 8ED
STORE AND PREMISES	71B FRONT LANE	CRANHAM	RM14 1XL
SHOP AND PREMISES	72 BRENTWOOD ROAD	ROMFORD	RM1 2EP
SHOP AND PREMISES	72 MASEFIELD CRESCENT	HAROLD HILL	RM3 7PB
SHOP AND PREMISES	72 NORTH STREET	ROMFORD	RM1 1DA
SHOP AND PREMISES	72 RAINHAM ROAD	RAINHAM	RM13 7RL
RESTAURANT AND PREMISES	72 STATION LANE	HORNCHURCH	RM12 6NA

SHOP AND PREMISES	72-74 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
BAR AND PREMISES	72-74 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	73 BUTTS GREEN ROAD	HORNCHURCH	RM11 2LD
SHOP AND PREMISES	73 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	73 FARNHAM ROAD	HAROLD HILL	RM3 8DX
SHOP AND PREMISES	73 FRONT LANE	CRANHAM	RM14 1XL
SHOP AND PREMISES	73 MAIN ROAD	ROMFORD	RM2 5EH
SHOP AND PREMISES	73 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	73 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP AND PREMISES	73-77 SOUTH STREET	TIME	RM1 1NL
SHOP AND PREMISES	73-77 STATION LANE	DRIVING TEST CENTRE	RM12 6JU
SHOP AND PREMISES	73A FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	74 HORNCHURCH ROAD	HORNCHURCH	RM11 1JR
SHOP AND PREMISES	74 NORTH STREET	GND FLR	RM1 1DA
SHOP AND PREMISES	74 RAINHAM ROAD	RAINHAM	RM13 7RL
CLUB AND PREMISES	74 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	74-76 BRENTWOOD ROAD	GND FLR	RM1 2EL
PUBLIC HOUSE AND PREMISES	74-76 MARKET PLACE	THE BULL	RM1 3ER
SHOP AND PREMISES	75 BUTTS GREEN ROAD	HORNCHURCH	RM11 2LD
SHOP, OFFICE AND PREMISES	75 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
STORE AND PREMISES	75 PARK LANE	R/O	RM11 1BH
SHOP AND PREMISES	75 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	75 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP AND PREMISES	75A WILLOW STREET	MAWNEYS	RM7 7LB
SHOP AND PREMISES	76 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	76 HIGH STREET	HORNCHURCH	RM12 4UW
SHOP AND PREMISES	76 HORNCHURCH ROAD	HORNCHURCH	RM11 1JS
SHOP AND PREMISES	76 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	76 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
Restaurant and Premises	76-78 NORTH STREET	ROMFORD	RM1 1HD
SHOWROOM, WORKSHOP, PETROL FILLING STATION AND PREMISES	77 BALGORES LANE	GIDEA PARK	RM2 5JP
SHOP AND PREMISES	77 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	77 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	77 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	77 WINGLETYE LANE	HORNCHURCH	RM11 3AT
Shop and Premises	77-79 BUTTS GREEN ROAD	GRD FLR	RM11 2LD
SHOP AND PREMISES	77-79 WENNINGTON ROAD	RAINHAM	RM13 9TH
SHOP AND PREMISES	77-81 FRONT LANE	CRANHAM	RM14 1XL
SHOP AND PREMISES	78 BRENTWOOD ROAD	ROMFORD	RM1 2EL
SHOP AND PREMISES	78 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	78 HIGH STREET	HORNCHURCH	RM12 4UW
SHOP AND PREMISES	78 MARKET PLACE	ROMFORD	RM1 3ER
SHOP AND PREMISES	78 RAINHAM ROAD	RAINHAM	RM13 7RL
SHOP AND PREMISES	78 SOUTH STREET	ADJACENT	RM1 1NL

RESTAURANT AND PREMISES	78 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	7-8 STATION PARADE	BT	RM1 2JA
SHOP AND PREMISES	78 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	78B DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	78B SOUTH STREET	ROMFORD	RM1 1NL
BANK AND PREMISES	7-9 BALGORES LANE	GIDEA PARK	RM2 5JS
SHOP AND PREMISES	79 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	7-9 LOCKWOOD WALK	ROMFORD	RM1 3RH
SHOP AND PREMISES	79 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	7-9 NORTH STREET	ROMFORD	RM1 1BA
SHOP AND PREMISES	79 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	79 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	79 STATION LANE	HORNCHURCH	RM12 6JU
SHOP AND PREMISES	79 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP AND PREMISES	7A WESTERN ROAD	ROMFORD	RM1 3LD
SHOP AND PREMISES	7B WESTERN ROAD	ROMFORD	RM1 3LD
SHOP AND PREMISES	7C WESTERN ROAD	ROMFORD	RM1 3LD
SHOP AND PREMISES	8 ATLANTA BOULEVARD	GND FLR	RM1 1TB
SHOP AND PREMISES	8 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	8 CARLTON ROAD	GIDEA PARK	RM1 5AA
SHOP & PREMISES	8 CHASE CROSS ROAD	ROMFORD	RM5 3PR
SHOP AND PREMISES	8 COLLIER ROW ROAD	ROMFORD	RM5 3NX
SHOP AND PREMISES	8 CROWN PARADE	213 UPMINSTER ROAD SOUTH	RM13 9BD
SHOP AND PREMISES	8 ELMER GARDENS	RAINHAM	RM13 7BS
SHOP AND PREMISES	8 HACTON PARADE	CENTRAL DRIVE	RM12 6EL
SHOP AND PREMISES	8 HOG HILL ROAD	COLLIER ROW	RM5 2DH
SHOP AND PREMISES	8 LAURIE WALK (H11)	ROMFORD	RM1 3RT
Shop and Premises	8 LHS, NORTH STREET	ROMFORD	RM1 1BH
BOUTIQUE CAKE STUDIO	8 LOVELL WALK	RAINHAM	RM13 7ND
SHOP AND PREMISES	8 MARLBOROUGH ROAD	MAWNEYS	RM7 8AJ
SHOP AND PREMISES	8 MOOR LANE	CRANHAM	RM14 1EB
SHOP AND PREMISES	8 NORTH STREET	HORNCHURCH	RM11 1QX
SHOP AND PREMISES	8 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	8 RONEO CORNER	HORNCHURCH	RM12 4TN
SHOP AND PREMISES	8 SOUTH END ROAD	RAINHAM	RM13 7XH
BANK AND PREMISES	8 SOUTH STREET	AND 8A INC MEZZ. 1ST FLOOR & PART	RM1 1NJ
SHOP AND PREMISES	8 ST MARYS LANE	UPMINSTER	RM14 2QT
SHOP AND PREMISES	8 STATION LANE	HORNCHURCH	RM12 6NJ
SHOP AND PREMISES	8 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	8 STATION PARADE	VICTORIA ROAD	RM1 2JA
SHOP AND PREMISES	8 STATION ROAD	UPMINSTER	RM14 2UB
SHOP AND PREMISES	8 STATION ROAD	GIDEA PARK	RM2 6DA
SHOP AND PREMISES	8 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	8 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	8 THE LIBERTY	ROMFORD	RM1 3RL

STORE AND PREMISES	8 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YX
SHOP AND PREMISES	8 WILLOW PARADE	MOOR LANE	RM14 1DZ
SHOP AND PREMISES	80 BRENTWOOD ROAD	ROMFORD	RM1 2EL
SHOP AND PREMISES	80 RAINHAM ROAD	RAINHAM	RM13 7RL
SHOP AND PREMISES	80 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	80 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	80 VICTORIA ROAD	ROMFORD	RM1 2LT
Shop and Premises	80-84 MARKET PLACE	ROMFORD	RM1 3ER
SHOP AND PREMISES	81 CHASE CROSS ROAD	ROMFORD	RM5 3PJ
SHOP AND PREMISES	81 CORBETS TEY ROAD	UPMINSTER	RM14 2AJ
SHOP AND PREMISES	81 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	81 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	81 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	81 STATION LANE	HORNCHURCH	RM12 6JU
SHOP AND PREMISES	81 WINGLETYE LANE	HORNCHURCH	RM11 3AT
SHOP AND PREMISES	8-10 THE ARCADE	FARNHAM ROAD	RM3 8ED
Shop and Premises	8-12 MORAY WAY	ROMFORD	RM1 4YD
SHOP AND PREMISES	82 BRENTWOOD ROAD	ROMFORD	RM1 2EL
SHOP AND PREMISES	82 RAINHAM ROAD	GRD FLOOR	RM13 7RJ
SHOP AND PREMISES	82 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	82 VICTORIA ROAD	ROMFORD	RM1 2LA
SHOP AND PREMISES	83 BALGORES LANE	GIDEA PARK	RM2 6BP
SHOP AND PREMISES	83 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
VEHICLE REPAIR WORKSHOP AND PREMISES	83 LONDON ROAD	ROMFORD	RM7 9RB
SHOP AND PREMISES	83 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	83 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	83 SOUTH STREET	ROMFORD	RM1 1NL
SHOP AND PREMISES	83 STATION LANE	HORNCHURCH	RM12 6JU
SHOP AND PREMISES	83A CHIPPENHAM ROAD	HAROLD HILL	RM3 8HP
SHOP AND PREMISES	83B CHIPPENHAM ROAD	HAROLD HILL	RM3 8HP
SHOP AND PREMISES	84 BRENTWOOD ROAD	ROMFORD	RM1 2EL
SHOP AND PREMISES	84 RAINHAM ROAD	RAINHAM	RM13 7RJ
SHOP AND PREMISES	84 SOUTH STREET	ROMFORD	RM1 1RX
RESTAURANT AND PREMISES	84 STATION LANE	THE CRANLEIGH	RM12 6LX
SHOP AND PREMISES	84 STATION ROAD	GIDEA PARK	RM2 6DB
SHOP AND PREMISES	84 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9AA
SHOP AND PREMISES	84 VICTORIA ROAD	ROMFORD	RM1 2LA
SHOP AND PREMISES	84-86 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	85 BALGORES LANE	GIDEA PARK	RM2 6BP
SHOP AND PREMISES	85 CHIPPENHAM ROAD	HAROLD HILL	RM3 8HP
SHOP AND PREMISES	85 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	85 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	85 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	85 PARK LANE	HORNCHURCH	RM11 1BH
RESTAURANT AND PREMISES	85 STATION LANE	HORNCHURCH	RM12 6JU

GARDEN CENTRE AND PREMISES	85-87 NORTH STREET	HORNCHURCH	RM11 1ST
SHOP AND PREMISES	86 BRENTWOOD ROAD	ROMFORD	RM1 2EL
SHOP AND PREMISES	86 DAGENHAM ROAD	RUSH GREEN	RM7 0TJ
CAR SALES SITE & PREMISES	86 RAINHAM ROAD	RAINHAM	RM13 7RJ
SHOP AND PREMISES	86 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	86 STATION ROAD	GIDEA PARK	RM2 6DB
SHOP AND PREMISES	86 VICTORIA ROAD	ROMFORD	RM1 2LA
SHOP AND PREMISES	87 CHASE CROSS ROAD	ROMFORD	RM5 3RP
SHOP AND PREMISES	87 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	87 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	87 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	87 PARK LANE	GROUND FLOOR	RM11 1BE
SHOP AND PREMISES	87 STATION LANE	HORNCHURCH	RM12 6NB
SHOP AND PREMISES	87-89 CHIPPENHAM ROAD	HAROLD HILL	RM3 8HT
PUBLIC HOUSE AND PREMISES	87-89 SOUTH STREET	YATES	RM1 1NX
SHOP AND PREMISES	88 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
SHOP AND PREMISES	88 BRENTWOOD ROAD	ROMFORD	RM1 2EL
SHOP AND PREMISES	88 DAGENHAM ROAD	RUSH GREEN	RM7 0TJ
SHOP AND PREMISES	88 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	88 NORTH STREET	ROMFORD	RM1 1DA
SHOP AND PREMISES	88 NORTH STREET	HORNCHURCH	RM11 1SR
SHOP AND PREMISES	88 STATION ROAD	GIDEA PARK	RM2 6DB
SHOP AND PREMISES	88-92 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	89 ALBERT ROAD	ROMFORD	RM1 2PS
SHOP AND PREMISES	89 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	89 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	8-9 HARE HALL LANE	GIDEA PARK	RM2 6BD
SHOP AND PREMISES	89 MAIN ROAD	ROMFORD	RM2 5EL
SHOP, OFFICE AND PREMISES	89 PARK LANE	HORNCHURCH	RM11 1BE
SHOP AND PREMISES	89 STATION LANE	HORNCHURCH	RM12 6JU
SHOP AND PREMISES	89-91 CHASE CROSS ROAD	ROMFORD	RM5 3RP
Computer Centre and Premises	9 AT 3 KING GEORGE CLOSE	ROMFORD	RM7 7PN
SHOP AND PREMISES	9 BILLET LANE	HORNCHURCH	RM11 1TS
SHOP AND PREMISES	9 BROADWAY PARADE	HORNCHURCH	RM12 4RS
SHOP AND PREMISES	9 CAMBORNE AVENUE	HAROLD HILL	RM3 8RH
SHOP AND PREMISES	9 CLOCKHOUSE LANE	COLLIER ROW	RM5 3PH
SHOP AND PREMISES	9 COLLIER ROW ROAD	ROMFORD	RM5 3NP
SHOP AND PREMISES	9 CORBETS TEY ROAD	UPMINSTER	RM14 2AP
BANK AND PREMISES	9 ELM PARADE	ST NICHOLAS AVENUE	RM12 4RH
SHOP AND PREMISES	9 FARNHAM ROAD	HAROLD HILL	RM3 8ED
SHOP AND PREMISES	9 HIGH STREET	HORNCHURCH	RM11 1TP
Shop and Premises	9 NOAK HILL ROAD	ROMFORD	RM3 7LA
SHOP AND PREMISES	9 NORTH STREET	HORNCHURCH	RM11 1RL
SHOP AND PREMISES	9 OAK ROAD	HAROLD WOOD	RM3 0PH
Shop and Premises	9 PARK LANE	HORNCHURCH	RM11 1BB
SHOP AND PREMISES	9 SOUTH STREET	ROMFORD	RM1 1NJ

SHOP AND PREMISES	9 STATION LANE	HORNCHURCH	RM12 6JL
SHOP AND PREMISES	9 STATION PARADE	THE BROADWAY	RM12 5AB
SHOP AND PREMISES	9 STATION ROAD	HAROLD WOOD	RM3 0BP
KIOSK AND PREMISES	9 STATION ROAD	GIDEA PARK STATION	RM2 6BX
SHOP AND PREMISES	9 STATION ROAD	UPMINSTER	RM14 2SJ
SHOP AND PREMISES	9 STEWARDS WALK	ROMFORD	RM1 3RJ
SHOP AND PREMISES	9 TADWORTH PARADE	THE BROADWAY	RM12 5AS
SHOP AND PREMISES	9 THE LIBERTY (E5)	ROMFORD	RM1 3RL
SHOP AND PREMISES	9 UPMINSTER ROAD SOUTH	RAINHAM	RM13 9YS
SHOP AND PREMISES	9 WILLOW PARADE	MOOR LANE	RM14 1DZ
SHOP AND PREMISES	90 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
SHOP AND PREMISES	90 BRENTWOOD ROAD	ROMFORD	RM1 2EL
SHOP AND PREMISES	90 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	90 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	90 NORTH STREET	STAR MINI CABS	RM1 1BA
SHOP AND PREMISES	90 NORTH STREET	HORNCHURCH	RM11 1SR
SHOP AND PREMISES	90 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	90 RAINHAM ROAD	RAINHAM	RM13 7RJ
SHOP AND PREMISES	90 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	90 STATION ROAD	GIDEA PARK	RM2 6DB
RESTAURANT AND PREMISES	90A RAINHAM ROAD	RAINHAM	RM13 7RJ
SHOP AND PREMISES	91 ALBERT ROAD	ROMFORD	RM1 2PS
SHOP AND PREMISES	91 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	91 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	91 PARK LANE	HORNCHURCH	RM11 1BH
PUBLIC HOUSE AND PREMISES	91 SHEPHERDS HILL	THE SHEPHERD & DOG	RM3 0NP
SHOP AND PREMISES	91 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	9-11 BUTTS GREEN ROAD	HORNCHURCH	RM11 2JR
SHOP AND PREMISES	9-11 CHASE CROSS ROAD	ROMFORD	RM5 3PJ
BANK AND PREMISES	9-11 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	9-11 QUADRANT ARCADE	ROMFORD	RM1 3ED
SHOP AND PREMISES	9-11 SUTTONS LANE	HORNCHURCH	RM12 6RD
Kitchen	9-17 EASTERN ROAD	4TH FLR KITCHEN	RM1 3PB
Kitchen	9-17 EASTERN ROAD	1ST FLR SUITE 1.13	RM1 3PB
SHOP AND PREMISES	92 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	92 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	92 NORTH STREET	HORNCHURCH	RM11 1SR
SHOP AND PREMISES	92 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	92 SOUTH STREET	ROMFORD	RM1 2RX
SHOP AND PREMISES	92 STATION ROAD	GIDEA PARK	RM2 6DB
SHOP AND PREMISES	92-94 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
SHOP AND PREMISES	92-94 MAWNEY ROAD	ROMFORD	RM7 7JB
SHOP, STORE AND PREMISES	92-98 BRENTWOOD ROAD	ROMFORD	RM1 2SA
SHOP AND PREMISES	93 ALBERT ROAD	ROMFORD	RM1 2PS
SHOP AND PREMISES	93 CHASE CROSS ROAD	ROMFORD	RM5 3RP

SHOP AND PREMISES	93 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	93 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	93 PARK LANE	HORNCHURCH	RM11 1BH
SHOP AND PREMISES	93 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	93-97 COLLIER ROW ROAD	ALDI	RM5 2AU
SHOP AND PREMISES	94 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	94 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	94 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	94 MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	94 NORTH STREET	HORNCHURCH	RM11 1SR
SHOP AND PREMISES	94 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	94 SOUTH STREET	ROMFORD	RM1 2AP
HOTEL AND PREMISES	94 STATION LANE	HORNCHURCH	RM12 6LX
SHOP AND PREMISES	94 STATION ROAD	GIDEA PARK	RM2 6DB
SHOP AND PREMISES	94 VICTORIA ROAD	ROMFORD	RM1 2PA
SHOP AND PREMISES	95 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	95 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	95 NORTH STREET	ROMFORD	RM1 1EU
SHOP AND PREMISES	95 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	96 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
SHOP AND PREMISES	96 DAGENHAM ROAD	RUSH GREEN	RM7 0DA
SHOP AND PREMISES	96 HIGH STREET	HORNCHURCH	RM12 4UH
SHOP AND PREMISES	96 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	96 MARKET PLACE	UNIT 2 TOLLGATE HOUSE	RM1 3ER
SHOP AND PREMISES	96 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	96 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	96-98 PETERSFIELD AVENUE	HAROLD HILL	RM3 9PH
SHOP AND PREMISES	97 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	97 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	97 NORTH STREET	ROMFORD	RM1 1EU
SHOP AND PREMISES	97 SOUTH STREET	ROMFORD	RM1 1NX
SHOP AND PREMISES	97 UPMINSTER ROAD	HORNCHURCH	RM11 3XB
Showroom (Not Car) and Premises	97-101 MAIN ROAD	ROMFORD	RM2 5EL
SHOP AND PREMISES	97-99 BALGORES LANE	GIDEA PARK	RM2 6BT
SHOP AND PREMISES	97A CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	98 COLLIER ROW ROAD	ROMFORD	RM5 2BA
SHOP AND PREMISES	98 HILLdene AVENUE	HAROLD HILL	RM3 8DT
SHOP AND PREMISES	98 NORTH STREET	HORNCHURCH	RM11 1SU
SHOP AND PREMISES	98 SOUTH STREET	ROMFORD	RM1 1RX
SHOP AND PREMISES	99 CORBETS TEY ROAD	UPMINSTER	RM14 2AH
SHOP AND PREMISES	99 FRONT LANE	CRANHAM	RM14 1XN
SHOP AND PREMISES	99 NORTH STREET	ROMFORD	RM1 1EU
SHOP AND PREMISES	99 UPMINSTER ROAD	HORNCHURCH	RM11 3XB
HAND CAR WASH AND PREMISES	99 VICTORIA ROAD	R/O	RM1 2LT
SHOP AND PREMISES	99 VICTORIA ROAD	ROMFORD	RM1 2LT
Health Centre and Premises	99 WESTERN ROAD	ROMFORD	RM1 3LS

PUBLIC HOUSE AND PREMISES	99-103 SOUTH STREET	THE MOON & STARS	RM1 1NX
FITNESS CENTRE AND PREMISES	ABBS CROSS GARDENS	MEDIA HOUSE	RM12 4XB
SHOP AND PREMISES	ADJ 156 BALGORES LANE	GIDEA PARK	RM2 6BP
SUPERSTORE AND PREMISES	AIRFIELD WAY	TESCO STORES LTD	RM12 5AF
STORE AND PREMISES	APPLETON WAY	R/O 24 STATION LANE	RM12 6JL
STORE AND PREMISES	APPLETON WAY	R/O 22 STATION LANE	RM12 6JL
RESTAURANT AND PREMISES	ARCADE PLACE	UNIT 1	RM1 1RS
PUBLIC HOUSE AND PREMISES	ARDLEIGH GREEN ROAD	ARDLEIGH & DRAGON	RM11 2SU
SHOP AND PREMISES	ATLANTA BOULEVARD	LIDL	RM1 1TB
LEISURE CENTRE AND PREMISES	ATLANTA BOULEVARD	FITNESS FIRST	RM1 1TB
GYM AND PREMISES	AVELEY ROAD	ADJ NO 9	RM14 2TN
STORE AND PREMISES	AVELEY ROAD	UNIT 1 THE STABLES	RM14 2TG
STORE AND PREMISES	AVELEY ROAD	UPMINSTER	RM14 2TG
STORE AND PREMISES	AVELEY ROAD	UNIT 5 THE STABLES	RM14 2TG
GARDEN CENTRE & PREMISES	AVELEY ROAD	DEEKS & SON NURSERY	RM14 2TG
STORE AND PREMISES	AVELEY ROAD	UNITS 2-3 THE STABLES	RM14 2TG
STORE AND PREMISES	AVELEY ROAD	FRONT STORE	RM14 2TG
STORE AND PREMISES	AVELEY ROAD	UNIT 4 THE STABLES	RM14 2TG
HEALTH CENTRE AND PREMISES	AVON ROAD	HEALTH CENTRE CORNER OF	RM14 1RQ
SPORTS GROUND AND PREMISES	BALGORES LANE	SPORTS GROUND	RM2 6BP
STORE AND PREMISES	BARLOW WAY	TPF AT UNIT 21	RM13 8BT
STORE AND PREMISES	BATES INDUSTRIAL ESTATE	UNIT 12A	RM3 0HU
STORE AND PREMISES	BATES INDUSTRIAL ESTATE	UNIT 32E	RM3 0HU
STORE AND PREMISES	BATES INDUSTRIAL ESTATE	UNIT 32D	RM3 0HU
STORE AND PREMISES	BATTIS WAY	ARCH NO 6	RM1 1TU
CAR SHOWROOM AND PREMISES	BEADLES VW ROMFORD	COLCHESTER ROAD	RM3 0GU
STORE AND PREMISES	BENSKINS LANE	MARICOT EQUESTRIAN CLUB	RM4 1RQ
SHOP AND PREMISES	BERESFORD ESTATE AGENTS	135 HIGH STREET	RM12 3YD
STORE, OFFICES AND PREMISES	BERNARD ROAD	UNIT 4B	RM7 0HX

HOTEL AND PREMISES	BERWICK POND ROAD	THE MANOR HOTEL	RM13 9EL
STORE AND PREMISES	BETTERTON ROAD	UNIT 1 CENTURION WORKS	RM13 8HL
THEATRE AND PREMISES	BILLET LANE	QUEENS THEATRE	RM11 1XP
STORE AND PREMISES	BLACKWATER CLOSE	TPF AT ANGLIA FORWARDING	RM13 8RH
PUBLIC HOUSE AND PREMISES	BRENTWOOD ROAD	THE DRILL	RM2 5TD
PUBLIC HOUSE AND PREMISES	BRENTWOOD ROAD	DURHAM ARMS	RM1 2EH
PUBLIC HOUSE , HOTEL AND PREMISES	BREWERS FAYRE & TRAVEL INN	WILLOW FARM	RM13 9ED
SHOP AND PREMISES	BREWERY WALK	UNIT 3	RM1 1AU
SHOP AND PREMISES	BREWERY WALK	ROMFORD	RM1 1AU
SHOP AND PREMISES	BREWERY WALK	UNIT 2	RM1 1AU
STADIUM AND PREMISES	BRIDGE AVENUE	HORNCHURCH STADIUM	RM14 2LX
CLUB HOUSE AND PREMISES	BRIDGE AVENUE	HAVERING MAYESBROOK ATH CLUB	RM14 2LX
Car Wash and Premises	BRIDGE ROAD	ARC CAR WASH	RM13 9YZ
SUPERSTORE AND PREMISES	BRIDGE ROAD	TESCO SUPERSTORE	RM13 9YZ
HAND CAR WASH	BRIDGE ROAD	HAND CAR WASH	RM13 9YZ
HALL AND PREMISES	BRIDGEWATER ROAD	GYM ON THE HILL	RM3 7UA
BOWLS CLUB AND PREMISES	BRIGHTS AVENUE	RAINHAM BOWLS CLUB	RM13 9NW
PUBLIC HOUSE AND PREMISES	BROADWAY	THE PHOENIX HOTEL	RM13 9YW
STORE	BROADWAY PARADE	ADJ KINGS HOUSE	RM12 4RS
SPORTS GROUND AND PREMISES	BROXHILL ROAD	CRICKET GROUND	RM4 1QH
RESTAURANT AND PREMISES	BRYANT AVENUE	DRIVE THRU MACDONALDS	RM3 0AP
RETAIL WAREHOUSE AND PREMISES	BRYANT AVENUE	UNIT 7 GALLOWS CORNER RETAIL PARK	RM3 0JB
HAND CAR WASH & PREMISES	BRYANT AVENUE	ROMFORD	RM3 0AP
KIOSK AND PREMISES	BRYANT AVENUE	TIMPSONS AT TESCOS	RM3 0LL
Superstore and Premises	BRYANT AVENUE	TESCOS	RM3 0LL
Restaurant and Premises	BRYANT AVENUE	TESCO CAFE AT TESCOS	RM3 0LL
Shop and Premises	BRYANT AVENUE	TESCO MOBILE AT TESCOS	RM3 0LL
Shop and Premises	BRYANT AVENUE	PHOTO EXPERT AT TESCOS	RM3 0LL

Kiosk and Premises	BRYANT AVENUE	TRAVEL MONEY AT TESCOS	RM3 0LL
HAND CAR WASH & PREMISES	CAR VALET UK HAND CAR WASH AT	BRITTANIA CAR PARK	RM1 3EE
SHOP AND PREMISES	CHASE CROSS ROAD	16 & PART GROUND FLOOR AT 18	RM5 3PR
HALL AND PREMISES	CHELMSFORD DRIVE	SCOUT HALL	RM14 2PH
SHOP AND PREMISES	CHEMIST ESEME LTD AT	329 UPMINSTER ROAD NORTH	RM13 9JR
PUBLIC HOUSE AND PREMISES	CHIPPENHAM ROAD	THE ALDERMAN	RM3 8HX
STORE AND PREMISES	CHUDLEIGH ROAD	(STORE)	RM3 9AU
HALL AND PREMISES	CHURCH LANE	THE SQUARE	RM14 3QH
HALL AND PREMISES	CHURCH ROAD	VICTORY HALL	RM4 1LD
AQUATIC CENTRE & PREMISES	CHURCH ROAD	SPICE PITS FARM	RM4 1LD
SPORTS GROUND AND PREMISES	CHURCH ROAD	NOAK HILL SPORTS GROUND	RM4 1LD
SHOP AND PREMISES	CHURCH ROAD	FARM SHOP HILL FARM	RM4 1LD
SHOP AND PREMISES	CHURCH ROAD	HAROLD COURT HOUSE	RM3 0JX
CLUB HOUSE AND PREMISES	CHURCH ROAD	HAVERING DOG TRAINING CENTRE	RM3 0JX
GARDEN CENTRE AND PREMISES	CLAY TYE ROAD	ADJ GROVELANDS	RM14 3PL
STORE AND PREMISES	CLOCKHOUSE LANE	UNIT 5 AT HILLSDENE	RM5 3PH
RETAIL WAREHOUSE AND PREMISES	COLCHESTER ROAD	B & Q	RM3 0AQ
CAR SHOWROOM, WORKSHOP AND PREMISES	COLCHESTER ROAD	HAROLD WOOD AUDI LTD	RM3 0YD
RETAIL WAREHOUSE AND PREMISES	COLCHESTER ROAD	UNIT 2 GALLOWES CORNER RETAIL PK	RM3 0AD
RETAIL WAREHOUSE AND PREMISES	COLCHESTER ROAD	UNIT 3 GALLOWES CORNER RETAIL PK	RM3 0AD
RETAIL WAREHOUSE AND PREMISES	COLCHESTER ROAD	UNIT 4 GALLOWES CORNER RETAIL PK	RM3 0AD
CAR SHOWROOM, OFFICE AND PREMISES	COLCHESTER ROAD	BMW SITE	RM3 0AQ
RETAIL WAREHOUSE AND PREMISES	COLCHESTER ROAD	ARGOS GALLOWES CORNER RETAIL PARK	RM3 0AD
RETAIL WAREHOUSE AND PREMISES	COLCHESTER ROAD	NEXT UNIT 6A	RM3 0AD

RESTAURANT AND PREMISES	COLCHESTER ROAD	KFC GALLOWES CORNER	RM3 0AA
RETAIL WAREHOUSE AND PREMISES	COLCHESTER ROAD	UNIT 1 GALLOWES CORNER RETAIL PK	RM3 0AD
Kiosk and Premises	COLCHESTER ROAD	MOBILE CATERING KIOSK IN CAR PARK	RM3 8GZ
Kiosk and Premises	COLCHESTER ROAD	MOBILE CATERING UNIT IN CAR PARK	RM3 0AD
Tipping Site and Premises	COLDHARBOUR LANE	RAINHAM LANDFILL AND LEACHGATE	RM13 9YB
CLUBHOUSE AND PREMISES	COLLIER ROW LANE	120 - GROUND FLOOR 122	RM5 3DT
PUBLIC HOUSE AND PREMISES	COLLIER ROW LANE	BELL & GATE	RM5 3JB
STORE AND PREMISES	COLLIER ROW ROAD	TRUNKMASTER AT GOBIONS FARM	RM5 2BH
STORE AND PREMISES	COLLIER ROW ROAD	JOHN WACKETT LTD AT GOBIONS FARM	RM5 2BH
SHOP AND PREMISES	COLLIER ROW ROAD	GOBIONS FARM SHOP	RM5 2BH
STORE AND PREMISES	COLLIER ROW ROAD	GOBIONS FARM	RM5 2BH
VEHICLE REPAIR WORKSHOP AND PREMISES	COLWOOD MOTORS	FAIRKYTES AVENUE	RM11 1XS
COTAINER USED AS SHOP AND PREMISES	CONTAINER ADJ	5 BRYANT AVENUE	RM3 0AP
POST OFFICE AND PREMISES	CORBETS TEY ROAD	UPMINSTER SORTING OFFICE	RM14 2AJ
SHOP AND PREMISES	CORBETS TEY ROAD	127-127A	RM14 2AJ
SHOP AND PREMISES	CORBETS TEY ROAD	6 BELL CORNER	RM14 2AT
SPORTS GROUND AND PREMISES	CORBETS TEY ROAD	UPMINSTER PARK	RM14 2AJ
SHOP AND PREMISES	CORBETS TEY ROAD	5 BELL CORNER	RM14 2AT
SHOP AND PREMISES	CORBETS TEY ROAD	4 BELL CORNER	RM14 2AT
SHOP AND PREMISES	CORBETS TEY ROAD	3 BELL CORNER	RM14 2AP
SHOP AND PREMISES	CORBETS TEY ROAD	1 BELL CORNER	RM14 2AT
SHOP AND PREMISES	CORBETS TEY ROAD	2 BELL CORNER	RM14 2AT
SHOP AND PREMISES	COSTA COFFEE PAVILLION 1	THE BREWERY SHOPPING CENTRE	RM1 1AU
CLUB HOUSE AND PREMISES	CROMER ROAD	FIELERS SPORTS GROUND	RM11 1BY
STORE AND PREMISES	CROW LANE	STORE AND PREMISES	RM7 0EU

CAFE AND PREMISES	DANES ROAD	ROOFERS REST CAFE	RM7 0HL
HAND CAR WASH & PREMISES	DAVIDSON WAY	HAND CAR WASH HOMEBASE	RM7 0AZ
RETAIL WAREHOUSE AND PREMISES	DAVIDSON WAY	SAINSBURYS HOMEBASE	RM7 0AZ
STORE AND PREMISES	DEANS FACTORY GROUP	UNITS 8-8A	RM13 9XL
MASONIC HALL AND PREMISES	DEYNCOURT GARDENS	MASONIC HALL	RM14 1DF
SUPERSTORE AND PREMISES	DOLPHIN APPROACH	ASDA	RM1 3EE
SHOP AND PREMISES	DOLPHIN APPROACH	KIOSK ADJ ASDA	RM1 3EE
STORE AND PREMISES	DORKING WALK	DEPOT	RM3 9AF
CAR SHOWROOM AND PREMISES	EAST LONDON HYUNDAI	EASTERN AVENUE WEST	RM7 7AQ
RETAIL WAREHOUSE AND PREMISES	EASTERN AVENUE WEST	UNIT 2	RM7 7EX
RETAIL WAREHOUSE AND PREMISES	EASTERN AVENUE WEST	DUNELM MILL	RM6 5SA
RESTAURANT AND PREMISES	EASTERN AVENUE WEST	BURGER KING UNIT 5	RM7 7EX
RETAIL WAREHOUSE AND PREMISES	EASTERN AVENUE WEST	POUNDSTRETCHER, UNIT 4	RM7 7EX
Retail Warehouse and Premises	EASTERN AVENUE WEST	UNIT 3 EASTERN AVENUE RETAIL PARK	RM7 7EX
RETAIL WAREHOUSE AND PREMISES	EASTERN AVENUE WEST	CARPHONE WAREHOUSE UNIT 1	RM7 7EX
KIOSK AND PREMISES	EL MEXICANA KIOSK	EAST MALL	RM1 3RL
STORE AND PREMISES	ELM PARADE	R/O ELM PARK LIBRARY	RM12 4PT
SHOP AND PREMISES	ELM PARK AVENUE	SAINSBURYS AT THE NEW ELM PARK HOTE	RM12 4SP
HAND CAR WASH AND PREMISES	ESSEX GARDENS	LECI'S HAND CAR WASH	RM11 3EH
RETAIL WAREHOUSE AND PREMISES	EXCHANGE STREET	STARBUCKS	RM1 1BQ
RETAIL WAREHOUSE AND PREMISES	EXCHANGE STREET	PARTY DELIGHTS	RM1 1BQ
HALL AND PREMISES	EYHURST AVENUE	ELM PARK ASSEMBLY HALL	RM12 4RA
VEHICLE REPAIR WORKSHOP AND PREMISES	FARINGDON AVENUE	AVONSTRAND	RM3 8SP
STORE AND PREMISES	FARINGDON GROVE	UNIT 4	RM3 8TD
STORE AND PREMISES	FARINGDON GROVE	UNIT 3 FARINGDON AVENUE	RM3 8TD

RESTAURANT AND PREMISES	FARINGDON GROVE	UNIT 6 FARINGDON AVENUE	RM3 8TD
SHOP AND PREMISES	FARNHAM ROAD	12A THE ARCADE	RM3 8DX
STORE AND PREMISES	FERRY LANE	KERRY FOODS LTD	RM13 9YY
CONCRETE BATCHING PLANT AND PREMISES	FERRY LANE	MIX-N-LAY	RM13 9BU
SHOP AND PREMISES	FITZILIAN AVENUE	5 & R/O 9-11	RM3 0QS
SHOP AND PREMISES	FOLKES LANE	WOODCROFT FARM	RM14 1TH
STORE AND PREMISES	FOLKES LANE	UNIT 4A AT FOLKES FARM	RM14 1TH
HALL AND PREMISES	FORD LANE	ARMY CADET FORCE	RM13 7BB
SHOP AND PREMISES	FRONT LANE	5 WILLOW PARADE	RM14 1DY
CAFE AND PREMISES	FRONT LANE	1 THE BROADWAY	RM14 1DY
SHOP AND PREMISES	FRONT LANE	4 WILLOW PARADE	RM14 1DY
SHOP AND PREMISES	FRONT LANE	2 THE BROADWAY	RM14 1XJ
SHOP AND PREMISES	FRONT LANE	1 WILLOW PARADE	RM14 1DY
LAND USED FOR CARAVAN STORAGE AND PREMISES	FRONT LANE	CRANHAM CARAVANS	RM14 3YD
SHOP AND PREMISES	FRONT LANE	2 WILLOW PARADE	RM14 1DY
PUBLIC HOUSE AND PREMISES	FRONT LANE	THE PLOUGH	RM14 1XL
TENNIS COURTS/CLUB	GIDEA CLOSE	GIDEA PARK TENNIS CLUB	RM2 5NP
SHOP AND PREMISES	GL1 LOCKWOOD WALK	ROMFORD	RM1 3LT
SHOP AND PREMISES	GL1A LOCKWOOD WALK	ROMFORD	RM1 3LT
SHOP AND PREMISES	GND FLOOR 138 SOUTH STREET	ROMFORD	RM1 1TE
KICKBOXING CLUB AND PREMISES	GND FLR	83C LONDON ROAD	RM7 9QD
Mini Cab Office and Premises	GND FLR 142 SOUTH STREET	ROMFORD	RM1 1SX
Shop and Premises	GND FLR 315 COLLIER ROW LANE	ROMFORD	RM5 3ND
KIOSK AND PREMISES	GND FLR OFFICE NO 1	AT 2-4 EASTERN ROAD	RM1 3PJ
PUBLIC HOUSE AND PREMISES	GOBIONS AVENUE	ASPEN TREE	RM5 3SP
HALL AND PREMISES	GOOSHAYS DRIVE	BREWSTER HALL	RM3 9LB
CLUB HOUSE AND PREMISES	GOOSHAYS DRIVE	HAVERING & ILFORD SUB AQUA CLUB	RM3 9LB

LEISURE CENTRE AND PREMISES	GOOSHAYS DRIVE	CENTRAL PARK LEISURE CENTRE	RM3 9LB
HEALTH CENTRE AND PREMISES	GOOSHAYS DRIVE	HAROLD HILL HEALTH CENTRE	RM3 9LB
BEAUTY SCHOOL AND PREMISES	GREAT NELMES CHASE	R/O 7	RM11 2PS
SHOP AND PREMISES	GRND FLR 4 ATLANTA BOULEVARD	SOUTH STREET	RM1 1TB
TENNIS COURTS/CLUBS	GROSVENOR GARDENS	GROSVENOR TENNIS CLUB	RM14 1DL
Hall and Premises	GROUND FLOOR 9 BRIDGE CLOSE	GLORIOUS KINGS FIRE MINISTRIES	RM7 0AU
CLINIC AND PREMISES	GUBBINS LANE	BLOCK 53	RM3 0BG
HEALTH CENTRE AND PREMISES	GUBBINS LANE	HAROLD WOOD POLYCLINIC	RM3 0FE
HEALTH CENTRE AND PREMISES	GUBBINS LANE	CLINIC	RM3 0QA
PUBLIC HOUSE AND PREMISES	HACTON LANE	THE OPTIMIST	RM14 2XY
CLUB HOUSE AND PREMISES	HALL LANE	UPMINSTER HALL SPORTS ASSOC	RM14 1TX
CLUB HOUSE AND PREMISES	HAROLD VIEW	HAROLD WOOD SPORTS ASSOCIATION	RM3 0LX
PUBLIC HOUSE AND PREMISES	HAVERING WELL	148 RUSH GREEN ROAD	RM7 0QA
BOWLS CLUB AND PREMISES	HAYNES ROAD	HAYNES PARK BOWLING CLUB	RM11 2HS
PUBLIC HOUSE AND PREMISES	HIGH STREET	GOLDEN LION	RM1 1HR
POST OFFICE AND PREMISES	HIGH STREET	127A-129A	RM11 1TX
HALL AND PREMISES	HITCHIN CLOSE	OLD PEOPLES HOME	RM3 7EG
CLUB HOUSE AND PREMISES	HORNCHURCH FOOTBALL CLUB	BRIDGE AVENUE	RM14 2LX
CLUB HOUSE AND PREMISES	HORNCHURCH ROAD	THE HORNCHURCH SPORTS CENTRE	RM11 1JU
INDOOR BOWLING CENTRE AND PREMISES	HORNCHURCH ROAD	HARROW LODGE PARK	RM11 1JU
PUBLIC HOUSE AND PREMISES	HORNCHURCH ROAD	THE CROWN INN	RM12 4TW
PUBLIC HOUSE AND PREMISES	HORNCHURCH ROAD	THE HARROW	RM11 1DP
RETAIL WAREHOUSE AND PREMISES	HORNCHURCH ROAD	B & Q	RM11 1PY
SPORTS CENTRE AND PREMISES	HORNCHURCH ROAD	HARROW LODGE SPORTS CENTRE	RM11 1JU
Kiosk and Premises	HORNCHURCH ROAD	MOBILE CATERING KIOSK RONEO CORNER	RM11 1PY
STORE AND PREMISES	IMPERIAL TRADING ESTATE	UNITS 85-86	RM13 9XL
STORE AND PREMISES	IMPERIAL TRADING ESTATE	UNIT 71	RM13 9XL

STORE AND PREMISES	IMPERIAL TRADING ESTATE	UNIT 90	RM13 9XL
KIOSK AND PREMISES	JOHN'S BLINDS KIOSK	LOCKWOOD WALK	RM1 3RH
VEHICLE REPAIR WORKSHOP AND PREMISES	JUTSUMS LANE	ALLENS OF ROMFORD	RM7 0ER
SPORTS GROUND AND PREMISES	KENILWORTH AVENUE	SPORTS GROUND	RM3 9NE
BOXING CLUB AND PREMISES	KILMARTIN WAY	ELM PARK AMATEUR BOXING CLUB	RM12 5NB
SHOP AND PREMISES	KING EDWARD AVENUE	R/O 411 UPMINSTER ROAD NORTH	RM13 9SA
STORE AND PREMISES	KING EDWARD ROAD	STORE, R/O 64 VICTORIA ROAD	RM1 2DH
LAND USED FOR CAR SALES AND PREMISES	LAND FRONTING WILLOW COTTAGES	ESSEX AUTO SALES	RM13 9EB
LAND USED FOR CAR SALES AND PREMISES	LAND FRONTING WILLOW COTTAGES	AVELEY CARS SALES	RM13 9EB
KIOSK AND PREMISES	LAURIE WALK	KIOSK 1	RM1 3RT
KIOSK AND PREMISES	LAURIE WALK	KIOSK 4	RM1 3RT
KIOSK AND PREMISES	LAURIE WALK	KIOSK 3	RM1 3RT
KIOSK AND PREMISES	LAURIE WALK	KIOSK 2	RM1 3RT
SHOP AND PREMISES	LAURIE WALK	H15 - H16 - H17	RM1 3RT
STORE AND PREMISES	LINDEN STREET	ADJ 14	RM7 7DP
SHOP AND PREMISES	LOCKWOOD WALK	UNIT GL3B	RM1 3RH
SHOP AND PREMISES	LOCKWOOD WALK	WATERSTONES	RM1 3RL
SHOP AND PREMISES	LOCKWOOD WALK	GL4	RM1 3RL
SHOP AND PREMISES	LOCKWOOD WALK	MORGAN	RM1 3LT
SHOP AND PREMISES	LOCKWOOD WALK	GL3A	RM1 3RL
SHOP AND PREMISES	LOCKWOOD WALK	SPORTS SOCCER LSU	RM1 3RL
GREYHOUND RACETRACK AND PREMISES	LONDON ROAD	ROMFORD STADIUM	RM7 9EJ
SPORTS GROUND AND PREMISES	LONDON ROAD	WESTLAND PLAYING FIELD	RM7 9NU
HALL AND PREMISES	LONDON ROAD	THE PAVILION	RM7 9QX
Public House and Premises	LONDON ROAD	CROWN HOTEL	RM7 9NA
Hand Car Wash	LONDON ROAD	CROWN HAND CAR WASH	RM7 9NA
PUBLIC HOUSE AND PREMISES	LONDON ROAD	THE SUN	RM7 9QA
PUBLIC HOUSE AND PREMISES	LONDON ROAD	SLATERS ARMS	RM7 9EU
Shop and Premises	LOWEN ROAD	UNIT 2	RM13 8QR
CLUB HOUSE AND PREMISES	MAIN ROAD	LODGE FARM PARK	RM2 5EL
SPORTS GROUND PAVILLION AND PREMISES	MAIN ROAD	GALLOWES CORNERS SPORTS CLUB	RM2 6NP

BOWLS CLUB AND PREMISES	MAIN ROAD	GIDEA PARK SPORTS GROUND	RM2 6NP
PUBLIC HOUSE AND PREMISES	MAIN ROAD	THE UNICORN	RM2 5EL
PUBLIC HOUSE AND PREMISES	MAIN ROAD	THE SHIP	RM2 5EL
STORES, OFFICES AND PREMISES	MALDON ROAD	UNIT 4	RM7 0JB
RESTAURANT AND PREMISES	MANOR WAY BUSINESS CENTRE	UNIT 1	RM13 8UG
MARKET AND PREMISES	MARKET PLACE	(MARKET)	RM1 3AB
STORE AND PREMISES	MARKET PLACE	KINGS ARMS YARD	RM1 3AB
SHOP AND PREMISES	MARKET PLACE	ROMFORD	RM1 3AB
HEALTH CENTRE AND PREMISES	MARKET PLACE	ROMFORD	RM1 3AB
SHOP AND PREMISES	MARLBOROUGH ROAD	ALDI 7	RM7 8AD
PUBLIC HOUSE AND PREMISES	MAWNEY ARMS	44 MAWNEY ROAD	RM7 7HT
SHOP AND PREMISES	MAWNEY ROAD	2 FAIRVIEW PARADE	RM7 7HH
SHOP AND PREMISES	MAWNEY ROAD	1 FAIRVIEW PARADE	RM7 7HH
SHOP AND PREMISES	MAWNEY ROAD	3 FAIRVIEW PARADE	RM7 7HH
SHOP AND PREMISES	MAWNEY ROAD	4-6 FAIRVIEW PARADE	RM7 7HL
HALL AND PREMISES	MAYBANK AVENUE	BRITISH REDCROSS HALL	RM12 5SH
PUBLIC HOUSE AND PREMISES	MERCURY GARDENS	THE LIBERTY BELL	RM1 3EN
SHOP AND PREMISES	N6 LAURIE WALK	ROMFORD	RM1 3RT
SHOP AND PREMISES	N7 LAURIE WALK	ROMFORD	RM1 3RT
GARDEN CENTRE AND PREMISES	NAGS HEAD LANE	WYVALE GARDEN CENTRE	RM14 1TS
HALL AND PREMISES	NELSON ROAD	SOUTH HORNCHURCH COMMUNITY HALL	RM13 8AP
PUBLIC HOUSE AND PREMISES	NEW ROAD	LENNARDS	RM13 9EB
CAFE, LAND AND PREMISES	NEW ROAD	GRANGEWOOD TRANSPORT CAFE	RM13 9PH
LAND USED FOR CAR SALES AND PREMISES	NEW ROAD	UNIT 17 NOAKES INDUSTRIAL ESTATE	RM13 9EB
STORE AND PREMISES	NEW ROAD	UNIT 10D LEFT R/O NOAKES CAFE	RM13 9EB
CAFE AND PREMISES	NEW ROAD	NOAKES CAFE	RM13 9EB
STORE AND PREMISES	NEW ROAD	UNIT 5	RM13 9EB
LAND USED FOR CAR SALES AND PREMISES	NEW ROAD	NOAKES CAR SALES	RM13 9EB

CAFE AND PREMISES	NEW ROAD	YELLOW CAFE ADJ	RM13 8RA
CLUB HOUSE AND PREMISES	NOAK HILL ROAD	HAROLD HILL BOWLS CLUB	RM3 7FL
Treatment Room and Premises	NOAK HILL ROAD	TREATMENT ROOM REAR AT	RM3 7FL
Treatment Room and Premises	NOAK HILL ROAD	TREATMENT ROOM FRONT AT	RM3 7FL
PUBLIC HOUSE AND PREMISES	NOAK HILL ROAD	THE BEAR	RM3 7LL
Shop and Premises	NOAK SIDE EXPRESS	8 NOAK HILL ROAD	RM3 7LA
PUBLIC HOUSE AND PREMISES	NORTH ROAD	THE ROYAL OAK	RM4 1PR
SHOP AND PREMISES	NORTH STREET	BEJAM	RM11 1DA
SHOP AND PREMISES	OCKENDON ROAD	MR UPTON	RM14 2DN
SHOP AND PREMISES	OCKENDON ROAD	FARM SHOP	RM14 2DN
PUBLIC HOUSE AND PREMISES	OCKENDON ROAD	HUNTSMAN & HOUNDS	RM14 2DN
STORE AND PREMISES	OCKENDON ROAD	UNIT B HIGH HOUSE FARM	RM14 2DN
STORE AND PREMISES	OCKENDON ROAD	UNIT A HIGH HOUSE FARM	RM14 2DN
STORE AND PREMISES	OCKENDON ROAD	UNIT D HIGH HOUSE FARM	RM14 2DN
SHOP AND PREMISES	OCKENDON ROAD	FARM SHOP MANOR FARM	RM14 2DN
STORE AND PREMISES	OCKENDON ROAD	UNIT 1,	RM14 2DN
STORE AND PREMISES	OCKENDON ROAD	UNIT 2 BUSYPLEDGE LTD	RM14 2DN
STORE AND PREMISES	OCKENDON ROAD	UNIT C HIGH HOUSE FARM	RM14 2DN
PUBLIC HOUSE AND PREMISES	OCKENDON ROAD	THE OLD WHITE HORSE	RM14 3PS
PUBLIC HOUSE AND PREMISES	ORANGE TREE HILL	ORANGE TREE PUBLIC HOUSE	RM4 1PJ
THERAPY CENTRE AND PREMISES	PEA LANE	UPMINSTER COMPLIMENTARY HEALING	RM14 2XH
KIOSK AND PREMISES	PERSONALISED CANVAS KIOSK	LOCKWOOD WALK	RM1 3RH
PUBLIC HOUSE AND PREMISES	PETERSFIELD AVENUE	THE SAXON KING	RM3 9PP
CLUB HOUSE AND PREMISES	PETTLEY GARDENS	RUGBY CLUB	RM7 9AB
STORE AND PREMISES	PINEWOOD ROAD	PLOTS 10-11	RM4 1PH
Shop and Premises	PT 8 RHS NORTH STREET	ROMFORD	RM1 1BH
STORE AND PREMISES	R/O 11 STATION LANE	HORNCHURCH	RM12 6JL
Store and Premises	R/O 156 NEW ROAD	UNIT A	RM13 8RS
STORE AND PREMISES	R/O 191 ST MARYS LANE	UPMINSTER	RM14 3BU
BOXING GYM AND PREMISES	R/O 207 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2SD
GYM AND PREMISES	R/O 222 SOUTH STREET	1 2 1 GYM	RM1 2AP

STORE AND PREMISES	R/O 33 STATION ROAD	OUTSIDE STORE	RM3 0BP
STORE AND PREMISES	R/O 33 STATION ROAD	GND FLR STORE 2	RM3 0BP
STORE AND PREMISES	R/O 33 STATION ROAD	GND FLR STORE 1	RM3 0BP
Dental Lab	R/O 37 KERSEY GARDENS	HAROLD HILL	RM3 0ER
HALL AND PREMISES	R/O 54 WESTERN ROAD	ROMFORD	RM1 3LP
HAND CAR WASH	R/O 66-70 BRENTWOOD ROAD	HAND CAR WASH	RM1 2EP
STORE USED AS OFFICE AND PREMISES	R/O 69-81 FRONT LANE	UNIT A	RM14 1XL
STORE AND PREMISES	R/O 69-81 FRONT LANE	UNITS D	RM14 1XL
STORE AND PREMISES	R/O 69-81 FRONT LANE	UNITS B-C	RM14 1XL
STORE AND PREMISES	R/O 78 RAINHAM ROAD	RAINHAM	RM13 7RL
STORE AND PREMISES	R/O 8 SOUTH END ROAD	RAINHAM	RM13 7XH
STORE	R/O 80 FARM ROAD	UNIT 1	RM13 9LQ
STORE AND PREMISES	R/O 80 FARM ROAD	UNIT 2	RM13 9PQ
STORE	R/O 80 FARM ROAD	UNIT 4	RM13 9LQ
STORE	R/O 80 FARM ROAD	UNIT 5	RM13 9LQ
STORE	R/O 80 FARM ROAD	UNIT 6	RM13 0LQ
STORE	R/O 80 FARM ROAD	UNIT 7	RM13 9LQ
STORE	R/O 80 FARM ROAD	UNIT 8	RM13 9LQ
STORE	R/O 80 FARM ROAD	UNIT 3	RM13 9LQ
RETAIL WAREHOUSE AND PREMISES	RAINHAM ROAD	BT 17-27 DOMINION WAY	RM13 8SP
CLUB HOUSE AND PREMISES	RAINHAM ROAD	BRETONS SPORTS & SOCIAL CLUB	RM13 8SP
PUBLIC HOUSE AND PREMISES	RAINHAM ROAD	THE ALBION	RM13 8SP
SHOWROOM AND PREMISES	RAINHAM ROAD	UNIT 1 R/O HORIZON HOUSE	RM13 8SP
FUNCTION HALL AND PREMISES	RISEBRIDGE CHASE	CARRINGTONS CLUBHOUSE	RM1 4PR
SHOP AND PREMISES	ROBERT PARISH, 12B THE ARCADE	FARNHAM ROAD	RM3 8DX
RETAIL WAREHOUSE AND PREMISES	ROM VALLEY WAY	PETS AT HOME	RM7 0AN
RETAIL WAREHOUSE AND PREMISES	ROM VALLEY WAY	CARPETRIGHT	RM7 0AN
RESTAURANT AND PREMISES	ROM VALLEY WAY	PIZZA HUT	RM7 0AE
RETAIL WAREHOUSE AND PREMISES	ROM VALLEY WAY	UNIT 1	RM7 0AN
Clinic and Premises	ROM VALLEY WAY	HCA LINAC BUNKER AT GND FLR	RM7 0AG
Food Court and Premises	ROM VALLEY WAY	FOOD COURT AT GND FLR	RM7 0AG
Clinic and Premises	ROM VALLEY WAY	HCA DIAGNOSIS ROOM AT GND FLR	RM7 0AG
Stall and Premises	ROM VALLEY WAY	FRUIT STALL AT MAIN ENTRANCE	RM7 0AG

Studio and Premises	ROM VALLEY WAY	HOSPITAL RADIO AT 1ST FLR	RM7 0AG
Cafe and Premises	ROM VALLEY WAY	COSTA COFFEE AT GND FLR	RM7 0AG
Shop and Premises	ROM VALLEY WAY	GO SHOP AT GND FLR QUEENS HOSPITAL	RM7 0AG
Clinic and Premises	ROM VALLEY WAY	BARTS NHS TRUST AT GND FLR	RM7 0AG
RETAIL WAREHOUSE AND PREMISES	ROM VALLEY WAY	MOTHERCARE WORLD	RM7 0AF
RETAIL WAREHOUSE AND PREMISES	ROM VALLEY WAY	SNOW & ROCK WAREHOUSE	RM7 0AE
STORE AND PREMISES	ROYAL JUBILEE COURT	FLAT 9, MAIN ROAD	RM2 5AN
HALL AND PREMISES	RUSH GREEN ROAD	RED CROSS HALL	RM7 0PJ
SPORTS GROUND AND PREMISES	RUSH GREEN ROAD	RUSH GREEN TRAINING GROUND	RM7 0LU
SORTING CENTRE AND PREMISES	SANDGATE CLOSE	QUEEN ELIZABETH HOUSE	RM7 0AB
RETAIL WAREHOUSE AND PREMISES	SCS WHITE ROCK HOUSE	SOUTHEND ARTERIAL ROAD	RM3 0XJ
HALL AND PREMISES	SLEWINS LANE	ARNAUD LODGE	RM11 1BZ
HALL AND PREMISES	SLEWINS LANE	EMERSON PARK SOCIAL CENTRE	RM11 1BZ
PUBLIC HOUSE AND PREMISES	SOUTH END ROAD	GOOD INTENT	RM12 5NU
HALL AND PREMISES	SOUTH STREET	MARDYKE COMMUNITY CENTRE	RM13 8PJ
KIOSK & PREMISES	SOUTH STREET	UNIT 7 PASSENGER CONCOURSE	RM1 2AP
KIOSK	SOUTH STREET	SUITE 1 MURIEL COURT	RM1 3EQ
KIOSK AND PREMISES	SOUTH STREET	UNIT 3 PASSENGER CONCOURSE	RM1 2AP
KIOSK	SOUTH STREET	SUITE 2 MURIEL COURT	RM1 3EQ
SHOP AND PREMISES	SOUTH STREET	JPL NEWS, PASSENGER CONCOURSE	RM1 2AP
SHOWROOM AND PREMISES	SOUTHEND ARTERIAL ROAD	3-7 THE PARADE	RM3 0EX
CAR SHOWROOM AND PREMISES	SOUTHEND ARTERIAL ROAD	RENAULT RETAIL LIMITED	RM2 6PL

RETAIL WAREHOUSE AND PREMISES	SOUTHEND ARTERIAL ROAD	CARPET RIGHT	RM11 2SF
CAR WASH AND PREMISES	SOUTHEND ARTERIAL ROAD	GARAGE CORNER OF MAIN ROAD	RM2 6NP
STORE AND PREMISES	SOUTHEND ARTERIAL ROAD	UNIT 6 R/O HILLVIEW	RM14 1TE
STORE AND PREMISES	SOUTHEND ARTERIAL ROAD	UNIT 7 R/O HILLVIEW	RM14 1TE
HOTEL AND PREMISES	SOUTHEND ARTERIAL ROAD	PALMS HOTEL	RM11 3UJ
RETAIL WAREHOUSE AND PREMISES	SOUTHEND ARTERIAL ROAD	JOLLYES PETFOOD	RM3 0BZ
RETAIL WAREHOUSE AND PREMISES	SOUTHEND ARTERIAL ROAD	TILE GIANT	RM3 0BZ
LAND USED FOR CAR SALES AND PREMISES	SOUTHEND ARTERIAL ROAD	8 & 9 THE PARADE	RM3 0EX
CAR SHOWROOM AND PREMISES	SOUTHEND ARTERIAL ROAD	CALEDONIA (TOYOTA)	RM2 6PL
CAFE AND PREMISES	SOUTHEND ARTERIAL ROAD	UNIT 7 AVENUE WORKS	RM3 0BY
Hand Car Wash and Premises	SOUTHEND ARTERIAL ROAD	BRENTWOOD CAR WASH	RM11 3UB
STORE AND PREMISES	SOUTHEND ARTERIAL ROAD	UNIT 6 R/O 1-2 THE PARADE	RM3 0EX
LAND USED FOR CAR SALES AND PREMISES	SOUTHEND ARTERIAL ROAD	1-2 THE PARADE	RM3 0EX
STORE AND PREMISES	SPRINGFIELD COURT	STORE 14 (R/O)	RM14 2AQ
PUBLIC HOUSE AND PREMISES	SQUIRRELS HEATH LANE	NEW INN	RM2 6DP
HEALTH & FITNESS CLUB AND PREMISES	SQUIRRELS HEATH LANE	GIDEA PARK	RM2 6DP
SHOP AND PREMISES	SQUIRRELS HEATH LANE	SHOP GND FLR RHS DAVID LLOYD CENTRE	RM11 2DY
PUBLIC HOUSE AND PREMISES	ST ANDREWS ROAD	PRINCE ALBERT	RM7 9BB
AQUATIC CENTRE & PREMISES	ST MARYS LANE	LATCHFORD FARM	RM14 3PB
PUBLIC HOUSE AND PREMISES	ST MARYS LANE	THATCHED HOUSE	RM14 3LT
BOWLS CLUB AND PREMISES	ST MARYS LANE	CLOCKHOUSE BOWLING CLUB	RM14 3PA
FITNESS CENTRE AND PREMISES	ST MARYS LANE	FRANKS FARM	RM14 3NU
SOCIAL HALL AND PREMISES	ST MARYS LANE	NEW WINDMILL HALL	RM14 3QH
PUBLIC HOUSE AND PREMISES	ST MARYS LANE	THE JOBBERS REST	RM14 3LT
GARDEN CENTRE & PREMISES	ST MARYS LANE	FOREST VIEW NURSERY	RM14 3DA
Hand Car Wash and Premises	ST MARYS LANE	HAND CAR WASH AT CRANHAM GOLF	RM14 3NU

Restaurant and Premises	ST MARYS LANE	THE RESTAURANT COMPANY AT	RM14 3NU
RETAIL UNIT	ST MARYS LANE	TACKLE SHOP AT PUDDLEDUCK FARM	RM14 3NX
CAFE AND PREMISES	ST MARYS LANE	CAFE AT PUDDLEDUCK FARM FISHERIES	RM14 3NX
KIOSK AND PREMISES	STARBUCKS	THE LIBERTY	RM1 3RL
PUBLIC HOUSE AND PREMISES	STATION LANE	RAILWAY HOTEL	RM12 6SB
BANK AND PREMISES	STATION LANE	GROUND FLOOR STIRLING HOUSE	RM12 6JL
CLUB HOUSE AND PREMISES	STATION LANE	HORNCHURCH SPORTS & SOC CLUB	RM12 6JL
SHOP AND PREMISES	STATION ROAD	STATION YARD	RM14 2SJ
SHOP AND PREMISES	STATION ROAD	W H SMITH UPMINSTER STATION	RM14 2TD
SHOP & PREMISES	STATION ROAD	2 STATION APPROACH	RM14 2TH
SHOP AND PREMISES	STATION ROAD	UPMINSTER STATION	RM14 2TD
BAR AND PREMISES	STATION ROAD	PLATFORM 7	RM14 2TD
PUBLIC HOUSE AND PREMISES	STATION ROAD	KING HAROLD HOTEL	RM3 OBS
SHOP AND PREMISES	STEWARDS WALK	UNIT A9A	RM1 3RJ
STORE AND PREMISES	STORE R/O 174 RUSH GREEN ROAD	RUSH GREEN	RM7 0JU
RESTAURANT AND PREMISES	STRAIGHT ROAD	MCDONALDS	RM3 8XR
FITNESS CENTRE AND PREMISES	SUTTONS BUSINESS PARK	UNITS A1 - A8	RM13 8DE
SHOP AND PREMISES	SWAN WALK	GL17	RM1 3HD
KIOSK AND PREMISES	THE BROADWAY	ADJ RAILWAY STATION	RM12 4RW
SHOP AND PREMISES	THE BROADWAY	STATION ENTRANCE	RM12 4RW
PUBLIC HOUSE AND PREMISES	THE MORRIS DANCER	MELKSHAM CLOSE	RM3 8QX
STORE AND PREMISES	THE SEEDBED CENTRE	ADJ THE EATING HOUSE, BLOCK C	RM7 0AZ
PUBLIC HOUSE AND PREMISES	THE SUTTON ARMS	14-16 STATION LANE	RM12 6NJ
PUBLIC HOUSE AND PREMISES	THE WINDMILL	UPMINSTER ROAD	RM11 3PL
Cafe and premises	TRAIN STATION	STATION APPROACH	RM14 2TH
HOTEL AND PREMISES	TRAVELODGE CENTRAL HOTEL	ST EDWARDS WAY	RM1 1XJ

Hotel and Premises	TRAVELODGE THE QUADRANT	MARKET PLACE	RM1 3ER
HALL AND PREMISES	TWEED WAY	TWEED HALL	RM1 4AZ
Shop and Premises	UNIT 1, 98 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
Vehicle Repair Workshop and Premises	UNIT 1, 9F SALAMONS WAY	RAINHAM	RM13 9UL
SHOP AND PREMISES	UNIT 1, TOLLGATE HOUSE	93 MARKET PLACE	RM1 3ER
SHOP AND PREMISES	UNIT 12A LOCKWOOD WALK	THE LIBERTY SHOPPING CENTRE	RM1 3RH
CLUB AND PREMISES	UNIT 1A ARCADE PLACE	ROMFORD	RM1 1RS
SHOP AND PREMISES	UNIT 2, 395-405 BRENTWOOD ROAD	ROMFORD	RM2 5TH
Shop and Premises	UNIT 2, 98 ARDLEIGH GREEN ROAD	HORNCHURCH	RM11 2LG
Vehicle Repair Workshop and Premises	UNIT 2, 9F SALAMONS WAY	RAINHAM	RM13 9UL
Vehicle Repair Workshop and Premises	UNIT 3 & 4, 9F SALAMONS WAY	RAINHAM	RM13 9UL
Vehicle Repair Workshop and Premises	UNIT 5, 9F SALAMONS WAY	RAINHAM	RM13 9UL
STORE AND PREMISES	UNIT A1 AT WYNGRAY FARM	ST MARYS LANE	RM14 3NX
SHOP AND PREMISES	UPMINSTER ROAD	(UPMINSTER BRIDGE STATION)	RM14 2RB
HAND CAR WASH	UPMINSTER ROAD	HAND CAR WASH ADJ THE WINDMILL	RM14 2RB
PUBLIC HOUSE AND PREMISES	UPMINSTER ROAD NORTH	THE SAXON HORN	RM13 9JR
HEALTH CENTRE AND PREMISES	UPMINSTER ROAD SOUTH	RAINHAM HEALTH CLINIC	RM13 9AB
SPORTS GROUND AND PREMISES	UPPER RAINHAM ROAD	SKATEBOARD PARK	RM12 4BE
BOWLS CLUB AND PREMISES	UPPER RAINHAM ROAD	ELM PARK BOWLS CLUB	RM12 4EZ
CARDROME & PREMISES	UPPER RAINHAM ROAD	CARDROME	RM12 4BE
CAR SALES LAND, WORKSHOP AND PREMISES	UPPER RAINHAM ROAD	ADJ CARDROME	RM12 4EU
HALL AND PREMISES	VICARAGE ROAD	KIMS HALL	RM12 4AT
SHOP AND PREMISES	VICTORIA ROAD	5-6 STATION CHAMBERS	RM1 2LX
SHOP AND PREMISES	VICTORIA ROAD	7 STATION CHAMBERS	RM1 2HS
Store and Premises	VICTORIA ROAD	REAR STORAGE UNIT R/O 35	RM1 2LH

Store and Premises	VICTORIA ROAD	FRONT STORAGE UNIT R/O 35	RM1 2LH
SHOP AND PREMISES	VICTORIA ROAD	UNIT 2 AT	RM1 2HS
HALL AND PREMISES	WELLINGTONIA AVENUE	BOWER HALL	RM4 1QP
STORE AND PREMISES	WENNINGTON ROAD	UNIT 4 WENNINGTON HALL	RM13 9EB
HEALTH CENTRE AND PREMISES	WESTLAND AVENUE	GND FLOOR	RM11 3SD
HEALTH CENTRE AND PREMISES	WESTLAND AVENUE	1ST - 2ND FLR	RM11 3SD
STORE AND PREMISES	WILLOW PARADE	(REAR OF 3)	RM14 1DZ
STORE AND PREMISES	WILLOW PARADE	(REAR OF 1)	RM14 1DZ
STORE AND PREMISES	WILLOW PARADE	(REAR OF 4)	RM14 1DZ
STORE AND PREMISES	WILLOW PARADE	(REAR OF 2)	RM14 1DZ
STORE AND PREMISES	WILLOW PARADE	(REAR OF 11)	RM14 1DZ
STORE AND PREMISES	WILLOW PARADE	GARAGE AT REAR OF NO 5	RM14 1DZ
STORE AND PREMISES	WILLOW PARADE	(REAR OF NO 9)	RM14 1DZ
STORE AND PREMISES	WILLOW PARADE	GARAGE 12 R/O	RM14 1DZ
HALL AND PREMISES	WILLOW STREET	WILLOW ROOM (HALL)	RM7 7JH
TENNIS CLUB	WOBURN AVENUE	ELM PARK TENNIS CLUB	RM12 4NQ
HALL AND PREMISES	WOOD LANE	SCOUT HALL THE PADDOCK	RM12 5NH
HALL AND PREMISES	WOOD LANE	SEA CADETS HQ	RM12 5NH
HALL AND PREMISES	WOOD LANE	A.T.C. CENTRE	RM12 5HU

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Appendix 3

Havering Street Trading Policy - Fees and Charges Calculations

Licence Type	Officer Hours	Cost Per Hour (£)	Total (£)
<u>Street Trading/shop fronts</u>			
Application			240
Annual Admin	4	60	240
Hearings/legal per annum			73
Enforcement	2	60	120
Policy Contribution			59
Total (New):			732
Total (Renewal):			642
<u>A-Boards</u>			
Processing	2	60	120
Annual Admin			0
Hearings/legal per annum			0
Enforcement			0
Total:			120
<u>Pitches 5am - 8pm</u>			
Application			240
Annual Admin	4	60	240
Hearings/legal per annum			305
Enforcement	6	60	360
Policy Contribution			59
Total (New):			1204
Total (Renewal):			1114

<u>Pitches 8pm - 2am</u>			
Application			240
Annual Admin	4	60	240
Hearings/legal per annum			305
Out of hours enforcement (two officers, 3 visits per annum - 2hrs each per visit)	12	60	720
Policy Contribution			59
Total (New):			1564
Total (Renewal):			1474
<u>Temporary Market Stalls</u>			
Processing			120
Total:			120

Admin Costs - Breakdowns:**Application cost**

Action	time (hours)	cost
Application received and entered on APP	0.5	30
application assessed fee processed	0.5	30
site visit including travelling time	1.5	90
consult with other relevant council services/partners.	0.5	30
application granted/ rejected and issued	1	60
Total:		240

Renewal

Application received and entered on APP	0.5	30
application assessed fee processed	0.5	30
consult with other relevant council services/partners.	0.5	30
application granted/ rejected and licence issued	1	60
Total:		150

Variation - change of commodity , pitch size

Application received and entered on APP	0.5	30
application assessed fee processed	0.5	30
site visit including travelling time	0.75	45
consult with other relevant council services/partners.	0.5	30
application granted/ rejected and licence issued	1	60
		195

Policy Costs

Legal advice			2500
Officer hours	83	60	4980
Consultation			5000
Total:			12480

<u>Anticipated Licences - Policy Contribution Per licence</u>			
Street Trading/Shop Fronts			50
Pitches			12
Total:			70
Cost of policy			12480
Policy Contribution			178
PC per licence per annum across 3 year policy term			59

<u>Hearings (Based on 3 per annum)</u>			
Legal advice			2400
Officer hours	21	60	1260
Total:			3660

<u>Anticipated Licences - Hearings Contribution</u>			
Street Trading/Shop Fronts			50
Hearings			3660
Contribution per licence			73.2
Pitches			12
Total:			3660
Contribution per licence			305

<u>Anticipated Licence Income</u>			
Licence Type	Quantity	Cost	Total
Street Trading/Shop Fronts	50	732	36621
Pitches AM	6	1204	7227
Pitches PM	6	1564	9387
A-Boards	50	120	6000
Temporary Markets	5	120	600
Total			59835

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Equality & Health Impact Assessment (EqHIA)

Document control

Title of activity:	<i>Consultation on Variation of Street Trading Licensing Policy</i>
Lead officer:	<i>Keith Bush, Public Protection Manager</i>
Approved by:	<i>Barry Francis, Director of Neighbourhoods</i>
Date completed:	<i>02/06/2020</i>
Scheduled date for review:	<i>Decision regards consultation for change to policy. Review of EqHIA is required following potential consultation prior to any implementation taking account of any response to the consultation or other relevant factors.</i>

Please note that the Corporate Policy & Diversity and Public Health teams require at least **5 working days** to provide advice on EqHIAs.

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Did you seek advice from the Public Health team?	No
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

Please note that EqHIAs are **public** documents and must be made available on the Council's [EqHIA webpage](#).

Please submit the completed form via e-mail to EqHIA@haverling.gov.uk thank you.

1. Equality & Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EqHIA and ensure you keep this section for your audit trail. If you have any questions, please contact EqHIA@havering.gov.uk for advice from either the Corporate Diversity or Public Health teams. Please refer to the Guidance in Appendix 1 on how to complete this form.

About your activity

1	Title of activity	<i>Public Consultation on a draft street trading licensing policy.</i>		
2	Type of activity	<i>Consultation on policy. This EqHIA also reviews potential impacts of the policy as it stands if the consultation goes ahead.</i>		
3	Scope of activity	<p><i>Formal consultation with the public, businesses and strategic stakeholders regarding changes to street trading licensing. This change is to look to extend designated trading areas, and to clarify uses for which licenses may be sought. This includes A boards, Shop Fronts, Stalls and Tables and Chairs outside catering and retail business premises.</i></p> <p><i>The outcome of the consultation is to establish whether the council wishes to proceed with this change to licensing.</i></p> <p><i>The outcome of changes to licensing, should this be agreed, is to:</i></p> <ul style="list-style-type: none"> <i>a) Regulate the use of the highway for street trading. The effect of this is to maintain safe pedestrian access for all including those with impaired vision, mobility difficulties, wheelchair users, and pram / pushchair users.</i> <i>b) Maintain safety and aesthetic standards in public areas by requiring applicants to consider how their proposed use of the highway may improve the aesthetic, and to apply for planning consent where applicable before granting licenses.</i> <i>c) Businesses using the highway without a street trading licence, or in breach of the conditions of their street trading licence could be subject to Fixed Penalty Notices.</i> 		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>any</u> of these questions is 'YES', please continue to question 5.	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6.
4b	Does this activity have the potential to impact (either positively or negatively) upon	Yes		

	people (9 protected characteristics)?			
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	No		
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.		
6	If you answered NO:	N/A		

Completed by:	<i>Nichola Lund, Metrology Partnership Manager, Public Protection, Neighbourhoods Directorate.</i>
Date:	<i>10/12/2019, revised 02/06/2020.</i>

2. The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:
<p>Havering currently licenses a small number of streets and specific 'designated' pitches for street trading. These are generally small retail pitches not linked to other premises, for instance, flower sellers, food vans and similar. The suggested extension of the current street trading policy to include licensing of A Boards, tables and chairs, stalls and shop fronts outside retail and food establishments will require the council to pass a resolution to vary and extend the designated streets in Havering to include all streets in the borough as areas from which traders can request a street trading licence.</p> <p>It is envisaged that the fees for the street trading licenses will be based on cost recovery for the grant, implementation and enforcement of each type of license, and charged accordingly. It will be necessary for the applicant to check if planning permission is needed, and if so, to ensure this is granted prior to application.</p> <p>Potential identified impacts of this change are:</p> <ul style="list-style-type: none"> • Maintain clearance for pedestrians and wheeled conveyances on the highway for users with and without mobility restrictions. • Confirm which areas can have tables and chairs and that this complies with Planning requirements, providing a level playing field for all businesses.

- Potential uptake is unknown and could mean that outside seating is not available for customers at premises who do not choose to pay for licensing. It is likely that other premises would be available. Details of uptake rates were sought from neighbouring local authorities operating comparable schemes, but these were very variable.

**Expand box as required*

Who will be affected by the activity?

Businesses – many businesses already operate with tables and chairs, A Boards and shop front usage on the highway. While this is an offence outside of the designated licensing area, this has not been enforced under the London Local Authorities Act in recent times. Businesses will now be required to pay for use of the highway or may be subject to a fixed penalty notice. The types of business affected range from multi-site chain pubs and restaurants to small independent retail and cafes with a much lower turnover.

Residents and visitors using the highway – setting standards for using tables and chairs on the highway will ensure that we are able to maintain clearance for pedestrians and persons using wheelchairs and pushchairs and prams. The applicant for a license is encouraged to consider planting and greenery as part of the usage, and this has a positive contribution to air quality and local aesthetic.

Residents and visitors using the licensed premises – some residents and visitors may choose to sit outside due to steps preventing them accessing some eateries and restaurants. These residents may be affected with regards to their choices if some businesses choose not to pay for licences for tables and chairs. Information regarding initial uptake is being sought from neighbouring and similar boroughs showed variable uptake and retention.

Smokers* - residents and visitors may choose to sit outside to smoke or vape. ONS data* has been reviewed to take account of the percentage of the population who smoke, and what the breakdown by protected characteristics is. The data from 2018 shows that 14.4% of the population in England smoke, of which 16% were male and 13% were female; of these that the highest proportion worked in manual and routine occupations (25% of these workers compared to 10% of those in managerial and professional roles) which is likely to be indicative of lower income earners; and that the highest prevalence of smoking according to ethnicity is among Polish nationals, followed by persons defining themselves as mixed race. There is a higher rate of smokers among unemployed, and those with no qualifications. Data on all protected characteristics were available via this data set.

Local authority – staff will be required to undertake new works and licensing schemes, and we will need to ensure this can be met without negatively impacting on current staff resource and wellbeing.

The consultation should take account of the varied population using outdoor seating in cafes and restaurants, and of the diversity of business owners who may wish to use the highway for any of the licensed purposes to ensure that all persons are appropriately and effectively consulted.

**Expand box as required*

Protected Characteristic - Age:

Please tick (✓) the relevant box:

Positive

Neutral

✓

Negative

Overall impact:

The impact of the consultation is neutral.

The impact of any *policy changes* going forward *may be positive* regarding maintenance of clear footways for those developing age related mobility problems, and a clear direction as to the legality of tables and chairs on the highway may encourage more businesses to provide extra seating. Increasing the aesthetic may contribute to a better living and working environment, and may contribute to economic development in those areas.

A low uptake by business may contribute to a reduction in the number of seats available outside which may be a *negative impact* for those looking for seating where mobility to access premises might be an issue.

Evidence:

(Please add in any additional evidence and use the evidence below that is relevant for your particular impact assessment, please delete unnecessary data)

The estimated population of the London Borough of Havering is 256,039.

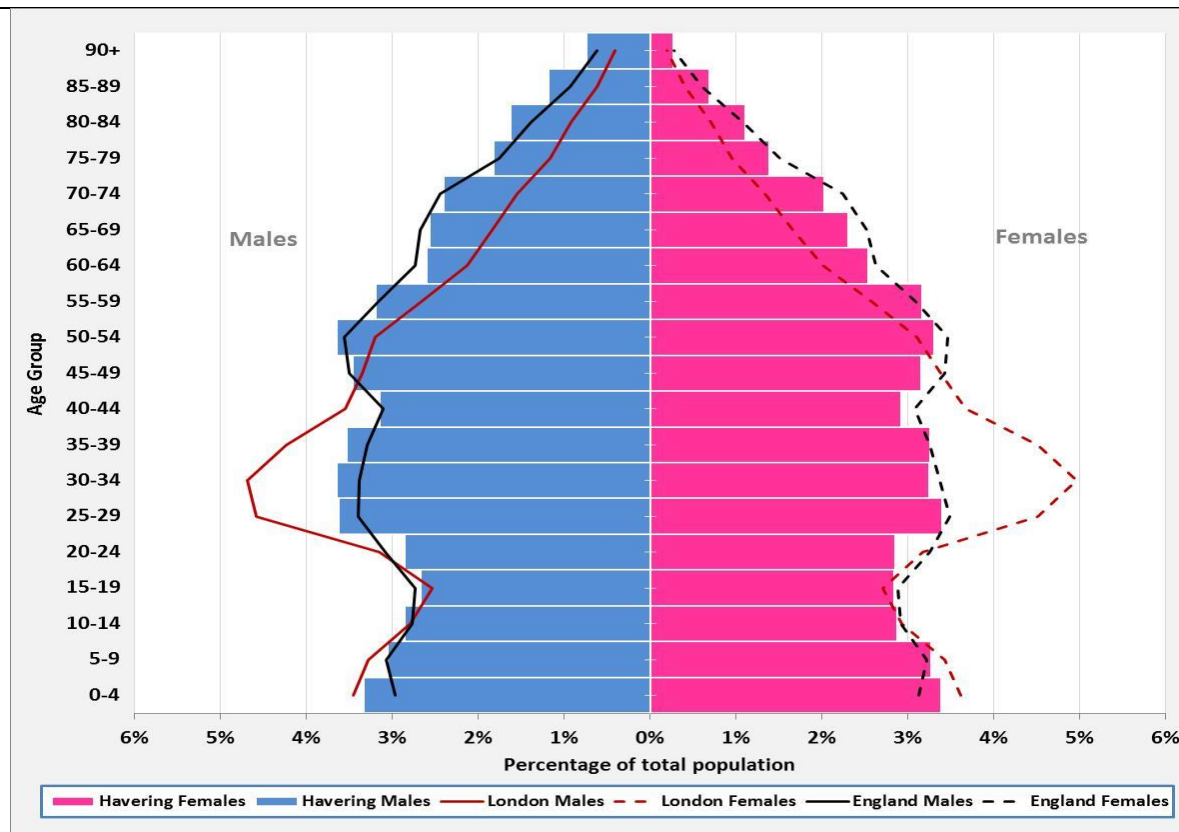
- It has the oldest population in London with a median age of approximately 40 years old, as recorded in the 2011 census.
- The Borough experienced a net population loss of 6.3% from 1983 to 2002 but the population has increased year on year from 2002, with a 13.7% increase from 2002 to 2017.
- As well as increases in the number of births in Havering, there has been an increase in the general fertility rate from 58 (per 1,000 women aged 15-44) in 2004 to 68 in 2017. This equates to an additional 10 births per 1,000 women aged 15-44 within the period.
- From 2011 to 2016, Havering experienced the largest net inflow of children across all London boroughs. 4,580 children settled in the borough from another part of the United Kingdom during this six year period.
- It is projected that the largest increases in population will occur in children (0-17 years) rising from 58,500 in 2018 to 72,100 in 2033 and older people age groups (65 years and above) from 46,900 in 2018 to 61,400 in 2033.

- The life expectancy at birth for people living in Havering is 80.1 years for males and 84.2 years for females.
- The life expectancy at age 65 years in Havering is 18.9 years for males and 21.6 years for females.

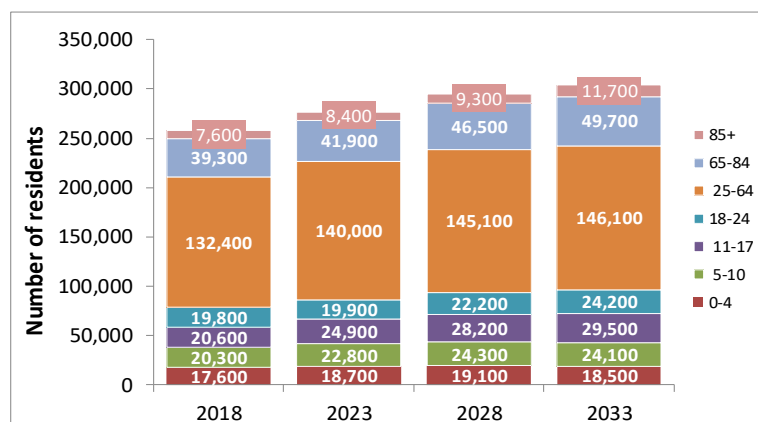
The table below shows the breakdown of current (mid-2017) population by gender and five-year age bands.

AGE BAND (YEARS)	MALE	FEMALE	PERSONS
00-04	8,671	8,553	17,224
05-09	8,371	7,820	16,191
10-14	7,359	7,306	14,665
15-19	7,277	6,833	14,110
20-24	7,316	7,308	14,624
25-29	8,688	9,295	17,983
30-34	8,325	9,355	17,680
35-39	8,344	9,038	17,382
40-44	7,491	8,078	15,569
45-49	8,064	8,879	16,943
50-54	8,463	9,333	17,796
55-59	8,103	8,183	16,286
60-64	6,504	6,664	13,168
65-69	5,903	6,577	12,480
70-74	5,191	6,158	11,349
75-79	3,539	4,672	8,211
80-84	2,836	4,157	6,993
85-89	1,756	3,032	4,788
90+	706	1,891	2,597
All Ages	122,907	133,132	256,039

The population pyramid compares the population figures for Havering with London and England by five-year age bands. The pyramid shows a much older age structure for the population of Havering compared to London but similar to England.



Projected Population Increases by Age group

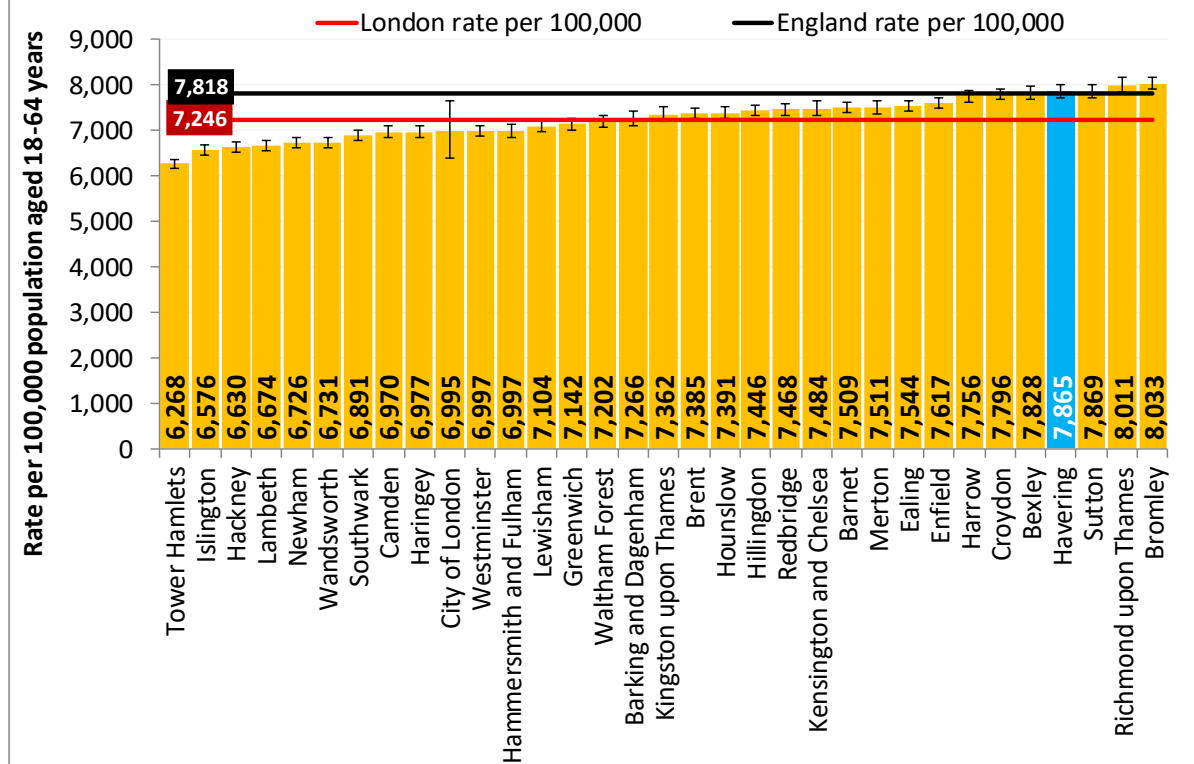


Age Group	Percentage change from 2018 to		
	2023	2028	2033
0-4	6%	9%	5%
5-10	12%	20%	19%
11-17	21%	37%	43%
18-24	1%	12%	22%
25-64	6%	10%	10%
65-84	7%	18%	26%
85+	11%	22%	54%

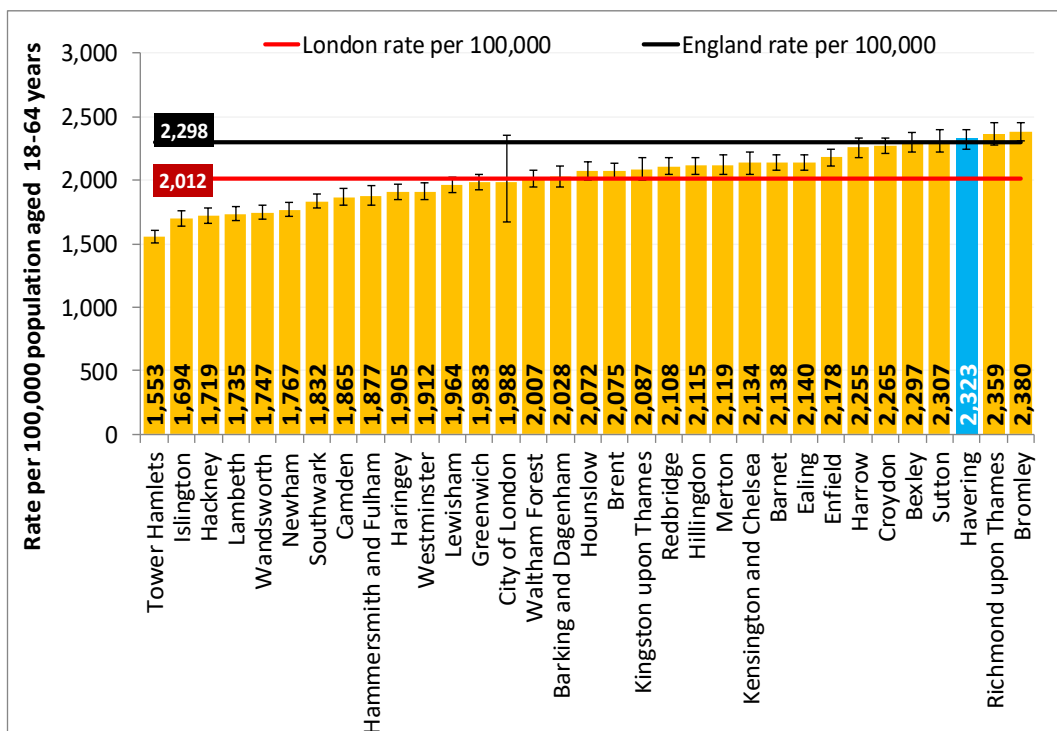
Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*
- Mid-year population estimates 2017; Office for National Statistics (ONS)
- GLA 2016 based Demographic Projections – Local Authority population projections Housing Led Model

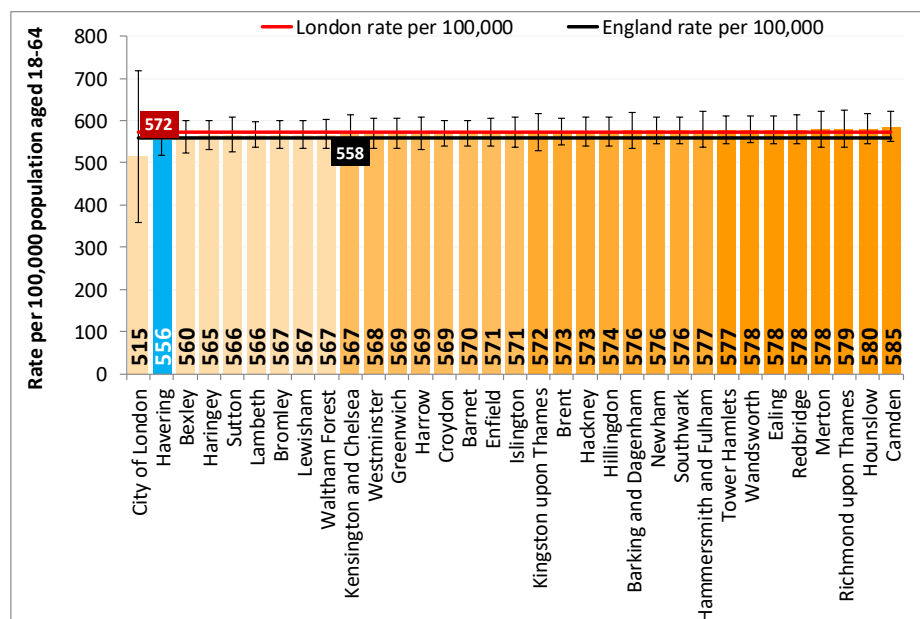
Protected Characteristic - Disability:		
Please tick (✓) the relevant box:		Overall impact:
Positive	✓	The overall impact of the consultation is positive.
Neutral		The impact of any <i>policy changes</i> going forward <i>will be positive</i> regarding maintenance of clear footways for persons with sight or mobility problems, and a clear direction as to the legality of the use of the highway may encourage more businesses to provide extra external seating which may be positive for persons who might not otherwise be able to access those premises.
Negative		<p>A low uptake by business may contribute to a reduction in the number of seats available outside which may be a <i>negative impact</i> for those looking for seating where mobility to access premises might be an issue.</p> <p>Physical Disability: As above</p> <p>Mental Disability and those with learning difficulties: Neutral</p> <p>For the definition of 'eligible', please see section 2 (background/context)</p>
Evidence: <i>(Please add in any additional evidence and use the evidence below that is relevant for your particular impact assessment, please delete unnecessary data)</i> <ul style="list-style-type: none"> According to the latest ONS Annual Population Survey (Jan 2015-Dec 2015), 19% of working age people living in Havering have disclosed that they have a disability or long term illness. This is a similar proportion to England (20%). The estimated number of people in Havering aged 18-64 living with moderate physical disabilities was 11,870 in 2017 – a rate of 7,865 per 100,000 population aged 18-64 years. This rate is one of the highest among London local authorities. It is statistically similar to England but significantly higher than the London average. 		



- In 2017, 3,506 adults (aged 18-64 years) were estimated to be living with serious physical disabilities in Havering. The estimated rate of serious physical disabilities in Havering (2,323 per 100,000 population aged 18-64 years) is similar to England but significantly higher than London average and one of the highest rates of London local authorities. The rationale for this is likely due to the relatively older population in Havering compared to other London boroughs.



- About 817 adults (aged 18-64 years) are estimated to be living with moderate or severe learning disabilities in Havering in 2015 and hence likely to be in receipt of health and social care services.
- The 2017 estimated rate of moderate or severe learning disabilities in Havering (556 per 100,000 persons aged 18-64 years) is similar to England. Havering is estimated to have the 2nd lowest rate of moderate or severe learning disabilities among London local authorities.



Mental Health Statistics

- At least one in four people will experience a mental health problem at some point in their life and one in six adults have a mental health problem at any one time
- One in ten children between 5 and 16 years has a mental health problem, and many continue to have mental health problems in adulthood.
- Half of those with lifetime mental health problems first experience symptoms by the age of 14, and three quarters before their mid-20's.
- Self-harming in young people is not un-common (10-13% of 15-16 year olds have self-harmed).
- Almost half of all adults will experience at least one episode of depression during their life-time.
- One in ten new mothers experience postnatal depression.
- About one in 100 people has a severe mental health problem.
- Some 60% of adults living in hostels have a personality disorder.
- Some 90% of all prisoners are estimated to have diagnosable mental health problem (including personality disorder) and / or substance misuse problem.

Sensory Impairment

Sight

- The estimated number of people living with sight **loss** in **England** is 1.7 million.
- Only 17 per cent of people experiencing sight loss are offered emotional support in response to their deteriorating vision.
- Only 27 per cent of blind and partially sighted people of working age are in employment – a fall from 33 per cent in employment in 2006.
- 39 per cent of blind and partially sighted people of working age say they have some or great difficulty in making ends meet.
- 35 per cent of blind and partially sighted people say that they sometimes, frequently or always experience negative attitudes from the public in relation to their sight loss.
- 31 per cent of people are rarely or never optimistic about the future.

Hearing

- There are 11 million people with hearing loss across the UK, that's around one in six of us.
- By 2035, we estimate there'll be around 15.6 million people with hearing loss across the UK - that's one in five.
- There are 50,000 children with hearing loss in the UK. Around half are born with hearing loss while the other half lose their hearing during childhood.
- An estimated 900,000 people in the UK have severe or profound hearing loss.
- We estimate that there are at least 24,000 people across the UK who use British Sign Language (BSL) as their main language (although there are likely to be more that we don't know about).
- More than 40% of people over 50 years old have hearing loss, rising to 71% of people over the age of 70.
- Around one in 10 UK adults has tinnitus.

Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*
- Projecting Adult Needs and Service Information System (PANSI, 2017); calculations uses Mid-year population estimates 2017; Office for National Statistics (ONS); *produced by public health intelligence*
- Mental Health JSNA January 2015
- Royal National Institute for the Blind
- Action on Hearing Loss
- Disability and Social Participation (ONS) 02/12/19

Protected Characteristic - Sex/gender:

Please tick (✓) the relevant box:

Positive

Neutral

Negative

☐

☒

☐

Overall impact: Neutral

For the definition of 'eligible', please see section 2 (background/context)

No differential impact has been identified on the grounds of this protected characteristic. The draft Street Trading Policy proposal applies equally to all traders operating in Havering irrespective of sex/gender.

Evidence:

(Please add in any additional evidence and use the evidence below that is relevant for your particular impact assessment, please delete unnecessary data)

MALE		FEMALE		TOTAL
122,907	48.0%	133,132	52.0%	256,039

The table below shows the breakdown of current (mid-2017) population by gender and five-year age bands.

AGE BAND (YEARS)	MALE	FEMALE	PERSONS
00-04	8,671	8,553	17,224
05-09	8,371	7,820	16,191
10-14	7,359	7,306	14,665
15-19	7,277	6,833	14,110
20-24	7,316	7,308	14,624
25-29	8,688	9,295	17,983
30-34	8,325	9,355	17,680
35-39	8,344	9,038	17,382
40-44	7,491	8,078	15,569
45-49	8,064	8,879	16,943
50-54	8,463	9,333	17,796
55-59	8,103	8,183	16,286
60-64	6,504	6,664	13,168
65-69	5,903	6,577	12,480
70-74	5,191	6,158	11,349
75-79	3,539	4,672	8,211
80-84	2,836	4,157	6,993
85-89	1,756	3,032	4,788
90+	706	1,891	2,597
All Ages	122,907	133,132	256,039

Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*

Protected Characteristic - Ethnicity/race: Consider the impact on different ethnic groups and nationalities

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

The impact of the consultation is neutral, although we should ensure that persons from all ethnicities / race are able to access and respond to the consultation.

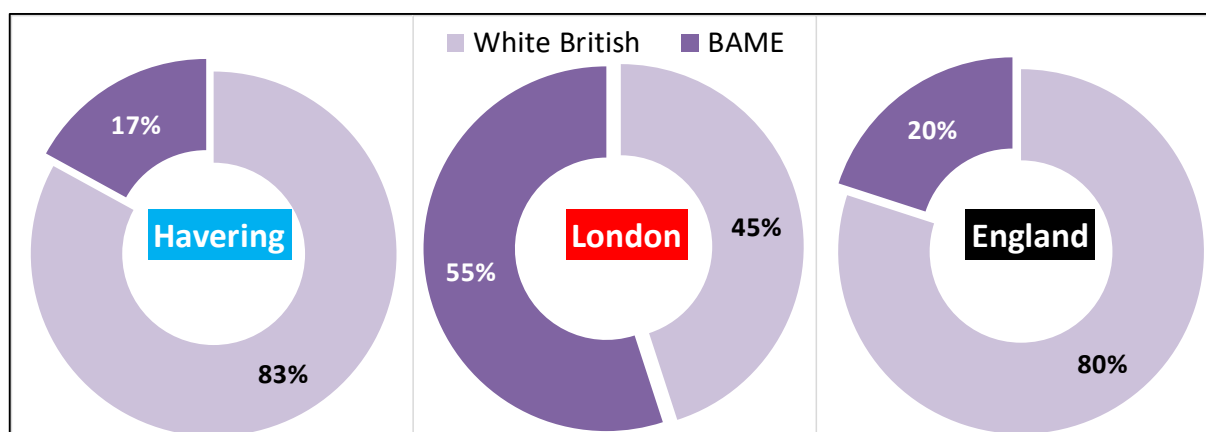
A review of the premises currently the highway shows a wide mix of traders including large national chains and small local chains, to small independent traders. The mix is very broad and does not appear to show a high proportion of traders of one type of ethnicity who would be affected differently to other traders.

For the definition of 'eligible', please see section 2 (background/context)

Evidence:

(Please add in any additional evidence and use the evidence below that is relevant for your particular impact assessment, please delete unnecessary data)

- Havering is one of the most ethnically homogenous places in London, with 83% of its residents recorded as White British in the 2011 census, higher than both London and England.
- However, the ethnically homogenous characteristic of Havering is gradually changing due to its growing cultural diversity.
- About 90% of the borough population were born in the United Kingdom.
- The Borough's white population is projected to decrease from the current 84% to 78% in 2032.
- The BME population, notably those from Black African heritage (though many of whom are likely to be British born) is projected to increase from 4.1% in 2017 to 5.3% of the Havering population in 2032.



Ethnicity - GLA Datastore - cis ethnicity dashboard 2011 census

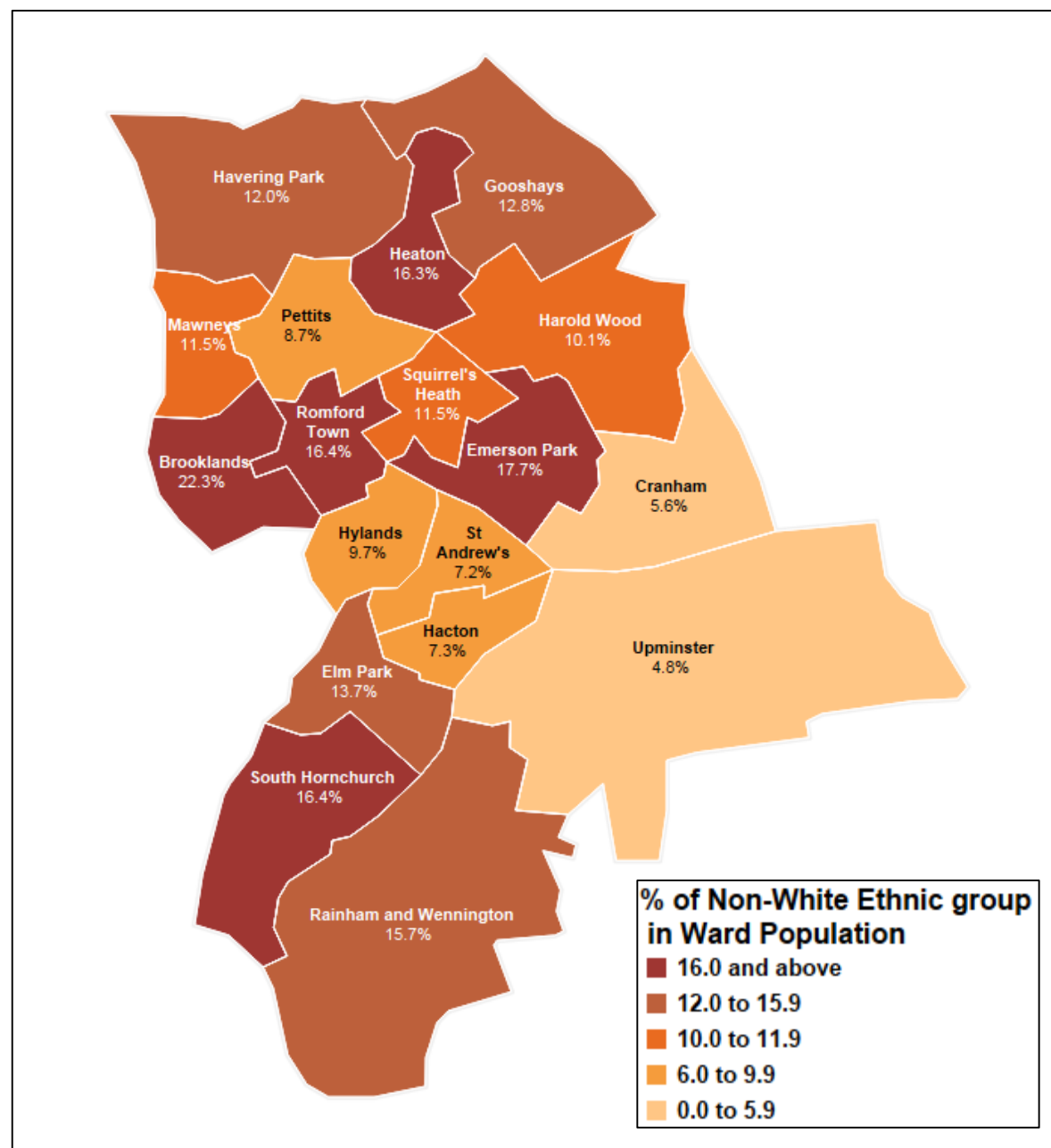
	Data	%
White British	197,615	83.3%
White Irish	2,989	1.3%
Gypsy	160	0.1%
Other White	7,185	3.0%
White and Black Caribbean	1,970	0.8%
White and Black African	712	0.3%
White and Asian	1,154	0.5%
Other Mixed	1,097	0.5%
Indian	5,017	2.1%
Pakistani	1,492	0.6%
Bangladeshi	975	0.4%
Chinese	1,459	0.6%
Other Asian	2,602	1.1%
Black African	7,581	3.2%
Black Caribbean	2,885	1.2%
Other Black	1,015	0.4%
Arab	311	0.1%
Any other ethnic group	1,013	0.4%
Totals	237,232	

Country of Birth - GLA - 2011 Census

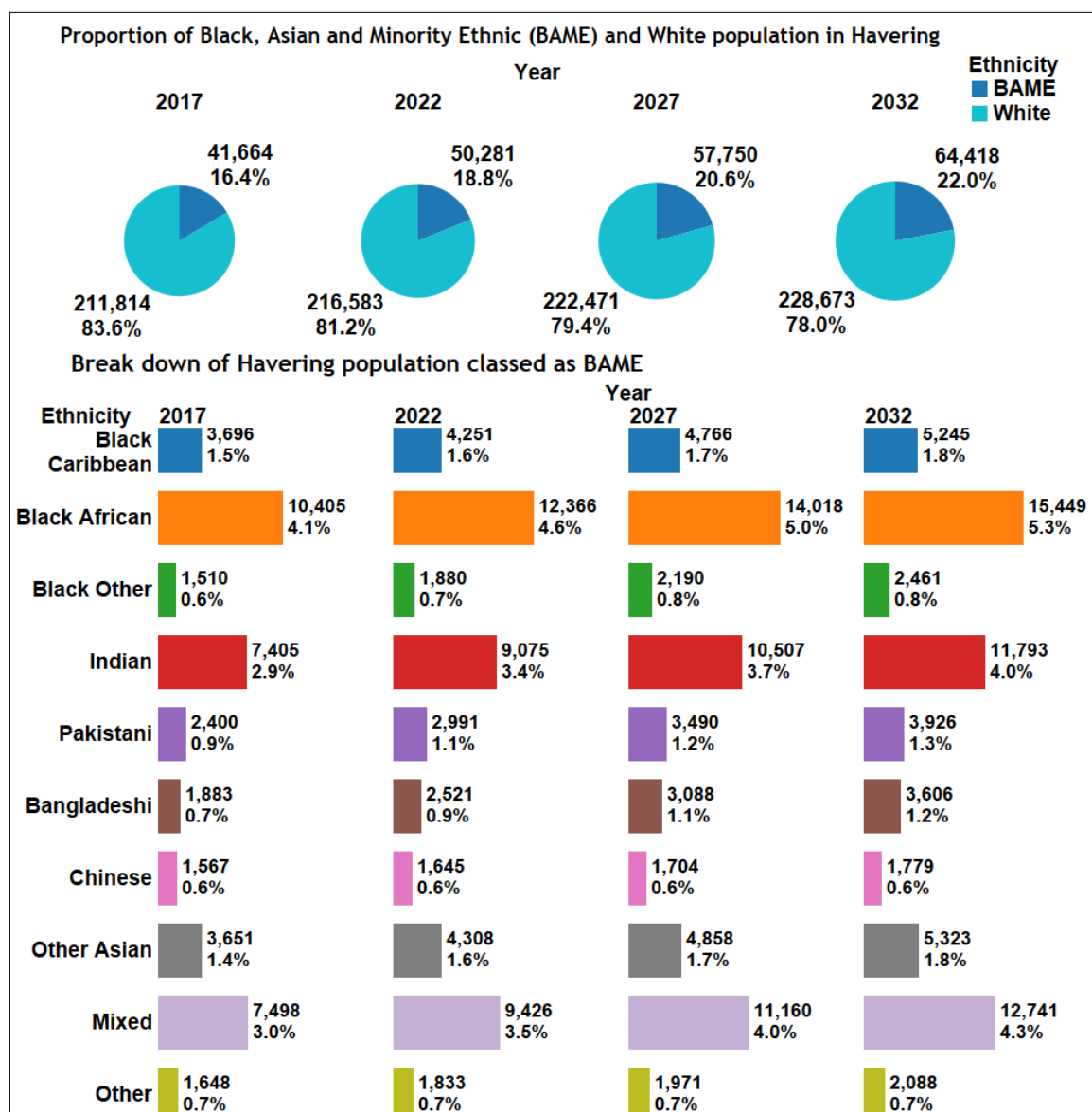
Country of Birth	Number	%
UK Born	212,840	89.7%
Non UK Born	24,392	10.3%
Havering	237,232	100.0%

Country of Birth	Number	%
UK Born	212,840	89.7%
Ireland	2,503	1.1%
India	2,301	1.0%
Nigeria	2,241	0.9%
Lithuania	1,065	0.4%
Poland	925	0.4%
Philippines	759	0.3%
Ghana	678	0.3%
Pakistan	653	0.3%
Zimbabwe	647	0.3%
South Africa	621	0.3%
Other	11,999	5.1%
Total	237,232	100.0%

Percentage of Non-white ethnic group by ward from 2011 census



Ethnicity population projections 2017 - 2032



English as First Language (2011 Census)

- Havering number of Households 97,199
- Number of people aged 16 and over in household that have English as main Language 91,739
- At least one person aged 16 and over in household that have English as main Language 2,504
- No people aged 16 and over in household but at least one person aged 3-15 that have English as main Language 684
- No people in household have English as main Language 2,272
- From 2011 census 10,461 people in Havering main language is not English

Sources used:

- This is Havering 2018 version 4.1 (August 2018)
- 2011 Census
- Internal Survey of Havering business premises using tables and chairs on the highway.

Protected Characteristic - Religion/faith

*Please tick (✓)
the relevant box:*

Positive
☐
Neutral
☒
Negative
☐
Overall impact:

The consultation would be neutral.

No differential impact has been identified on the grounds of this protected characteristic. The draft Street Trading Policy proposal applies equally to all traders operating in Havering irrespective of faith/religion.

Evidence:

(Please add in any additional evidence and use the evidence below that is relevant for your particular impact assessment, please delete unnecessary data)

Religion and Belief 2011 Census

Faith	Number	%
Christian	155,597	65.6%
Buddhist	760	0.3%
Hindu	2,963	1.2%
Jewish	1,159	0.5%
Muslim	4,829	2.0%
Sikh	1,928	0.8%
Other Religion	648	0.3%
No Religion	53,549	22.6%
No Response	15,799	6.7%
Totals	237,232	100.0%

Sources used:

- 2011 Census

Protected Characteristic - Sexual orientation		
Please tick (✓) the relevant box:		Overall impact: The impact of the consultation would be neutral. The policy if adopted would be neutral in impact on the basis of sexual orientation. Havering LGBT Forum will be consulted on the draft policy as part of the consultation process.
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence: Managers seeking the views of this group are encouraged to undertake consultation directly or via the Havering LGBT Forum. Write to: info@haveringlgbtforum.co.uk .		
Sources used: There is insufficient data available to measure accurately the potential effect of these proposals in relation to sexual orientation. It is not believed that the Draft Policy Street Trading Policy will have an impact in relation to this protected characteristic.		

Protected Characteristic - Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth

*Please tick (✓)
the relevant box:*

Positive

☐

Neutral

☒

Negative

☐

Overall impact:

The impact of the consultation would be neutral.

The policy if adopted would be neutral in impact on the basis of gender reassignment.

Evidence:

Managers seeking the views of this group are encouraged to undertake consultation directly or via the Havering LGBT Forum. Write to:

info@haveringlgbtforum.co.uk

Sources used:

There is insufficient data available to measure accurately the potential effect of these proposals in relation to gender reassignment.

It is not believed that the Draft Policy Street Trading Policy will have an impact in relation to this protected characteristic.

Protected Characteristic - Marriage/civil partnership: Consider people in a marriage or civil partnership		
Please tick (✓) the relevant box:		Overall impact: The impact of the consultation would be neutral. The policy if adopted would be neutral in impact on the basis of marriage or partnership.
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence: In 2017 it is estimated that: <ul style="list-style-type: none"> • Single 27,558,916 • Married 24,249,371 • Civil Partnered 99,695 • Divorced 3,696,837 • Widowed 3,139,776 		
Sources used: <ul style="list-style-type: none"> • Office for National Statistics (ONS) – Dataset Population estimates by marital status and living arrangements, England and Wales 		

Protected Characteristic - Pregnancy, maternity and paternity		
Please tick (✓) the relevant box:		Overall impact:
Positive		The impact of the consultation is neutral.
Neutral	✓	The impact of any policy changes going forward <i>may be positive</i> regarding maintenance of clear footways for persons with prams, pushchairs and small children, and a clear direction as to the legality of tables and chairs on the highway may encourage more businesses to provide extra external seating which may be positive for persons who might otherwise have difficulty accessing those premises.
Negative		A low uptake by business may contribute to a reduction in the number of seats available outside which may be a <i>negative impact</i> for those looking for outside seating where indoor access to premises might be an issue due to space for prams / pushchairs.
Evidence: 2016 Data for Havering <ul style="list-style-type: none"> • All Conceptions – 4,475 • Percentage all conceptions leading to abortion – 24.9% • Conceptions under 18 – 106 • Percentage under 18 leading to abortion – 67% • Conceptions under 16 – 13 • Percentage under 16 leading to abortion – 69.2% 2017 Data for Havering <ul style="list-style-type: none"> • Fertility rate 1.91 children per woman • Live births 3,393 		
Sources used: <ul style="list-style-type: none"> • Office for National Statistics (ONS) 		

Health & Wellbeing Impact: Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity? Please use the Health and Wellbeing Impact Tool in Appendix 2 to help you answer this question.

Please tick (✓) all the relevant boxes that apply:

Positive

✓

Neutral

✓

Negative

✓

Overall impact:

The impact of the consultation is neutral.

The impact of any adoption of changes to policy will be better known following public consultation and any subsequent policy review.

The impact on staff required to manage and implement the new policy *could be negative* in terms of mental and physical welfare if provision is not made to adequately resource this new policy. Staff may be classed as financially vulnerable in this review.

The impact on residents and businesses using the licensing scheme going forward there may be a *positive impact* going forward in light of the current social distancing requirements, as the use of outside space, enables adherence to social distancing and allows for more ventilation to minimise risk of Covid 19 infection. This therefore supports both the reopening of hospitality businesses and also the safe return of hospitality staff to work and to keep customers safe.

Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box

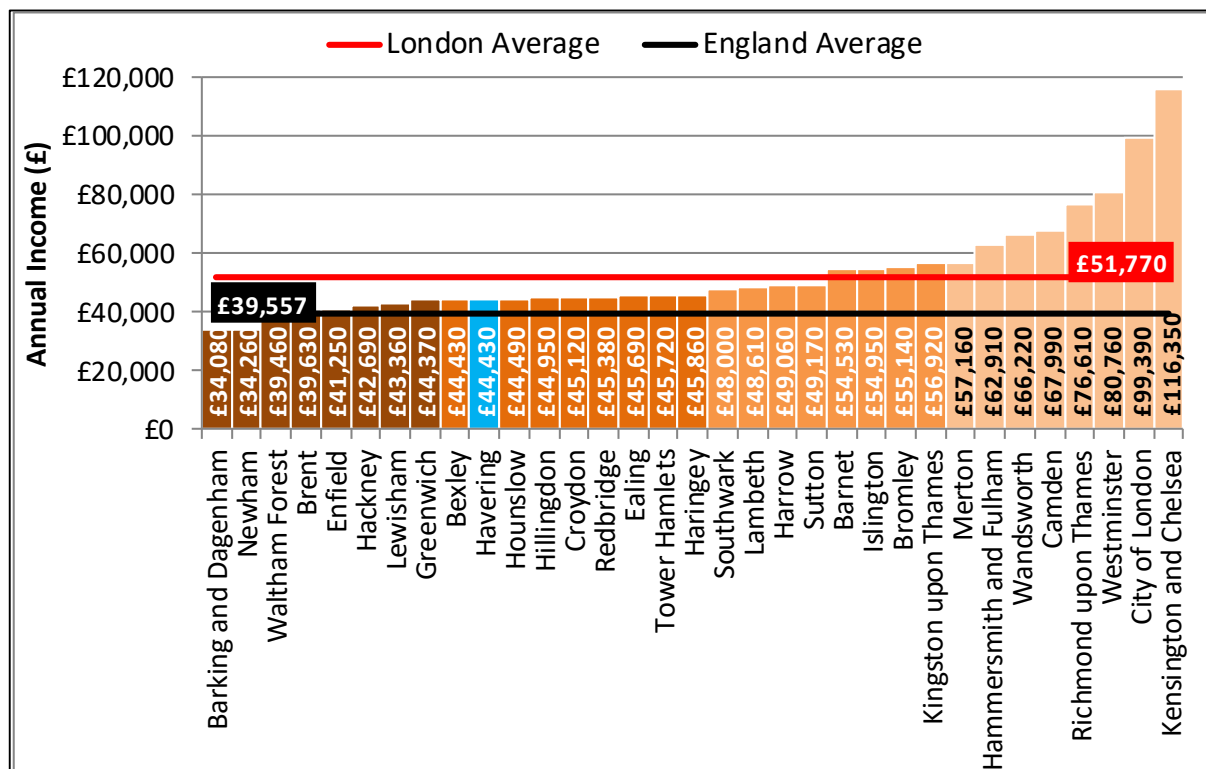
Yes

No ✓ ☐

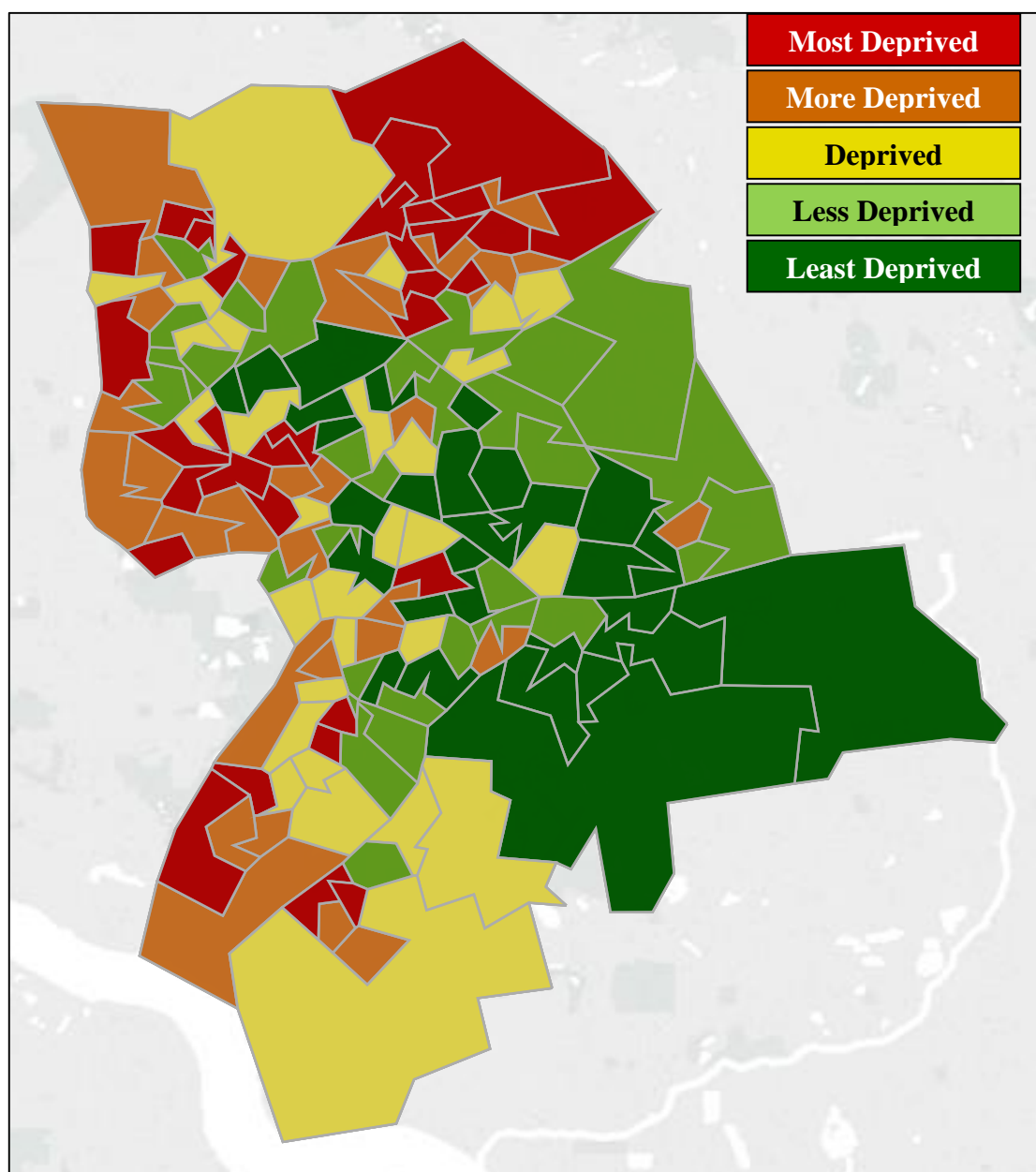
Sources used:

Socio – Economic impact:		
Please tick (✓) the relevant box:		Overall impact: The impact of the consultation will be neutral. There are potentially positive impacts in increasing visibility of smaller businesses through outdoor seating areas which may benefit small independent traders. Also through provision to customers who may wish to smoke, vape or may not be able to access the business premises due to steps or space for pushchairs or prams. Potentially, small operators may feel that they do not wish to pay for licensing this outdoor space, which could negatively affect their income through loss of revenue. However, it is envisaged that the potential revenue would outweigh the cost of the licence. The requirement to consider the improvement of the local aesthetic as part of the application process may contribute towards a positive socio-economic impact, both in encouraging people to work, shop and eat in the area, with a related impact on jobs and income to the area.
Positive		
Neutral	✓	
Negative		
Evidence: <ul style="list-style-type: none"> • The average gross income per household in Havering (£44,430, as measured in 2012/13) is low in comparison to the London average (£51,770) and slightly higher than the England average (£39,557). • 77% of households in Havering have at least one car and compared to other local authorities in London, Havering has the second highest proportion of households (32.8%) with 2 or more cars. • Majority of children in Havering are not poor, but around 8,800 live in income-deprived households. Gooshays and Heaton wards have the highest proportion of children living in poverty. • About 77.9% of working age residents in Havering were in employment between April and June 2018. Overall employment rate in Havering is higher than London (74.6%) and England (75.9%) • The proportion of working age residents in Havering claiming out-of-work benefits (6.8%) is significantly lower than England (8.4%). 		

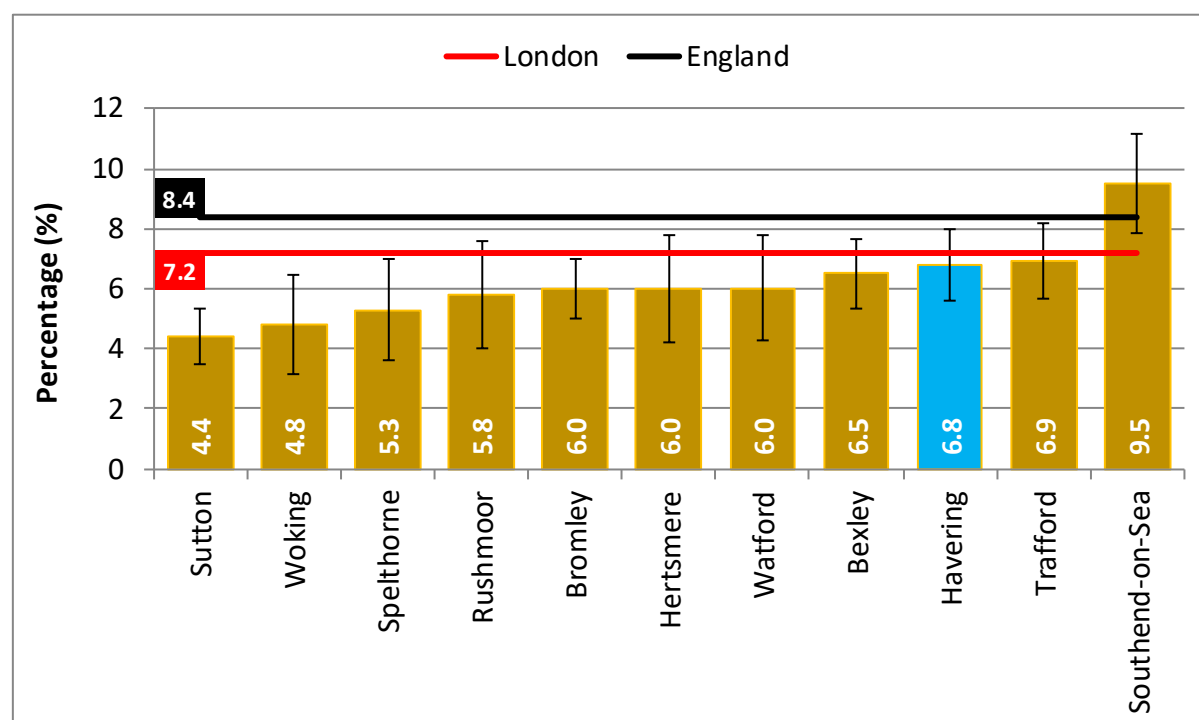
Income 2012/13



Income deprivation affecting Children, quintiles within Havering LSOA, 2015



Proportion of working age residents claiming out-of-work benefits in Havering and ONS statistical comparator group, November 2016



Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*

3. Outcome of the Assessment

The EqHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:

	1. The EqHIA identified <u>no significant concerns</u> OR the identified <u>negative concerns</u> have already been <u>addressed</u>	➔	Proceed with implementation of your activity
	2. The EqHIA identified some <u>negative impact</u> which still needs <u>to be addressed</u>	➔	COMPLETE SECTION 4: Complete action plan and finalise the EqHIA
	3. The EqHIA identified some <u>major concerns</u> and showed that it is <u>impossible to diminish negative impacts</u> from the activity to an acceptable or even lawful level	➔	Stop and remove the activity or revise the activity thoroughly . Complete an EqHIA on the revised proposal.

4. Action Plan

The real value of completing an EqHIA comes from the identifying the actions that can be taken to eliminate/minimise negative impacts and enhance/optimize positive impacts. In this section you should list the specific actions that set out how you will address any negative equality and health & wellbeing impacts you have identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Race/ ethnicity	Consultation - Neutral	Ensure consultation designed to be accessible			
Age	Consultation - Neutral	Ensure consultation designed to be accessible			
Disability	Consultation - neutral	Ensure consultation designed to be accessible			

Add further rows as necessary

* You should include details of any future consultations and any actions to be undertaken to mitigate negative impacts

** Monitoring: You should state how the impact (positive or negative) will be monitored; what outcome measures will be used; the known (or likely) data source for outcome measurements; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

5. Review

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

Review: The EqHIA should be reviewed after consultation in light of feedback, and subsequently in light of any changes to the policy prior to going to Cabinet. Dates for these cannot be confirmed ahead of process.

Scheduled date of review:

Lead Officer conducting the review: TBC

**Expand box as required*

Please submit the completed form via e-mail to EqHIA@havering.gov.uk thank you.

Appendix 1. Guidance on Undertaking an EqHIA

This Guidance can be deleted prior to publication.

What is it?

The Equality & Health Impact Assessment (EqHIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service, whilst at the same time ensuring a person's chance of leading a healthy life is the same wherever they live and whoever they are. We want to ensure that the activities of the Council are 'fit for purpose' and meet the needs of Havering's increasingly diverse communities and employees. This robust and systematic EqHIA process ensures that any potential detrimental effects or discrimination is identified, removed, or mitigated and positive impacts are enhanced.

When to Assess:

An EqHIA should be carried out when you are changing, removing or introducing a new service, policy, strategy or function; for simplicity, these are referred to as an "activity" throughout this document. It is best to conduct the assessment as early as possible in the decision-making process.

Guidance: Equality & Health Impact Assessment Checklist

The Checklist in Section 1 asks the key questions,

4a) Are you changing, introducing a new, or removing a service, policy, strategy or function?

4b) Does this activity (policy/strategy/service/decision) have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?

4c) Does this activity (policy/strategy/service/decision) have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?

- If the answer to ANY of the questions 4a, 4b or 4c of the Checklist is 'YES' then you must carry out an assessment. e.g. Proposed changes to Contact Centre Opening Hours
'YES' = you need to carry out an EqHIA
- If the answer to ALL of the questions, 4a or 4b of the Checklist is NO, then you do not need to carry out an EqHIA assessment. e.g. Quarterly Performance Report
'NO' = you DO NOT need to carry out an EqHIA. Please provide a clear explanation as to why you consider an EqHIA is not required for your activity.

Using the Checklist

The assessment should take into account all the potential impacts of the proposed activity, be it a major financial decision, or a seemingly simple policy change. Considering and completing this EqHIA will ensure that all Council plans, strategies, policies, procedures, services or other activity comply with relevant statutory obligations and responsibilities. In particular it helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#) and its public health duties under the [Health and Social Care Act 2012](#).

Having Due Regard

To have due regard means that in making decisions and in its other day-to-day activities, the Council must consciously consider the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups
- Foster good relations between different groups
- Reduce inequalities in health outcomes

Combining Equality and Health Impact Assessment:

[Equality Impact Assessments \(EIAs\)](#) provide a systematic way of ensuring that legal obligations are met. They assess whether a proposed policy, procedure, service change or plan will affect people different on the basis of their 'protected characteristics' and if it will affect their human rights. Currently there are **nine protected characteristics** (previously known as 'equality groups' or 'equality strands'): age, disability, sex/gender, ethnicity/race, religion/fait, sexual orientation, gender reassignment, marriage/civil partnership, and pregnancy/ maternity/paternity.

An activity does not need to impact on all 9 protected characteristics – impacting on just one is sufficient justification to complete an EqHIA.

[Health Impact Assessments \(HIAs\)](#) consider the potential impact of any change or amendment to a policy, service, plan, procedure or programme on the health and wellbeing of the population. HIAs help identify how people may be affected differently on the basis of where they live and potential impacts on health inequalities and health equity by assessing the distribution of potential effects within the population, particularly within vulnerable groups. 'Health' is not restricted to medical conditions, or the provision of health services, but rather encompasses the wide range of influences on people's health and wellbeing. This includes, but is not limited to, experience of discrimination, access to transport, housing, education, employment - known as the 'wider determinants of health'.

This [Equality and Health Impact Assessment \(EqHIA\)](#) brings together both impact assessments into a single tool which will result in a set of recommendations to eliminate discrimination and inequality; enhance potential positive impacts and mitigate where possible for negative impacts. In conducting this EqHIA you will need to assess the impact (positive, neutral or negative) of your activity on individuals and groups with **protected characteristics** (this includes staff delivering your activity), **socio-economic status** and **health & wellbeing**. Guidance on what to include in each section is given on the next pages.

Guidance: What to include in background/context

In this section you will need to add the background/context of your activity, i.e. what is the activity intending to do, and why?

Make sure you include the scope and intended outcomes of the activity being assessed; and highlight any proposed changes. Please include a brief rationale for your activity and any supporting evidence for the proposal. Some questions to consider:

- What is the aim, objectives and intended outcomes?
- How does this activity meet the needs of the local population?
- Has this activity been implemented in another area? What were the outcomes?
- Is this activity being implemented as per best practice guidelines?
- Who were the key stakeholders in this activity?

*Note that the boxes will expand as required

Guidance: Who will be affected by the activity?

The people who will be affected may be

Residents: pay particular attention to vulnerable groups in the population who may be affected by this activity

Businesses/ manufacturing / developers / small, medium or large enterprises

Employees: e.g. Council staff for an internal activity, other statutory or voluntary sector employees, local businesses and services

*Note that the boxes will expand as required

Guidance: What to include in assessing a Protected Characteristic e.g. AGE

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact: In this section you will need to consider and note what impact your activity will have on individuals and groups (including staff) with protected characteristics based on the data and information you have. You should note whether this is a positive, neutral or negative impact.

It is essential that you note all negative impacts. This will demonstrate that you have paid 'due regard' to the Public Sector Equality Duty if your activity is challenged under the Equality Act.

*Note that the boxes will expand as required

Evidence: In this section you will need to document the evidence that you have used to assess the impact of your activity.

When assessing the impact, please consider and note how your activity contributes to the three aims of the Public Sector Equality Duty (PSED) as stated in the section above.

It is essential that you note the full impact of your activity, so you can demonstrate that you have fully considered the equality implications and have paid 'due regard' to the PSED should the Council be challenged.

- If you have identified a **positive impact**, please note this.
- If you think there is a **neutral impact** or the impact is not known, please provide a full reason why this is the case.
- If you have identified a **negative impact**, please note what steps you will take to mitigate this impact. If you are unable to take any mitigating steps, please provide a full reason why. All negative impacts that have mitigating actions must be recorded in the **Action Plan**.
- **Please ensure that appropriate consultation with affected parties has been undertaken and evidenced**

Sources used: In this section you should list all sources of the evidence you used to assess the impact of your activity. This can include:

- Service specific data
- Population, demographic and socio-economic data. Suggested sources include:
 - o Service user monitoring data that your service collects
 - o [Havering Data Intelligence Hub](#)
 - o [Office for National Statistics \(ONS\)](#)

If you do not have any relevant data, please provide the reason why.

*Note that the boxes will expand as required

Guidance: What to include in assessing Health & Wellbeing Impact:

Please tick (✓) all the relevant boxes that apply:

Positive

Neutral

Negative

Overall impact: In this section you will need to consider and note whether the proposal could have an overall impact on, or implications for, people's health and wellbeing or any factors which determine people's health.

How will the activity help address inequalities in health?

Include here a brief outline of what could be done to enhance the positive impacts and, where possible, mitigate for the negative impacts.

*Note that the boxes will expand as required

Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box

Yes ☐ No ☐

Evidence: In this section you will need to outline in more detail how you came to your conclusions above:

- What is the nature of the impact?
- Is the impact **positive** or **negative**? It is possible for an activity to have **both positive and negative impacts**. Consider here whether people will be able to access the service being offered; improve or maintain healthy lifestyles; improve their opportunities for employment/income; whether and how it will affect the environment in which they live (housing, access to parks & green space); what the impact on the family, social support and community networks might be
- What can be done to mitigate the negative impacts and/or enhance the positive impacts?
- If you think there is a **neutral impact**, or the impact is not known, please provide a brief reason why this is the case.
- What is the likelihood of the impact? Will the impact(s) be in weeks, months or years? In some cases the short-term risks to health may be worth the longer term benefits.
- Will the proposal affect different groups of people in different ways? A proposal that is likely to benefit one section of the community may not benefit others and could lead to inequalities in health.

Please use the Health & Wellbeing Impact Tool in Appendix 2 as a guide/checklist to assess the potential wider determinants of health impacts.

This tool will help guide your thinking as to what factors affect people's health and wellbeing, such as social support, their housing conditions, access to transport, employment, education, crime and disorder and environmental factors. It is not an exhaustive list, merely a tool to guide your assessment; there may be other factors specific to your activity.

Some questions you may wish to ask include:

- Will the activity impact on people's ability to socialise, potentially leading to social isolation?
- Will the activity affect a person's income and/or have an effect on their housing status?
- Is the activity likely to cause the recipient of a service more or less stress?
- Will any change in the service take into account different needs, such as those with learning difficulties?
- Will the activity affect the health and wellbeing of persons not directly related to the service/activity, such as carers, family members, other residents living nearby?
- If there is a short-term negative effect, what will be done to minimise the impact as much as possible?

- Are the longer-term impacts positive or negative? What will be done to either promote the positive effects or minimise the negative effects?
- Do the longer term positive outcomes outweigh the short term impacts?

*Note that the boxes will expand as required

Sources used: In this section you should list all sources of the evidence you used to assess the impact of your activity. This could include, e.g.:

Information on the population affected

- Routinely collected local statistics (e.g. quality of life, health status, unemployment, crime, air quality, educational attainment, transport etc.)
- Local research/ Surveys of local conditions
- Community profiles

Wider Evidence

- Published Research, including evidence about similar proposals implemented elsewhere (e.g. Case Studies).
- Predictions from local or national models
- Locally commissioned research by statutory/voluntary/private organisations

Expert Opinion

- Views of residents and professionals with local knowledge and insight

*Note that the boxes will expand as required

Guidance: Outcome of the Assessment

On reflection, what is your overall assessment of the activity?

The purpose of conducting this assessment is to offer an opportunity to think, reflect and **improve** the proposed activity. It will make sure that the Council can evidence that it has considered its due regard to equality and health & wellbeing to its best ability.

It is not expected that all proposals will be immediately without negative impacts! However, where these arise, what actions can be taken to mitigate against potential negative effects, or further promote the positive impacts?

Please tick one of the 3 boxes in this section to indicate whether you think:

1. all equality and health impacts are adequately addressed in the activity – proceed with your activity pending all other relevant approval processes
2. the assessment identified some negative impacts which could be addressed – please complete the Action Plan in Section 4.
3. If the assessment reveals some significant concerns, this is the time to stop and re-think, making sure that we spend our Council resources wisely and fairly. There is no shame in stopping a proposal.

*Note that the boxes will expand as required

Guidance: Action Plan

For each protected characteristic/health & wellbeing impact where an impact on people or their lives has been identified, complete one row of the action plan. You can add as many further rows as required.

State whether the impact is Positive or Negative

Briefly outline the actions that can be taken to mitigate against the negative impact or further enhance a positive impact. These actions could be to make changes to the activity itself (service, proposal, strategy etc.) or to make contingencies/alterations in the setting/environment where the activity will take place.

For example, might staff need additional training in communicating effectively with people with learning difficulties, if a new service is opened specifically targeting those people? Is access to the service fair and equitable? What will the impact on other service users be? How can we ensure equity of access to the service by all users? Will any signage need changing? Does the building where the service being delivered comply with disability regulations?

Guidance: Review

Changes happen all the time! A service/strategy/policy/activity that is appropriate at one time, may no longer be appropriate as the environment around us changes. This may be changes in our population, growth and makeup, legislative changes, environmental changes or socio-political changes.

Although we can't predict what's going to happen in the future, a review is recommended to ensure that what we are delivering as a Council is still the best use of our limited resources. The timescale for review will be dependent on the scale of the activity.

A major financial investment may require a review every 2-3 years for a large scale regeneration project over 10-15 years.

A small policy change may require a review in 6 months to assess whether there are any unintended outcomes of such a change.

Please indicate here how frequently it is expected to review your activity and a brief justification as to why this timescale is recommended.

Appendix 2. Health & Wellbeing Impact Tool

Will the activity/service/policy/procedure affect any of the following characteristics? Please tick/check the boxes below

The following are a range of considerations that might help you to complete the assessment.

Lifestyle	YES <input type="checkbox"/> NO <input type="checkbox"/>	Personal circumstances	YES <input type="checkbox"/> NO <input type="checkbox"/>	Access to services/facilities/amenities	YES <input type="checkbox"/> NO <input type="checkbox"/>
<input type="checkbox"/> Diet <input type="checkbox"/> Exercise and physical activity <input type="checkbox"/> Smoking <input type="checkbox"/> Exposure to passive smoking <input type="checkbox"/> Alcohol intake <input type="checkbox"/> Dependency on prescription drugs <input type="checkbox"/> Illicit drug and substance use <input type="checkbox"/> Risky Sexual behaviour <input type="checkbox"/> Other health-related behaviours, such as tooth-brushing, bathing, and wound care		<input type="checkbox"/> Structure and cohesion of family unit <input type="checkbox"/> Parenting <input type="checkbox"/> Childhood development <input type="checkbox"/> Life skills <input type="checkbox"/> Personal safety <input type="checkbox"/> Employment status <input type="checkbox"/> Working conditions <input type="checkbox"/> Level of income, including benefits <input type="checkbox"/> Level of disposable income <input type="checkbox"/> Housing tenure <input type="checkbox"/> Housing conditions <input type="checkbox"/> Educational attainment <input type="checkbox"/> Skills levels including literacy and numeracy		<input type="checkbox"/> to Employment opportunities <input type="checkbox"/> to Workplaces <input type="checkbox"/> to Housing <input type="checkbox"/> to Shops (to supply basic needs) <input type="checkbox"/> to Community facilities <input type="checkbox"/> to Public transport <input type="checkbox"/> to Education <input type="checkbox"/> to Training and skills development <input type="checkbox"/> to Healthcare <input type="checkbox"/> to Social services <input type="checkbox"/> to Childcare <input type="checkbox"/> to Respite care <input type="checkbox"/> to Leisure and recreation services and facilities	
Social Factors YES <input type="checkbox"/> NO <input type="checkbox"/>		Economic Factors YES <input type="checkbox"/> NO <input type="checkbox"/>		Environmental Factors YES <input type="checkbox"/> NO <input type="checkbox"/>	
<input type="checkbox"/> Social contact <input type="checkbox"/> Social support <input type="checkbox"/> Neighbourliness <input type="checkbox"/> Participation in the community <input type="checkbox"/> Membership of community groups <input type="checkbox"/> Reputation of community/area <input type="checkbox"/> Participation in public affairs <input type="checkbox"/> Level of crime and disorder <input type="checkbox"/> Fear of crime and disorder <input type="checkbox"/> Level of antisocial behaviour <input type="checkbox"/> Fear of antisocial behaviour <input type="checkbox"/> Discrimination <input type="checkbox"/> Fear of discrimination <input type="checkbox"/> Public safety measures <input type="checkbox"/> Road safety measures		<input type="checkbox"/> Creation of wealth <input type="checkbox"/> Distribution of wealth <input type="checkbox"/> Retention of wealth in local area/economy <input type="checkbox"/> Distribution of income <input type="checkbox"/> Business activity <input type="checkbox"/> Job creation <input type="checkbox"/> Availability of employment opportunities <input type="checkbox"/> Quality of employment opportunities <input type="checkbox"/> Availability of education opportunities <input type="checkbox"/> Quality of education opportunities <input type="checkbox"/> Availability of training and skills development opportunities <input type="checkbox"/> Quality of training and skills development opportunities <input type="checkbox"/> Technological development <input type="checkbox"/> Amount of traffic congestion		<input type="checkbox"/> Air quality <input type="checkbox"/> Water quality <input type="checkbox"/> Soil quality/Level of contamination/Odour <input type="checkbox"/> Noise levels <input type="checkbox"/> Vibration <input type="checkbox"/> Hazards <input type="checkbox"/> Land use <input type="checkbox"/> Natural habitats <input type="checkbox"/> Biodiversity <input type="checkbox"/> Landscape, including green and open spaces <input type="checkbox"/> Townscape, including civic areas and public realm <input type="checkbox"/> Use/consumption of natural resources <input type="checkbox"/> Energy use: CO2/other greenhouse gas emissions <input type="checkbox"/> Solid waste management <input type="checkbox"/> Public transport infrastructure	



CABINET

Subject Heading:

East London Joint Resources and Waste Strategy - Approval of Public Consultation

Cabinet Member:

Cllr Osman Dervish

SLT Lead:

Barry Francis

Report Author and contact details:

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Policy context:

The East London Waste Authority (ELWA) and its constituent Boroughs (the 'Partner Authorities') are statutorily required to produce a Joint Resources and Waste Strategy (JRWS) to replace the existing strategy which is expiring. Waste management will also be a key topic within Havering's upcoming Climate Action Plan.

Financial summary:

ELWA has set up a Strategy Reserve to cover the costs arising out of the development and planning for post 2027 waste disposal arrangements. Consequently, there is no separate strategy expenditure included in the budget and levy approved by the Authority on 4 February 2019.

Is this a Key Decision?

Yes

(c) Significant effect on two or more Wards

When should this matter be reviewed?

February 2022 will see a new decision for formal adoption of the Strategy.

Reviewing OSC:

Environment OSC

The subject matter of this report deals with the following Council Objectives

Communities making Havering
Places making Havering
Opportunities making Havering
Connections making Havering

☐
☒
☐
☐

SUMMARY

- 1.1 As Waste Collection Authorities (WCAs) the London Borough of Havering and the other 3 Constituent Boroughs of the East London Waste Authority (ELWA) (Barking and Dagenham, Newham and Redbridge) collect household and other waste that is subsequently treated and/or disposed of by ELWA as the Joint Waste Disposal Authority (JWDA).
- 1.2 ELWA and its constituent Boroughs (the 'Partner Authorities') are statutorily required to produce a Joint Resources and Waste Strategy (JRWS) to replace the existing strategy which is expiring.
- 1.3 The Preliminary Draft of the new East London Joint Resources and Waste Strategy (ELJRWS) has been developed in close cooperation between officers and Members of the Partner Authorities (Appendix 1).
- 1.4 The context around the Partner Authorities delivering waste management services is subject to considerable change over coming years, with changes to national waste policy, obligations through the London Environment Strategy (LES), and the ending of ELWA's current treatment contract in 2027 with the need to develop successor arrangements. Summaries of the above are provided in Appendix 2.
- 1.5 Whilst there are constraints and uncertainties around some of the above, particularly around the context in which ELWA will develop successor waste treatment and disposal solutions, the Preliminary Draft of the ELJRWS will be subject to public consultation to understand the public opinion on its priorities and actions. Future service changes will be subject to consultation as appropriate in line with statutory obligations.

RECOMMENDATIONS

- 2.1 Cabinet is recommended to approve the release of the Preliminary Draft of the East London Joint Resources and Waste Strategy (ELJRWS) and associated documents to the four statutory consultees (Environment Agency, Greater London Authority, Historic England and Natural England).
- 2.2 Cabinet is recommended to approve the start of wider public engagement in line with the proposals in this report.
- 2.3 To delegate to the Director of Neighbourhoods in consultation with the Cabinet Member for Environment, the decision to make minor amendments to the proposal set out in this report. Such amendments will be limited to changes in the public consultation timeline and minor changes within the Strategy document.

REPORT DETAIL

3. Background

3.1 Current Waste Management Arrangements

- 3.1.1 As a Waste Collection Authority (WCA) the London Borough of Havering has a statutory obligation to collect household waste arising from homes and other premises, alongside commercial waste at the request of individual businesses. It is also responsible for undertaking street cleansing and other public realm management duties, which result in the collection of other waste streams.
- 3.1.2 The ELWA is a 'Joint Waste Disposal Authority' and is responsible for providing treatment and disposal for the waste and recycling collected by the Partner Authorities, and the operation of Reuse and Recycling Centres (RRC's) the contract of which started in 2002 and ends in December 2027.
- 3.1.3 Waste Authorities in London, and their associated strategies, are required to deliver waste services in 'general conformity' (subject to some caveats) with the Mayor of London's 2018 London Environment Strategy (LES).
- 3.1.4 The Resources and Waste Strategy for England (2018) sets out the Government's vision for future waste management policy.
- 3.1.5 Appendix 2 provides background information on the above two strategies, including targets for recycling.

4 Key Elements of the Preliminary Draft of the ELJRWS

- 4.1 The strategy development process is outlined in Appendix 3.

4.2 Recycling Rate Targets

- 4.2.1 Targets outlined in Appendix 2 are respectively national targets for England and London-wide targets, not targets on individual local authorities within these areas. It is acknowledged that individual local authorities will over- or under-achieve against these targets depending on local circumstances.
- 4.2.2 The shared Local Authority Collected Waste (LACW) recycling rate target within the Preliminary Draft of the ELJRWS is 35% for 2030.
- 4.2.3 There are also local ambitions to achieve higher recycling performance than that which has been modelled, with external factors such as the Government proposals for Extended Producer Responsibility (EPR) and Deposit return Schemes (DRS).
- 4.2.4 The targets and modelling assumptions included in the ELJRWS are as set out in Appendix 4.

4.3 ELWA's Successor Post-2027 Waste Treatment and Disposal Solution

- 4.3.1 The end of the current waste treatment contract in 2027 will mean that ELWA needs to make new arrangements to manage the waste and recycling collected by the Partner Authorities. This is a process that can take several years to plan because of the large investments for new infrastructure and because of the lengthy procurement / development times.
- 4.3.2 It is important for ELWA and the Constituent Councils to work together to ensure the most appropriate whole system solution is obtained.
- 4.3.3 Due to the uncertainties around the detail of future policy and the capacity

available for different types of infrastructure in 2027, it is not appropriate or possible to set out a prescribed solution for the management of waste handled by ELWA beyond 2027 at this stage.

4.3.4 Section 4.4.2 of the Preliminary Draft of the ELJRWS contains a series of priorities and actions to guide the process of developing successor arrangements. Given that ELWA's successor contracts could last for up to 30 years in line with standard waste industry contracts, the ELJRWS period is 2027 to 2057.

4.3.5 The Preliminary Draft of the ELJRWS does however still set out a range of actions that the Partner Authorities are committed to undertake to improve services prior to 2027, and commits the Partner Authorities to review of the Strategy between 2028 and 2030 and thereafter at intervals of not more than 10 years.

4.4 Contents of the Preliminary Draft of the ELJRWS

- **Chapter One – Introduction** - sets the context, aims and objectives of the strategy.
- **Chapter Two – What is Our Current Situation?** – sets out the context of the Partner Authorities' area, current waste management arrangements, a description of the waste managed, and the current performance.
- **Chapter Three – What Might the Future Look Like?** - describes how the area will change, impacts of national and regional policy on waste generation, and likely other factors such as changes in consumer behaviour.
- **Chapter Four – Where do we Want to Be?** - sets out the vision for how the Partner Authorities will work together to help reduce waste and reuse and recycling. Sets out recycling targets and priorities and actions for ELWA's post-2027 arrangements.
- **Chapter Five – How do we Get There** - outlines how the Partner Authorities will work together to achieve the aims and ambitions set out in the ELJRWS including provisions for future review; and
- **Chapter Six – Measuring Success** - describes how the performance indicators outlined will be used to measure success.

5 **Key stakeholders**

5.1 Engagement with the Greater London Authority

5.1.1 Officers from ELWA and the Constituent Councils have been engaging with the Greater London Authority (GLA) since project commencement, in order to chart a course towards achieving general conformity with the LES.

5.1.2 The engagement has been productive and positive, and the Partner Authorities appear to be on track to achieve this. This will be confirmed during formal consultation with the GLA.

5.2 The Need for a Strategic Environmental Assessment (SEA)

- 5.2.1 An SEA Screening Report has been produced for the ELJRWS (Appendix 5), which will be sent to the statutory consultees - the Environment Agency, Historic England and Natural England. This report will seek their agreement that an SEA is not required for the ELJRWS, given that it does not contain proposals on future waste collection or treatment.
- 5.2.2 The risk of the statutory consultees disagreeing with the Partner Authorities' position on an SEA not being required is considered to be low, however informal engagement with the statutory consultees is being undertaken.
- 5.2.3 There remains a risk that a statutory consultee determining an SEA is needed would delay formal adoption of the ELJRWS until later in 2022.

5.3 Wider Stakeholder Engagement Process

- 5.3.1 Due to the aforementioned constraints and uncertainties, the preliminary draft ELJRWS largely sets out broad directions of travel and general principles for future waste and resource management.
- 5.3.2 A public consultation should only be run when there is either a statutory obligation to do so, when there are different options for a plan, policy or proposal being considered, or when views are sought on a single defined matter.
- 5.3.3 These criteria do not appear to have been met for the ELJRWS, subject to agreement being reached about not proceeding with an SEA at this stage.
- 5.3.4 However, engaging local stakeholders would be a useful first step in this process when considering how to meet the targets and ambitions set out in the ELJRWS.
- 5.3.5 It is therefore proposed that a public engagement process is undertaken during the summer of 2021.
- 5.3.6 It is proposed that this takes the form of an online survey, supported by drop-in sessions. The proposed consultation plan and survey questions are attached as Appendix 6.

5.4 Timetable

- 5.4.1 A timetable has been provided in Appendix 7 to show the intended progression of the Preliminary Draft of the ELJRWS, through public consultation and leading to formal adoption.

REASONS AND OPTIONS

6. Reasons for the decision:

- 6.1 The WCAs and WDAs in 'two tier' areas (i.e. areas with separate WCAs and WDAs) in England are required under s32 of the Waste Emissions Trading Act to have in place a joint strategy for the management of household and similar wastes. The Act also obligates these Authorities to:

- Ensure that the policies in the joint strategy are kept under review;
- Have regard to the relevant government guidance; and
- When formulating a joint strategy “carry out such consultation as they consider appropriate”.

6.2 Other options considered:

- 6.3 Not produce a new strategy. However, give the above statutory requirements, this is not considered a viable option.

IMPLICATIONS AND RISKS

7. Financial implications and risks:

- 7.1 The targets and priorities within the ELJRWS do not bind the Council to any specific expenditure, but there will need to be investment in recycling and waste services in the future to meet performance expectations, both within the strategy, as well as upcoming national legislation. Further analysis of financial implications will need to be undertaken as more specific proposals are brought forward for the Council's collection services as well as the wider infrastructure solutions for ELWA. Havering's future waste collection services will be designed with expected requirements in mind.

7.2 Legal implications and risks:

- 7.3 The WCAs and WDAs in ‘two tier’ areas (i.e. areas with separate WCAs and WDAs) in England are required under s32 of the Waste Emissions Trading Act to have in place a joint strategy for the management of household and similar wastes. The Act also obligates these Authorities to:

- Ensure that the policies in the joint strategy are kept under review;
- Have regard to the relevant government guidance; and
- When formulating a joint strategy “carry out such consultation as they consider appropriate”.

7.4 Human Resources implications and risks:

- 7.5 There are no specific HR implications arising from the contents of this report.

7.6 Equalities implications and risks:

- 7.7 An Equalities Impact Assessment has been completed for the ELJRWS. There are no specific equality implications relating to the content of the ELJRWS. Local collection arrangements are already in place to meet the needs of mobility-impaired residents. The cultural diversity of the Borough

will inform the development of any communications or education programmes arising from the ELJRWS.

7.8 Health and Wellbeing implications and Risks

- 7.9 There are no specific health and wellbeing implications arising as a result of the publication of the draft strategy, nor a public consultation to gather local stakeholder viewpoints. Havering's policy team will be consulted to ensure relevant stakeholders are given the opportunity to respond.

BACKGROUND PAPERS

N/A

A Joint Strategy for Resources and Waste Management in East London 2027 – 2057 – Preliminary Draft

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Executive Summary

It is important that the environment is left in a better condition for the next generation.

This Joint Strategy sets out how the five Partner Authorities, namely the [East London Waste Authority](#) (ELWA) and the London Boroughs of [Barking and Dagenham](#), [Havering](#), [Newham](#) and [Redbridge](#), will preserve resources by minimising waste, promoting resource efficiency and moving towards a circular economy, all of which will help to protect the natural environment and reduce carbon emissions.

There is a great deal of change coming in the next few years that will affect the management of resources and waste in the Partner Authorities' area. This includes the end of ELWA's long-term 25-year contract for waste treatment services in 2027, potential changes to existing Partner Authority vehicle and service contracts, as well as important national and regional initiatives and targets that will result in new legislation and requirements for local authorities.

This Joint Strategy sets out the strategic aims and aspirations for resources and waste management of the five Partner Authorities, and outlines how the Partner Authorities will work together to manage resources and waste within their boundaries between 2027 and 2057, after the end of the long-term contract for waste treatment services.

Working with residents and businesses, the Partner Authorities want to make it as easy as possible to produce less waste, and to reuse, repair, and recycle more items and materials. Within the Joint Strategy a series of priorities are outlined that will help facilitate this, including how the Partner Authorities will support future improvements with infrastructure. These priorities will form the basis of how the Partner Authorities will manage waste in the future, contribute to London-wide and national targets, and meet the aspirations for future performance. The Partner Authorities will need to work together to achieve these goals.

The Joint Strategy also outlines the journey required to deliver improvement and respond to future changes. The Joint Strategy starts in 2027 once the current long-term contract for waste and recycling treatment comes to an end, but it is recognised that action to deliver improvements needs to start as soon as possible to achieve future performance aspirations. Steps that the Partner Authorities are taking to improve performance in the intervening years, including development of an East London Waste Prevention Programme and Borough Reduction and Recycling Plans (submitted to the Mayor of London), are detailed.

The Joint Strategy itself will need to be reviewed periodically to confirm it remains relevant in light of the rapidly changing policy environment and provides the right framework to drive performance improvements. The first overall review will take place by 2028.

The Partner Authorities also will need to regularly monitor progress against current and proposed performance indicators, which focus on reducing waste, maximising reuse, repair and recycling and limiting any waste sent to landfill.

This Joint Strategy sets the framework to drive environmental improvements that will support the Partner Authorities to help protect the environment for future residents and businesses of East London.

1 Introduction

1.1 Purpose of the Joint Resources and Waste Strategy

This Joint Strategy sets out the strategic aims and aspirations for resources and waste management of the five Partner Authorities, namely the [East London Waste Authority](#) (ELWA) and the London Boroughs of [Barking and Dagenham](#), [Havering](#), [Newham](#) and [Redbridge](#) (the 'Constituent Councils'). The Partner Authorities work together to manage resources and waste within their boundaries. It is a long-term strategy.

It is important that the environment is left in a better condition for the next generation. This Joint Strategy sets out how the Partner Authorities will preserve resources by minimising waste, promoting resource efficiency and moving towards a circular economy, all of which will help to protect the natural environment and reduce carbon emissions.

There is a great deal of change coming in the next few years that will affect the management of resources and waste in the Partner Authorities' area. This includes the end of ELWA's long-term 25-year contract for waste treatment services in 2027, potential changes to existing Partner Authority vehicle and service contracts, as well as important national and regional initiatives and targets that will result in new legislation and requirements for local authorities.

The Joint Strategy period is from 2027 to 2057. It is therefore primarily focused on how resources (the materials we use in our everyday lives) and waste will be managed in the future.

The Partner Authorities will commit to undertake a high-level review of this Joint Strategy by 2028 (see Chapter 5), to ensure the targets, priorities and aspirations are appropriate once future waste and recycling collection and treatment arrangements are better understood. Reviews thereafter will be conducted at intervals of not more than 10 years, to ensure the Joint Strategy continues to drive improvement and enable the Partner Authorities to respond to evolving innovations and policies on resources and waste management.

The previous strategy was originally drafted in 1996 and reviewed in 2006 and set the framework for performance for the 25-year contract period to 2027. The contract operator (Renewi) has developed a number of five-year and annual budget and service delivery plans, which review progress and outline future performance standards¹ and the Partner Authorities have prepared Reduction and Recycling Plans (RRPs) that set out how they will develop their services and local performance to work towards the targets and service standards within the London Environment Strategy². The Partner Authorities Plans will also be updated as proposals for future service and performance improvement on waste reduction, reuse and recycling evolve.

The Joint Strategy does not cover local issues such as the collection of litter, street cleansing and fly-tipping, and also does not set out specific details on how each Borough will develop its household waste and recycling collection services in the future. The Joint Strategy focuses on the longer-term targets and aspirations of the Partner Authorities, and the general principles

¹ [Renewi-FYSDP-Report-web-res.pdf \(eastlondonwaste.gov.uk\)](#)

² [London Environment Strategy](#)

by which the Partner Authorities will work together to achieve them. Further details on the responsibilities of the Partner Authorities can be found in section 1.2.

1.1.1 Structure of the Joint Strategy

- **Chapter One** – sets the context for the Joint Strategy;
- **Chapter Two** - describes how resources (the valuable materials that we dispose of every day) and waste are currently managed in the Partner Authorities' area, and provides detail on some of the opportunities, challenges and existing performance levels;
- **Chapter Three** - describes what changes the Partner Authorities expect to see in the future, both in terms of how the area will change, what impacts national and regional policy may have on the types and quantities of waste being generated, and some of the other factors which may also play a role in how consumers buy, use and dispose of products that will have an effect on resources and waste management;
- **Chapter Four** – sets out the vision for how the Partner Authorities will work together and with the community to help reduce waste and divert more items for repair and reuse. It sets out what level of recycling performance is expected to be achieved across the area, the aspirations the Partner Authorities have for diverting even more waste from disposal, and how future waste treatment capacity will be sourced;
- **Chapter Five** – outlines how the Partner Authorities will work together to achieve the aims and aspirations set out in the Joint Strategy; and
- **Chapter Six** – describes what performance measures will be used to measure success.

1.2 Responsibilities of the Partner Authorities

The four Constituent Councils (as 'waste collection authorities') are responsible for arranging the collection of household waste and recycling, as well as undertaking waste and recycling collections from local businesses that choose to use their commercial waste services.

The Constituent Councils also manage street cleansing, fly-tipping removal, and management of litter from local parks and open spaces, which all generate waste.

ELWA is the 'joint waste disposal authority' for the region, and is responsible for providing treatment and disposal services for the waste and recycling collected by the Constituent Councils. ELWA also operates four Reuse and Recycling Centres (RRCs) where residents can deposit a wide range of materials for reuse, recycling and disposal.

1.3 Why Do We Need a Strategy?

This Joint Strategy is needed to help the Partner Authorities start to plan for the end of the long-term 25-year contract (2002-2027) for waste treatment, while meeting the new requirements that will be arising from national and regional policy changes, and economic, environmental and societal drivers. The Partner Authorities also recognise the imperative to manage resources better in the future, to enhance resource efficiency and minimise greenhouse gas emissions. The main drivers are described in the following sections.

Development of a Joint Strategy is a statutory requirement for waste authorities in two-tier areas³. Furthermore, development of this document provides an opportunity to ensure that future strategy, procurement proposals and targets align as closely as possible with London’s overall strategic ambitions, as set out in the London Environment Strategy.

1.3.1 Summary of the Key Drivers

Figure 1: Summary of the Key Drivers



³ [Waste and Emissions Trading Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk)

1.3.2 Society and the Environment

In recent years there has been growing concern throughout society about our impact on the environment, particularly around climate change, the 'throw-away' society and plastic pollution. An increasing number of people are now aware that producing and consuming goods and services results in greenhouse gas emissions and waste. Members of the public are looking to brands, retailers, governments, and other organisations to help them adopt more sustainable lifestyles.

This growing public interest in how products are made and what happens to the waste people generate has led to a number of policy initiatives at an international, national and regional level. Many of these policies include adherence to the waste hierarchy (Figure 2), which presents the management options for waste and resources in order of preference based on environmental impacts. Policies and programmes are also increasingly focused on delivering what is known as the Circular Economy (Figure 3), which involves designing out waste and pollution, keeping products and materials in use, and regenerating natural systems. Embracing the principles of both the waste hierarchy and the Circular Economy supports society in moving away from unsustainable levels of consumption of natural resources and helps to protect the environment in a number of ways. New policies that focus on these principles, along with pressure from consumers, are driving innovation and change in manufacturing and retailing, leading to new technologies for managing waste products.

At an international level the Sustainable Development Goals⁴ (SDGs), also known as the Global Goals, were adopted by all United Nations Member States in 2015 as a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030. The goals collectively represent a sort of 'social value charter' for the planet.

The 17 SDGs are integrated, recognising that action in one area will affect outcomes in others, highlighting that development must balance social, economic and environmental sustainability. From the 17 goals and 169 targets there are at least eight indicators which focus on solid waste management, the majority of which sit in Goal 12 – Responsible Consumption and Production. These indicators cover everything from domestic material consumption through to global food loss, but importantly link back to the issue of sustainable management of the resources we have and use.

Developing a Joint Strategy for resources and waste management provides an opportunity for the Partner Authorities to explore the ways they can work together and with the local community (residents, businesses and other organisations) to deliver more sustainable systems for managing resources and waste in accordance with the Circular Economy principles within the national Resources and Waste Strategy and the London Environment Strategy. This includes identifying ways to reduce waste, divert more materials for reuse and recycling, and reduce the greenhouse gas emissions associated with the generation and management of waste and resources. The Partner Authorities will look at how to do this within

⁴ [THE 17 GOALS | Sustainable Development \(un.org\)](https://un.org/sustainabledevelopment)

their own services and how to influence wider work by a range of organisations involved in the supply of goods and services locally.

Figure 2: The waste hierarchy

The Waste Hierarchy

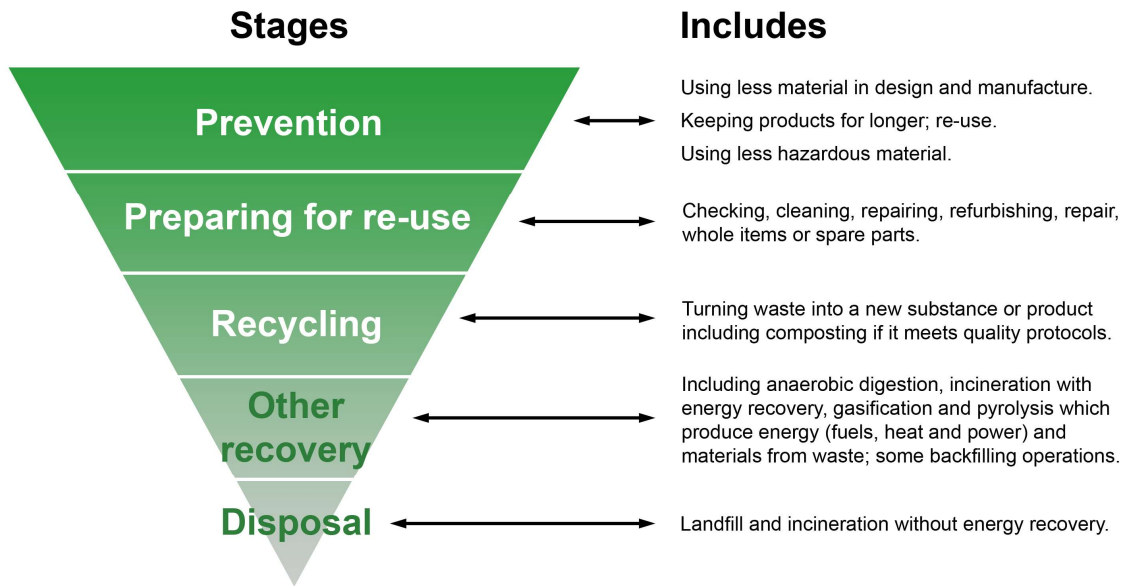
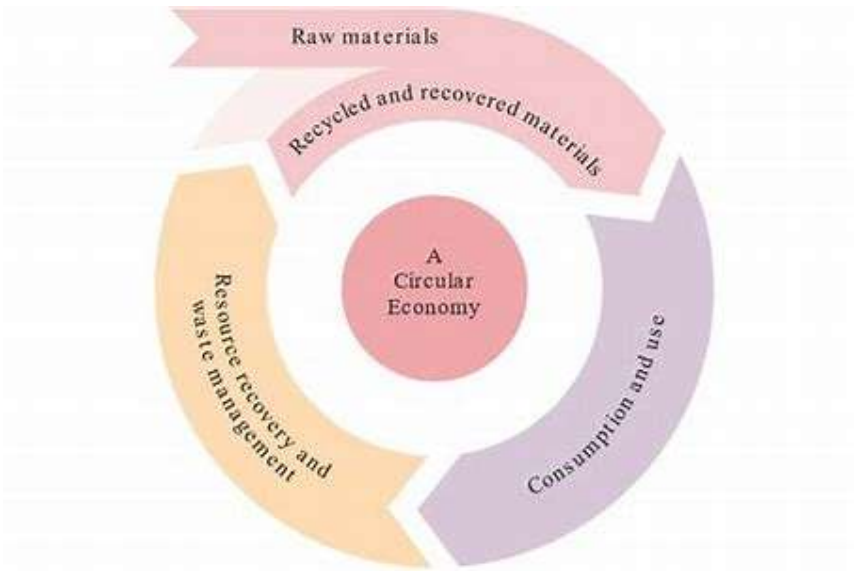


Figure 3: Vision of a circular economy (RWS)



1.3.3 Policy Landscape

National and regional policy on resources and waste is rapidly evolving in order to meet ambitions on preserving materials, reduce environmental impacts, and establish a Circular Economy.

The national Resources and Waste Strategy⁵ (RWS) was published in 2018, and includes many new proposals that will change how local authorities deliver recycling and waste services, and how communities interact with them. These include the setting up of a Deposit Return Scheme (DRS) for drinks containers, extended producer responsibility (EPR) for the costs of managing packaging waste, and establishing more consistent household and business recycling services across the country (Consistency). Further discussion of these issues can be found in Section 3.2.1.

The Government launched a second round of consultations on the DRS, EPR and Consistency proposals in the spring of 2021. This Joint Strategy has included consideration of, and assumptions on, the direction of travel for the development of these proposals, and the actions and priorities set out within the document include further review of the final course of action that the Government decides upon for implementing the RWS.

The Mayor of London also published the London Environment Strategy⁶ (LES) in 2018, which covers a broad range of environmental issues including waste management. The LES includes an aspiration for London to be a 'zero waste city' by 2050. The regional waste policies contained within the LES are similar to the national Consistency proposals, and waste authorities in London must demonstrate 'general conformity' with them.

The national and regional strategies both set ambitious targets for reuse and recycling, which East London will contribute towards. These are explained in Chapter 4 of this Joint Strategy, which also covers local priorities and aspirations, whilst the range of national and regional policies and proposals that have come forward are covered in more detail in Chapter 3.

Local policy issues including commitments to reduce carbon emissions and improve air quality will also need to be taken into consideration and will help to inform the way that we manage waste materials in the future.

1.3.4 Economic

Local authorities have faced a challenging financial situation in recent years, and the Covid-19 pandemic has put extra pressure on budgets locally as demand for some services has increased while income from other activities has dropped. The long-term effects of the pandemic are not yet known, but the disruption to the national economy, along with accelerated changes to how many people live and work, are likely to mean that some adverse effects on local authority finances will continue. The Partner Authorities need to deliver waste collection and treatment services in the most cost-effective way, in order to protect other frontline services that residents value.

The existing long-term waste treatment contract (see below) has prevented the Partner Authorities from gaining the financial savings that other local authorities have been able to through increasing recycling, and the overall costs for treatment of the waste and recycling collected have generally been higher for the Partner Authorities than in many parts of London.

⁵ [Resources and waste strategy for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/681212/resources-and-waste-strategy-for-england.pdf)

⁶ [London Environment Strategy - GLA](https://www.london.gov.uk/what-we-do/environment/london-environment-strategy)

When this contract ends in late 2027, the Partner Authorities will have the opportunity to start making savings on waste treatment by diverting more material for recycling, and may also be able to access cheaper solutions for managing the residual waste. To make the best of these opportunities, it is important for the Partner Authorities to work together to consider what mix of collection and treatment services will provide the most cost-effective solutions overall, taking into account local priorities and needs. The development of this Joint Strategy is the first stage in that process.

1.3.5 Contract Situation

The current long-term waste treatment contract started in 2002, and was designed to achieve high levels of diversion of waste from landfill. This was consistent with national policy at the time, and the contract was supported by the Government through the implementation of a Private Finance Initiative model. The operator of the contract, Renewi (formerly Shanks Waste Management), has achieved and indeed significantly exceeded the targets set on landfill diversion, and at the time of writing this Joint Strategy less than 1% of the Partner Authorities' waste goes to landfill (a reduction from 3% in 2018/19).

Unfortunately, the structure of the contract has made it more difficult to increase recycling in the Partner Authorities' area, and local recycling performance has fallen behind the rest of the country. The financial savings that other local authorities can achieve by increasing recycling are not available under the structure of the contract, and the range of materials that can be collected for recycling has also been limited by the infrastructure that was built in the mid-2000s to support local waste treatment.

Renewi is working with the Partner Authorities to try to improve local recycling, including supporting initiatives to introduce a wider range of materials into household recycling collection services. The company's annual budget and service delivery plans⁷ include a number of projects designed to help the Partner Authorities meet and exceed a local 33% recycling target, with partnership working across the region intended to improve household collections, increase the quality of the recycling collected through reduced contamination, recover even more materials from the residual waste, and increase reuse and recycling at the four Reuse and Recycling Centres. The local recycling target was expected to be achieved by 2021, but the impacts of the Covid-19 pandemic unfortunately meant that this was just missed. At the time of writing this draft Joint Strategy, it is anticipated that this target will be met or exceeded in 2022. [Paragraph to be updated for final Joint Strategy]

The Partner Authorities will be working with Renewi to continue to improve local recycling services and performance to the end of the contract in 2027, including identifying opportunities to take full advantage of the changing policy landscape. There will also be work done to mitigate national changes that are expected on how local recycling rates are calculated, which may see a significant portion of the material recovered by Renewi from residual waste no longer being counted towards this performance and reducing local recycling rates by up to 5%.

⁷ [ELWA's Strategy « East London Waste Authority](#)

1.4 Producing a Joint Strategy – Aims and Objectives

With the end of the long-term waste treatment contract approaching, and the significant changes coming forward on resources and waste policy, the Partner Authorities agreed that the development of a new Joint Strategy for East London would be an important first stage in planning for the future.

To develop the Joint Strategy, a series of basic questions were posed that would need to be answered for the Partner Authorities:

- What is our current situation?
- How much waste will there be to manage in the future, and what will its composition be?
- How much can we reduce the amount of waste that is generated?
- How much waste can we divert for reuse or repair?
- How much of the waste can we recycle or compost?
- How will we manage the treatment of the waste collected for recycling or composting, as well as the waste that cannot be recycled?

The following aims and objectives (displayed overleaf) were developed by the Partner Authorities for the Joint Strategy to provide a clear outline of what needs to be achieved in the future. The priorities for the future which are detailed in Chapter 4 are based on the aims and objectives.

Joint Strategy Aims

The aims of the Joint Strategy are:

- A1. to promote and implement sustainable municipal resources and wastes management policies in East London as part of our contribution to transitioning to a more Circular Economy;**
- A2. to minimise the overall environmental impacts of resources and wastes management;**
- A3. to engage residents, community groups, local business and any other interested parties in the development and implementation of the above resources and wastes management policies; and**
- A4. to provide customer-focused, cost-effective, best value services.**

Joint Strategy Objectives

The objectives of the Joint Strategy are:

- O1. to minimise the amount of municipal wastes arising;**
- O2. to maximise reuse, recycling and composting rates;**
- O3. to maximise the diversion of resources and wastes from landfill, particularly organic materials that would produce greenhouse gases;**
- O4. to co-ordinate and continuously improve municipal wastes minimisation and management policies in East London;**
- O5. to manage municipal wastes in the most environmentally benign and economically efficient ways possible, including reducing greenhouse gas emissions, through the provision and co-ordination of appropriate resources and wastes management facilities and services;**
- O6. to ensure that services and information are fully accessible to all members of the community;**
- O7. to maximise all opportunities for local regeneration and increased social value benefits from waste and resource management, including employment, skills and wellbeing; and**
- O8. to ensure an equitable distribution of costs, so that those who produce or manage the waste pay for it.**

2 What is our Current Situation?

This chapter provides a snapshot of services delivered and performance at the time of writing the Joint Strategy (spring 2021).

Data and information to support the development of the Joint Strategy was taken from the last full year of service that was available when the development of the document started (namely 2018/2019) and has been used to understand current performance but also provide a baseline for future projections. Any updates to this have been highlighted within this chapter.

Development of the Joint Strategy began in late 2019, and continued during the Covid-19 pandemic. The pandemic has had an effect on the amount (quantities) and type (composition) of waste produced, and the Partner Authorities continue to monitor these changes. However, the Partner Authorities believe it is too soon to forecast with confidence what the longer-term impacts on local waste quantities and composition will be.

2.1 Our Area

The London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge cover an area of 93 square miles, bordering the historic East End, the edges of Epping Forest, rural Essex and the River Thames. The 1.1 million residents live in 425,000 households, spread over a diverse mix of districts that include large housing estates, dense terraces, detached suburban streets, and small villages. There are also significant pockets of commercial land, active farms, and large industrial zones. The area is seeing a great deal of regeneration, spurred on by the 2012 Olympics, the imminent arrival of Crossrail services, and the repurposing of land next to the Thames. Further details on what East London could look like in the future can be found in Chapter 3.

The local community is vibrant, diverse, and ever changing. Residents come from a wide range of cultures and backgrounds, and the development of new housing is attracting many more people to the area. As is commonplace in London, an increasing number of people are renting rather than buying their homes, which contributes to relatively high levels of population transience (meaning people move more regularly). The population density varies significantly from neighbourhood to neighbourhood, but is generally increasing across the area as more new homes are provided in blocks of flats than houses.

2.2 How We Currently Manage Resources and Waste

2.2.1 Collections

2.2.1.1 Regular Household Collections

The four Constituent Councils all provide a weekly residual waste collection for residents, with more frequent services for some blocks of flats where space for bins is limited, and also on high streets where residents need to put their waste out on the street in bags. Commercial waste collections for businesses are currently offered by three of the four Constituent Councils.

Collections of 'dry' recycling, which mainly includes paper, card, plastic bottles, tins and cans, are provided on a weekly or fortnightly basis. Opportunities to improve local recycling services and collect a wider range of materials are being explored, and at the time of writing this Joint

Strategy work is underway to begin allowing a wider range of materials to be accepted in recycling collection services.

Garden waste collections are provided by all four Constituent Councils to meet local needs.

Some of the Partner Authorities also collect additional materials for recycling from households, such as Havering's service for small electronic appliances and batteries. Commercial recycling services are currently offered in two of the four boroughs (as well as by private waste contractors), and there is a network of public recycling banks around the area that residents can use to recycle more materials, including glass.

Residents can book bulky waste collections for larger items like furniture and white goods, with some items being separated so they can be recycled. Some of the Partner Authorities also have additional arrangements in place to allow bulky items to be diverted from disposal, such as Barking & Dagenham's partnership with an online electrical retailer to provide a free collection scheme for specific bulky items that can be reused and repaired.

There are also special collections available for household collections of clinical waste and hazardous waste.

Unlike many other parts of London, the Partner Authorities benefit from some materials being recovered for recycling from the residual waste, such as glass, metals, and the dried residue of food and garden waste. The recovery of these materials currently counts towards local recycling performance, but the Government has indicated that there may be changes to how local recycling rates are calculated in the future that could see the contributions from some of these recovered materials no longer counting. Further information is awaited from the Government on this issue.

2.2.1.2 Street Cleansing and Parks Waste

The four Constituent Councils collect waste from street cleansing operations, including the contents of litter bins, material swept off the street, and larger items that have been cleared from fly-tips.

Similar waste is also collected from the parks managed by the four Constituent Councils, along with material similar to household garden waste (where it is not composted at the parks themselves).

2.2.1.3 Reuse and Recycling Centres

ELWA provides four Reuse and Recycling Centres (RRCs), with one in each Borough. These are available for residents to use free of charge to deposit a wide range of materials for reuse, recycling or disposal. Three of the RRCs are also available for businesses to pay to use, through a direct arrangement with the operator of the sites.

2.2.2 Waste Treatment

ELWA is responsible for providing treatment services for the waste the four Constituent Councils have collected from households, businesses, and through street cleansing. These treatment services are provided through a long-term integrated waste services contract with Renewi, which ends in late 2027.

Much of the dry recycling (paper, card, tins, cans, plastic bottles, etc.) is collected in one bin or bag, so has to be sorted before each type of item can be sent off for recycling into new products. This sorting is done at a Materials Recovery Facility (MRF). Separated materials are then sent to reprocessing facilities that can recycle them into new products, and materials that can't be recycled (contamination) are sent for treatment (predominantly to be used as a fuel for electricity generation and district heating elsewhere).

Figure 4: How Waste and Resource Management works within the Partner Authorities' area



Recycling from bring banks and some household collections do not require sorting and are able to be sent directly to reprocessors for recycling.

Garden waste is sent to industrial composting facilities, which produce a high-quality product that can be used to improve soil on agricultural land. This reduces the demand for fertiliser made using fossil fuels, helping to reduce greenhouse gas emissions and other pollution.

Some recyclable materials, such as electrical items, metal and wood, are extracted from the bulky waste that is collected from residents, so that these can be sent away for reprocessing into new products. The remaining bulky waste is shredded to make a fuel to be used for electricity generation and district heating elsewhere.

The residual waste is processed through two Mechanical-Biological Treatment (MBT) facilities, located at Frog Island (Havering) and Jenkins Lane (Newham), which opened in the

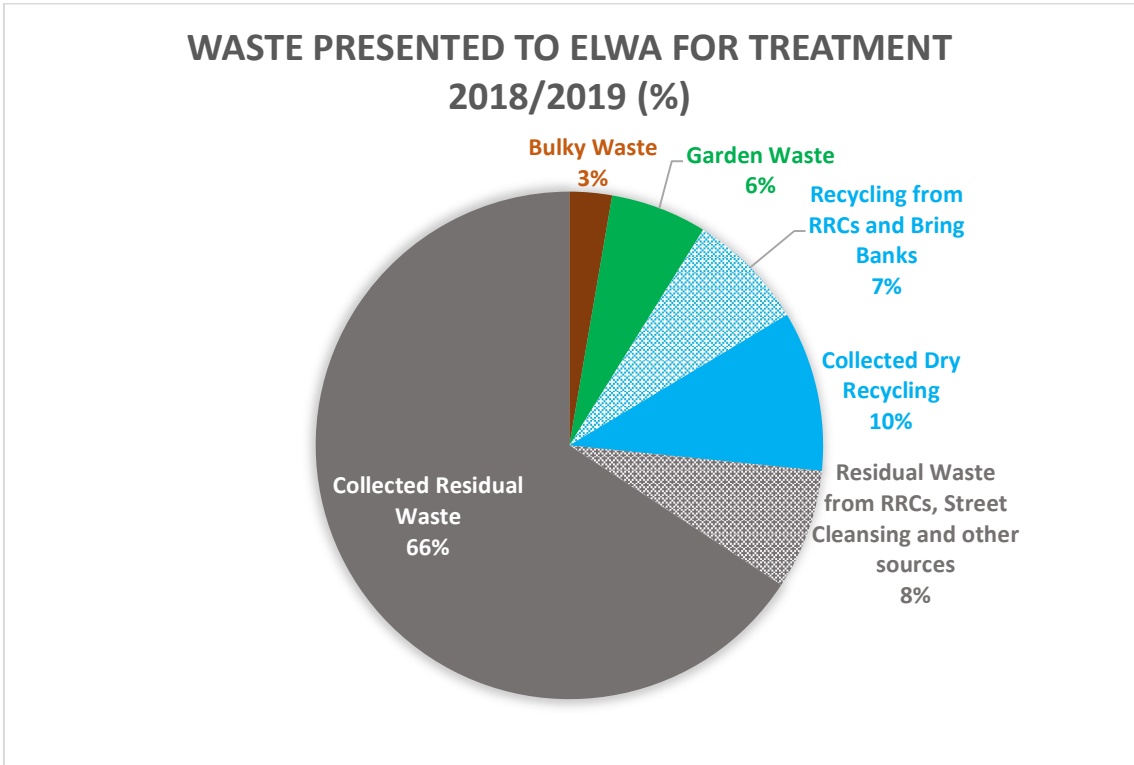
mid-2000s and are paid for through the current 25-year contract. The MBT system works by drying out the waste through natural processes similar to composting, where the organic content of the waste (mostly food) decomposes and produces heat. This drives off a lot of the moisture in the waste over the 10 to 14 days it spends in the drying halls at the MBT facilities, reducing the overall weight by about 30% (21% of total waste arisings including recycling). The dried waste is then put through a series of devices to recover some recyclable materials, such as glass, metals, and the solid residue of the food waste. These are sent off for re-processing, whilst the remaining waste is used as a fuel for electricity generation and district heating elsewhere. A short video of the process was produced by Newham Council, and is available on YouTube⁸.

2.3 How Much Waste Do We Manage?

The Partner Authorities currently manage approximately 450,000 tonnes of waste per year, which comes from a number of sources including households, businesses, Reuse and Recycling Centres (RRCs), on-street bring banks and street cleansing.

Figure 5 displays the percentage proportion of each waste type presented to ELWA for treatment in the 2018/19 financial year.

Figure 5: Waste presented to ELWA for treatment 2018/2019 (%)



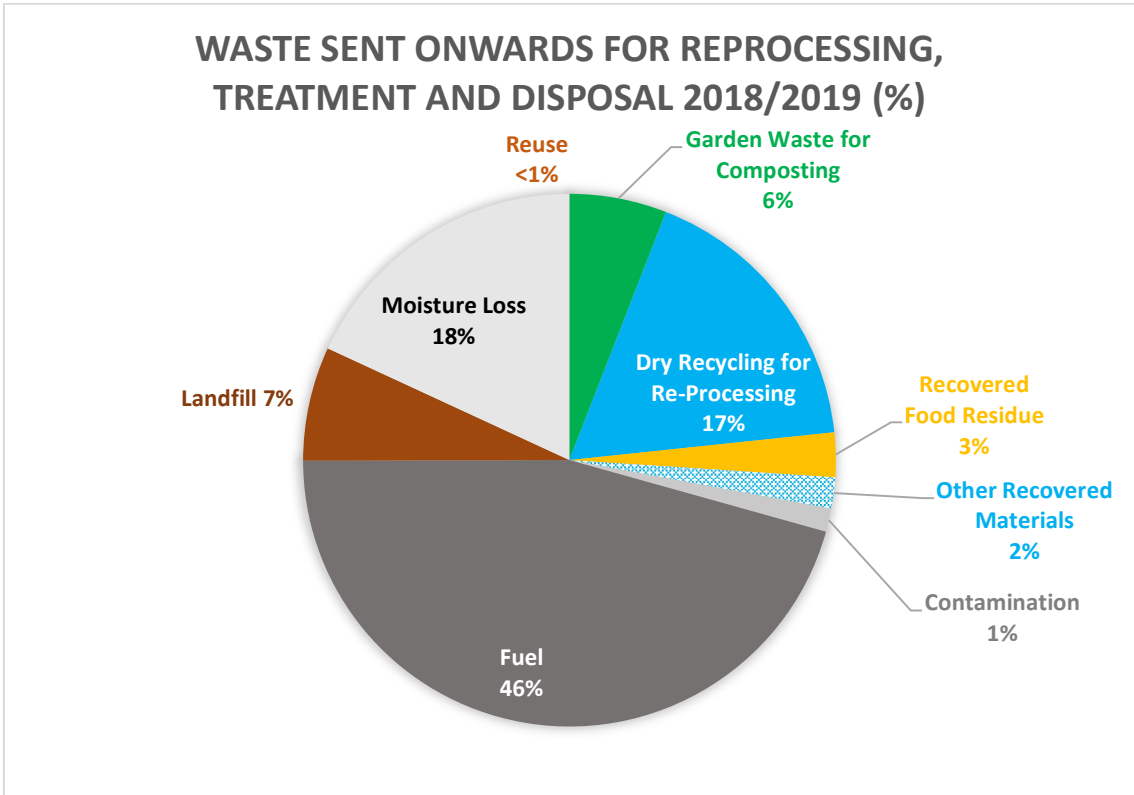
Once the collected materials are bulked together at a local transfer station or undergo initial treatment, they leave the ELWA facilities for onward treatment and reprocessing.

⁸ [What happens to your rubbish in Newham - YouTube](#)

Around 300,000 tonnes of residual waste is processed through the two MBT plants each year, whilst around 43,000 tonnes of mixed dry recycling is sorted at a number of different MRFs. The garden waste is sent to composting facilities, and the materials residents have put into bring banks or taken to the RRCs are sent to other re-processors to be turned into new products.

Figure 6 displays the amount (percentage) of waste and recycling from all ELWA facilities sent onwards from ELWA for reprocessing, treatment and disposal. It includes the moisture loss from the MBT process which results in an overall weight (tonnage) reduction of waste being sent on for further treatment compared to what was collected.

Figure 6: Waste and Recycling sent onward from ELWA for reprocessing, treatment and disposal (%)



2.4 What's In Our Waste

To be able to understand how best to plan future waste collection and treatment services, including how recycling performance could be improved, it is important to understand in more detail what amounts and types of waste residents are currently producing.

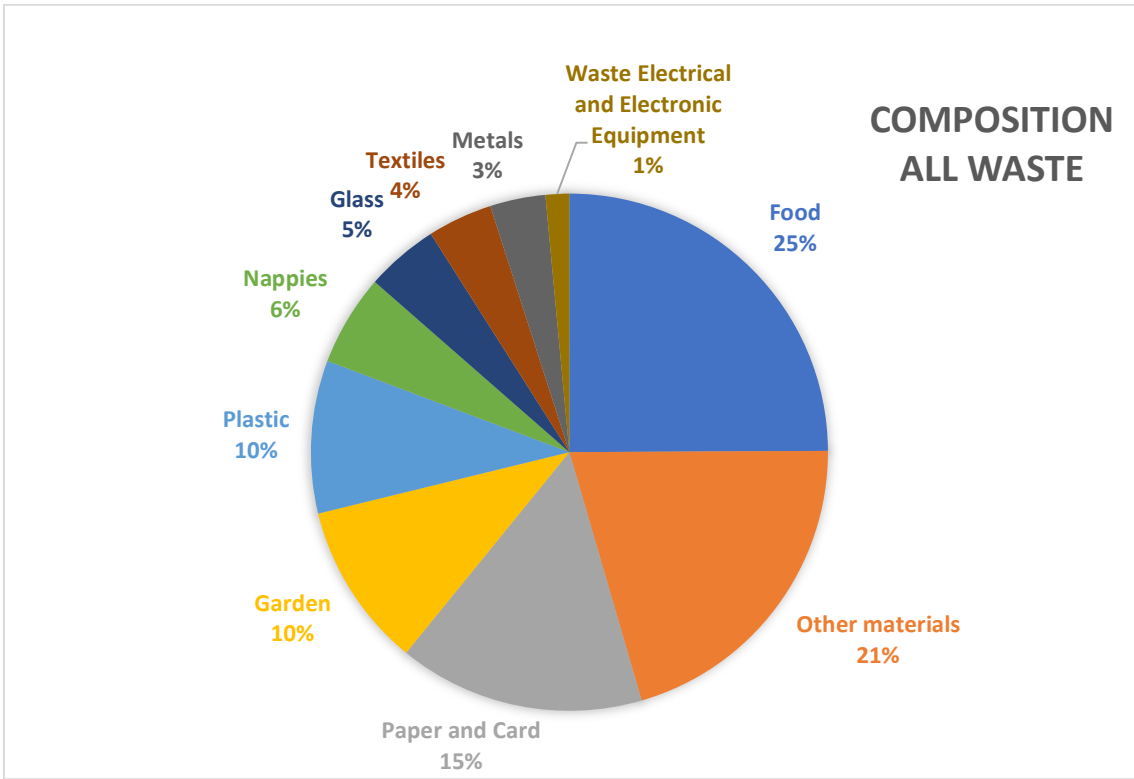
The last time a detailed analysis of the composition of waste managed by the Partner Authorities took place was in 2016, and the charts below show the results from that study. Figure 7 provides the composition of the household waste that was sampled (recycling and residual waste), whilst Figure 7 provides the composition of the residual waste only. This is particularly important as it helps the Partner Authorities to understand how much waste that could have been recycled is still being disposed of in residual waste.

The analysis carried out in 2016 revealed that there is a large amount of food waste being produced and disposed of as residual waste within the Partner Authorities’ area. This is common to many parts of the country, but it shows that a significant difference to the amount of residual waste being produced could be made by helping local residents to reduce food waste. According to the environmental charity WRAP, the average family of four can save just over £60 per month⁹ by reducing their food waste, whilst preventing food waste would have significant environmental and cost benefits.

Data from the residual waste composition analysis also shows that large amounts of paper and card, plastics and metals are being thrown away which could have been recycled.

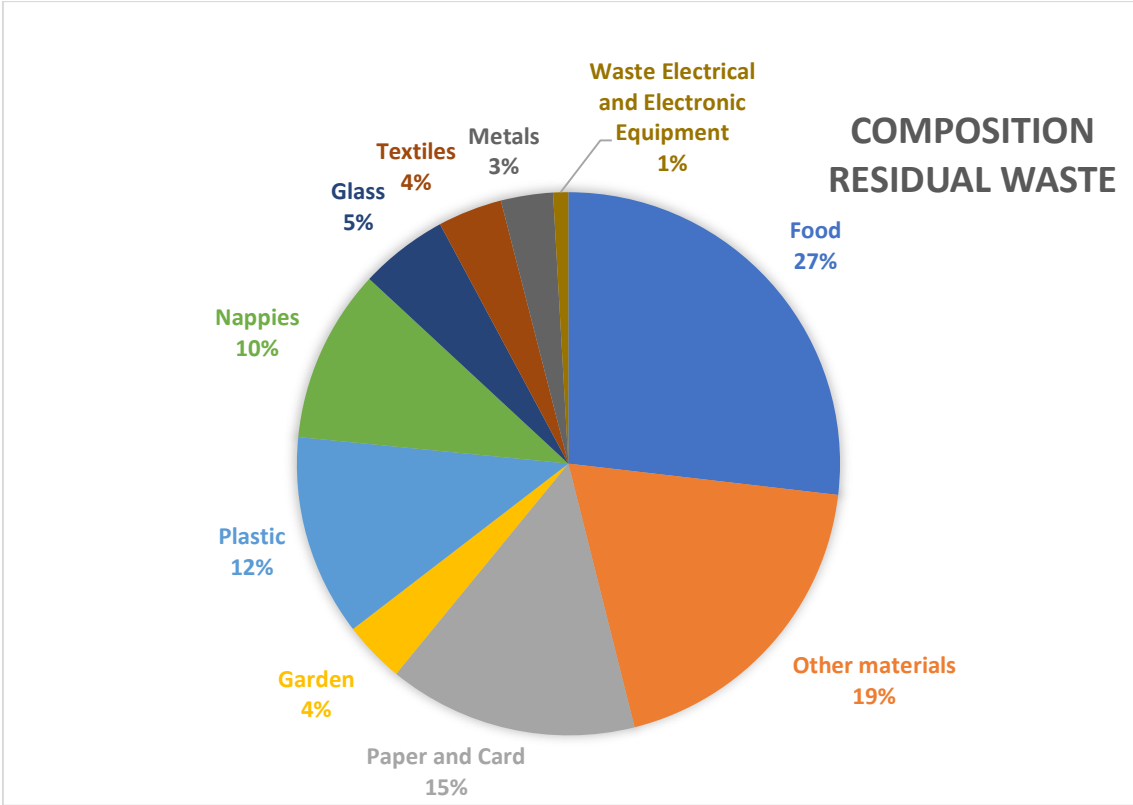
A further composition analysis will be conducted in 2021.

Figure 7: Waste Composition Analysis Results 2016 – All household waste



⁹ [Why Save Food | Love Food Hate Waste](#)

Figure 8: Waste Composition Analysis Results 2016 - Residual Waste



2.5 Our Current Performance

The Partner Authorities' area faces some considerable challenges relative to other parts of England and London in achieving the high recycling rates and reductions in residual waste more widely achieved elsewhere.

One of the main challenges is ELWA's current long-term waste treatment contract. This was innovative when it first began in 2002 and means that very little residual waste is landfilled (which is environmentally beneficial). However, over time it has become restrictive for the Partner Authorities and has meant that it has not been economically viable to achieve the same high levels of performance on recycling as other parts of the country.

2.5.1 Barriers to Recycling

A number of studies have identified common barriers to recycling, many of which are applicable to the Partner Authorities' area. Within the WRAP Barriers to Recycling at Home¹⁰ study the following universal barriers were identified:

¹⁰ [WRAP Barriers to Recycling at Home](#)

Situational barriers – including not having adequate containers, a lack of space for storage, unreliable collections, unable to get to bring sites;

- Lack of space for storage within a property is a common challenge for those residents living in flats or in Houses of Multiple Occupancy (HMOs)

Behaviour – for example household disorganisation, being too busy with other preoccupations, difficulties in establishing routines for sorting waste and remembering to put it out on collection day;

- Examples of behavioural barriers include putting things in the recycling even if the unsure if it can be recycled, which can cause contamination of the recycling

Lack of knowledge – such as knowing what materials to put in which container, and understanding the basics of how the scheme works; and

- High levels of transience (residents moving often), combined with a lack of information provided to tenants about services, can limit recycling

Attitudes and perceptions – such as not accepting there is an environmental or other benefit, resistant to householder sorting, and not getting a personal motivational reward from recycling.

- Ease of throwing everything into one bin combined with not having anywhere to store recycling can limit recycling

WRAP's Recycling Tracker¹¹ identifies that age profiles and home ownership affects recycling rates. Residents between 18-35 record lower rates of recycling, and home owners tend to recycle more than people who rent their homes.

ReLondon has produced a report about recycling in flats¹², which noted that people who live in these types of property recycle much less than those who live in houses.

Across the area, the levels of garden waste collected are relatively low because many properties in the region have very small or no gardens, with the lack of a garden becoming even more common due to the increasing number of blocks of flats. Garden waste often makes a large contribution to the recycling rates in higher performing parts of the country.

However, despite the barriers identified, the Partner Authorities aspire to improve recycling rates in the future with the support of the community and businesses. Some of the current initiatives that the Partner Authorities are working on are covered below in section 2.6. The Joint Strategy is looking at how significant improvements in performance can be achieved beyond this once the current waste treatment contract comes to an end in 2027.

2.5.2 Reuse, Recycling and Composting

As a consequence of the factors detailed above, East London has some of the lowest recycling rates in the country.

A particular concern for the Partner Authorities is the amount of contamination in the recycling.

¹¹ [WRAP Recycling Tracker 2020](#)

¹² [Report - Making recycling work for people in flats | ReLondon](#)

Contamination is the name given to non-recyclable material that residents incorrectly put out for recycling, or recyclable materials which are placed in the wrong bin (e.g. textiles need to be placed into a recycling bank or donated locally, rather than into household recycling bins and bags). Contamination has to be sorted out from other recyclable items before being sent away for disposal. Some types of contamination are particularly problematic, as they can also damage other materials that would otherwise be able to be recycled. Tissues, nappies and food waste are examples of this type of contamination, and they are especially damaging to paper and card when put into the same recycling bin or bag.

Figure 9: Percentage of household waste sent for reuse, recycling 2018/2019 – NI192
Partner Authorities

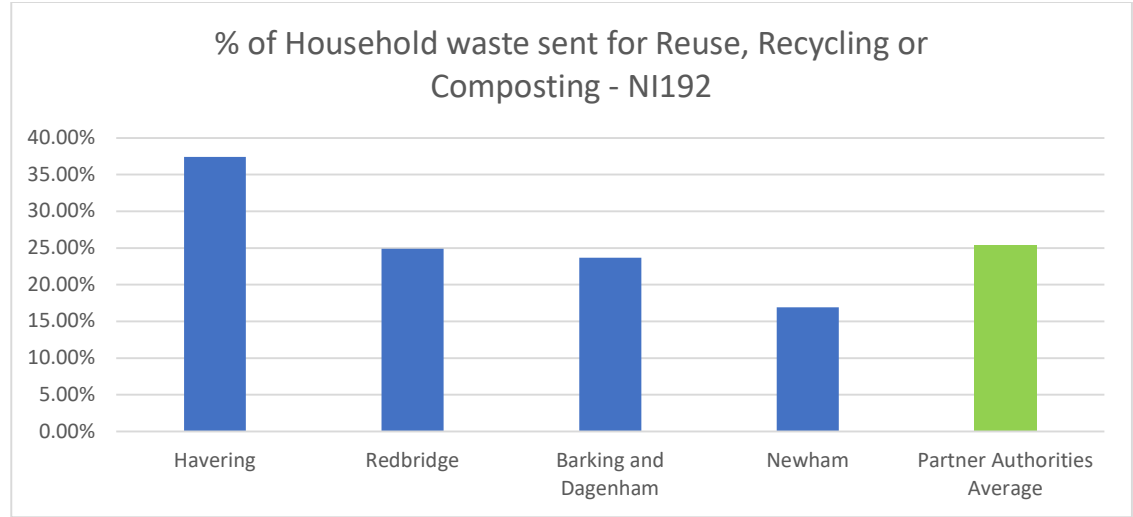
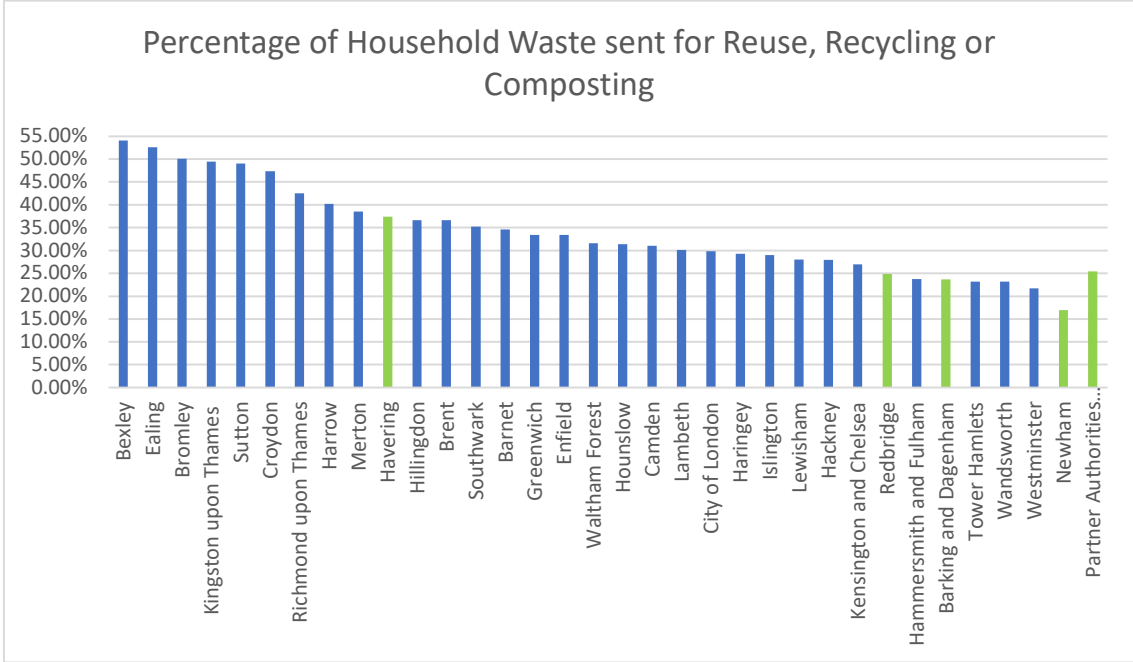


Figure 10: Percentage of household waste sent for reuse, recycling 2018/2019 – NI192 for all London Boroughs and the City of London



2.5.3 Waste Generation

The Partner Authorities’ area has some of the highest levels of waste generation in London. The relatively low recycling rates also contribute to the larger amounts of residual waste collected in the area.

Figure 11 displays the total weight of all household waste per head of population, and Figure 12 displays the total weight of residual household waste per household, compared to the other London Boroughs and the City of London.

Figure 11: Total household waste per head (kilograms/head/year) 2018/2019 – for all London Boroughs and the City of London

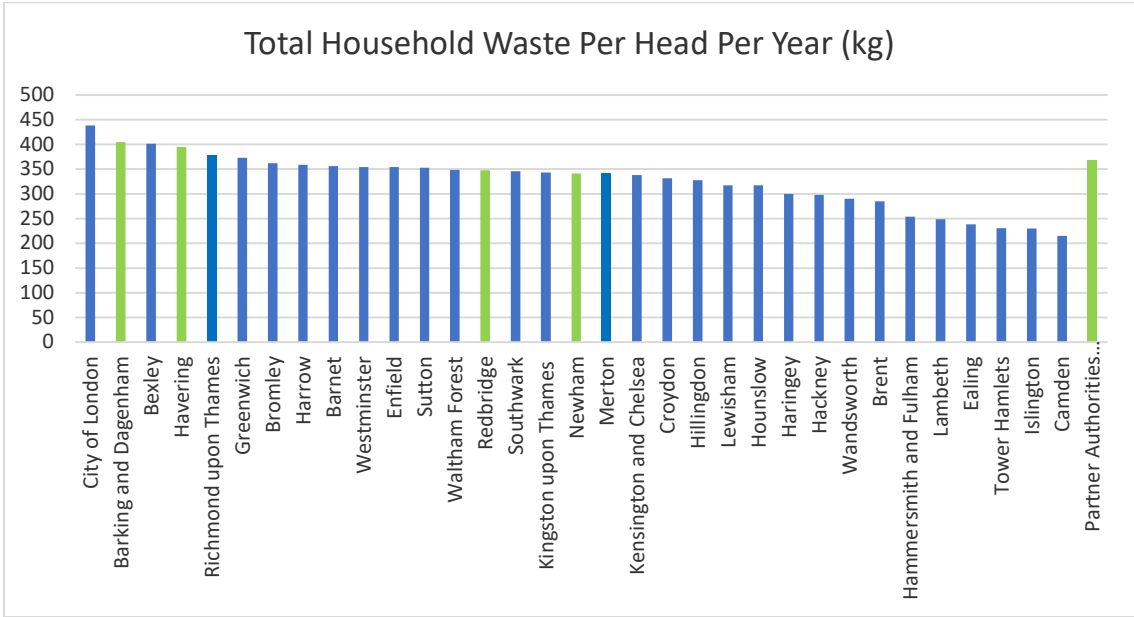
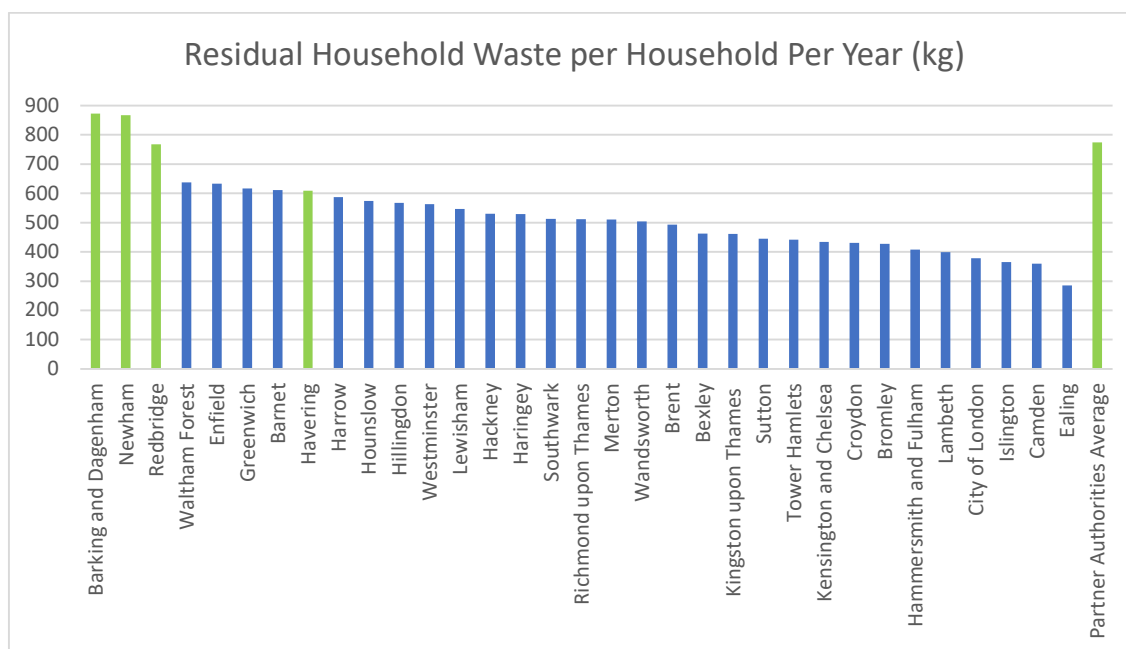


Figure 12: Residual waste per household (kilograms/household/year) 2018/2019 – NI191 for all London Boroughs and the City of London



2.5.4 Landfill Diversion

The Partner Authorities' area achieves a high rate of diversion of waste from landfill due, in large part, to the treatment of residual waste by the MBT facilities described above in section 2.2.2. Other items that may once have been more commonly sent to landfill, such as discarded furniture, are also now treated in a similar way to recover recyclable items and create a fuel from the remaining material. The performance in the baseline year for this Joint Strategy, landfill diversion was 92.4% compared to a London-wide average of 90.5%. However, this has since been increased to more than 99%. In recent years ELWA has been working closely with its contractor Renewi to improve the recovery of recyclable materials from the residual waste at the MBTs. Renewi has also worked hard to establish long-term arrangements for using the fuel it creates from the residual waste, which has resulted in great improvements in landfill diversion. Renewi is continuing to invest in its facilities to improve performance.

2.6 How We Are Improving

Although there are some considerable challenges to overcome, the Partner Authorities have been working for some time to improve performance on waste reduction, reuse and recycling.

The four Constituent Councils have each produced Reduction and Recycling Plans¹³ (RRPs), which have been submitted to the Mayor of London. These explain how they will reduce waste, increase reuse and improve recycling, working with ELWA and other stakeholders, as part of contributing to the goals and targets in the London Environment Strategy.

In line with their RRP, Constituent Councils are exploring how to improve local recycling services before the end of the current waste treatment contract, including options for starting to collect a wider range of materials. in order to align more closely with the Mayor of London's

¹³ [Waste Reduction and Recycling Plans – London Datastore](#)

minimum service standards¹⁴¹⁵. There are also projects planned or underway to try to get more residents to start recycling properly, separating more of their recyclable waste and reducing contamination.

2.6.1 Reduction and Reuse

There have been a number of projects and initiatives in East London to reduce waste and increase reuse. These include offers of discounted home composting bins for residents, discounts or promotions on reusable nappies, campaigns and workshops focused on reducing food waste, and 'give and take' days that enable residents to donate items they no longer need while also having the opportunity to find products that they would otherwise have to buy.

The work on waste reduction and reuse has now been developed into the Waste Prevention Programme, which is being delivered collectively by the Partner Authorities. This is focusing on some core materials, such as food waste, furniture, clothing, nappies and electronics, with a number of projects and new services being introduced to help residents reduce waste and save money.

2.6.2 Community Engagement

The Partner Authorities understand the importance of working with communities to reduce waste, increase reuse and improve recycling. There are teams dedicated to community engagement on waste and recycling, visiting residents at their homes, attending community meetings, and running events and roadshows. During the Covid-19 pandemic these teams have made use of online platforms (such as Zoom and Microsoft Teams) to continue this work, providing opportunities for residents to learn how to waste less and recycle more even during the most challenging times.

ELWA and the Constituent Councils also work closely with Renewi and Renewi's communications partner Keep Britain Tidy to deliver a programme of education in schools and community engagement on waste reduction, reuse and recycling.

The Partner Authorities have supported national and regional campaigns on waste reduction, reuse and recycling, including Recycle Week, Compost Awareness Week, Real Nappy Week, Recycle for London/London Recycles, and Love Food Hate Waste.

3 What Might the Future Look Like?

3.1 The Partner Authorities' Area in the Future

The Partner Authorities' area has been a focus for regeneration for several decades, and major new developments are planned or in progress across the region. The opening of new transport links in the late 1990s and the staging of the London Olympics in 2012 resulted in a rapid pace of new development in the west of the area particularly, whilst the imminent arrival of Crossrail is helping to drive similar changes elsewhere in the region.

The demand for new housing in London has put extra pressure on the land available, so most new housing being developed is in higher-density developments. New areas are being opened up for housing development for the first time, particularly along the River Thames and the region's major transport corridors, whilst new commercial zones are also coming forward. The area is a particular focus for new 'green industries' moving into the capital, spurred on by the excellent air, road, rail and water transport options.

3.2 Resources and Waste Management in the Future

As mentioned in Chapter 2, there are a number of policy drivers that will influence how the Partner Authorities manage resources and waste in the future. These are covered in more detail within this chapter.

3.2.1 Policy Landscape

3.2.1.1 Overview

In its **25 Year Environment Plan**¹⁶ (Jan 2018), the Government set out its ambition to improve the environment within a generation. This included adopting policies within Government Strategies to use resources from nature more sustainably and efficiently, and managing pressures on the environment by minimising waste. Specifically, with relevance to this Strategy, it sets out the following policies:

- Maximising resource efficiency and minimising environmental impacts at end of life
- Achieving zero avoidable plastic waste by the end of 2042
- Reducing food supply chain emissions and waste
- Reducing litter and littering
- Improving management of residual waste
- Cracking down on fly-tippers and waste criminals

The Plan highlights the importance of taking a natural capital approach when developing and implementing policy.

¹⁶ [25 Year Environment Plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/25-year-environment-plan)

The 25 Year Environment Plan is supported by a number of strategies including:

- **Clean Growth Strategy**¹⁷ – which commits to exploring new and innovative ways to manage emissions from landfill
- **Industrial Strategy**¹⁸ – which looks at major projects and encouraging consumers to look at the whole life value of a product
- **Litter Strategy**¹⁹ – which outlines how the Government will work with groups and businesses to reduce litter
- **Resources and Waste Strategy**²⁰ – which demonstrates the Government’s ambitions to move to a more circular economy
- **Waste Prevention Plan** – being consulted on in 2021²¹

The **Resources and Waste Strategy** (RWS, 2018) combines the Government’s pledges with the commitments it has made through the adoption of the EU Circular Economy Package²². The RWS is guided by two overarching objectives:

- To maximise the value of resource use; and
- To minimise waste and its impact on the environment.

The RWS will contribute to the delivery of five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

3.2.1.2 What Does This Mean for the Partner Authorities’ Area?

The Environment Bill will bring into law a number of key policies set out in the RWS. At the time of writing this Joint Strategy the Environment Bill is still passing through parliament, and new consultations on three key policies from the RWS were launched in the spring of 2021. Although they are not fully defined, several have already been identified as being important for the Partner Authorities to consider:

¹⁷ [Clean Growth Strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/clean-growth-strategy)

¹⁸ [The UK's Industrial Strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/industrial-strategy)

¹⁹ [Litter Strategy for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/litter-strategy)

²⁰ [Our waste, our resources: a strategy for England \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/our-waste-our-resources-a-strategy-for-england)

²¹ Note that the London Environment Strategy also contains Waste Prevention objectives (7.1) and a plan for London is expected to follow the national plan.

- **The introduction of a Deposit Return Scheme (DRS) for drinks containers, to incentivise recycling.** Under the proposals consumers would pay a deposit for items like bottles and cans, which they could reclaim by returning these containers to shops or new 'Reverse Vending Machines' (RVMs) which would be located in supermarkets and other relevant locations.
- DRS systems increase recycling rates and can also reduce litter, but how the proposed system will interact with local authority collections, and whether the additional recycling can be counted towards performance locally, is unclear. There also remains a question about potential future revenue loss from the sale of these materials, if drinks containers are diverted from local authority collection systems.
- **Standardising recycling collections from businesses and households.** This will set requirements for local authorities to provide separate collections of food waste for composting and specify the range of materials to be included in recycling collections. These mirror the minimum standard requirements for household waste collection services set out in the London Mayor's Environment Strategy. Requirements on businesses to separate waste for recycling and composting are also proposed.
- Under the Consistency proposals all of the Constituent Councils will need to conduct assessments on the delivery of the required services and, notably, the degree to which materials should be collected separately from each other for recycling to satisfy tests set by Government.
- **Extended Producer Responsibility (EPR) for packaging.** This will require businesses in the packaging production and retail chain to pay for the costs of managing their waste packaging and includes a number of initiatives to make packaging more recyclable. EPR may provide an opportunity for additional funds for local authorities to support collection and recovery of packaging. This is to be consulted on by Government.

The Environment Bill as drafted enables DRS schemes and producer responsibility regimes for other materials to be brought forward by the Government in the future.

Other key provisions of the RWS relevant to this strategy include:

- **A tax on plastic packaging containing less than 30% recycled content** – In addition to the EPR and DRS proposals, which both include some focus on improving the management of plastic waste, the Government has introduced from April 2022, a tax on plastic packaging that contains less than 30% recycled plastic, and will use regulations to phase out single use unrecyclable packaging and place bans on the sale of other items such as drinking straws.
- **Ways of measuring performance beyond recycling rates** – The Government is exploring new ways to monitor the performance of resources and waste management systems, to try to better capture wider environmental impacts. This could include moving away from weight-based targets such as recycling rates, which can incentivise the recycling of heavier materials instead of those that offer greater environmental

benefits through recycling.

- The Partner Authorities will continue to measure performance using a range of metrics and will lobby Government to consult on the use of a carbon metric (and other proposed metrics). Further details on performance measurement can be found in Chapter 6.

3.2.2 Resource Efficiency and Scarcity

The natural resources we use are valuable, and as the population of the world increases, the demand for these resources will rise. This will put more pressure on the environment as new sources of these resources are explored, and will also increase the costs for using them.

With the harm we are doing to our environment becoming more severe, and increasing competition around the world for the natural resources we have already extracted, finding ways to use those resources more efficiently will continue to be an urgent priority. Reducing our overall consumption of resources is of the utmost importance, whilst ensuring that materials that are in circulation keep their value and continue to be used again and again will minimise the demand for extracting more from nature. Reducing our waste and reusing or recycling as much as possible are both vital to improving the efficiency of our use of natural resources.

Over time some of the resources we value will start to become scarce, as natural sources get depleted and the costs of finding more become prohibitive. Retaining resources we already have access to by reusing and recycling our waste will help to minimise the pressures that resource scarcity could create.

3.2.3 Greenhouse Gas Emissions

Climate change has become one of the most important concerns for governments and communities around the world, and the role that humans have played in causing it is now well understood. Taking action on climate change is an international priority, and is likely to continue to increase in importance as the effects of the global warming we are already seeing become more apparent. This strategy is being developed in the year that the 26th UN Climate Change Conference of the Parties (COP26) is being hosted in the UK (Glasgow).

The principal focus is on reducing the emissions of a range of 'greenhouse gases', such as carbon dioxide and methane, that are responsible for the rising global temperatures and subsequent disruptive effects on the climate and weather systems. The UK Government has set ambitious targets²³ to cut greenhouse gas emissions by 68% by 2030 (based on 1990 levels). This target is amongst the highest in the world, and commits the UK to cut emissions at the fastest rate of any major economy so far. Everyone has a role to play in achieving this target, and there are implications for all industry sectors. The national resources and waste policy aims to reduce carbon emissions and protect the wider environment by encouraging citizens to reduce consumption and subsequent waste, reuse what we can and recycle materials to retain the value.

²³ [UK sets ambitious new climate target ahead of UN Summit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit)

Reducing emissions is also a regional and local priority. The London Environment Strategy sets out a number of actions for reducing emissions through changes to our buildings, how we travel, the provision of parks and green spaces that can absorb some greenhouse gases, and how we consume and dispose of products. The Emissions Performance Standard (EPS) measures greenhouse gases released from London's local authority waste management activities and forms a core part of the Mayor's London Environment Strategy. The EPS aims to achieve significant carbon dioxide (CO₂) emission savings from the management of London's local authority waste. The EPS focuses on treatment of waste with an emphasis on recovering materials which deliver greater CO₂ reductions. The EPS sets targets that London Boroughs are expected to contribute to through their RRP, and defines a Carbon Intensity Floor²⁴ (CIF) that residual waste solutions must meet. The Partner Authorities are all developing plans for cutting emissions arising from their own operations, as well as identifying ways that they can work with local communities to help residents play their part such as encouraging sustainable consumption.

In urban areas in particular, including East London, air quality is another important issue that is being tackled as the effects on human health of certain pollutants become clearer. Many of the activities that emit greenhouse gases are also the cause of local air pollution, so actions to adopt more sustainable lifestyles will help in tackling both problems. Some of the Partner Authorities have implemented air quality management areas, and all Partner Authorities are observing the London Environment Strategy requirements on emissions when planning for future vehicle fleets.

3.3 Preparing for the Future

The Partner Authorities have an aspiration to manage resources and waste more sustainably in the future, through a focus on reducing waste, increasing reuse and repair, and improving recycling.

Huge changes have happened to the types of waste that we have produced over previous decades, and this type of change is expected to continue. The Partner Authorities need to understand what the waste they collect and manage might look like in the future, covering a period that would match the lifespan of most kinds of large-scale waste treatment infrastructure. A period of 30 years from the end of the current long-term contract in 2027 has therefore been looked at, meaning predictions have been made to 2057. However, the Partner Authorities recognise that the accuracy of forecasts will reduce the further into the future they look, and as such will review the predictions every few years to determine whether anticipated growth, material changes and other factors have developed as expected.

Land use in the Partner Authorities' area will also change in the future, as new housing is built, transport links are improved, industries move in and out of the area, and major regeneration plans are developed and delivered. A changing local area will inevitably mean the amount and type of waste being generated also changes, and the Partner Authorities will need to be able to respond to this.

²⁴ [Policy 5.17 Waste capacity | London City Hall](#)

3.3.1 How Did We Forecast?

A range of forecasting or 'horizon scanning' techniques were used to look at the factors which could influence the amount and type of waste that will be generated in the future.²⁵

The first stage was to identify how much the amount and type of housing in the Partner Authorities' area might change, as this is likely to be the single biggest influence on the future generation of waste, and the interface between residents and their local waste and recycling collection services. The second stage was to predict how some of the proposals in the Resources and Waste Strategy might impact on future waste. Finally, an analysis was done of other political, economic, social, technological, legal and environmental (PESTLE) factors that might lead to changes to the types and quantities of products that are consumed and disposed of in the future (Figure 13). All of this analysis was based on research from around the world, as well as forecasting that other organisations or industries have done.

Examples of the types of forces considered include:

- Climate change making the UK warmer and wetter - increasing garden growth rates;
- Growth of online shopping and deliveries – cardboard;
- Smart Technology including smart home items (lights, speakers etc.) and wearable devices (glasses, wristbands, shoes etc.).

Figure 13: Overview of PESTLE Forces



²⁵ <https://eastlondonwaste.gov.uk/jointstrategy>

Three examples of future 'worlds' were created by grouping together different impacts:

Green World – this is a 'best case' scenario, where governments, communities and businesses all embrace the most environmentally conscious behaviours and lifestyles, leading to reductions in waste and the adoption of truly sustainable lifestyles.

Current Trends – in this scenario there continues to be improvements in legislation, product design and the adoption of sustainable lifestyles, but not to the extent as in the Green World scenario.

Degraded World – this is a very unlikely scenario, where even current environmental protections come to an end, and waste generation significantly increases.

In addition, to help provide some comparison with the current situation, current levels of waste generation per household were projected into the future using the forecasts for the amount of new housing that is expected to be built in the Partner Authorities' area to understand how much waste there would be to manage with no other changes considered. This created a fourth 'world' known as Household Growth Only.

Figure 14: Example forces mapped against the three 'worlds'

Forces	Potential outcomes 1 Green World	Potential outcomes 2 Current Trends	Potential outcomes 3 Degraded Word
Climate change making the UK warmer and wetter - increasing garden growth rates	Increased rates of garden vegetation growth and further land dedicated to allotments. Increased levels of growing food at home. Increased consumption of salad and vegetables. Increased garden waste arisings and higher levels of participation in food waste collections.	Increased rates of garden vegetation growth. No new allotments. Slow take up of growing food at home. Some increase in consumption of salad and vegetables. No change in garden waste arisings. Food waste recycling collections are introduced.	Increased rates of garden vegetation growth. Reduced number of allotments due to housing developments. Slow take up of growing food at home. Some increase in consumption of salad and vegetables. No change in garden waste arisings. Food waste recycling collections are rejected by government.
Growth of online shopping and deliveries - cardboard	Increased switch to online shopping and deliveries (currently 15 - 20% of all consumer goods are sold online). Pro-environmental behaviours encourage reduced levels of consumption and high levels of recycling. Take back schemes embraced. Use of crates increases. New schemes enter the market in the medium term and refills increase.	Online consumption increases. Increased arisings of cardboard in the short term which is recycled (change in composition). Take back schemes in the longer term - embraced where compulsory (reduction in cardboard produced and recycled).	Online consumption increases. Increased arisings of cardboard in the short term which are not recycled. Take back schemes in the longer term - only used where compulsory.

Forces	Potential outcomes 1	Potential outcomes 2	Potential outcomes 3
	Green World	Current Trends	Degraded World
Smart Technology including smart home items (lights, shower, speakers etc.) and wearable devices (glasses, wristbands, shoes etc.)	Increased levels of Waste Electrical and Electronic Equipment (WEEE) due to an increase of Internet of Things (IoT) and required sensors. Items that aren't considered WEEE currently will need to be re-categorised in the future. E.g. textiles. Comprehensive take back for WEEE items Extended Producer Responsibility (EPR) and widespread recycling options that are used.	Increased WEEE arisings due to an increase of IoT and required sensors. Items that aren't considered WEEE currently will need to be re-categorised in the future. E.g. textiles. Comprehensive take back for WEEE items (EPR) recycling increases in line with increased arisings.	Increased WEEE arisings due to an increase of IoT and required sensors. Items that aren't considered WEEE currently will need to be re-categorised in the future. E.g. textiles. Comprehensive take back for WEEE items (EPR) used when financially viable.

It was decided to base this Joint Strategy on the Current Trends world, which anticipates reductions in waste per household compared to the current situation but recognises that the transition to a comprehensively more sustainable economic model will take a considerable amount of time to achieve. However, if everyone makes a strong commitment to living more sustainably, the outcomes projected in the Green World scenario could be achieved. The Partner Authorities will ensure that future services are able to respond to the world changing in a different way than has been projected, and will support efforts across society to move towards a future that is as close as possible to the Green World.

3.3.2 Our Predictions for the Future

The Current Trends world considered a wide range of possibilities, and anticipated gradual increases in policy, legislation and social trends that will help to protect the environment. Many of the current barriers to more sustainable ways of life are expected to continue, but growing concern about the environment will lead to greater awareness and consideration of waste generation by individuals, organisations and governments.

The impacts of these predictions on materials vary, but notably the following types of waste are anticipated to increase:

- Waste electrical and electronic equipment
- Nappies and other absorbent hygiene products
- Plastic film

Recycling opportunities for plastic film and electronic equipment are expected to increase, as is the use of food waste for generating energy and making soil improvers. The use of paper is expected to continue to decrease, but this will be offset to some degree by the increasing use of cardboard for packaging and home deliveries.

3.3.3 Preparing for the Unforeseen

The process to forecast what the world may look like in the future was completed before the emergence of the Covid-19 pandemic in March 2020. Although local authorities plan for a number of events as part of managing risks, the size, severity and length of the Covid-19 outbreak was not foreseen.

At the time of writing this Joint Strategy, the pandemic is still ongoing and organisations across the resources and waste industry are continuing to manage its impacts. These have included more household waste being generated as many people started working from home, fluctuations in global material markets as international trade was disrupted, and large amounts of healthcare waste starting to be generated as testing and vaccination regimes got underway.

There are also a number of possible long-term impacts from the pandemic that are starting to be discussed at a local, regional, national and even international level. These range from relatively short-term economic downturns to fundamental shifts in how and where people live and work.

The Covid-19 pandemic has highlighted the need for greater resilience in how services are planned and delivered, but has also demonstrated how sudden events could set the world on a different path than had been predicted. The Partner Authorities will take the learning from this pandemic on board in the planning of future services, and will monitor the long-term changes that could come about to ensure that the forecasts of future waste types and quantities explained in this chapter remain relevant.

4 Where Do We Want To Be?

The Partner Authorities have high aspirations for increasing the sustainability of local resources and waste management in the future, as outlined in the aims and objectives for the Joint Strategy (see boxes below). This chapter sets out the Partner Authorities' priorities and aspirations for resources and waste management for the Joint Strategy period.

Joint Strategy Aims

The aims of the Joint Strategy are:

- A1. to promote and implement sustainable municipal resources and wastes management policies in East London as part of transitioning to a Circular Economy;**
- A2. to minimise the overall environmental impacts of resources and wastes management;**
- A3. to engage residents, community groups, local business and any other interested parties in the development and implementation of the above resources and wastes management policies; and**
- A4. to provide customer-focused, cost-effective, best value services.**

Joint Strategy Objectives

The objectives of the Joint Strategy are:

- O1. to minimise the amount of municipal wastes arising;**
- O2. to maximise reuse, recycling and composting rates;**
- O3. to maximise the diversion of resources and wastes from landfill, particularly organic materials that would produce greenhouse gases;**
- O4. to co-ordinate and continuously improve municipal wastes minimisation and management policies in East London;**
- O5. to manage municipal wastes in the most environmentally benign and economically efficient ways possible, including reducing greenhouse gas emissions, through the provision and co-ordination of appropriate resources and wastes management facilities and services;**
- O6. to ensure that services and information are fully accessible to all members of the community;**
- O7. to maximise all opportunities for local regeneration and increased social value benefits from waste and resource management, including employment, skills and wellbeing; and**
- O8. to ensure an equitable distribution of costs, so that those who produce or manage the waste pay for it.**

Priorities outlined in this chapter are based on extensive modelling, and provide realistic and appropriate steps that align to, and will contribute towards, London-wide and national policies and targets. Further details on the modelling work can be found in the Technical Reports²⁶ for this Joint Strategy.

As discussed in chapter 2, as the Partner Authorities move beyond the existing integrated waste management contract in 2027, there is scope to implement more flexible and ambitious waste management policies and an eagerness to do so. As set out in Chapter 3 it is difficult to predict the future and the Partner Authorities commit to review their aspirations as circumstances change in line with the aims and objectives of the Joint Strategy.

4.1 Waste Prevention

In line with the Waste Hierarchy, waste prevention provides the greatest environmental and cost benefits for the communities of East London, so is a top priority for the Partner Authorities.

An East London Waste Prevention Programme was approved in February 2021 so that the Partner Authorities can increase their role in preventing waste as soon as possible. The plan includes activities which specifically target key materials, and will facilitate simple ways that residents, businesses and other stakeholders can work together to reduce waste.

Priority materials

Waste prevention activities will focus on a number of priority waste streams that reflect the:

- amount of material within the residual waste either at the kerbside or RRC;
- opportunities to reduce carbon emissions;
- opportunities to protect material scarcity; and
- imperative to minimise the use of plastic.

²⁶ <https://eastlondonwaste.gov.uk/jointstrategy>

The following table sets out the Partner Authorities' priorities and actions on waste prevention:

The Partner Authorities' waste prevention priorities:

- Continue to work with residents and businesses to reduce waste growth and contribute to the London wide aspiration of becoming a 'zero waste city'
- Support the London wide target of reducing food waste by 50% by 2030 and will work with the Greater London Authority, ReLondon²⁷ and other authorities to do this
- Work to raise awareness of the individual, community and environmental benefits of reducing waste

More specifically we will:

- Develop waste prevention plans, Reduction and Recycling Plans, or other appropriate tools that outline the actions that will be taken to provide communications, engagement and access to services that help residents reduce waste and save money
- Support national and regional campaigns on waste prevention, and develop local campaigns to support projects and services
- Develop partnership arrangements with community organisations, housing associations local authorities, and other key stakeholders to enhance work on waste prevention
- Work with the Government, other local authorities and key stakeholders to promote higher standards of product design and manufacture, to prolong product lifecycles and reduce avoidable waste

Objectives: These priorities meet the following objectives of this Joint Strategy: O1, O2, O3, O4, O6, O7

4.2 Reuse and Repair

Increasing the amount of unwanted or broken items that are diverted for reuse or sent for repair will not only reduce the environmental impacts of waste management, but will also provide community benefits through support of local businesses and community organisations, enhancing job opportunities and training. Establishing a local circular economy will also improve access to reduced price goods for lower income families – a social value benefit.

The Partner Authorities will work to significantly increase reuse and repair activities within East London, and work with communities to encourage reuse and repair for both disposing of unwanted items and the purchase of new. Reuse and repair will form a significant part of the Waste Prevention Plan which will start in 2021.

²⁷ Formally known as LWARB – the London Waste and Recycling Board

The following table sets out the Partner Authorities’ priorities and actions on reuse and repair:

<p>The Partner Authorities’ reuse and repair priorities:</p> <ul style="list-style-type: none">• Work to increase the amount of products that are kept in local circulation through reuse and repair services• Seek to normalise reuse within our communities as a means of disposing of unwanted items• Seek to promote the purchase of reused, refurbished and repaired products as a beneficial alternative to buying new• Seek to advance local green economy job and training opportunities through supporting the development of reuse and repair services <p>More specifically we will:</p> <ul style="list-style-type: none">• Explore options for providing or supporting existing and new reuse collection services from homes and businesses• Investigate opportunities for increasing reuse provision at the Reuse and Recycling Centres, including on-site retail outlets where viable• Work with reuse organisations to develop / expand existing valued partnerships, strengthen local offerings, and support increases in scope and capacity to enhance the services available to residents• Raise awareness of repair options available within the Partner Authorities’ area• Participate in national, regional and sub-regional campaigns promoting reuse and repair, and undertake local promotion of the benefits and range of available services• Work with the Government, other local authorities and key stakeholders to promote higher standards of product design and manufacture, to enhance opportunities for cost-effective reuse <p>Objectives: These priorities meet the following objectives of this Joint Strategy: O1, O2, O3, O4, O5, O6, O7</p>
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4.3 Recycling

The structure of the current long-term contract for waste treatment and the wider context in the Partner Authorities’ area has made it more difficult for the Partner Authorities to keep up with other parts of the country in increasing recycling. However, when this contract ends in late 2027 and the policy landscape changes, there will be new opportunities to improve performance. The Constituent Councils have already identified ways that they will be working to increase recycling before the end of the contract through their RRP’s. As has been explained in previous chapters, the Partner Authorities’ area also faces increasing challenges in achieving high recycling, notably because a larger proportion of high-density flats is being built across the area than in most other parts of the capital.

Another challenge relates to the current MBT processes which recover some materials for recycling, including glass, metals and dried food waste. The recycling of these recovered materials counts toward local recycling rates at present. However, at the time of writing this Joint Strategy, there are indications that the dried food waste may no longer be able to be

counted towards local recycling performance in the future because of some proposed changes to Government policy. This could mean up to a 5% reduction in current local recycling rates.

The Partner Authorities will work with the Government, other local authorities and waste industry bodies to try to reduce the impact of this proposed change, as the recovery of the dried food waste presents clear environmental benefits that should continue to be encouraged. However, if the proposed change does happen, targets set for the future will need to take the loss of the current (up to) 5% contribution into account.

4.3.1 Modelling Future Performance

To understand what future recycling performance could look like, extensive modelling has been undertaken²⁸. This has used the forecasts of future waste levels that were explained in the previous chapter, and has looked at how improvements to recycling services and investment in communications that the Partner Authorities could make would increase local recycling rates. The modelling has taken into account the large and increasing number of flats within the region and the challenges these properties face with recycling.

The modelling focused on the likely required household waste and recycling services that the Government has proposed through the “Consistent Recycling Collections” chapter of the national Resources and Waste Strategy. All collection options include a separate food waste collection service, along with the addition of glass and a wider range of plastics to recycling collections. The modelling of future performance includes assumptions on the likely impact of the proposed introductions of a Deposit Return Scheme (DRS) for drinks containers and an Extended Producer Responsibility (EPR) regime for packaging waste. The future types of waste treatment technology that will be used are currently unknown (see Section 4.4), so to help the Partner Authorities understand what levels of recycling they might be able to achieve if current industry-standard approaches to waste treatment were used after 2027, the modelling has assumed that there will be no contribution to local recycling rates from recovery of materials from the residual waste. The continuation of current arrangements for garden waste and provision of weekly rubbish collections for all residents are included in the modelling.

At the time of writing this Joint Strategy, the Government is still working on implementing the proposals within the Resources and Waste Strategy. The Partner Authorities support these proposals as they should result in many environmental benefits, a general increase in recycling across the country and a move towards the ‘polluter pays’ principle. The proposed DRS in particular could result in recyclable waste being collected by organisations other than local authorities. The Partner Authorities have assumed in the modelling that cans and bottles recycled through the DRS will still count towards local recycling rates. The Partner Authorities will monitor and engage with the forthcoming Government consultations to fully understand potential implications and will place the targets in the context of the new policy environment when it becomes clearer.

4.3.2 Aspirations for Future Performance

²⁸<https://eastlondonwaste.gov.uk/jointstrategy>

The modelling has revealed that a minimum **joint** recycling performance of 35% of Local Authority Collected Waste (LACW) by 2030 is realistic, given the above challenges. This assumes that current performance levels will reduce by as much as 5% in the intervening years because of the proposed change to how local recycling rates are calculated (as explained in 4.3).

The Partner Authorities aspire to jointly achieve considerably more than 35% recycling and composting of Local Authority Collected Waste, in order to help London meet the strategic ambition of 50% set in the London Environment Strategy.

Achieving higher levels of recycling will require everyone to play their part, reducing and reusing their waste as much as possible, separating items for recycling whenever and wherever they can while also being careful to correctly dispose of non-recyclable items. The Partner Authorities will work with local residents, businesses and other stakeholders to continuously educate on and promote recycling, and will focus particular efforts on reducing contamination and improving recycling performance in blocks of flats. The opportunities to increase local recycling rates through cost-effective recovery of more material from the residual waste will also be explored as part of a procurement plan, which is covered in the next section.

The Partner Authorities will work together as emerging national policy on resources and waste continues to evolve, in order to understand how best to provide services and maximise opportunities to further improve local recycling performance.

The individual borough contributions that make up the joint performance aspirations are set out in the table below.

Table 1: Borough Contributions to the Joint LACW Minimum Recycling Performance and Borough /LES Aspirations for 2030²⁹³⁰

Borough	2030 LACW Minimum Performance	Borough / LES Aspiration
Barking & Dagenham	35%	50%
Havering	45%	50%
Newham	28%	50%
Redbridge	35%	50%
Joint Performance	35%	50%

²⁹ Note: Recycling contributions from RRCs and residual treatment processes managed by ELWA are apportioned to individual Boroughs and form part of these performance figures

³⁰ The differences in performance contribution between the Partner Authorities relates to the factors that can challenge recycling performance, outlined in Chapter 2, such as proportion of flats and gardens.

4.3.3 Contribution to National and Regional Targets

The joint minimum performance and local aspirations proposed would allow the Partner Authorities to contribute to the targets set out in the Resources and Waste Strategy:

- 50% of household waste recycled or composted by 2025
- 65% of municipal waste (which includes waste from businesses that is similar to household waste, comprising materials like food, paper, plastic etc.) recycled or composted by 2035

A contribution would also be made to the targets the Mayor of London has set in the London Environment Strategy (which was completed shortly before the RWS was published):

- 50% of local authority waste recycled or composted by 2025
- 65% of municipal waste recycled or composted by 2030

The targets outlined within the RWS and LES are high, and it is acknowledged that nationally and across London there are many authorities with lower numbers of flats and greater levels of garden waste that will achieve and exceed the targets. The Partner Authorities have set a realistic joint minimum performance based on the local circumstances and future challenges that were explained earlier in this Joint Strategy, but will continue to work together and with the wider community to identify ways to increase recycling further and meet local aspirations for higher performance.

The following table sets out the Partner Authorities' priorities and actions on recycling:

The Partner Authorities' recycling priorities:

- We aspire to reach 50% recycling, and will work with local communities in this regard
- We aim to achieve a minimum joint reuse, recycling and composting performance of 35% of LACW by 2030
- We will work together to offer the Mayor's minimum level of household recycling service provision, providing residents with straightforward and easy-to-use recycling collection services
- We will improve the quality of recycling collected and reduce contamination
- We will improve recycling performance in houses and blocks of flats
- We will work alongside new policy commitments including DRS and the EPR regime for household packaging to maximise opportunities for increasing recycling

More specifically we will:

- Introduce separate food waste collections for street level properties and blocks of flats, in line with anticipated regulations and Government guidance
- Expand household collection services to allow residents to recycle a wider range of packaging and containers where relevant markets exist
- Continue to investigate opportunities to recycle even more materials, through collection services, public recycling facilities and the Reuse and Recycling Centres

- Work with In-house commercial waste services and private waste companies to ensure that businesses in East London are able to access cost-effective recycling services
- Work with our residents and businesses to increase awareness of recycling
- Provide feedback to residents and businesses on contamination, and highlight the need for material quality
- Identify opportunities to use the ReLondon 'Making Recycling Work for People in Flats toolkit'³¹ or other suitable approaches to improve recycling performance in blocks of flats
- Work with the Government, other local authorities, producers and key stakeholders to develop better approaches to the planning and design of new developments to ensure residents are able to recycle easily
- Work together to identify opportunities to extract more recyclable material from bulky waste, street cleansing waste and fly tipped materials
- Explore opportunities to increase recycling through recovery of materials from other waste streams
- Support London Recycles messaging and campaigning to ensure that a consistent reduce, reuse, recycle message is delivered across London
- Work with the Government, other local authorities, producers and key stakeholders to promote standards of product design that enhance opportunities for cost-effective recycling

Objectives: These priorities meet the following objectives of this Joint Strategy: O2, O3, O4, O5, O6

³¹ [Report - Making recycling work for people in flats | ReLondon](#)

4.4 Supporting Improvements with Infrastructure

4.4.1 Why Do We Need New Infrastructure?

The end of the long-term integrated waste contract in 2027 will mean that ELWA needs to make new arrangements to manage the waste and recycling collected by the Partner Authorities. This is a process that can take several years to plan because of the large investments that may be needed in new infrastructure.

The end of this contract also provides an opportunity for improvements to be made to reuse and recycling services for households and businesses. It can take time to plan these types of improvements, particularly where investment in new contracts or vehicles are required, and there will be differing infrastructure needs to support these arrangements.

It is important for ELWA and the Constituent Councils to work together on planning future arrangements for managing resources and waste, so that the right types and sizes of waste and recycling treatment are available, and the best whole system solution is obtained.

4.4.2 What Are the Priorities for the Partner Authorities?

Due to the uncertainties around the detail of future policy and the capacity available for different types of infrastructure in 2027, it is not appropriate or possible to set out a prescribed solution for the reuse, recycling and waste treatment/disposal of waste handled by ELWA beyond 2027 at this stage.

ELWA will develop a procurement plan to support the delivery of future waste treatment capacity from 2027 onwards, and will work with the Constituent Councils to understand their infrastructure needs as they make plans for any future changes to waste and recycling collection services.

The following table sets out the Partner Authorities' priorities and actions for supporting local performance improvements with infrastructure:

The Partner Authorities' infrastructure priorities:

- We will contribute to national and regional targets on reducing waste sent to landfill
- We will secure access to waste treatment capacity in ways that support the Partner Authorities' priorities around reuse, repair and recycling
- We will establish resilient, responsive and flexible arrangements for future waste treatment, so that the Partner Authorities can continue to improve local services while remaining responsive to changes in global material markets and international policy
- We will seek to procure waste treatment services that provide local economic, environmental and social benefits
- We aim to support the Mayor's target of managing the equivalent of 100% of London's waste within the capital

More specifically we will:

- Maximise the use of, and value from, ELWA's existing waste treatment contract
- Develop a procurement plan for future waste treatment capacity, to support the aims and objectives of this Joint Strategy. A Strategic Environmental Assessment screening will form part of the procurement plan process
- Ensure effective and responsible future commissioning, considering issues such as flexibility, resilience, value for money, service quality, social value, and environmental impacts including greenhouse gas emissions
- Ensure that any future contracts commissioned will not impede the Partner Authorities' ability to improve recycling in line with aspirations to reach 50%
- Investigate options for supporting the development of appropriate new local infrastructure for reuse, repair and remanufacture, which provide opportunities for local regeneration
- Work with the Greater London Authority to deliver future infrastructure and waste treatment capacity solutions that align with the policies set out in the London Environment Strategy, and ensure compliance with the Mayor of London's Carbon Intensity Floor requirements³² for any technology solutions considered that may include energy recovery (note: technologies will be considered as part of a procurement plan)
- Work with the Government, other local authorities and key stakeholders to encourage the development of local materials reprocessing capacity

Objectives: These priorities meet the following objectives of this Joint Strategy: O1, O3, O4, O5, O7

³² [London Environment Strategy - Policy 7.3.2.b](#)

5 How Do We Get There?

The Joint Strategy has so far set out a number of priorities and actions for improving performance on waste reduction, reuse and recycling, as well as delivering future waste treatment capacity. This chapter will focus on how the Partner Authorities will work together to achieve, and improve on, the targets and aspirations set out in the previous chapter.

5.1 Partnership Working and Progress Reporting

This Joint Strategy has been developed by the Partner Authorities. The continuation of joint working will be important in successfully delivering the aims and objectives the Partner Authorities have set out (Section 1.4), and the Partner Authorities will need to work collectively to monitor progress against these goals. Appropriate governance arrangements will be developed to do this, which could include a Joint Strategy board or formal committee, which is likely to undertake activities including:

- allowing the Partner Authorities to share information on local proposals for improving services;
- identifying opportunities for residents and other stakeholders to provide feedback on progress;
- tracking the development of the ELWA procurement plan;
- continuing to engage with the GLA and other key stakeholders on future procurement and other key plans; and
- discussing further changes to national or regional policy that may influence the management of resources and waste in the Partner Authorities' area including those linked to carbon emissions.

New partnerships will also be important to helping to improve performance on waste reduction, reuse and recycling. Where appropriate, formal arrangements will be set up with other key organisations, such as local charities providing reuse services. More informal partnership working will be developed with national, regional and local organisations that have common goals to reduce waste, increase reuse and repair, and improve recycling. These organisations could include other local authorities or organisations representing local government.

5.2 Delivering Improvement

The Partner Authorities have committed to improving performance on waste reduction, reuse and recycling, and have set a joint minimum performance of 35% reuse, recycling and composting of their collected wastes by 2030 with aspirations to contribute as much as possible towards the London-wide ambition of 50%.

The modelling that has been carried out to support the development of this Joint Strategy has provided the basis for setting performance aspirations through consideration of standard service models, and some anticipated service improvements have been highlighted. As discussed in section 4.3 the aspirations also take into consideration predicted changes to the way that recycling rates will be reported in the future which would mean a reduction in the current recycling rate.

Under the Government's Consistency proposals, all of the Partner Authorities will need to conduct assessments on the delivery of the required services and, and the degree to which materials should be collected separately from each other for recycling. This will require close coordination between the Constituent Councils and ELWA to ensure that the waste handling and treatment solutions driven by the collection services are deliverable in the context of the Partner Authorities' area. These review points will also provide an opportunity to ensure services are cost-effective, meet local needs, and are able to take full advantage of the opportunities that new national policies may bring.

The nature of the current long term waste treatment contract means that it may not be cost-effective for the Partner Authorities to make significant improvements to services before 2027. However, the Partner Authorities also recognise the importance of increasing local recycling rates as soon as possible and complying with emerging policy from the Resources and Waste Strategy, so will undertake analysis to determine the best times to make any changes that are planned during the transition process to new waste treatment arrangements. Service improvements will be set out in the Constituent Councils' Reduction and Recycling Plans. Work will also be undertaken to determine the most effective methods for equitably distributing the costs of future waste and recycling treatment services, in order to reduce barriers to improved performance and align with new policy and funding regimes such as those being developed by Government under the national Resources and Wastes Strategy.

5.3 Responding to Change

The Partner Authorities have identified a number of national and regional policies and initiatives that could affect how resources and waste are managed in the future, and have included estimated impacts within the forecasting and modelling work that underpins this Joint Strategy. This includes some of the proposals within the national Resources and Waste Strategy, for which experience and benchmarking from other European countries has been used to estimate what impact there could be in East London.

At the time of writing this Joint Strategy, the Covid-19 pandemic is causing significant change and disruption across the world. The immediate impacts of this pandemic on resources and waste management in the Partner Authorities' area are well understood, but there could be longer-term effects that cannot yet be predicted.

Over the period of the Joint Strategy there are also likely to be other issues that arise which may mean that there are changes to how resources and waste are managed. The extensive forecasting work that has been undertaken to support the development of this document has attempted to identify a large number of these, including housing growth, climate change and innovations in product design, with research being used to develop predictions about what effect they may have. However, there may be other issues that arise which have not been foreseen, particularly in the longer term. As mentioned previously, effective future commissioning will consider issues such as flexibility and resilience as well as value for money, service quality, social value, and environmental impacts including carbon emissions

The Partner Authorities will work together to review evolving national policy, so that the implications for local services and performance can be fully understood at the earliest opportunity. The Partner Authorities will also continue to work closely with one another to

understand how other issues are developing that may mean there needs to be fresh consideration of how resources and waste management could change in the future and the role that the Partner Authorities could play in mobilising a green economic recovery.

5.4 Reviewing the Joint Strategy

This Joint Strategy covers a 30-year period from the end of ELWA's current waste treatment contract in 2027.

Such a long-term strategy will require reviewing and updating to reflect how East London is changing, waste and recycling services are developing, performance is improving, and national and regional policy is evolving (including the London Environment Strategy, which has its own review periods³³).

The Partner Authorities will commit to undertake a high-level review of this Joint Strategy to ensure the targets, priorities and aspirations are appropriate once new national policy has been implemented, and once future waste and recycling collection and treatment arrangements are better understood. The Partner Authorities will launch this review at the appropriate time, and will commit to this taking place by 2028. Reviews thereafter will be conducted at intervals of not more than 10 years, to ensure the Joint Strategy continues to drive improvement and enable the Partner Authorities to respond to evolving innovations and policies on resources and waste management.

³³ [LES Implementation Plan](#)

6 Measuring Success

This Joint Strategy sets out the principles for a long-term approach to managing waste and resources. The Partner Authorities will carry out regular reviews and updates to make sure the approach continues to be relevant, appropriate and effective. This will include monitoring the contribution to all of the Mayor of London's targets in any future update of the London Environment Strategy.

In order to know whether the aims and objectives of the Joint Strategy are being met, it is important to establish, monitor and report on appropriate measures.

6.1 Current Performance Indicators

The key measures which are currently reported by the Partner Authorities to the GLA and the UK Government currently include:

- Total tonnage of residual (non-recycled) waste per household (NI 191)
- Percentage of household waste sent for reuse, recycling or composting (NI 192)
- Percentage of waste sent to landfill (NI 193)

6.2 Proposed Performance Indicators

This section identifies the performance indicators that the Partner Authorities will use to monitor progress against the aims and objectives of the Joint Strategy.

6.2.1 Weight-Based Targets

Residual waste per household (kilograms/household/year) (NI 191) and per head (kilogram/head/year)

These will be core performance indicators for the Partner Authorities. They measure the amount of residual household waste that residents dispose of, either through their regular collection from home, at the Reuse and Recycling Centres, or through street litter bins. Positive performance is indicated by the figures reducing against the indicators, and this can be achieved not only by recycling, but also through reducing overall waste generation and diverting more unwanted or broken items for reuse or repair.

Evolving national policies may result in less recyclable waste being presented to local authorities to manage, with it instead being returned to producers through take-back schemes or a national Deposit Return Scheme. This would be a positive development, but it could be detrimental to the recycling performance that local authorities are able to report. However, the positive impacts of these types of scheme would still be captured through monitoring of these indicators, as the amount of residual waste that residents produce would be likely to reduce.

These measures will allow monitoring against the following objectives of this Joint Strategy:

O1, O2, O4, O5, O6

LACW reused, recycled or composted (%)

This is an expansion of the existing NI 192 measure of reuse, recycling and composting performance, which takes into account all Local Authority Collected Waste (LACW). This includes household waste, as well as the commercial waste that local authorities collect from local businesses that choose to use the council's service. Use of this measure is in line with the London Environment Strategy, which has set reuse, recycling and composting targets for LACW, and this Joint Strategy has set a joint minimum performance against the LACW measure of 35% by 2030 with aspirations to reach 50%.

This measure will allow monitoring against the following objectives of this Joint Strategy:

O1, O2, O4, O5, O6

Percentage of waste sent to landfill (NI 193)

This indicator will monitor how well the Joint Strategy is delivering against national and regional targets on reducing the use of landfill. Disposing of waste in landfill does not allow either the material or energy content to be recovered, so is considered to be the least desirable method of disposal.

This measure will allow monitoring against the following objectives of this Joint Strategy:

O3, O4, O5

In addition, the Partner Authorities will continue to report against the existing household waste-based reuse, recycling and composting indicator (NI 192), until such a time as it is reviewed by the Government. This indicator is no longer statutory, but continues to be used by local authorities for consistency and performance monitoring and so is useful for benchmarking.

6.2.2 Greenhouse Gas Emissions

The consumption of goods and services, and the management of the resources and waste that arise from these activities, results in greenhouse gas emissions. These emissions can vary significantly according to how the waste materials are being managed, and it is important to consider the "whole system" of collections and treatment when comparing different approaches to resources and waste management.

It is common for the measurement of different greenhouse gas emissions to be standardised into 'carbon equivalent' emissions. This reflects that the various greenhouse gases (such as carbon dioxide and methane) have different impacts when released into the atmosphere, and allows for easier comparisons of the many types of activity that produce greenhouse gas emissions.

Carbon emissions will need to be monitored to help the Partner Authorities understand how the Joint Strategy is delivering against local, regional and national ambitions on reducing environmental impact and achieving 'net zero' carbon emissions.

At the time of writing this Joint Strategy, the Constituent Councils are developing local approaches for measuring, monitoring and reducing carbon emissions. The Partner Authorities will work together to develop suitable measuring and monitoring frameworks for

the Joint Strategy, so that the impacts of resources and waste management can be appropriately reported at a local level.

At a regional level, the GLA's Emissions Performance Standard will be used to monitor performance and model the impacts of proposed new services, and new waste treatment solutions will be assessed against the Carbon Intensity Floor³⁴ where applicable. The Partner Authorities will also feed into national reporting regimes as they are developed.

These approaches to monitoring greenhouse gas emissions associated with the management of East London's resources and waste will allow monitoring against the following objectives of this Joint Strategy:

O4, O5

6.2.3 Air Quality

Air quality is a top priority in many urban areas, including East London, and developing approaches to reducing pollution and improving the quality of the air we breathe requires a good understanding of the sources of pollution.

The collection and treatment of resources and waste needs to be considered as part of improving air quality. The Partner Authorities will work together to develop effective reduction, abatement, measuring and monitoring approaches for pollution emissions associated with local resources and waste management, feeding into regional work being taken forward to deliver on the air quality policies within the London Environment Strategy.

These approaches to monitoring air quality impacts associated with the management of East London's resources and waste will allow monitoring against the following objectives of this Joint Strategy:

O4, O5

6.2.4 Social Value

Increasingly, organisations are considering their activities holistically, taking account of the wider economic, social and environmental effects of their actions. Social Value serves as an umbrella term for these broader effects, and organisations which make a conscious effort to ensure that these effects are positive can be seen as adding social value by contributing to the long-term wellbeing and resilience of individuals, communities and society in general³⁵. Local Authorities can take social value into account through their policy and spending decisions to maximise the benefit for the communities they serve.

There are established tools for understanding the social value that different services or contracts can bring, which can then be used to monitor the delivery of the anticipated social benefits. One example is the Social Value Portal, which a number of local authorities are now using as part of their procurement and contract management processes. The Partner Authorities will explore the options available for monitoring and reporting on social value, so

³⁴ [London Environment Strategy - Policy 7.3.2.b](#)

³⁵ [What is Social Value? - Social Value Portal](#)

that opportunities to enhance local communities through this Joint Strategy and the development of future services are fully realised.

Monitoring the social value of local resources and waste management services will allow monitoring against the following objectives of this Joint Strategy:

O4, O5, O6, O7

6.3 New Performance Measures

In 2019 the Government consulted on proposals contained within the Resources and Waste Strategy to reduce waste, increase recycling and improve the quality of the recycling collected. As part of further consultations due to be released in 2021, the government is seeking views on introducing new national Key Performance Indicators and developing alternative methods for measuring performance on resources and waste management. Waste-related performance has traditionally been measured by weight, but the limitations of this approach are becoming clearer as it can result in a focus on collecting heavier recyclable materials (such as garden waste) rather than those which may offer the best overall environmental benefits through being recycled.

The Government has recognised that other methods of measuring waste and recycling performance are needed, such as looking at the impact on climate change.

As mentioned in Chapter 3.2.1, the Government is increasingly using a natural capital approach when developing and implementing policy. The importance of nature has also been emphasised in the recent publication, *The Economics of Biodiversity: The Dasgupta Review*³⁶, which highlights the need to change how we think, act and measure success. It states that 'introducing natural capital into national accounting systems would be a critical step towards making inclusive wealth our measure of progress'. It is likely that over the life of the Joint Strategy new metrics will be introduced that place an emphasis on the value of nature including valuing our natural resources.

The Partner Authorities will continue to monitor the evolution of these proposals in addition to wider environmental proposals, and will adapt their monitoring and reporting approaches accordingly.

Developing new environmental performance measures in line with evolving national and regional policy will allow monitoring against the following objectives of this Joint Strategy:

O4, O5

6.4 New Funding Regimes

The Partner Authorities will review the way in which ELWA's costs are apportioned between the Constituent Councils so that, the Constituent Councils' pay equitably for the services they use. The most appropriate time to implement any changes is expected to be when successor services to ELWA's current long-term contract are put in place.

Such new financial arrangements will have to take account of new national regimes to be

³⁶ [Final Report - The Economics of Biodiversity: The Dasgupta Review - GOV.UK \(www.gov.uk\)](#)

introduced under the Resources and Waste Strategy, once these have become clear. Similarly, any further new national regimes introduced during the term of this Joint Strategy may require a further review to ensure there continues to be an equitable distribution of costs.

The Partner Authorities should then all have both an environmental and a financial business case to improve services and reduce environmental impacts as much as possible.

Developing new financial arrangements locally will allow monitoring against the following objectives of this Joint Strategy

O8

Glossary

Term	Definition
Biodegradable Waste	Biodegradable waste is any product that can be easily broken down naturally by water, oxygen, the sun's rays, radiation, or microorganisms. It includes most food and green garden waste, and can include some paper and card.
Carbon Dioxide (CO₂)	Principal greenhouse gas related to climate change.
Carbon Dioxide-Equivalent (CO₂e)	The universal unit of measurement used to indicate the global warming potential (GWP) of greenhouse gases. It is used to evaluate the impacts of releasing (or avoiding the release of) different greenhouse gases. For example, the GWP of methane is 21 times that of CO ₂ , which has a GWP of 1. Sulphur hexafluoride has a GWP of 23,900. A CO ₂ -equivalent figure is used to represent the warming impact of greenhouse gases.
Carbon Footprint	Total greenhouse gas emissions resulting from an activity or group of activities, including embodied carbon.
Carbon Intensity Floor	The CO ₂ e emissions performance level set for electricity generated from London's municipal waste to achieve. The carbon intensity floor has been set at the level whereby any electricity generated from London's municipal waste is to be no more polluting in carbon terms than the electricity source it replaces. The carbon intensity floor sits within the Emissions Performance Standard that has been set for London's activities associated with the collection, treatment and final disposal of London's municipal waste to achieve.
Circular Economy	An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.
Climate Change	A large scale, long-term shift in the planet's weather patterns or average temperatures. Characterised by higher temperatures, sea level rise, changing rainfall, and more frequent and severe extreme weather.
Commercially Collected Waste	Waste from businesses in the possession or control of a body or organisation that is not a waste authority
Composition Analysis	An analysis of the different items present within waste. This can include the types and weight of items and materials.

Term	Definition
GLA	The Greater London Authority is the administrative body for Greater London. It comprises a directly elected Mayor and directly elected London Assembly.
Greenhouse Gas (GHG)	Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.
Household Waste	All waste collected by Waste Collection Authorities under section 45(1) of the Environmental Protection Act 1990, plus all waste arisings from Civic Amenity sites and waste collected by third parties for which collection or disposal credits are paid under Section 52 of the Environmental Protection Act 1990. Household waste includes waste from collection rounds of domestic properties (including separate rounds for the collection of recyclables), schools, public buildings, street cleansing and litter collection, beach cleansing, bulky household waste collections, hazardous household waste collections, household clinical waste collections, garden waste collections, Civic Amenity/Reuse and Recycling Centre wastes, drop-off/'bring' systems, clearance of fly-tipped wastes, weekend skip services and any other household waste collected by the waste authorities. Household waste accounts for approximately four fifths of London's municipal waste.
Local Authority Collected Waste (LACW)	All waste in the possession or control of waste authorities. This includes waste collected from households and businesses.
Municipal Waste	Household waste or business waste that is similar in composition irrespective of who collects or disposes of it.
Natural Capital	London's natural capital is the set of environmental resources (open land, air, water, wildlife) that provides services - such as flood protection or cleaner air. Natural capital benefits the wellbeing of Londoners and the city's economy. Alongside other forms of capital - such as human knowledge and skills, manufactured goods, buildings and products - natural capital is a valuable asset that must be managed sustainably to secure and improve these benefits.
Net Zero	'Net zero' refers to achieving an overall balance between emissions produced and emissions taken out of the atmosphere.
Polluter Pays Principle	The 'polluter pays' principle is the commonly accepted practice that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment.

Term	Definition
Recycling	Waste Framework Directive: 'any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations'
Responsible Procurement	Socially, environmentally and economically sustainable procurement to deliver an improved quality of life and better value for money. It involves working across London to provide sustained employment opportunities and improve working conditions. It means opening up access to contract opportunities for London's diverse businesses, and voluntary and community sector organisations, encouraging improved practices with suppliers and promoting greater environmental sustainability to make London a better place to live and work.
Residual Waste	Waste that is left once recyclable waste or reusable items have been separated.
Reuse	Waste Framework Directive: 'any operation by which products or components that are not waste are used again for the same purpose for which they were conceived' The processes contribute to sustainable development and can save raw materials, energy and transport costs.
Social Value	<p>Increasingly, organisations are considering their activities holistically, taking account of the wider economic, social and environmental effects of their actions.</p> <p>Social Value serves as an umbrella term for these broader effects, and organisations which make a conscious effort to ensure that these effects are positive can be seen as adding social value by contributing to the long-term wellbeing and resilience of individuals, communities and society in general.</p> <p>The United Nations Sustainable Development Goals are, in effect, a social value charter for the planet.</p> <p>Public sector bodies can take social value into account through their policy and spending decisions to maximise the benefit for the communities they serve. Businesses can make decisions both about what they do and how they do it in ways that add social value.</p>
Waste	Any substance or object which the holder discards, intends to discard or is required to discard.

Term	Definition
Waste Authority	A Waste Collection Authority and a Waste Disposal Authority. It includes London's 33 waste collection authorities (all 32 boroughs and the City of London), those 12 authorities that are "unitary" waste authorities (combined collection and disposal) and the 4 statutory waste disposal authorities.
Waste Collection Authority	The authority responsible for arranging the collection of household waste in their area (in London this is on a borough-wide basis) and commercial or industrial waste on request.
Waste Disposal Authority	The authority responsible for arranging for the disposal of waste collected in their area by the Waste Collection Authority. They also provide sites where householders can deposit waste free of charge (Reuse and Recycling Centres).
Waste Prevention	<p>Waste Framework Directive: 'measures taken before a substance, material or product has become waste, that reduce:</p> <ul style="list-style-type: none"> (a) the quantity of waste, including through the re-use of products or the extension of the life span of products; (b) the adverse impacts of the generated waste on the environment and human health; (c) the content of harmful substances in materials and products.

Appendix 2: Current and Future Government and Mayoral Waste Policy and Targets

1. The national Resources and Waste Strategy (RWS) was published in 2018, and notably include proposed policies for setting up of a Deposit Return Scheme (DRS) for drinks containers, Extended Producer Responsibility (EPR) for packaging waste, and establishing more consistent household and business recycling services across the country (Consistency).
2. The RWS sets out two recycling targets - that 50% of household waste will be recycled or composted by 2025 and that 65% of municipal waste (which includes commercial waste that is similar in composition to household waste, including that collected by the private waste sector) recycled or composted by 2035.
3. The Government launched a second round of consultations on the three proposed policies in March 2021, with a view to the introduction of the policies from 2023. Notwithstanding that residual uncertainties around the three proposed future policies they will lead to significant changes to both collection and disposal activities in the Partner Authority area.
4. The DRS proposals are likely to mean that the recycling rate of drinks containers will increase and littering of these products will reduce. However, the amount of drinks containers in constituent Borough waste collections (both recycling and residual waste) will reduce, and it is not clear if the items diverted into the DRS will be able to be counted in local authority recycling rates.
5. The EPR proposals, aside from making the packaging industry responsible for the costs of packaging waste, are likely to drive consistent recyclability labelling on packaging and the use of more recyclable packaging.
6. Broadly in line with the Government's Consistency proposals, the Mayor of London's Minimum Service Standards set out in the LES include six main dry recycling materials collected from all properties and separate food waste collections, including from flats where practical and cost-effective.
7. The LES contains recycling rate targets for London of 50% of Local Authority Collected Waste (LACW) by 2025 and 65% of Municipal Waste recycled by 2030. LACW is all waste collected by local authorities, which is mainly household waste but also includes other wastes such as commercial waste collected by local authorities, street cleansing and fly-tipped waste.

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Appendix 3: Strategy Development Process

1. The ELJRWS development was commenced in 2019, with ELWA as the lead authority.
2. Levels of governance:
 - Project Team consisting of officers from ELWA and Constituent Councils
 - Project Board, comprising the Managing Director of ELWA and the four Borough Environment Directors.
 - ELWA Members (portfolio holders from the Constituent Councils)
3. Initial workshops were held with the Members and officers to set out priorities that would need to be addressed in the document.
4. A procurement exercise for consultancy support in modelling and forecasting was then undertaken, the successful bidder being Ricardo Energy & Environment.
5. A baseline was established using data from 2018-19 (last full year for available data at the time the exercise commenced).
6. Forecasting and modelling was carried out on future waste arisings.
7. Modelling was then carried out to consider how this could be reduced through resident engagement and service development.
8. The modelling of potential future collection services was then undertaken to understand what recycling performance could be expected using service models set out by the Government in its Consistency proposals and extensive benchmarking of other local authorities.
9. Review of the modelling by the Partner Authorities and engagement with the GLA to agree a reasonable recycling target for the ELJRWS.
10. The ELJRWS itself was then drafted, along with the necessary supporting documents (which are outlined below). These were extensively reviewed by Members and officers from the five Partner Authorities, prior to completion of the Preliminary Draft.

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Appendix 4:

Borough Contributions to the Joint LACW Minimum Recycling Performance and Borough /LES Aspirations for 2030

Borough	2030 LACW Minimum Performance	Borough / LES Aspiration
Barking & Dagenham	35%	50%
Havering	45%	50%
Newham	28%	50%
Redbridge	35%	50%
Joint Performance	35%	50%

Key assumptions in the modelling:
The loss of the recycling rate contribution (currently 5%) from the MBT's either at the end of the existing ELWA contract or before if reporting requirements change.
The increasing proportion of flats.
Prudent assumptions on the impact of EPR and DRS and that material captured by the DRS will be reported against individual local authority recycling rates.
That, in conformity with the Government's Consistency proposals and the LES Minimum Service Standards, the constituent Boroughs will add glass and a wider range of plastic containers to recycling services, as well as launching separate food waste collections.
The retention of the existing weekly residual waste collections for properties served at street level, and the existing garden waste charging and collection arrangements.

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1 Introduction

1.1 This Document

This document forms the Strategic Environmental Assessment (SEA) screening statement for the Joint Strategy for Resources and Waste Management in East London 2027-2057 (Joint Strategy).

1.2 Purpose of the Joint Strategy

The Joint Strategy sets out the strategic aims and ambitions for resources and waste management of the five Partner Authorities, namely the East London Waste Authority (ELWA) and the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge and outlines how the Partner Authorities will work together to manage resources and waste within their boundaries between 2027 and 2057, after the end of the long-term contract for waste treatment services.

The Partner Authorities will commit to undertake a high-level review of the Joint Strategy by 2028, to ensure the targets, priorities and ambitions are appropriate once future waste and recycling collection and treatment arrangements are better understood. Reviews thereafter will be conducted at intervals of not more than 10 years.

The previous strategy was originally drafted in 1996, reviewed in 2006 and set the framework for performance for the 25-year waste management contract to 2027. The contract operator (Renewi) has developed a number of five-year annual budget and service delivery plans, which review progress and outline future performance standards¹. The Partner Authorities have also prepared Reduction and Recycling Plans (RRPs) that set out how they will develop their services and local performance to work towards the targets and service standards within the London Environment Strategy². The Partner Authorities Plans will be updated as proposals for future service and performance improvement on waste reduction, reuse and recycling as they evolve.

The Joint Strategy does not cover local issues such as the collection of litter, street cleansing and fly-tipping, and it does not set out specific details on how each borough will develop its household waste and recycling collection services in the future. The Joint Strategy focuses on the longer-term targets and ambitions of the Partner Authorities, and the general principles by which the Partner Authorities will work together to achieve them.

1.3 The Joint Strategy and the SEA Screening Process

The objective of SEA is to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

The requirement for SEA was brought into legislation by the SEA Regulations³. These regulations

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¹ [Renewi-FYSDP-Report-web-res.pdf \(eastlondonwaste.gov.uk\)](#)

² [London Environment Strategy](#)

³ The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633) apply to any plan or programme which relates solely or in part to England.

transposed the requirements of EU Directive 2001/42/EC (the SEA Directive) into English legislation. Following Brexit, minor amendments, to correct deficiencies and terminology, were made to the SEA Regulations through the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018.

This SEA screening has been prepared in accordance with the requirements of the SEA Regulations. The Practical Guide to SEA⁴ has also been taken into account.

The screening consultation has been prepared to enable the Consultation Bodies as specified in section 4 of the SEA Regulations to provide comment on the appropriateness of the screening process and its conclusion for this draft strategy. Those bodies are Natural England, Historic England and the Environment Agency. Other bodies that have specifically been invited to comment are the Greater London Authority and the Partner Authorities.

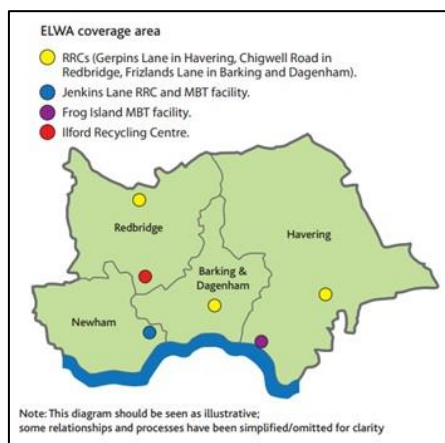
The consultation period will be in summer 2021. Any comments are invited to be made in writing and returned to the Team at:

Email: consultation@eastlondonwaste.gov.uk

Postal Address: to be confirmed.

Once responses to this screening statement have been received, a statement of determination will be produced indicating that the SEA screening process has been conducted in accordance with the SEA Regulations and available guidance. In accordance with the SEA Regulations the conclusions on the determination will also be made available to the public.

1.4 The Strategy Area



The area covered by the ELWA is shown in Figure 1. The London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge cover an area of 93 square miles, bordering the historic East End, the edges of Epping Forest, rural Essex and the River Thames. The 1.1 million residents live in 425,000 households, spread over a diverse mix of districts including large housing estates, dense terraces, detached suburban streets, and small villages. There are also significant pockets of commercial land, active farms, and large industrial zones.

Figure 1: Map of the East London Partner Authorities

Commented [d1]: Just to check – in cabinet reports we say we are consulting to ask that we don't need an SEA at this stage – is this saying the same thing?

Commented [d3R2]: Agreed – all cabinet reports except LBN attaches SEA as an appendix

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Commented [HJ4]: Ditto – looking into a PO box, given the consultation may well straddle ELWA's office move.

Commented [d5]: I didn't think we were asking for this at this stage?

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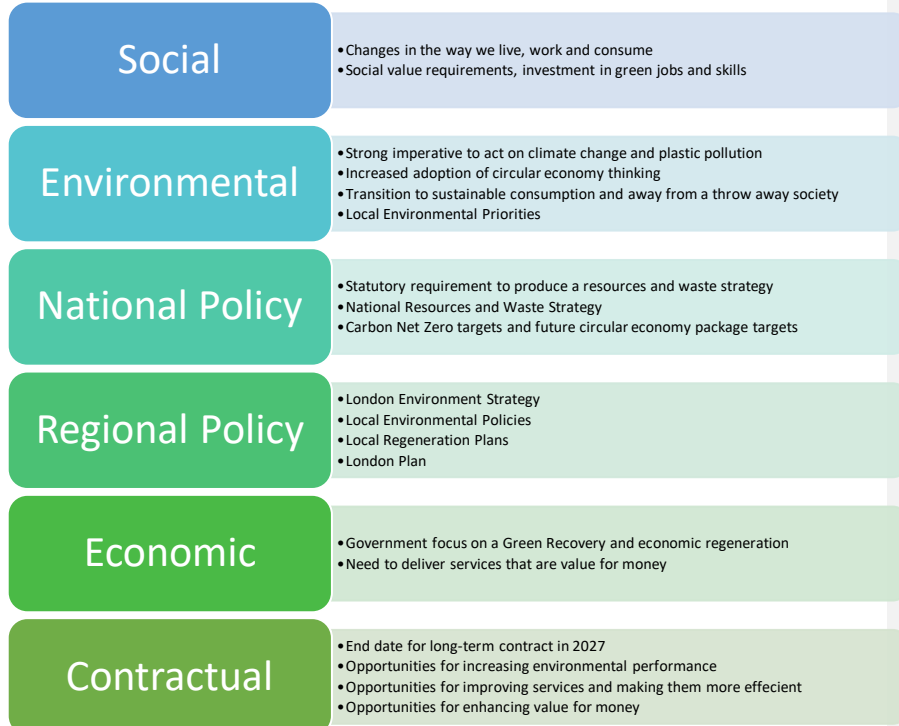
⁴ A Practical Guide to the Strategic Environmental Assessment Directive: Practical Guidance on Applying European Directive 2001/42/EC, Office of the Deputy Prime Minister, 2005.

1.5 Context of the Strategy

This Joint Strategy is needed to help the Partner Authorities start to plan for the end of the long-term 25-year contract (2002-2027) for waste treatment, while meeting the new requirements that will be arising from national and regional policy changes, and economic, environmental and societal drivers. The Partner Authorities also recognise the imperative to manage resources better in the future, to enhance resource efficiency and minimise greenhouse gas emissions.

Development of a joint strategy is a statutory requirement for waste authorities in two-tier areas⁵. Furthermore, development of the Joint Strategy provides an opportunity to ensure that future strategy, procurement proposals and targets align as closely as possible with London's overall strategic ambitions, as set out in the London Environment Strategy. The summary of the key drivers of the Joint Strategy is shown in **Figure 2**.

Figure 2: Summary of the Key Drivers



⁵ [Waste and Emissions Trading Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk)

1.6 The Structure of the Joint Strategy

The structure of the Joint Strategy is as follows:

- **Chapter One** – sets the context for the Joint Strategy;
- **Chapter Two** - describes how resources and waste are currently managed in the Partner Authorities' area, and provides detail on some of the opportunities, challenges and existing performance levels;
- **Chapter Three** - describes what changes the Partner Authorities expect to see in the future, both in terms of how the area will change, what impacts national and regional policy may have on the types and quantities of waste being generated, and some of the other factors which may also play a role in how consumers buy, use and dispose of products that will have an effect on resources and waste management;
- **Chapter Four** – sets out the vision for how the Partner Authorities will work together and with the community to help reduce waste and divert more items for repair and reuse. Four aims and eight objectives have been developed by the Partner Authorities to provide a clear outline of what is to be achieved and priorities for the future. This chapter also sets out priorities around Waste Prevention, Reuse and Repair, Recycling and supporting improvements with infrastructure;
- **Chapter Five** – outlines how the Partner Authorities will work together to achieve the aims and ambitions set out in the Joint Strategy; and
- **Chapter Six** – describes what performance measures will be used to measure success.

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1.7 Responsibilities of the Partner Authorities

The four Constituent Councils, namely the London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge, are responsible as 'waste collection authorities' for arranging the collection of household waste and recycling, as well as undertaking waste and recycling collections from local businesses that choose to use their commercial waste services. The Constituent Councils also manage street cleansing, fly-tipping removal, and management of litter from local parks and open spaces, which all generate waste.

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ELWA is the 'joint waste disposal authority' for the region and is responsible for providing treatment and disposal services for the waste and recycling collected by the Constituent Councils. ELWA also operates four Reuse and Recycling Centres (RRCs) where residents can deposit a wide range of materials for reuse, recycling and disposal.

2 The SEA Screening Process

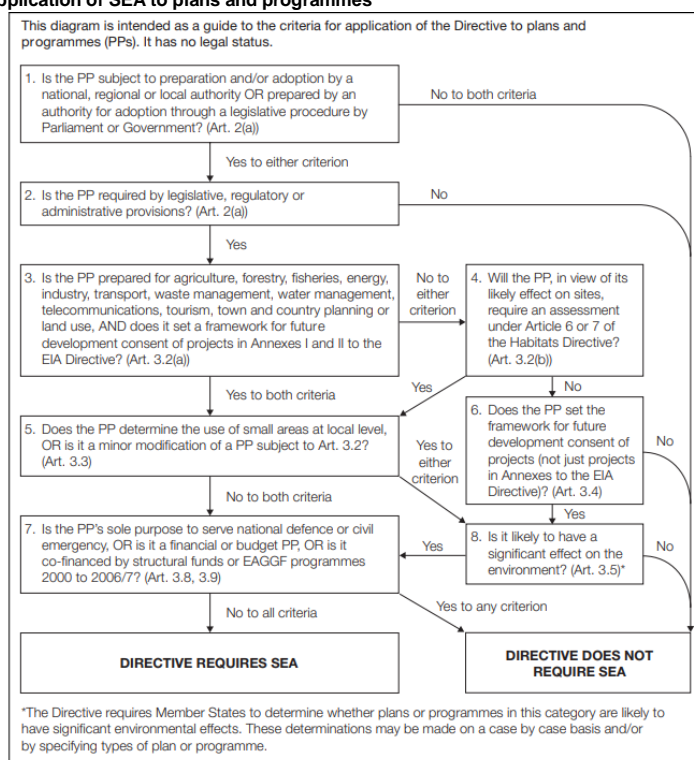
2.1 The Requirement for SEA

As stated in the SEA Regulations, the requirement for a SEA applies to waste management plans, programmes and strategies. A SEA is only required if the Joint Strategy is likely to have 'significant environmental effects' as detailed in Regulation 9(3):

"Where the responsible authority determines that the plan, programme or modification is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination."

The screening process forms the first stage of a SEA and determines whether a SEA is required for a plan or programme. The Practical Guide to SEA⁶ provides a framework for determination of the requirement for SEA (the screening process) in a staged flow-diagram (see **Figure 3**).

Figure 3: Application of SEA to plans and programmes



In accordance with **Figure 3**, the Practical Guide to SEA sets out eight criteria that should be considered when screening a plan, programme or strategy to determine whether it will require SEA. These are set out in **Table 1**.

⁶ A Practical Guide to the Strategic Environmental Assessment Directive: Practical Guidance on Applying European Directive 2001/42/EC, Office of the Deputy Prime Minister, 2005.

Table 1: ODPM Assessment

	Screening Question	Screening Assessment
1	Is the strategy subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament or Government?	Yes This Joint Strategy sets out how the five Partner Authorities, namely ELWA and the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge, will work together to preserve resources by minimising waste, promoting resource efficiency and moving towards a circular economy.
2	Is the strategy required by legislative, regulatory or administrative provisions?	Yes The development of a joint strategy is a statutory requirement for waste authorities in two-tier areas ⁷ . The strategy will also be publicly available, has been prepared in a formal way and will involve consultation with interested parties.
3	Is the strategy prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	No Whilst the strategy is prepared for waste management it does NOT set a framework for future development consent of projects.
4	Will the strategy, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive	No The implementation of this strategy will not have any likely effects on sites.
5	Does the strategy determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	No
6	Does the strategy set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	No The strategy does not set the framework for future development consent of projects.
7	Is the strategy sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000-2006/7?	No
8	Is it likely to have a significant effect on the environment?	No This Joint Strategy sets out the strategic aims and ambitions for resources and waste management of the five Partner Authorities, and outlines how the Partner Authorities will work together to manage resources and waste within their boundaries between 2027 and 2057, after the end of the long-term contract for waste treatment services. The strategy encourages environmental performance and sets some aims and objectives to help set priorities for the future. Specific actions, will be decided later by the Partner Authorities.

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⁷ [Waste and Emissions Trading Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk)

2.2 Determination of Significance

In accordance with the SEA Regulations the likely significance of all changes to the Joint Strategy have been considered with the relevant SEA Screening criteria and are presented in **Table 2**.

Table 2: Consideration of significant environmental effects of the strategy

SEA Screening Criteria	Summary of Predicted Environmental Effects	Significant Environmental Effect?
1. The characteristics of plans and programmes, having regard, in particular, to-		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The Joint Strategy will not provide a policy framework or allocate resources. Instead it provides <u>high level strategic direction</u> on how policies <u>and proposals</u> could be developed <u>in the future</u>. The <u>Joint Strategy</u> prescribes no alterations to the location, nature, size or operating conditions of potential facilities related to waste management.</p> <p>The <u>Joint Strategy</u> seeks to explore and investigate options in collaboration with wider organisations as well as promoting initiatives to the community. In terms of specific changes to the waste and recycling services that are already in place across East London, the <u>Joint Strategy</u> seeks to introduce separate waste food collections <u>if in line with anticipated regulations and Government guidance</u>, and expand household collection services to allow residents to recycle a wider range of packaging and containers where markets exist.</p> <p>These are not considered to entail a significant environmental effect.</p>	No
b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>The Joint Strategy <u>is</u> for the Partner Authorities and will be influenced by a number of plans and programmes <u>nationally and regionally</u>, within which there are a number of policy drivers that will influence how the Partner Authorities manage resources and waste in the future. This includes the Environment Bill which will bring into law key policies set out in the Government's Resources and Waste Strategy which have been identified as being important for the Partner Authorities to consider. These include the introduction of a Deposit Return Scheme for drinks containers, to incentivise recycling; standardising recycling collections from businesses and households and Extended Producer Responsibility for packaging.</p> <p>East London will also contribute towards reuse and recycling targets set out in the national and regional</p>	No

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Commented [d7R6]: I agree

Commented [d8]: I am not sure this is right. It doesn't provide a steer on allocations or Local Plans – it may do later but not currently

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Commented [HJ9]: ? Could do with a discussion on what this means, particularly as it then goes on to say it will be influenced by a number of other plans.

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SEA Screening Criteria	Summary of Predicted Environmental Effects	Significant Environmental Effect?
	strategies. The Joint Strategy itself has limited direct influence over other plans and programmes and therefore, it is not considered to entail a significant environmental effect.	
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The <u>Joint Strategy</u> is relevant for the integration of environmental considerations to minimise waste arising and maximise waste reuse, repair and recycling. The London Plan and the Constituent Councils' Local Plans set the policies for sustainable development. The objectives in the Joint Strategy will not change Local Plan policy.	No
(d) environmental problems relevant to the plan or programme;	The Joint Strategy promotes waste prevention, and increase in reuse, repair and recycling in accordance with the waste hierarchy and moving towards a circular economy. <u>▼</u> The objectives in the Joint Strategy will not introduce or exacerbate any environmental problems. <u>↓</u>	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The <u>Joint Strategy</u> supports targets for recycling and landfill diversion. The <u>Joint Strategy</u> also contains aims, objectives, and priorities to facilitate treatment of waste in line with the waste hierarchy. The Joint Strategy will <u>not change</u> Local Plan policies and is not relevant to the implementation of Community legislation on the environment.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to (i.e. will the environmental effects be significant when consideration is given to:)		
(a) the probability, duration, frequency and reversibility of the effects;	It is not envisaged that the implementation of the <u>Joint Strategy</u> is likely to have any significant negative environmental effects. <u> </u> The <u>Joint Strategy</u> is designed to improve environmental protection and performance. A number of the objectives and priorities proposed aim to deliver improved performance in line with wider regional and national targets.	No
(b) the cumulative nature of the effects;	The <u>Joint Strategy</u> is designed to improve environmental protection/performance, and therefore there are no negative cumulative environmental effects	No

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Commented [HJ11]: My big question here is: taking "implementation" in its entirety, a procurement plan would be developed underneath the Joint Strategy that could ultimately result in some sort of new infrastructure coming forward. Should this be addressed in this screening statement? I agree, in terms of what is directly said in the Joint Strategy there are no significant environmental impacts, but it is the launching point for more to follow.

Commented [d12R11]: I think that is a fair point and applies throughout this section. It mirrors what we say in the conclusion though. Could we just add a sentence or two at the beginning of the SEA to set this context and say that subsequent documents will follow ?

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SEA Screening Criteria	Summary of Predicted Environmental Effects	Significant Environmental Effect?
	envisaged for the Joint Strategy. The Joint Strategy is consistent with the waste hierarchy and therefore will promote that waste is treated increasingly in a more sustainable and environmentally friendly manner, meaning pollution and other negative environmental impacts are reduced over the life of the Joint Strategy.	
(c) the transboundary nature of the effects;	Currently, it is understood that the treatment processes for the regions waste are undertaken within the partnership's geographical boundaries. There are no changes outlined in the Joint Strategy that would have a significant effect on other regions. The Joint Strategy intends that changes in waste treatment should move waste up the Waste Hierarchy where possible, and therefore any potential effects of service changes will entail an environmental performance improvement within the boundaries of the ELWA area.	No
(d) the risks to human health or the environment (for example, due to accidents);	There are no expected additional risks to human health and/or the environment arising from the implementation of the Joint Strategy. Two of the key Joint Strategy aims are to promote and implement sustainable municipal resources and wastes management policies and to minimise the overall environmental impact of resources and wastes management. This would potentially reduce materials handling that can give risk to potential health concerns.	No
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The spatial extent of the Joint Strategy is contained within the Constituent Councils' Local Plan areas. The Joint Strategy does not seek to expand current waste management operations in the area. It seeks to reduce waste growth, increase reuse, repair and recycling. The Joint Strategy seeks to improve waste management which is considered to have positive effects in the ELWA area.	No
(f) the value and vulnerability of the area likely to be affected due to- (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality	The Joint Strategy is not site specific and has been considered alongside sustainability issues as described in criteria 1(d). Furthermore, the implementation of the Joint Strategy will not remove protection for any such areas and therefore there are no significant effects associated with the Joint Strategy.	No

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Commented [HJ13]: I'm not sure about this. Again, the Joint Strategy itself does not say or commit to anything that would result in treatment locations moving, but the future procurement of post-2027 services may well lead to our waste being treated outside the area.

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SEA Screening Criteria	Summary of Predicted Environmental Effects	Significant Environmental Effect?
standards or limit values; or (iii) intensive land-use;		
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The Joint Strategy will not remove any protection for areas with a recognised community or international protection status. The strategy will encourage improved environmental performance.↓	No

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3 Conclusion

The scope of the Joint Strategy has been considered against the criteria from the Practical Guide to SEA⁸ and the SEA Regulations.

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It is considered that the Joint Strategy will not set a framework for future development consent of projects. Also, the aims, objectives and priorities set out in the Joint Strategy are focussed on exploring ways to work together and in partnership with the local community and other organisations to deliver sustainable systems for managing resources and waste in accordance with wider established targets and evolving legislation. The Partner Authorities will be exploring how to do this within their own services. For these reasons it is considered that the Joint Strategy is not likely to have any significant environmental effects and a SEA is not required.

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⁸ A Practical Guide to the Strategic Environmental Assessment Directive: Practical Guidance on Applying European Directive 2001/42/EC', Office of the Deputy Prime Minister, 2005.



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East London Joint Resources and Waste Strategy Consultation Plan

This document sets out the consultation plan for the East London Joint Resources and Waste Strategy (the 'Joint Strategy').

There will be a process of consulting with statutory organisations, which will take place at the same time as a public consultation. All consultation activities will be managed by the East London Waste Authority (ELWA), with the public consultation being delivered through the existing contract for consultancy support with Ricardo Energy & Environment (Ricardo).

The aim of the public consultation will be to provide all users of the waste/recycling collection, treatment and disposal services provided by the Partner Authorities (all residents and any business users), any other interested parties, and any statutory consultees, the opportunity to comment on the draft proposals within the Joint Strategy. To facilitate this, a blended approach of online survey (with paper copies available), focus group and question and answer session will be undertaken. This paper provides detail on the methods proposed, how they will be delivered and who will be involved.

When will the consultation take place?

The consultation period is planned to run for 8 weeks in total between mid-July and mid-September. This time-period does cross a traditional holiday time (August), but the proposed focus group will take place early in the consultation period, will be timetabled early evening or weekends to encourage ease of attendance.

Appendix B (Spreadsheet) provides an overview of the consultation timetable, which includes preparation time, delivery of activities, and analysis, review and reporting of results and feedback once the consultation has concluded. A report detailing the outputs of the consultation will be delivered mid-October and the Joint Strategy will be updated during November 2021.

How will the consultation be delivered?

Statutory consultees

As part of the development of the Joint Strategy, a screening process will be undertaken to determine whether a Strategic Environmental Assessment (SEA) is required. The screening report (with the Joint Strategy), will be sent to statutory consultees (Environment Agency, Historic England and Natural England) at the start of the consultation period, providing them with a period of eight weeks in which to respond (beyond the required six week minimum period).

The Joint Strategy will also be sent to the Greater London Authority for formal consultation as part of testing general conformity with the London Environment Strategy on municipal waste.

Public consultation – online survey

An online survey will be developed that will be available to anyone with access to the internet (configured for mobile or computer). A paper copy survey will be available in libraries across the Partner Authorities' area and upon request for those that cannot complete the survey online. Guidance will be provided to library staff on completing the survey so that they can signpost it to library users. Advice will be taken from Borough Officers / Consultation leads regarding potential numbers of paper copies required and any additional accessibility requirements. The proposed survey questions are included at Appendix A.

The online survey will be hosted using a specialist online tool (Survey Monkey), with the link being placed on a dedicated consultation page on the ELWA website. That webpage will host all supporting documents, including the Joint Strategy, technical appendices, screening report and Equalities Impact Assessment. A dedicated consultation@eastlondonwaste.gov.uk email will be set up for any enquiries.

Ricardo will develop the questions and introduction to the online survey (a draft structure is suggested at Appendix A) and will load them into the Survey Monkey tool. ELWA will develop the webpage and set up and monitor the email address.

Ricardo will develop suggested accompanying text for social media feeds and emails to be used as a template for Borough Officers. This text could be tailored by Officers to suit individual requirements and Borough communication protocols.

Sampling – online survey

The target population for the consultation will be residents and businesses (preferably users of Borough waste services) in the Partner Authorities' area. Other parties with an interest may also respond to the survey.

For a web-based survey, 'stratified random sampling' is the recommended approach to monitor whether a representative sample of the population has responded. This means that the population is divided into groups (strata) based on specific characteristics of the population.

Should a specific stratum be lacking in the responses received then a number of different methods could be used to encourage more people to respond including:

- An email from Borough officers to specific local groups highlighting the survey and encouraging responses (where permitted by GDPR)
- Promotion of the survey on Borough social media feeds including targeted advertising via sites such as NextDoor that have a hyperlocal focus on different neighbourhoods.

Response rates – online survey

A high response rate will be encouraged, but it is recognised that actual response rates may vary. An online survey that is aligned to a strong area of interest may attract response rates of 10-15% of the population it is targeted towards. A survey on waste and resources that is not connected with services that residents are immediately familiar with e.g. collections, litter, fly-tipping, and which requires a long term view may not attract as large a response rate. Target numbers acceptable would be around 200 per Borough, with 400 per Borough suggested as an upper limit. A total response of around 800 results would have a +/- 5% precision rate (see figures below).

- **1,100** responses will provide a +/- 3% precision rate, so we could say that for a result of 50% of residents responding that they are in favour of a proposal the figure would be 47% - 53%
- **400** responses will provide a +/- 5% precision rate, so we could say that for a result of 50% of residents responding that they are in favour of a proposal the figure would be 45% - 55%
- **100** responses will provide a +/-10% precision rate, so we could say that for a result of 50% of residents responding that they are in favour of a proposal the figure would be 40% - 60%

The survey questions developed are a mix of open and closed questions.

Reporting – online survey

The Survey Monkey tool provides detailed analytics that will allow the Ricardo team to monitor progress including response rates, rate of completion and defined population characteristics (socio-

demographic information, Borough etc.) throughout the time that the survey is open. Standard reports can be extracted from the tool and will be used to provide data to inform a consultation response report which will detail the results from each question asked. The number of responses for each question will also be provided so that a completion rate can be noted.

Commentary will be provided on the results gained, and free-text responses (open questions) will be detailed. Any responses provided in paper format will also be included within a survey report. Any paper response forms provided will include a stamped addressed (ELWA office) envelope to facilitate a free postal response, and a process will be investigated to see if they could also be returned to a local library.

Public consultation – focus group

A focus group is a research method that involves several participants (usually between six and ten) and a facilitator/moderator. It is a way of getting much deeper insight into issues compared with a survey. It is a form of group interview where a specific topic is discussed in detail, and it is the group interaction that distinguishes it from other research methods. Focus groups are particularly useful for 'hard-to-reach' areas where people tend not to respond to surveys. Views expressed in focus groups cannot be generalised to a wider population but are useful for in-depth insight.

A focus group will be run as part of the consultation process, to gain in-depth insight into thoughts and views on the Joint Strategy.

Sampling – focus group

The focus group will be delivered by Ricardo. A specialist market research organisation, MEL Insights, will be used for recruitment of the participants, who will be a group representative of local residents and businesses within the Partner Authorities' area.

Ricardo will engage with Borough consultation leads on appropriate methods to incentivise participation in the focus group.

Delivery – focus group

The session will be delivered by a specialist facilitator from Ricardo who has not been involved in the development of the Joint Strategy and can thus remain independent.

Notes will be taken, and with permission a recording made of the session solely for the purpose of enabling the Ricardo team to fully capture all comments made (the recording would not be made public, or retained for any other uses once a full set of notes has been made). Comments will not be attributable to individuals.

The focus group is planned to take place early in the consultation period. There remains uncertainty regarding Covid-19 safety requirements for this period so it will be planned as a virtual event.

The session will be 1.5 hours maximum, which tends to be the maximum that is feasible before participants' interest starts to decrease. This will allow the session to be broken into approximately 15min sections which relate to the themes of the consultation survey.

A facilitator will run the session, supported by a note taker. Observers from the project team may be permitted to attend, but will be expected to refrain from taking part in the discussions during the main session.

For issues raised outside of the Joint Strategy discussion a 'parking lot' approach will be used where questions/comments can be addressed either at the end of the session (after the allotted time) or separately via email/call.

Topic guide – focus group

A topic guide will be developed prior to the event, and will use the themes from the online survey as its basis. Time will be spent reviewing the priorities set out in the Joint Strategy, identifying any gaps that participants feel there may be, and gathering thoughts on the overall Joint Strategy. Different practical or online exercises will be used to maintain interest and provide everyone with an equal opportunity to contribute. A copy of the Joint Strategy will be provided to participants as part of the invitation, but it cannot be assumed that participants will have read the Joint Strategy prior to the session so there will be a short overview of each section prior to the corresponding facilitated discussion.

Public consultation – Question and Answer Session

An online Question and Answer (Q&A) session will take place around the middle of the consultation period. The format of the session will be a short presentation which covers the structure of the Joint Strategy, key themes and priorities, followed by Q&A. It will provide participants the opportunity to speak to one of the project team and ask questions on the Joint Strategy or any of the supporting reports. Feedback on the Joint Strategy will also be taken from those participating, and included in the analysis and reporting on the response to the public consultation.

The session will be 1.5 hours long and will be facilitated by a member of the Ricardo team with appropriate support from the project team. The session will be open to anyone and the date and time of the session (likely to be early evening) will be advertised on the ELWA website and in any publicity connected with the consultation. Ricardo staff will liaise with Borough officers to identify potential groups and individuals that may be interested in the session. Participants may include individuals with a keen interest in the Joint Strategy such as members of environmental groups. People wishing to attend will be able to sign up via a webform on the ELWA website. Should the session be oversubscribed then either additional sessions may be run or a breakout room format used during the virtual session that will allow smaller groups to discuss issues.

Notes will be taken during the Q&A session, and with permission a recording made of the session solely for the purpose of enabling the Ricardo team to fully capture all comments made (the recording would not be made public, or retained for any other uses once a full set of notes has been made). Comments will not be attributable to individuals.

Consultation results reporting

A report combining all the findings of the public consultation (including the online survey and the focus group and Q&A session) will be developed. It will include any recommendations for changes to be considered and incorporated within the final Joint Strategy. The consultation report will be available as an appendix to the final Joint Strategy document.

APPENDIX A

This is the proposed online survey for the public consultation.

Please note that information on data capture and use as per GDPR, as well as any other required information e.g. equalities monitoring, or disclaimers, will be included at the start of the survey. This text will be agreed with consultation leads from each of the Boroughs.

Once the questions are uploaded to Survey Monkey, additional functionality will be provided to enhance the user experience e.g. use of drop down boxes, and a mobile-friendly user interface.

Joint Resources and Waste Strategy Consultation

We'd like to gain your feedback on our draft Joint Strategy.

The Joint Strategy sets out the strategic aims and ambitions for resources and waste management of the five Partner Authorities, namely the [East London Waste Authority](#) (ELWA) and the London Boroughs of [Barking and Dagenham](#), [Havering](#), [Newham](#) and [Redbridge](#). The Partner Authorities work together to manage resources (the materials we recycle and donate for reuse) and waste within their boundaries.

It is important that the environment is left in a better condition for the next generation. The Joint Strategy sets out how the Partner Authorities will preserve resources by minimising waste, promoting resource efficiency and moving towards a circular economy, all of which will help to protect the natural environment and reduce carbon emissions.

The Joint Strategy starts in 2027, which is when the existing long-term contract for treating the waste and recycling from the local area comes to an end. The Joint Strategy has forecast future waste generation to 2057, so that the Partner Authorities can understand how best to source future waste treatment infrastructure (which is often built for 25-30 year lifespans). However, the document will be reviewed regularly, and the priorities and actions set out within it are for mainly the early part of the 30 year period of the Joint Strategy.

We're keen to hear from you if you live or work in the Partner Authority areas, or you have an interest in resources and waste management or wider environmental issues.

This consultation is structured in 6 parts:

- Waste Prevention
- Reuse and Repair
- Recycling
- Supporting Improvements with Infrastructure

Chapters Five and Six

Chapters Five and Six outline the journey of implementing the Joint Strategy, setting up mechanisms to monitor progress, respond to change, and the metrics against which success will be measured.

- 1. Do you have any comments on Chapters Five and Six?**
 - Comments – Please state
 - No Comment
-
- A little bit about you

The consultation will take approximately **X** minutes to complete and has 29 questions in total.

Please note, this consultation is focussed on the Joint Strategy. If you have any issues or suggestions you'd like to raise about the current waste and recycling services in your local area, please contact your local Council. Details have been provided at the end of the survey.

2. Do you

- ☐ Live in the area
- ☐ Work in the area
- ☐ Live and work in the area
- ☐ Other (please state)

3. Are you responding to the survey on behalf of a business?

- ☐ **Yes**
- ☐ **No**

4. What's your home postcode? Please provide your work postcode if responding on behalf of a business

- ☐ Please state

Chapters One and Two

Chapters One and Two of the Joint Strategy provide the purpose of the document, detail the key drivers for producing a Joint Strategy, and outline the current situation within the Partner Authorities' area including performance and barriers to recycling.

5. Do you have any comments on Chapters One and Two?

- ☐ **Comments – Please state**
- ☐ **No Comment**

Chapter Three

Chapter Three provides a summary of the forecasting work that has been conducted, including future policy, potential changes we may see to how people consume goods and services, and advances in technology. Details of the work conducted to model future recycling performance including the quantity and composition of future waste streams is also included.

6. Do you have any comments on Chapter Three?

- ☐ **Comments – Please state**
- ☐ **No Comment**

Chapter Four

Chapter Four of the Joint Strategy sets out the Partner Authorities' priorities and ambitions for resources and waste management for the Joint Strategy period of 2027 to 2057. These focus on the themes of Waste Prevention, Reuse and Repair, Recycling, and Supporting Improvements with Infrastructure.

We'd like to gather your thoughts on the priorities we have identified.

Waste Prevention

The Partner Authorities' waste prevention priorities:

1. Continue to work with residents and businesses to reduce waste growth and contribute to the London wide aspiration of becoming a 'zero waste city'
2. Support the London wide target of reducing food waste by 50% by 2030 and will work with the Greater London Authority, ReLondon¹ and other authorities to do this
3. Work to raise awareness of the individual, community and environmental benefits of reducing waste

More specifically we will:

- a) Develop waste prevention plans, Reduction and Recycling Plans, or other appropriate tools that outline the actions that will be taken to provide communications, engagement and access to services that help residents reduce waste and save money
- b) Support national and regional campaigns on waste prevention, and develop local campaigns to support projects and services
- c) Develop partnership arrangements with community organisations, housing associations local authorities, and other key stakeholders to enhance work on waste prevention
- d) Work with the Government, other local authorities and key stakeholders to promote higher standards of product design and manufacture, to prolong product lifecycles and reduce avoidable waste

7. Do you support the waste prevention priorities outlined

- ☐ Yes – I support all of the priorities
- ☐ Yes – I generally support the priorities but would like to propose a change
- ☐ No – I don't support the priorities listed

8. Are there any additions that you would make to the priorities identified?

- ☐ Yes – I'd like to suggest the following additions (please state)
- ☐ No changes

9. Is there one priority that is more important than the others?

- ☐ Yes - Please state
- ☐ No
- ☐ Other (please state)

10. Do you have any other comments on the Waste Prevention priorities?

- ☐ Yes – Please state
- ☐ No

¹ Formally known as LWARB – the London Waste and Recycling Board

Reuse and Repair

The Partner Authorities' reuse and repair priorities:

1. Work to increase the amount of products that are kept in local circulation through reuse and repair services
2. Seek to normalise reuse within our communities as a means of disposing of unwanted items
3. Seek to promote the purchase of reused, refurbished and repaired products as a beneficial alternative to buying new
4. Seek to advance local green economy job and training opportunities through supporting the development of reuse and repair services

More specifically we will:

- a) Explore options for providing or supporting existing and new reuse collection services from homes and businesses
- b) Investigate opportunities for increasing reuse provision at the Reuse and Recycling Centres, including on-site retail outlets where viable
- c) Work with reuse organisations to develop / expand existing valued partnerships, strengthen local offerings, and support increases in scope and capacity to enhance the services available to residents
- d) Raise awareness of repair options available within the Partner Authorities' area
- e) Participate in national, regional and sub-regional campaigns promoting reuse and repair, and undertake local promotion of the benefits and range of available services
- f) Work with the Government, other local authorities and key stakeholders to promote higher standards of product design and manufacture, to enhance opportunities for cost-effective reuse

11. Do you support the reuse and repair priorities outlined?

- ☐ Yes – I support all of the priorities
- ☐ Yes – I generally support the priorities but would like to propose a change
- ☐ No – I don't support the priorities listed

12. Are there any additions that you would make to the priorities identified?

- ☐ Yes – I'd like to suggest the following additions (please state)
- ☐ No changes

13. Is there one priority that is more important than the others?

- ☐ Yes - Please state
- ☐ No
- ☐ Other (please state)

14. Do you have any other comments on the reuse and repair priorities?

- ☐ Yes – please state
- ☐ No

Recycling

The Partner Authorities' recycling priorities:

1. We aspire to reach 50% recycling, and will work with local communities in this regard
2. We aim to achieve a minimum joint reuse, recycling and composting performance of 35% of LACW by 2030
3. We will work together to offer the Mayor's minimum level of household recycling service provision, providing residents with straightforward and easy-to-use recycling collection services
4. We will improve the quality of recycling collected and reduce contamination
5. We will improve recycling performance in houses and blocks of flats
6. We will work alongside new policy commitments including DRS and the EPR regime for household packaging to maximise opportunities for increasing recycling

More specifically we will:

- a) Introduce separate food waste collections for street level properties and blocks of flats, in line with anticipated regulations and Government guidance
- b) Expand household collection services to allow residents to recycle a wider range of packaging and containers where relevant markets exist
- c) Continue to investigate opportunities to recycle even more materials, through collection services, public recycling facilities and the Reuse and Recycling Centres
- d) Work with In-house commercial waste services and private waste companies to ensure that businesses in East London are able to access cost-effective recycling services
- e) Work with our residents and businesses to increase awareness of recycling
- f) Provide feedback to residents and businesses on contamination, and highlight the need for material quality
- g) Identify opportunities to use the ReLondon 'Making Recycling Work for People in Flats toolkit² or other suitable approaches to improve recycling performance in blocks of flats
- h) Work with the Government, other local authorities, producers and key stakeholders to develop better approaches to the planning and design of new developments to ensure residents are able to recycle easily
- i) Work together to identify opportunities to extract more recyclable material from bulky waste, street cleansing waste and fly tipped materials
- j) Explore opportunities to increase recycling through recovery of materials from other waste

² [Report - Making recycling work for people in flats | ReLondon](#)

streams

- k) Support London Recycles messaging and campaigning to ensure that a consistent reduce, reuse, recycle message is delivered across London
- l) Work with the Government, other local authorities, producers and key stakeholders to promote standards of product design that enhance opportunities for cost-effective recycling

15. Do you support the recycling priorities outlined?

- ☐ Yes – I support all of the priorities
- ☐ Yes – I generally support the priorities but would like to propose a change
- ☐ No – I don't support the priorities listed

16. Are there any additions that you would make to the priorities identified?

- ☐ Yes – I'd like to suggest the following additions (please state)
- ☐ No changes

17. Is there one priority that is more important than the others?

- ☐ Yes - Please state
- ☐ No
- ☐ Other (please state)

18. Do you have any other comments on the recycling priorities?

- ☐ Yes – please state
- ☐ No

Supporting Improvements with Infrastructure

The Partner Authorities' infrastructure priorities:

1. We will contribute to national and regional targets on reducing waste sent to landfill
2. We will secure access to waste treatment capacity in ways that support the Partner Authorities' priorities around reuse, repair and recycling
3. We will establish resilient, responsive and flexible arrangements for future waste treatment, so that the Partner Authorities can continue to improve local services while remaining responsive to changes in global material markets and international policy
4. We will seek to procure waste treatment services that provide local economic, environmental and social benefits
5. We aim to support the Mayor's target of managing the equivalent of 100% of London's waste within the capital

More specifically we will:

- a) Maximise the use of, and value from, ELWA's existing waste treatment contract
- b) Develop a procurement plan for future waste treatment capacity, to support the aims and objectives of this Joint Strategy. A Strategic Environmental Assessment screening will form part of the procurement plan process
- c) Ensure effective and responsible future commissioning, considering issues such as flexibility, resilience, value for money, service quality, social value, and environmental impacts including greenhouse gas emissions
- d) Ensure that any future contracts commissioned will not impede the Partner Authorities' ability to improve recycling in line with aspirations to reach 50%
- e) Investigate options for supporting the development of appropriate new local infrastructure for reuse, repair and remanufacture, which provide opportunities for local regeneration
- f) Work with the Greater London Authority to deliver future infrastructure and waste treatment capacity solutions that align with the policies set out in the London Environment Strategy, and ensure compliance with the Mayor of London's Carbon Intensity Floor requirements³ for any technology solutions considered that may include energy recovery (note: technologies will be considered as part of a procurement plan)
- g) Work with the Government, other local authorities and key stakeholders to encourage the development of local materials reprocessing capacity

³ [London Environment Strategy - Policy 7.3.2.b](#)

19. Do you support the recycling priorities outlined?

- ☐ Yes – I support all of the priorities
- ☐ Yes – I generally support the priorities but would like to propose a change
- ☐ No – I don't support the priorities listed

20. Are there any additions that would you make to the priorities identified?

- ☐ Yes – I'd like to suggest the following additions (please state)
- ☐ No changes

21. Is there one priority that is more important than the others?

- ☐ Yes - Please state
- ☐ No
- ☐ Other (please state)

22. Do you have any other comments on the recycling priorities?

- ☐ Yes – please state
- ☐ No

Chapters Five and Six

Chapters Five and Six outline the journey of implementing the Joint Strategy, setting up mechanisms to monitor progress, respond to change, and the metrics against which success will be measured.

23. Do you have any comments on Chapters Five and Six?

- ☐ Comments – Please state
- ☐ No Comment

24. Do you have any other feedback on the Joint Strategy? Please note, if you have any local issues to report you should contact your Council directly using the details provided at the end of this consultation survey

- ☐ Yes - Please state
- ☐ No

A little bit about you

[NOTE: Content and structure of the equalities monitoring questions would be confirmed with consultation leads from the Constituent Councils.]

Documents available for review on the website would include the full draft joint strategy, technical reports, Strategic Environmental Assessment screening report and the Equalities Impact Assessment.]

We'd like to find out a little bit more about you to support our equalities monitoring.

25. What is your gender?

- ☐ Male
- ☐ Female
- ☐ Other

26. What is your age?

- ☐ Under 18
- ☐ 18-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65 or above

27. What is your ethnicity?

- ☐ White British
- ☐ White Irish
- ☐ Other White background
- ☐ Indian or Indian British
- ☐ Pakistani or Pakistani British
- ☐ Bangladeshi or Bangladeshi British
- ☐ Chinese or Chinese British
- ☐ Other Asian background
- ☐ Black Caribbean
- ☐ Black African
- ☐ Other Black background
- ☐ White and Black Caribbean
- ☐ White and Black African
- ☐ White and Asian
- ☐ Other mixed background
- ☐ Arab
- ☐ Gypsy or Irish Traveller
- ☐ Other

28. What is your religion or belief?

- ☐ Buddhist
- ☐ Christian
- ☐ Hindu
- ☐ Jewish
- ☐ Muslim
- ☐ Sikh

- No religious belief
 - Other
- 29. What is your sexual orientation?
 - Heterosexual/straight
 - Homosexual/gay/lesbian
 - Bisexual
 - Other
- 30. Do you have a long term physical or mental impairment, which greatly impacts your ability to carry out normal day-to-day activities and you are likely to be considered disabled under the Equality Act 2010?
 - Yes
 - No

Appendix 7: Timeline for consultation and adoption

June 2021	The Preliminary Draft of the ELJRWS will be reviewed by each of the Partner Authorities in the cycle of Council Cabinet and ELWA Authority meetings, with the same recommendations being made at each.
July 2021	Subject to approval from the five Partner Authorities, the Preliminary Draft of the ELJRWS will be released to the four statutory consultees.
July-August 2021	This two-month period has also been allocated for wider stakeholder engagement.
September-October 2021	Two months have been provided to incorporate any changes that may be required to the ELJRWS following the public engagement and review by statutory consultees. The feedback from this exercise, as well as a further review of the evolving national policy landscape, will be used to update the ELJRWS before it is finalised and formally adopted by Partner Authorities.
November 2021 – February 2022	From November the final ELJRWS will need to be passing through the pre-Cabinet governance processes in the Constituent Councils, so that formal adoption can proceed in February 2022.

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CABINET

Subject Heading:

Public Realm Transformation – New Operating Model

Cabinet Member:

Cllr Dervish

SLT Lead:

Barry Francis, Director of Neighbourhoods

Report Author and contact details:

Paul Ellis, 01708432966,
paul.ellis@havering.gov.uk

Policy context:

This decision supports the Corporate Plan, especially 'A Great Place to Live' as outlined in the Places theme

Financial summary:

Should Members agree the recommendation to tender for an integrated waste and recycling collection and street cleansing contract, this will deliver the best value for money as outlined in exempt Appendix 4

Is this a Key Decision?

Yes: expenditure or saving (including anticipated income) of £500,000

When should this matter be reviewed?

7 July 2021

Reviewing OSC:

Environment

The subject matter of this report deals with the following Council Objectives

Communities making Havering
Places making Havering
Opportunities making Havering
Connections making Havering

☐
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Appendix 1, 2, 3 and 4 of this report are exempt from publication by virtue of paragraph 3 and 5 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended in that they contain information relating to the financial or business affairs of any particular person (including the authority holding that information); and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

SUMMARY

In September 2019, the Council started the procurement process for an integrated public realm services contract, tendering for a single contract to include waste and recycling collection, street cleansing, grounds and tree maintenance and associated services. Tendering had commenced but the outbreak of the Covid-19 pandemic introduced a period of uncertainty with bidders concentrating on service delivery and not new business jeopardising the procurement project plan timetable, leading to a significant risk that the programme would fail with severe disruption to services. Consequently, in September 2020 Cabinet agreed to stop this procurement.

The Public Realm Transformation programme has been reviewed again, concluding the market has now recovered to restart a procurement exercise. In the light of the previous Options Appraisal, Business Case and the present circumstances, three main service delivery models have been reconsidered:

- Continuing with the current operating model, with waste and recycling collection services and tree maintenance outsourced while street cleansing and grounds maintenance remain in-house. The Tree maintenance contract was extended for one year and is due to expire on 31st March 2022. The Waste and Recycling Contract will expire on 29th July 2023.
- Conduct a procurement exercise and engage an external contractor to deliver waste and recycling collection, street cleansing, grounds and tree maintenance and associated services in a single contract, or various permutations of these services to be included in the procurement with waste services
- Deliver public realm services through a Local Authority Company either by setting up a new company, using an existing company founded by the Council or partnership arrangement to deliver the services.

Assisted by Eunomia, a recent review indicates that the option likely to deliver the best outcome for the Council is to tender a waste and recycling collection service combined, and integrating, the street cleansing service. The research also indicated that retendering a standalone waste and recycling collection contract was likely to reduce bidder participation, reducing competition.

An integrated waste and recycling collection and street cleansing service contract will provide the Council opportunities to:

- Remove demarcation inefficiencies about who is responsible for litter and spillages in the street scene to achieve cleaner streets
- Improve supervision across waste collection and street cleansing services
- Share processes, procedures and ICT systems for swifter rectification of waste and street scene issues
- Lower its carbon footprint and improve local air quality with the introduction of ULEZ compliant vehicles, and may include electric and/or hydrogen vehicles where practicable
- Improve service performance within a framework of best value for money
- Increase value of the potential contract to the market which could lead to improved competition demonstrating value for money.

This report outlines the reason for the recommendation seeking approval to change the Council's operating model to deliver waste and recycling collection, weed control, trunk road cleaning and street cleansing functions in one combined integrated contract and for procurement to start as soon as practicably possible.

RECOMMENDATIONS

For the reasons highlighted in this report and its appendices, Cabinet is asked to:

1. Approve the new operating model whereby waste and street cleansing, trunk road cleaning, recycling collection and weed control services are combined in one single integrated contract offering and the commencement of the procurement of that contract; and
2. Delegate authority to the Director of Neighbourhoods, in consultation with the Cabinet Member for Environment and Director of Legal & Governance, to take all necessary steps to award the contract post procurement at the estimated value of £10 million per year and deliver an integrated contract for street cleansing, trunk road cleaning, waste and recycling collection and weed control.

REPORT DETAIL

1.0 Background

- 1.1 On 18 September 2019, Cabinet agreed that—grounds maintenance, gully cleansing, elements of parks development, park gates locking, street cleansing, winter maintenance (all delivered in-house), tree maintenance,

waste and recycling collection, trunk road cleaning and weed control (all outsourced) were to be tendered in one integrated contract. However, due to the Covid-19 pandemic, bidders struggled to undertake due diligence delaying procurement activity that jeopardised the project timetable. With key milestones not being delivered, the project was at serious risk of being unable to deliver these important services. Consequently, as agreed by Cabinet on 16 September 2020, the project was halted. Services that were already outsourced either had their contracts extended or the procurement opportunities were retendered.

- 1.2 The extended waste and recycling collection service contract is outsourced, with the extended contract due to expire in July 2023. To ensure service continuity this contract requires retendering imminently. The weed control contract is to expire in late 2023, and can be phased into a new contract in 2023 if required. The trunk road cleaning contract is updated annually with the highways contractor, and can be terminated for July 2023.

2.0 Market Testing and Operating Model

- 2.1 Recent research indicates the market has recovered from the pandemic sufficiently to tender. Research also indicated:

- With a shrinking market, there are fewer companies able to tender for waste and/or an integrated public realm contract
- There is market congestion with many similar contracts to be tendered at a similar period in London and other areas of England as Havering's procurement opportunity
- Of those companies that have the capacity to tender, several are targeting locations and services, and may concentrate their efforts where they hope to retain their contracts
- The market advised against the fully integrated public realm approach as previously procured and especially indicated a lack of appetite for grounds and tree maintenance services to be included with waste services
- If waste and recycling collection contract was retendered by itself, the market is less interested in this procurement opportunity as it is of lower value than many other procurement opportunities in the wider market.
- The Council will have greater procurement successes if it procures a waste and recycling collection contract combined with street cleansing services. More detail outlining the outcome of the recent market testing is in Appendices 1 and 2 (Exempt).

- 2.2 The risk profile of the project is appended at exempt Appendix 3 including mitigation steps that can be taken.

- 2.3 It is noted that strong market indication is that if the Council does not include street cleansing services in the tender with waste and recycling collection, it

is likely fewer bidders will tender for Havering's opportunity, decreasing competition that may result in less competitive pricing and innovation.

- 2.4 Consequently, to ensure procurement success, this report seeks approval to change the public realm operating model to deliver waste and recycling collection, weed control, trunk road cleaning and street cleansing services within one single integrated contract (the 'Contract'), to be delivered by one single contractor.

3.0 Governance and Procurement

- 3.1 Governance of this programme has followed Council policy and a Public Realm Transformation (PRT) Board of appropriate senior officers and experts, supported by a Project Team of specialists, will oversee the programme. The project will be monitored by the PRT Board with the Cabinet Member for Environment updated as appropriate. It is expected the award for the new Contract will be made the summer 2022.

- 3.2 The procurement of the new Contract seeks to deliver good value for money while creating a new emphasis on the management, maintenance and condition of the public realm, especially the street scene. The objectives that the Council will aim to achieve as part of the procurement of the new Contract are:

- Value for money
- An integrated Contract with the potential to deliver better co-ordinated management of the street scene, including cleaner streets.
- A contract that contributes towards other Council strategies such as improved air quality, as the Council will seek the best environmental solutions that are practicably available ensuring vehicles are ULEZ compliant, and may include electric & hydrogen vehicles, social values and community benefits where possible, assisting with the future sustainability of Havering.
- Improved technology, embracing innovative systems to improve service delivery and communications

- 3.3 Procurement will be through the Competitive Dialogue (CD) procedure. This procedure is best selected when the technical specification cannot be defined with precision and when the requirements may necessitate and involve innovative solutions which can be best delivered with the input of the market. As the Council is proposing to create a new integrated contract for the waste collection, weed control and street cleansing services, the CD procedure offers significant flexibility, as the Council can continue with the process until it is satisfied that a solution (or solutions) that is capable of meeting the needs has been identified. Given the market testing, this procurement opportunity will not be offered in lots. As outlined in section 5, an integrated solution has the potential to remove demarcation of responsibilities, join up services delivery and accountability and deliver cleaner streets with in a framework to deliver value for money.

- 3.4 Where appropriate and in consultation with the Cabinet Member for Environment, an 'outcome-based' specification, which informs bidders of the service standards that must be met but not the methods of delivery needed to achieve these outcomes, will be adopted. This gives bidders greater flexibility to decide how and when to deliver the services and encourages innovation. The contract will seek prices to deliver services as they are currently delivered but will also seek prices for separate recycling methods, especially food waste collection, and refuse containerisation to ensure the flexibility to introduce these options in the future should legislation require. Based on their experience of delivering similar services across the country and beyond, bidders will have different approaches on how best to achieve the Council's required outcomes.
- 3.5 The new Contract will be awarded for an initial period of 8 years with, subject to acceptable performance, the option for the Council to extend for up to a further 8 years, the duration of which may range from 1 year to 8 years, with no lower or upper limit to the number of extensions the Council can arrange, subject to not exceeding the maximum contract length of 16 years (initial contract term plus all extensions). Annual reviews with associated improvement plans will be specified to assist in driving improved performance and efficiency. Flexibility will be built into the extension provisions that will allow the Council to adapt to future service changes, including possible changes in waste collection requirements when there are legislative changes, the East London Waste Authority's (ELWA) waste disposal contract ends (due to expire in December 2027), innovation, new technologies, financial pressures, and whether to continue or retender the contract depending on contractor performance and the Council's long-term strategy.
- 3.6 The Council will base the award of the Contract on the Most Economically Advantageous Tender (MEAT) and, to ensure high standards of performance and market participation, a price/quality split of 50%/50% will apply. The bidders' solutions will be measured against the evaluation criteria, sub-criteria and weightings set by the Council. The Council will discuss with the bidders how each of the outcomes will be measured during the procurement process.
- 3.7 The contract will give due consideration, during the formulation of the contract and the procurement documents, to the development of a concise set of Key Performance Indicators (KPIs) which focus on the strategic aspects of the services and enable effective contract management activities. The new Contract will include an element of self-monitoring and be guided by the use of effective technology to measure performance that will be shared with the Council's client team. A payment and performance mechanism, including default mechanisms and profit sharing, which is based on good contract management principles will be included in the contract. A concise number of KPIs, focusing on the strategic aspects of the services, will be an efficient means of measuring performance and effective in driving service improvement where needed. The Council will continue to have the adequate instruments to deal with poor performance during the contract.

- 3.8 Before procurement can commence, the Council is obliged to consult with the GLA on waste issues to ensure they align with the Mayor of London's Environment Strategy. The initial stages of consultation has begun to enable the procurement timetable to be adhered to.
- 3.9 Subject to Cabinet approval for the operating model outlined in this report, officers will review the internal requirements and arrangements to ensure a robust client team is available for the new Contract. This will be conducted alongside an internal review of public realm management, grounds maintenance and parks development due to commence this summer.

4.0 Indicative timetable

- 4.1 Subject to the approval of the strategic direction outlined in this report, the implementation of the procurement is in accordance with the following indicative timetable.
- 4.2 The contract notice is likely to be published in September 2021. Potential providers may express a request to participate in the opportunity and complete the Selection Questionnaire (SQ). The submissions will be evaluated and those organisations which have demonstrated adequate economic and financial standing, technical and professional abilities will be selected to progress.
- 4.3 The main stages of the Competitive Dialogue process will then start. A two-stage Competitive Dialogue process, consisting of: Invitation to Submit Detailed Solutions (ISDS) followed by Invitation to Submit Final Tenders (ISFT) if selected. The consecutive stages will be used to reduce the number of bidders by applying the award criteria and until the Council has identified the solutions which are capable of meeting its needs. It is envisaged that this process will start in late 2021 and conclude in the early summer of 2022. Following submission of the final solutions, officers and their advisors will carry out an evaluation to determine the preferred bidder. A detailed report will then be developed and it is anticipated that the award of the contract will take place in summer 2022. The mobilisation of the services will commence within an adequate timeframe to ensure that the new contractor can prepare for the delivery of the new services from the start of the new Contract in July 2023.
- 4.4 The PRT Board will manage and agree the programme outcomes. Strong and effective representation of all relevant areas is necessary and subject matter experts attend the PRT Board. Relevant external support in the critical areas of project management, technical, procurement and legal functions will also be secured.
- 4.5 Trade Unions and employees have been updated on the proposals outlined in this report, and regular updates will continue. Formal consultation with Trade Unions and employees will be undertaken at the appropriate times.

REASONS AND OPTIONS

5.0 Reasons for the decision:

5.1 It is recommended the option for the waste and recycling services, weed control, trunk road cleaning and street cleansing services are procured as a single integrated Contract as this option is capable of delivering the “best” balance of benefits and risks:

- The ability to transfer some of the financial risks to the selected contractor.
- Maximises market participation.
- The opportunity to attract greater competition during the procurement process to secure best value for money.
- The ability to maximise market innovation to secure a contract which is fit for the future.
- The opportunity for improved technology, embracing innovative systems to improve service delivery and communications.

5.2 The procurement of this integrated contract achieves the following benefits:

- Reducing demarcation inefficiencies and conflicts at the interface of service delivery, especially in the street scene.
- Increased operatives’ accountability and more collaborative working.
- Improved co-ordination and sharing of resources, offering better value for money.
- Improved ICT systems leading to quicker decisions to rectify issues if they arise
- Increased value of the potential contract to the market which could lead to improved competition and better demonstration of value for money.

5.3 The Council has a legal obligation to tender contracts of this value. It also provides an opportunity to demonstrate that the Council is obtaining best value for money by carrying out an open and transparent process and engaging with the market. The competitive tension provided through a procurement process incentivises innovation and reduces costs.

6.0 Other options considered:

6.1 Other service delivery model options were considered. The selection of the options was mainly driven by the following considerations:

- The nature of the services in scope.
- The solutions available, taking into account existing and new ways of working, re-design of the business process and configuration.
- The availability of service providers.

- The ability of the supply side to deliver the required services within the constraints of delivery timeframe with other procurement opportunities in the pipeline.

6.2 The three options reviewed were:

- 6.2.1 Option 1: continuing to deliver services as the current operating model, i.e. waste & recycling collection to remain outsourced while street cleansing to remain an in-house service.

This option was not deemed viable as, because of the number of procurement opportunities in the pipeline in England, to retender a standalone waste services contract would significantly curtail participation for this lower valued contract compared to other procurement opportunities available to bidders at the same time. This situation is compounded by other risks as outlined in Appendix 3 (Exempt). Also, this option would not allow the Council to negotiate with suppliers the best delivery model for waste services, particularly removing the flexibility to allow the market to suggest ways to capitalise from any changes in the ELWA contract.

- 6.2.2 Option 2: contracting out (outsourcing) an integrated solution for the entirety of the Public Realm services, or various combinations of Public Realm services to be included in the procurement with waste services

The outsourcing completely of Public Realm services into a single integrated option is dismissed as research indicates, with fewer companies tendering for public realm contracts, a significant number of companies indicated they would not participate in the procurement if grounds and tree maintenance were included. Others indicated if they did participate, these services would have to be sub-contracted to third parties.

The Market strongly suggested procuring the waste and recycling collection service to be tendered in an integrated contract to include street cleansing would be the better procurement route (for reasons already outlined in this report). The market strongly indicated it would not bid for a waste and recycling collection service combined with grounds maintenance only.

- 6.2.3 Option 3: Set up a Local Authority Company to deliver the Contract.

The option to deliver the services through a Local Authority Company was considered and rejected as this option leaves all the financial risks with the Council and does not allow for contractors to inform the Council of the best way to structure and deliver services. Also, unless

refuse delivery specialists were engaged, the Council lacks the skills and management to progress this option at the present time.

- 6.2.4 The option of “insourcing the services” was not considered as this option has been rejected before as it is prohibitively expensive; the circumstances that led to this conclusion have not changed.

IMPLICATIONS AND RISKS

7.0 Financial implications and risks:

7.1 Savings

The financial impacts of this procurement route are outlined in Appendix 4 (exempt). It is unlikely that any savings (reduction in the Council’s overall budget) will be made through this procurement. However, it is likely that tendering for a combined waste collection and street cleansing contract will provide efficiencies and offer overall better value for money. If the government pursue the option to increase additional kerbside recycling for residents, i.e. food, glass, etc., it is likely that the cost to collect these materials will increase the contractor’s costs, which may be reflected in bid submissions.

7.2 Vehicles and Workshops

Outsourcing in-house services will leave the council with a surplus of cleansing vehicles. These vehicles are internally leased from workshops. Some vehicles have shorter leases than others, with almost all leases ending before the new Contract starts. All vehicles will be disposed of through auction. Currently street cleansing vehicles are also maintained and serviced at the council’s workshops. A contractor may or may not separately negotiate to continue to have their fleet serviced at the council’s workshops. If they do not, workshop income will reduce, requiring workshop fixed overhead costs to be reviewed and reapportioned to all other users.

7.3 Performance Management

A new client team is to be created to manage the contract. There is already a client team to manage waste collection and weed control contractors. The number of staff required to manage the integrated contract will be expanded to manage/client additional functions and services, namely street cleansing. Additional costs will be met from the savings through internal review process, as outlined in exempt Appendix 4.

7.4 Risks

There are several financial risks associated with this programme; with the introduction of additional recycling, there is a potential for contract prices to increase. This will be clearly outlined in a future report for contract award. The vehicles auctioned may not clear the balance, and the service's budget will be put under pressure. An estimate will be made on the auction value of the vehicles nearer to the time of award, and included in a cost matrix in the report outlining award in the summer of 2022.

8.0 Legal implications and risks:

- 8.1 The Council is under a number of statutory duties to provide a lot of the services detailed within this report which are the subject of transfer. Amongst these the Highways Act 1980 provides in s41 that a Highway Authority must maintain a public highway and that includes a requirement to keep it clean and free from obstructions. The Council is also a principal litter authority under the Environmental Protection Act 1990. This can be coupled with the council having a general power of competence under section 1 of the Localism Act 2011 to act as that of an individual, subject to other statutory provisions limiting or restricting its use.
- 8.2 The Council is required to procure this above threshold services contract under Public Contract Regulations 2015 (as amended) (PCR 2015). This report and its appendices detail the outcome and learning from the market testing officers have developed with the aid of an external consultant. Pursuant to Reg 40 PCR 2015, the Council conducted preliminary market consultation before commencing the procurement procedure via soft market testing meetings and previous know how. In accordance with Reg 26 (Choice of Procedures) PCR 2015 the PRT Board agreed the Competitive Dialogue (CD) procedure.
- 8.3 The Council may use the CD procedure in circumstances where any one or more of the grounds set out in Reg26(4) PCR 2015 exist(s):
- (i) the needs of the contracting authority cannot be met without adaptation of readily available solutions;
 - (ii) the services include design or innovative solutions; and
 - (iii) the technical specifications cannot be established with sufficient precision by the contracting authority with reference to a standard, European Technical Assessment, common technical specification or technical reference. To enable development of a solution best suited to the locality.
- 8.4 Reg 46(2) PCR 2015 requires the Council to provide an indication of the main reasons for their decision not to subdivide into lots. The reasons must be included in the procurement documents or in reports such as this report and its appendices drawn up under Reg 84(1) PCR 2015).

- 8.5 Due to the length of the contract there is likely to be some changes in the law, technology, etc., which will have an impact during the life of the contract. Some of these, where known are identified in this report. The procurement exercise and subsequent contract will try and capture, where possible, all these in a “clear, precise and unequivocal manner” as required under Regulation 72 PCR 2015 thus allowing the council and the market certainty as to intentions to include such provision, particularly where these offer best fit for the future delivery of services to residents.
- 8.6 The Council has a legal obligation to ensure due diligence and appropriate consultation for the Council’s staff that are to be transferred through the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE). Officers are developing what will translate to a detailed mobilisation plan which will include the transfer of its staff and staff of 3rd party contractors (where applicable) at the end of their contracts to the newly procured contractor post contract award. The pension’s arrangements have been considered and the new contractor will seek either admission to the Havering pension fund or alternatively will be required to provide a broadly comparable fund under the pension’s regulations.
- 8.7 Officers are aware to the need for careful management of existing contracts associated with this new opportunity to be tendered.

9.0 Human Resources implications and risks:

- 9.1 The in-house service to be included in this procurement is street cleansing. This service employs 80 staff directly, with additional agency workers as required. HR has been involved in this programme from an early stage, and is represented on the PRT Board, and will continue to offer guidance on staffing matters throughout this programme.
- 9.2 The Council employees would be TUPE transferred to the winning contractor in a controlled manner, in accordance with the Transfer of Undertakings (Protection of Employment) Regulations 2006 and their terms and conditions protected.
- 9.3 Transferring employees’ pensions will be safeguarded; market testing indicated that all contractors are likely to seek admission (Admitted Body Status (ABS)) to the Local Government Pension Scheme (LGPS). The Pensions Service has previously indicated that if the correct conditions are met, this is an acceptable outcome. The Contract will include provisions regarding pensions risk sharing and the admission to the LGPS would be subject to the execution of the contractor admission agreement. There are risks around the employer contribution rate payable into the LGPS Fund for the eligible employees and dealing with any deficit or surplus of the LGPS Fund at the cessation of the Contract. Potential bidders are likely to seek pass-through to mitigate against pension risks and, if the right conditions are met, pass-through will be agreed during the initial stages of procurement.

These legal matters will be subject to negotiation with the market during the procurement process. These risks are outlined further in Appendix 3 (exempt).

- 9.4 If this report is agreed, the Council intend to undertake a change management programme over the coming months to ensure it is best placed to manage the future contract. There is already a client team to manage the waste collection and weed control contracts. This team will be reviewed to ensure the skills and resources required to manage all aspects of the new contract, including street cleansing. This will be undertaken as part of a larger internal review that is to consider public realm management, grounds maintenance and parks development.
- 9.5 Any indirect Restructure which become apparent following this Transformation Programme will be managed through the Council's Change Management process.
- 9.6 This may be an unsettling time for staff. Managers will keep staff and Trade Unions updated, and will continue to keep them informed as the programme progresses. Support will continue to be offered to all staff through the Employee Assistance Programme. Formal consultation with Trade Unions and staff will commence at the appropriate time. Due diligence will be taken accordingly to mitigate against the risk of challenge that may be made, and an Equalities Impact Assessment (EqIA) has been conducted.
- 9.7 The waste and recycling collection services, trunk road cleansing and weed control services are already outsourced. The Council has limited responsibilities with the regard to the TUPE process for these staff, but will endeavour to ensure due diligence as it is in the Council's best interest to ensure that this progresses smoothly, to ensure services are not affected and there is a smooth transition (if an incumbent is not awarded the contract) from one provider to another.

10.0 Equalities implications and risks:

- 10.1 Under section 149 of the Equality Act 2010, the Council has a duty when exercising its functions. This includes to have "due regard" to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act and advance equality of opportunity and foster good relations between persons who share a protected characteristic and persons who do not. This is the public sector equality duty. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 10.2 "Due regard" is the regard that is appropriate in all the circumstances. The weight to be attached to each need is a matter for the Council. As long as the

council is properly aware of the effects and has taken them into account, the duty is discharged.

- 10.3 Appendix 5 outlines the detail of the Equalities Impact Assessment (EqIA). As outlined, currently 80 full-time staff are directly employed in the in-house street cleansing service. It is unlikely that there would be any specific individual impacts to any particular characteristic or group of staff.

11.0 Health and Wellbeing implications and Risks

- 11.1 Neutral impact. There will be no changes to current services and where assisted services are required, these will continue in any new contract.
- 11.2 Positive impact. Improved air quality through the introduction low emission vehicles. Also, learning from the Covid-19 pandemic, contractors will continue to adopt safer methods for street cleansing and waste collection functions, including staff health protection.

BACKGROUND PAPERS

None

Appendix 1 (Exempt) – Market testing, Havering

Appendix 2 (Exempt) – Market testing, Eunomia

Appendix 3 (Exempt) – Risks

Appendix 4 (Exempt) – Finance

Appendix 5 - Equalities Impact Assessment (EqIA)

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Equality & Health Impact Assessment (EqHIA)

Document control

Title of activity:	Public Realm Transformation – New Operating Model
Lead officer:	Peter Gay, Project Manager, Public Realm, Neighbourhoods.
Approved by:	Paul Ellis, Head of Environment, Neighbourhoods
Date completed:	26/05/2021
Scheduled date for review:	June to July 2023

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Did you seek advice from the Public Health team?	Yes
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

Please note that EqHIAs are **public** documents and must be made available on the Council's [EqHIA webpage](#).

Please submit the completed form via e-mail to EqHIA@havering.gov.uk thank you.

1. Equality & Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EqHIA and ensure you keep this section for your audit trail. If you have any questions, please contact EqHIA@havering.gov.uk for advice from either the Corporate Diversity or Public Health teams. Please refer to the Guidance in Appendix 1 on how to complete this form.

About your activity

1	Title of activity	Public Realm Transformation – New Operating Model		
2	Type of activity	Proposed outsourcing of Street Cleansing services in to an integrated waste collection and street cleansing contract.		
3	Scope of activity	<p>If Cabinet approve the new operating model, the procurement process will begin in September 2021. The procurement and mobilisation phase will be completed in July 2023.</p> <p>Subject to Cabinet approval to award this contract, there will be the need to transfer approximately 80 council employees to the contractor. TUPE will apply.</p>		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	<p>If the answer to <u>any</u> of these questions is 'YES', please continue to question 5.</p>	<p>If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6.</p>
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	No		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes		
5	If you answered YES:			
6	If you answered NO:			

Completed by:	Sam Cornell, Project Support Officer, Public Realm
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Date:

25/05/2021

2. The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:

The purpose of this Equalities Impact Assessment (EIA) is to:

- Undertake a thorough and systematic analysis of the effect of implementation of the proposed new operational model of the Public Realm on employees across the Council;
- Determine the impact and what extent the Public Realm Transformation Programme has on particular groups of staff;
- Assess the impact that will occur to minority groups or individuals when the programme is implemented;
- Propose measures to mitigate, eliminate or counterbalance that impact;
- Promote equality of opportunity.

Reference will be made to the following nine protected characteristics:

- Age
- Disability
- Sex/Gender
- Ethnicity/Race
- Religion/Faith
- Sexual Orientation
- Gender Reassignment
- Marriage/Civil Partnership
- Pregnancy, Maternity and Paternity

Staff and Trade Unions have been kept updated about the Public Realm Transformation Programme. The Council will continue to update Trade Unions and staff. If Cabinet agrees the new operating model for service delivery of Public Realm services, up to 80 staff could be subject to transfer to a new contractor. This number may decrease/increase as it is proposed that in-house services will not be transferred to a contractor until July 2023, and there may be staff reductions/increases before then.

An EIA requires that consultation should be carried out with relevant interest groups. The proposed programme is subject to consultation with the recognised Trade Unions and staff affected. The Transfer of Undertakings (Protection of Employment) Regulations (TUPE) applies for these staff. The Council will ensure due diligence throughout the process, and consult appropriately.

When the contract is awarded, it is likely to be a total of 80 employees to be transferred from council to contractor. Based on the equality strands detailed in this assessment, there should be no negative impact to any of these groups as all staff within these services will be subject to transfer to the contractor regardless profile. All affected staff will be transferred and TUPE applies.

Although the Council will provide anonymised TUPE data to support its procurement activities, the broader mechanism for the transfer of staff will be contained within the Mobilisation Plan. Where the information is not confidential, this information will be shared with staff and Trade Unions.

The Council will continuously monitor and oversee the transfer of staff from the Council to the contractor throughout the programme.

**Expand box as required*

Who will be affected by the activity?

This element of the Public Realm Transformation Programme affects approx. All these affected staff will be subject to TUPE.

Reference is made to the following nine protected characteristics:

- Age
- Disability
- Sex/Gender
- Ethnicity/Race
- Religion/Faith
- Sexual Orientation
- Gender Reassignment
- Marriage/Civil Partnership
- Pregnancy, Maternity and Paternity

The tables below show the proportion of employees currently employed in the affected staff group and how this relates to the overall composition of the Council workforce.

There is no indication that the Public Realm Transformation Programme will adversely affect any strand of equality set out above. Consideration to equality issues will be reviewed following the consultation process to establish if any equality strand is adversely affected. Actions the Council will take to mitigate against any adverse impact include :

- All affected staff will have:
 - Regular updates
 - Access to one to one meeting throughout the consultation period with Council managers
 - Access to the Employees Assistance Programme
 - Access to one to one meeting throughout the mobilisation period with Council managers and the incoming contractor's managers
- Trade Unions will be updated and consulted as appropriate

**Expand box as required*

Protected Characteristic - Age: Consider the full range of age groups

Please tick (✓)
the relevant box:

Overall impact:

Positive								
Neutral	✓							
Negative		Age	Havering (number of employees and percentage)		Neighbourhoods (number of employees and percentage)		Specified Employees (number of employees and percentage)	
		<20 Years	6	0.24%		0.00%		0.00%
		20-30 Years	246	9.94%	36	7.83%	5	6.25%
		30-40 Years	480	19.40%	81	17.61%	7	8.75%
		40-50 Years	604	24.41%	101	21.96%	9	11.25%
		50-60 Years	828	33.47%	179	38.91%	45	56.25%
		>=60 Years	310	12.53%	63	13.70%	14	17.50%
		Grand Total	2474	100.00%	460	100.00%	80	100.00%
Age Profile – The age profiles of the affected groups indicate that 85% are within the over 40's age profiles, with the majority (56.25%) of those between the ages of 50 and 60. All of these employees should be transferred on their existing terms and conditions from Council to a new contractor, through the TUPE process.								
*Expand box as required								

**Expand box as required*

Evidence:

The Council employees will TUPE to the contractor on their existing terms and conditions. Transferring employees' pensions will be safeguarded too; market testing indicated that all contractors are very likely to seek admission to the Local Government Pension Scheme (Admitted Body Status (ABS)). The Pensions Service has indicated that if the correct conditions are met, this is the likely outcome. In the unlikely event that ABS is not granted/sought, all employees would be offered a comparable pension offering the same/very similar benefits instead. The Council will not be seeking to harmonise terms and conditions with any prospective contractor prior to transfer. Therefore, staff transferred to a contractor should continue to have the same benefits with a contractor that they currently have with the Council.

**Expand box as required*

Sources used:

Data was supplied by the London Borough of Havering Human Resources department.

**Expand box as required*

Protected Characteristic - Disability: Consider the full range of disabilities; including physical mental, sensory and progressive conditions

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

Disability	Havering		Neighbourhoods		Specified Employees	
No	32	1.29%	1	0.22%		0.00%
Not Recorded	2397	96.89%	449	97.61%	80	100.00%
Prefer not to answer	1	0.04%		0.00%		0.00%
Yes	44	1.78%	10	2.17%		0.00%
Grand Total	2474	100.00%	460	100.00%	80	100.00%

Disability Profile – No staff within the specified group have been recorded. This means there is no data to say whether or not any of the employees have any disabilities. As TUPE applies, staff will be transferred regardless of disability.

		<i>*Expand box as required</i>
<p>Evidence: Whilst any TUPE impact is less applicable here, all employers are obliged to adhere to the Equalities Act 2010.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>		
<p>Sources used: Data was supplied by the London Borough of Havering Human Resources department.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>		

Protected Characteristic - Sex/gender: Consider both men and women							
Please tick (✓) the relevant box:		Overall impact:					
Positive		Gender	Havering		Neighbourhoods		Specified Employees
		Female	1695	68.51%	142	30.87%	2 2.50%
Neutral	✓	Male	779	31.49%	318	69.13%	78 97.50%
		Grand Total	2474	100.00%	460	100.00%	80 100.00%
Negative		Gender Profile – This review affects 80 people, of those people, 97.50% identify as male and the other 2.50% identify as female. As TUPE applies to all staff regardless of gender, there should be no impact.					
<i>*Expand box as required</i>							
<p>Evidence: Whilst any TUPE impact is less applicable here, all employers must abide the Equalities Act 2010.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>							
<p>Sources used: Data was supplied by the London Borough of Havering Human Resources department.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>							

Protected Characteristic - Ethnicity/race: Consider the impact on different ethnic groups and nationalities							
Please tick (✓) the relevant box:		Overall impact:					
Positive		Ethnicity Grouping	Havering		Neighbourhoods		Specified Employees
		BAME	200	8.08%	23	5.00%	3 3.75%
		non-BAME	1361	55.01%	301	65.43%	61 76.25%
Neutral	✓	Not Recorded	871	35.21%	131	28.48%	14 17.50%

Negative		Prefer not to say	42	1.70%	5	1.09%	2	2.50%
		Grand Total	2474	100.00%	460	100.00%	80	100.00%
	<p>Ethnicity Profile – Only 3.75% of the workforce identify as BAME. The percentage of Non-BAME staff affected by the proposal is significantly higher with the wider council average. However, there is no particular impact to this group.</p>							
<p>Evidence: Whilst any TUPE impact is less applicable here, all employers must abide the Equalities Act 2010.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>								
<p>Sources used: Data was supplied by the London Borough of Havering Human Resources department.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>								

Protected Characteristic - Religion/faith: Consider people from different religions or beliefs including those with no religion or belief							
Please tick (✓) the relevant box:		Overall impact:					
Positive		Religion	Havering		Neighbourhoods		Specified Employees
		Any other religion	7	0.28%		0.00%	0.00%
		Buddhist	2	0.08%		0.00%	0.00%
Neutral	✓	Christian	191	7.72%	25	5.43%	0.00%
		Hindu	6	0.24%	1	0.22%	0.00%
		Jewish	1	0.04%		0.00%	0.00%
		Muslim	10	0.40%	1	0.22%	0.00%
		No religion	117	4.73%	17	3.70%	0.00%
		Not Recorded	2107	85.17%	411	89.35%	100.00%
		Prefer not to Say	28	1.13%	5	1.09%	0.00%
		Sikh	5	0.20%		0.00%	0.00%
		Grand Total	2474	100.00%	460	100.00%	80
Negative		<p>Religion Profile – None of the specified employees have had this characteristic recorded. As TUPE applies to all staff regardless of religion/faith, there should be no impact.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>					
<p>Evidence: Whilst any TUPE impact is less applicable here, all employers must abide the Equalities Act 2010.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>							

Sources used:

Data was supplied the by London Borough of Havering Human Resources department.

**Expand box as required*

Protected Characteristic - Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual

Please tick (✓)
the relevant box:

Positive

Neutral

✓

Negative

Overall impact:

Sexual Orientation	Havering		Neighbourhoods		Specified Employees	
Bisexual	3	0.12%		0.00%		0.00%
Gay or Lesbian	14	0.57%		0.00%		0.00%
Not Recorded	2115	85.49%	413	89.78%	80	100.00%
Other sexual orientation	2	0.08%		0.00%		0.00%
Prefer not to answer	22	0.89%	1	0.22%		0.00%
Straight or Heterosexual	318	12.85%	46	10.00%		0.00%
Grand Total	2474	100.00%	460	100.00%	80	100.00%

Sexual Orientation Profile – None of 80 specified employees have had their sexual orientation recorded.

**Expand box as required*

Evidence:

Whilst any TUPE impact is less applicable here, all employers must abide the Equalities Act 2010.

**Expand box as required*

Sources used:

Data was supplied by the London Borough of Havering Human Resources department.

**Expand box as required*

Protected Characteristic - Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth																																		
Please tick (✓) the relevant box:		Overall impact:																																
Positive		<table border="1"> <thead> <tr> <th>Gender</th> <th colspan="2">Havering</th> <th colspan="2">Neighbourhoods</th> <th colspan="2">Specified Employees</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>1695</td> <td>68.51%</td> <td>142</td> <td>30.87%</td> <td>2</td> <td>2.50%</td> </tr> <tr> <td>Male</td> <td>779</td> <td>31.49%</td> <td>318</td> <td>69.13%</td> <td>78</td> <td>97.50%</td> </tr> <tr> <td>Grand Total</td> <td>2474</td> <td>100.00%</td> <td>460</td> <td>100.00%</td> <td>80</td> <td>100.00%</td> </tr> </tbody> </table>					Gender	Havering		Neighbourhoods		Specified Employees		Female	1695	68.51%	142	30.87%	2	2.50%	Male	779	31.49%	318	69.13%	78	97.50%	Grand Total	2474	100.00%	460	100.00%	80	100.00%
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Neutral	✓																																	
Negative		<p>There is no data available regarding gender reassignment within this workforce. Therefore, we can only base this assessment on reported gender identities.</p> <p>Gender Profile – This review affects 80 people, of those people, 97.50% identify as male and the other 2.50% identify as female. As TUPE applies to all staff regardless of gender, all will be transferred.</p>																																
<i>*Expand box as required</i>																																		
Evidence:																																		
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Sources used:																																		
<p>Data was supplied by the London Borough of Havering Human Resources department.</p>																																		
<i>*Expand box as required</i>																																		

Protected Characteristic - Marriage/civil partnership: Consider people in a marriage or civil partnership						
Please tick (✓) the relevant box:		Overall impact:				
Positive		<p>There is no indication that the Public Realm Transformation Programme will adversely affect any strand of equality set out in this impact assessment. Consideration to equality issues will be reviewed following the consultation process to establish if any equality strand is adversely affected. Actions the Council will take to mitigate against any adverse impact include :</p> <ul style="list-style-type: none"> All affected staff will have: <ul style="list-style-type: none"> Regular updates Access to one to one meeting throughout the consultation period with Council managers Access to the Employees Assistance Programme 				
Neutral	✓					
Negative						

		<ul style="list-style-type: none"> ○ Access to one to one meeting throughout the mobilisation period with Council managers and the incoming contractor's managers <p>Trade Unions will be consulted and updated as appropriate</p> <p><i>*Expand box as required</i></p>
Evidence: <p>The Council employees will TUPE to the contractor on their existing terms and conditions. Whilst any TUPE impact is less applicable here, all employers must abide the Equalities Act 2010.</p> <p><i>*Expand box as required</i></p>		
Sources used: <p>Data was supplied by the London Borough of Havering Human Resources department.</p> <p><i>*Expand box as required</i></p>		

Protected Characteristic - Pregnancy, maternity and paternity: Consider those who are pregnant and those who are undertaking maternity or paternity leave		
Please tick (✓) the relevant box:		Overall impact:
Positive		<p>There is no indication that the Public Realm Transformation Programme will adversely affect any strand of equality set out in this impact assessment. However, consideration to equality issues will be reviewed following the consultation process to establish if any equality strand is adversely affected. Actions the Council will take to mitigate against any adverse impact include :</p> <ul style="list-style-type: none"> • All affected staff will have: <ul style="list-style-type: none"> ○ Regular updates ○ Access to one to one meeting throughout the consultation period with Council managers ○ Access to the Employees Assistance Programme ○ Access to one to one meeting throughout the mobilisation period with Council managers and the incoming contractor's managers <p>Trade Unions will be consulted and updated as appropriate</p> <p><i>*Expand box as required</i></p>
Neutral	✓	
Negative		
Evidence: <p>The Council employees will TUPE to the contractor on their existing terms and conditions. Whilst any TUPE impact is less applicable here, all employers must abide the Equalities Act 2010.</p> <p><i>*Expand box as required</i></p>		

Sources used:

Data was supplied by the London Borough of Havering Human Resources department.

**Expand box as required*

Socio-economic status: Consider those who are from low income or financially excluded backgrounds

Please tick (✓) the relevant box:

Positive

Neutral

Negative

✓

Overall impact:

There is no indication that the Public Realm Transformation Programme will adversely affect any strand of equality set out in this impact assessment. However, consideration to equality issues will be reviewed following the consultation process to establish if any equality strand is adversely affected. Actions the Council will take to mitigate against any adverse impact include :

- All affected staff will have:
 - Regular updates
 - Access to one to one meeting throughout the consultation period with Council managers
 - Access to the Employees Assistance Programme
 - Access to one to one meeting throughout the mobilisation period with Council managers and the incoming contractor's managers
- Trade Unions will be consulted and updated as appropriate

**Expand box as required*

Evidence:

The Council employees will TUPE to the contractor on their existing terms and conditions.

**Expand box as required*

Sources used:

Data was supplied by the London Borough of Havering Human Resources department.

**Expand box as required*

Health & Wellbeing Impact: Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity? Please use the Health and Wellbeing Impact Tool in Appendix 2 to help you answer this question.

Please tick (✓) all the relevant boxes that apply:

Overall impact:

Positive		There is no indication that the Public Realm Transformation Programme will adversely affect any strand of equality set out in this impact assessment.
Neutral	✓	However, consideration to equality issues will be reviewed following the consultation process to establish if any equality strand is adversely affected. Actions the Council will take to mitigate against any adverse impact include :
Negative		<ul style="list-style-type: none"> • All affected staff will have: <ul style="list-style-type: none"> ○ Regular updates ○ Access to one to one meeting throughout the consultation period with Council managers ○ Access to the Employees Assistance Programme ○ Access to one to one meeting throughout the mobilisation period with Council managers and the incoming contractor's managers <p>Trade Unions will be consulted and updated as appropriate</p> <p>This may be an unsettling time for staff. Managers have kept staff and Trade Unions updated, and will continue to keep them informed as the programme progresses. Support will continue to be offered to all staff through the Employee Assistance Programme. Formal consultation with Trade Unions and staff will commence at the appropriate time.</p> <p>All standard HR processes will be followed in order to minimise any impact on staff health and wellbeing.</p> <p>The new Contract has the potential to lead to the development and retention of a multi skilled workforce, as the integrated solution may present more opportunities for staff that wish to develop their professional career.</p> <p style="text-align: right;"><i>*Expand box as required</i></p> <p>Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box</p> <p style="text-align: right;">Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
Evidence: The Council employees will TUPE to the contractor on their existing terms and conditions. Transferring employees' pensions will be safeguarded too. All employers must abide the Equalities Act 2010. <p style="text-align: right;"><i>*Expand box as required</i></p>		
Sources used: Data was supplied by the London Borough of Havering Human Resources department. <p style="text-align: right;"><i>*Expand box as required</i></p>		

3. Outcome of the Assessment

The EqHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:

	1. The EqHIA identified <u>no significant concerns</u> OR the identified <u>negative concerns</u> have already been <u>addressed</u>	➔	Proceed with implementation of your activity
	2. The EqHIA identified some <u>negative impact</u> which still needs <u>to be addressed</u>	➔	COMPLETE SECTION 4: Complete action plan and finalise the EqHIA
	3. The EqHIA identified some <u>major concerns</u> and showed that it is <u>impossible to diminish negative impacts</u> from the activity to an acceptable or even lawful level	➔	Stop and remove the activity or revise the activity thoroughly . Complete an EqHIA on the revised proposal.

4. Action Plan

The real value of completing an EqHIA comes from the identifying the actions that can be taken to eliminate/minimise negative impacts and enhance/optimize positive impacts. In this section you should list the specific actions that set out how you will address any negative equality and health & wellbeing impacts you have identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer

Add further rows as necessary

* You should include details of any future consultations and any actions to be undertaken to mitigate negative impacts

** Monitoring: You should state how the impact (positive or negative) will be monitored; what outcome measures will be used; the known (or likely) data source for outcome measurements; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

5. Review

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

Review:

Scheduled date of review:

Lead Officer conducting the review:

**Expand box as required*

Please submit the completed form via e-mail to EqHIA@havering.gov.uk thank you.

Appendix 1. Guidance on Undertaking an EqHIA

This Guidance can be deleted prior to publication.

What is it?

The Equality & Health Impact Assessment (EqHIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service, whilst at the same time ensuring a person's chance of leading a healthy life is the same wherever they live and whoever they are. We want to ensure that the activities of the Council are 'fit for purpose' and meet the needs of Havering's increasingly diverse communities and employees. This robust and systematic EqHIA process ensures that any potential detrimental effects or discrimination is identified, removed, or mitigated and positive impacts are enhanced.

When to Assess:

An EqHIA should be carried out when you are changing, removing or introducing a new service, policy, strategy or function; for simplicity, these are referred to as an "activity" throughout this document. It is best to conduct the assessment as early as possible in the decision-making process.

Guidance: Equality & Health Impact Assessment Checklist

The Checklist in Section 1 asks the key questions,

4a) Are you changing, introducing a new, or removing a service, policy, strategy or function?

4b) Does this activity (policy/strategy/service/decision) have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?

4c) Does this activity (policy/strategy/service/decision) have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?

- If the answer to ANY of the questions 4a, 4b or 4c of the Checklist is 'YES' then you must carry out an assessment. e.g. Proposed changes to Contact Centre Opening Hours
'YES' = you need to carry out an EqHIA
- If the answer to ALL of the questions, 4a or 4b of the Checklist is NO, then you do not need to carry out an EqHIA assessment. e.g. Quarterly Performance Report
'NO' = you DO NOT need to carry out an EqHIA. Please provide a clear explanation as to why you consider an EqHIA is not required for your activity.

Using the Checklist

The assessment should take into account all the potential impacts of the proposed activity, be it a major financial decision, or a seemingly simple policy change. Considering and completing this EqHIA will ensure that all Council plans, strategies, policies, procedures, services or other activity comply with relevant statutory obligations and responsibilities. In particular it helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#) and its public health duties under the [Health and Social Care Act 2012](#).

Having Due Regard

To have due regard means that in making decisions and in its other day-to-day activities, the Council must consciously consider the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups
- Foster good relations between different groups
- Reduce inequalities in health outcomes

Combining Equality and Health Impact Assessment:

[Equality Impact Assessments \(EIAs\)](#) provide a systematic way of ensuring that legal obligations are met. They assess whether a proposed policy, procedure, service change or plan will affect people different on the basis of their 'protected characteristics' and if it will affect their human rights. Currently there are **nine protected characteristics** (previously known as 'equality groups' or 'equality strands'): age, disability, sex/gender, ethnicity/race, religion/faith, sexual orientation, gender reassignment, marriage/civil partnership, and pregnancy/ maternity/paternity.

An activity does not need to impact on all 9 protected characteristics – impacting on just one is sufficient justification to complete an EqHIA.

[Health Impact Assessments \(HIAs\)](#) consider the potential impact of any change or amendment to a policy, service, plan, procedure or programme on the health and wellbeing of the population. HIAs help identify how people may be affected differently on the basis of where they live and potential impacts on health inequalities and health equity by assessing the distribution of potential effects within the population, particularly within vulnerable groups. 'Health' is not restricted to medical conditions, or the provision of health services, but rather encompasses the wide range of influences on people's health and wellbeing. This includes, but is not limited to, experience of discrimination, access to transport, housing, education, employment - known as the 'wider determinants of health'.

This [Equality and Health Impact Assessment \(EqHIA\)](#) brings together both impact assessments into a single tool which will result in a set of recommendations to eliminate discrimination and inequality; enhance potential positive impacts and mitigate where possible for negative impacts. In conducting this EqHIA you will need to assess the impact (positive, neutral or negative) of your activity on individuals and groups with **protected characteristics** (this includes staff delivering your activity), **socio-economic status** and **health & wellbeing**. Guidance on what to include in each section is given on the next pages.

Guidance: What to include in background/context

In this section you will need to add the background/context of your activity, i.e. what is the activity intending to do, and why?

Make sure you include the scope and intended outcomes of the activity being assessed; and highlight any proposed changes. Please include a brief rationale for your activity and any supporting evidence for the proposal. Some questions to consider:

- What is the aim, objectives and intended outcomes?
- How does this activity meet the needs of the local population?
- Has this activity been implemented in another area? What were the outcomes?
- Is this activity being implemented as per best practice guidelines?
- Who were the key stakeholders in this activity?

*Note that the boxes will expand as required

Guidance: Who will be affected by the activity?

The people who will be affected may be

Residents: pay particular attention to vulnerable groups in the population who may be affected by this activity

Businesses/ manufacturing / developers / small, medium or large enterprises

Employees: e.g. Council staff for an internal activity, other statutory or voluntary sector employees, local businesses and services

*Note that the boxes will expand as required

Guidance: What to include in assessing a Protected Characteristic e.g. AGE

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact: In this section you will need to consider and note what impact your activity will have on individuals and groups (including staff) with protected characteristics based on the data and information you have. You should note whether this is a positive, neutral or negative impact.

It is essential that you note all negative impacts. This will demonstrate that you have paid 'due regard' to the Public Sector Equality Duty if your activity is challenged under the Equality Act.

*Note that the boxes will expand as required

Evidence: In this section you will need to document the evidence that you have used to assess the impact of your activity.

When assessing the impact, please consider and note how your activity contributes to the three aims of the Public Sector Equality Duty (PSED) as stated in the section above.

It is essential that you note the full impact of your activity, so you can demonstrate that you have fully considered the equality implications and have paid 'due regard' to the PSED should the Council be challenged.

- If you have identified a **positive impact**, please note this.
- If you think there is a **neutral impact** or the impact is not known, please provide a full reason why this is the case.
- If you have identified a **negative impact**, please note what steps you will take to mitigate this impact. If you are unable to take any mitigating steps, please provide a full reason why. All negative impacts that have mitigating actions must be recorded in the **Action Plan**.
- **Please ensure that appropriate consultation with affected parties has been undertaken and evidenced**

Sources used: In this section you should list all sources of the evidence you used to assess the impact of your activity. This can include:

- Service specific data
- Population, demographic and socio-economic data. Suggested sources include:
 - o Service user monitoring data that your service collects
 - o [Havering Data Intelligence Hub](#)
 - o [Office for National Statistics \(ONS\)](#)

If you do not have any relevant data, please provide the reason why.

*Note that the boxes will expand as required

Guidance: What to include in assessing Health & Wellbeing Impact:

Please tick (✓) all the relevant boxes that apply:

Positive

Neutral

Negative

Overall impact: In this section you will need to consider and note whether the proposal could have an overall impact on, or implications for, people's health and wellbeing or any factors which determine people's health.

How will the activity help address inequalities in health?

Include here a brief outline of what could be done to enhance the positive impacts and, where possible, mitigate for the negative impacts.

*Note that the boxes will expand as required

Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box

Yes ☐ No ☐

Evidence: In this section you will need to outline in more detail how you came to your conclusions above:

- What is the nature of the impact?
- Is the impact **positive** or **negative**? It is possible for an activity to have **both positive and negative impacts**. Consider here whether people will be able to access the service being offered; improve or maintain healthy lifestyles; improve their opportunities for employment/income; whether and how it will affect the environment in which they live (housing, access to parks & green space); what the impact on the family, social support and community networks might be
- What can be done to mitigate the negative impacts and/or enhance the positive impacts?
- If you think there is a **neutral impact**, or the impact is not known, please provide a brief reason why this is the case.
- What is the likelihood of the impact? Will the impact(s) be in weeks, months or years? In some cases the short-term risks to health may be worth the longer term benefits.
- Will the proposal affect different groups of people in different ways? A proposal that is likely to benefit one section of the community may not benefit others and could lead to inequalities in health.

Please use the Health & Wellbeing Impact Tool in Appendix 2 as a guide/checklist to assess the potential wider determinants of health impacts.

This tool will help guide your thinking as to what factors affect people's health and wellbeing, such as social support, their housing conditions, access to transport, employment, education, crime and disorder and environmental factors. It is not an exhaustive list, merely a tool to guide your assessment; there may be other factors specific to your activity.

Some questions you may wish to ask include:

- Will the activity impact on people's ability to socialise, potentially leading to social isolation?
- Will the activity affect a person's income and/or have an effect on their housing status?
- Is the activity likely to cause the recipient of a service more or less stress?
- Will any change in the service take into account different needs, such as those with learning difficulties?
- Will the activity affect the health and wellbeing of persons not directly related to the service/activity, such as carers, family members, other residents living nearby?
- If there is a short-term negative effect, what will be done to minimise the impact as much as possible?

- Are the longer-term impacts positive or negative? What will be done to either promote the positive effects or minimise the negative effects?
- Do the longer term positive outcomes outweigh the short term impacts?

*Note that the boxes will expand as required

Sources used: In this section you should list all sources of the evidence you used to assess the impact of your activity. This could include, e.g.:

Information on the population affected

- Routinely collected local statistics (e.g. quality of life, health status, unemployment, crime, air quality, educational attainment, transport etc.)
- Local research/ Surveys of local conditions
- Community profiles

Wider Evidence

- Published Research, including evidence about similar proposals implemented elsewhere (e.g. Case Studies).
- Predictions from local or national models
- Locally commissioned research by statutory/voluntary/private organisations

Expert Opinion

- Views of residents and professionals with local knowledge and insight

*Note that the boxes will expand as required

Guidance: Outcome of the Assessment

On reflection, what is your overall assessment of the activity?

The purpose of conducting this assessment is to offer an opportunity to think, reflect and **improve** the proposed activity. It will make sure that the Council can evidence that it has considered its due regard to equality and health & wellbeing to its best ability.

It is not expected that all proposals will be immediately without negative impacts! However, where these arise, what actions can be taken to mitigate against potential negative effects, or further promote the positive impacts?

Please tick one of the 3 boxes in this section to indicate whether you think:

1. all equality and health impacts are adequately addressed in the activity – proceed with your activity pending all other relevant approval processes
2. the assessment identified some negative impacts which could be addressed – please complete the Action Plan in Section 4.
3. If the assessment reveals some significant concerns, this is the time to stop and re-think, making sure that we spend our Council resources wisely and fairly. There is no shame in stopping a proposal.

*Note that the boxes will expand as required

Guidance: Action Plan

For each protected characteristic/health & wellbeing impact where an impact on people or their lives has been identified, complete one row of the action plan. You can add as many further rows as required.

State whether the impact is Positive or Negative

Briefly outline the actions that can be taken to mitigate against the negative impact or further enhance a positive impact. These actions could be to make changes to the activity itself (service, proposal, strategy etc.) or to make contingencies/alterations in the setting/environment where the activity will take place.

For example, might staff need additional training in communicating effectively with people with learning difficulties, if a new service is opened specifically targeting those people? Is access to the service fair and equitable? What will the impact on other service users be? How can we ensure equity of access to the service by all users? Will any signage need changing? Does the building where the service being delivered comply with disability regulations?

Guidance: Review

Changes happen all the time! A service/strategy/policy/activity that is appropriate at one time, may no longer be appropriate as the environment around us changes. This may be changes in our population, growth and makeup, legislative changes, environmental changes or socio-political changes.

Although we can't predict what's going to happen in the future, a review is recommended to ensure that what we are delivering as a Council is still the best use of our limited resources. The timescale for review will be dependent on the scale of the activity.

A major financial investment may require a review every 2-3 years for a large scale regeneration project over 10-15 years.

A small policy change may require a review in 6 months to assess whether there are any unintended outcomes of such a change.

Please indicate here how frequently it is expected to review your activity and a brief justification as to why this timescale is recommended.

Appendix 2. Health & Wellbeing Impact Tool

Will the activity/service/policy/procedure affect any of the following characteristics? Please tick/check the boxes below

The following are a range of considerations that might help you to complete the assessment.

Lifestyle YES <input type="checkbox"/> NO <input type="checkbox"/>	Personal circumstances YES <input type="checkbox"/> NO <input type="checkbox"/>	Access to services/facilities/amenities YES <input type="checkbox"/> NO <input type="checkbox"/>
<input type="checkbox"/> Diet <input type="checkbox"/> Exercise and physical activity <input type="checkbox"/> Smoking <input type="checkbox"/> Exposure to passive smoking <input type="checkbox"/> Alcohol intake <input type="checkbox"/> Dependency on prescription drugs <input type="checkbox"/> Illicit drug and substance use <input type="checkbox"/> Risky Sexual behaviour <input type="checkbox"/> Other health-related behaviours, such as tooth-brushing, bathing, and wound care	<input type="checkbox"/> Structure and cohesion of family unit <input type="checkbox"/> Parenting <input type="checkbox"/> Childhood development <input type="checkbox"/> Life skills <input type="checkbox"/> Personal safety <input type="checkbox"/> Employment status <input type="checkbox"/> Working conditions <input type="checkbox"/> Level of income, including benefits <input type="checkbox"/> Level of disposable income <input type="checkbox"/> Housing tenure <input type="checkbox"/> Housing conditions <input type="checkbox"/> Educational attainment <input type="checkbox"/> Skills levels including literacy and numeracy	<input type="checkbox"/> to Employment opportunities <input type="checkbox"/> to Workplaces <input type="checkbox"/> to Housing <input type="checkbox"/> to Shops (to supply basic needs) <input type="checkbox"/> to Community facilities <input type="checkbox"/> to Public transport <input type="checkbox"/> to Education <input type="checkbox"/> to Training and skills development <input type="checkbox"/> to Healthcare <input type="checkbox"/> to Social services <input type="checkbox"/> to Childcare <input type="checkbox"/> to Respite care <input type="checkbox"/> to Leisure and recreation services and facilities
Social Factors YES <input type="checkbox"/> NO <input type="checkbox"/>	Economic Factors YES <input type="checkbox"/> NO <input type="checkbox"/>	Environmental Factors YES <input type="checkbox"/> NO <input type="checkbox"/>
<input type="checkbox"/> Social contact <input type="checkbox"/> Social support <input type="checkbox"/> Neighbourliness <input type="checkbox"/> Participation in the community <input type="checkbox"/> Membership of community groups <input type="checkbox"/> Reputation of community/area <input type="checkbox"/> Participation in public affairs <input type="checkbox"/> Level of crime and disorder <input type="checkbox"/> Fear of crime and disorder <input type="checkbox"/> Level of antisocial behaviour <input type="checkbox"/> Fear of antisocial behaviour <input type="checkbox"/> Discrimination <input type="checkbox"/> Fear of discrimination <input type="checkbox"/> Public safety measures <input type="checkbox"/> Road safety measures	<input type="checkbox"/> Creation of wealth <input type="checkbox"/> Distribution of wealth <input type="checkbox"/> Retention of wealth in local area/economy <input type="checkbox"/> Distribution of income <input type="checkbox"/> Business activity <input type="checkbox"/> Job creation <input type="checkbox"/> Availability of employment opportunities <input type="checkbox"/> Quality of employment opportunities <input type="checkbox"/> Availability of education opportunities <input type="checkbox"/> Quality of education opportunities <input type="checkbox"/> Availability of training and skills development opportunities <input type="checkbox"/> Quality of training and skills development opportunities <input type="checkbox"/> Technological development <input type="checkbox"/> Amount of traffic congestion	<input type="checkbox"/> Air quality <input type="checkbox"/> Water quality <input type="checkbox"/> Soil quality/Level of contamination/Odour <input type="checkbox"/> Noise levels <input type="checkbox"/> Vibration <input type="checkbox"/> Hazards <input type="checkbox"/> Land use <input type="checkbox"/> Natural habitats <input type="checkbox"/> Biodiversity <input type="checkbox"/> Landscape, including green and open spaces <input type="checkbox"/> Townscape, including civic areas and public realm <input type="checkbox"/> Use/consumption of natural resources <input type="checkbox"/> Energy use: CO2/other greenhouse gas emissions <input type="checkbox"/> Solid waste management <input type="checkbox"/> Public transport infrastructure