

ENFORCEMENT OF PUBLIC SPACES PROTECTION ORDERS, STREET TRADING & FIXED PENALTY NOTICES

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|---------------------------|--|
| Committee name | Residents' Services Select Committee |
| Officer reporting | Daniel Ferrer, Licensing Team Manager David Holmes, Anti-Social Behaviour Team Leader |
| Papers with report | Borough Wide, Parks & Public Spaces PSPO – Appendix A Private Hire Vehicle & Taxi PSPO – Appendix B Restricted Areas for PSPO – Appendix C Street Trading Policy - Appendix D |
| Ward | All |

HEADLINES

This report provides information on the Council's responsibilities under the Public Spaces Protection Orders, Street Trading licensing legislation and the use of Fixed Penalty Notices. It provides an overview of activity, trends and enforcement cases.

RECOMMENDATIONS

That the Residents' Services Select Committee:

1. Notes the content of this report

SUPPORTING INFORMATION

INTRODUCTION

The purpose of this report is to provide the Residents' Services Select Committee with a clear view of enforcement performance against PSPO breaches and illegal street trading, and how FPNs are being used to support compliance and deter repeat offending. The scope covers enforcement activity, trends, the legal basis for interventions, and representative case studies that demonstrate how enforcement protects the public realm, supports town centre and economic activity, and upholds community safety standards.

LEGISLATIVE FRAMEWORK

The Council enforces PSPOs under Part 4 of the Antisocial Behaviour, Crime and Policing Act 2014 (sections 59–75). The Act enables prohibitions and requirements where activities have a detrimental, persistent or continuing effect and where restrictions are reasonable. Breaches may be addressed by FPNs or prosecution. Hillingdon's Orders include the Parks & Public Places PSPO found at **Appendix A** and the Private Hire Vehicle & Taxi PSPO found at **Appendix B**, both with a 3-year duration, setting borough wide and ward specific obligations and requirements. There are also Restricted Areas for the PSPOs found at **Appendix C**.

Illegal street trading is enforced under Part 3 of the London Local Authorities Act 1990 (as amended). The Council's Street Trading Policy found at **Appendix D** sets the application process, consultation periods, grounds for refusal, standard and special licence conditions, lists of designated licence streets, and enforcement tools such as warnings, revocation, seizure, and prosecution—with decisions guided by the Council's current Enforcement Policy and 'The Code for Crown Prosecutors' published by the Crown Prosecution Service.

ENFORCEMENT ACTIVITY OVERVIEW

PSPO Enforcement

Enforcement has concentrated on behaviours identified by the Orders as causing harm or nuisance. Boroughwide conditions include controls on alcohol consumption and surrender, drug influence, engine idling, e-scooter / e-bike and vehicle misuse on footways and green spaces, urination, defecation and spitting, and dog control. Parks and Open Spaces add conditions around fires/BBQs/fireworks, amplified sound, metal detecting, fishing/dredging, and park closing times; Town Centre conditions include controls on unauthorised street trading and distribution of printed matter. Targeted ward restrictions in the PHV & Taxi PSPO address nuisance arising from hire and reward vehicles waiting or parking within Heathrow Villages, Pinkwell and West Drayton. Enforcement Officers are able to issue verbal/written warnings, FPNs and, where proportionate and evidentially robust, proceeded to prosecution. Patrols have been scheduled to match demand patterns—early mornings/after school for dog control and fouling, evenings/weekends for town centre ASB and PHV waiting, and event related deployments. In addition, further enforcement actions are targeted during strategic activity such as multi departmental, intelligence led operations or routine operations between the enforcement services.

Street Trading

Under the London Local Authorities Act 1990 (as amended) Hillingdon currently have **167** Shop front street trading licences and **11** pitches. Tables and chairs were previously licenced under the same legislation; however, following the Covid pandemic, tables and chairs are now authorised under the pavement licensing scheme under the Business & Planning Act 2020. Hillingdon currently have **81** pavement licences. It should be noted that unlike the London Local Authorities Act 1990 (as amended) the Business & Planning Act 2020 does not authorise powers for Officers to issue FPNs. Breaches of Pavement Licence conditions can lead to removal of furniture, revocation or variation of the Pavement licence. Enforcement relies solely on administrative actions and there are no criminal offences.

Street trading operations under London Local Authorities Act 1990 (as amended) have focused on pitches and shop fronts. Officers have used policy conditions and designated street schedules to check compliance, applying graded interventions - warnings, FPNs, the option of seizure, consideration for not renewing licences and prosecution. Enforcement has been coordinated with Highways, Licensing and the Anti-Social Behaviour Team but also main stakeholders such as Uxbridge BID and the Police. Where traders have engaged constructively, officers have promoted licensing pathways and compliance education to reduce repeat offences.

Fixed Penalty Notices remain an out of court disposal in lieu of prosecution and provide an administrative tool for swift, proportionate enforcement, while maintaining escalation routes for non-payment, persistent offending, or aggravated circumstances and providing enforcement whilst offering a route to avoid prosecution to a suspected offender.

Environmental Enforcement Team (APCOA)

APCOA currently hold the contract to supply Environmental Enforcement Officers (EEOs) to the London Borough of Hillingdon. These officers conduct a wide range of public-space and street-scene enforcement tasks designed to maintain cleanliness, safety, and compliance with Public Space Protection Orders. Access to the team is via a simple one-page request form.

The team operate with ten officers and are deployed from 7am to 11pm each day.

Patrols & Monitoring of Environmental Byelaws

APCOA's Environmental Enforcement Officers conduct regular foot patrols to monitor compliance with environmental law. Their core focus includes:

- Littering/ fly tipping offences
- Compliance checks for controlled waste from businesses
- Failing to comply with Public Space Protection Orders
- Street trading, Licencing and failure to produce documents.
- Highway obstruction
- Unauthorised Advertising
- Skip/ Scaffolding
- Unlicenced Commercial Activity
- Deposits on the highway

Issuing Fixed Penalty Notices (FPNs)

Officers have authority to enforce environmental law through issuing Fixed Penalty Notices for appropriate offences. Offences carry a fixed penalty of £100. The role of the team is to patrol identified hotspot areas and issue penalties where an offence is clearly observed. Where a problematic area is identified, the ward officer submits a tasking form requesting patrols at a specified location, date, and time. The duration of these patrols will depend on availability and the officer's request. Areas may be monitored for several days or weeks, depending on the nature and frequency of the offence.

The Council monitors issue to payment timelines (14/28 days), payment rates, cancellations/withdrawals and prosecutions for unpaid notices. The mix of PSPO vs Street Trading FPNs varies by location and season; hotspots are typically linked to town centre footfall, transport hubs, parks, and areas with PHV/taxi activity.

PSPO related Fixed Penalty Notices – Overview of Enforcement -

| Offence | Total | January | February | March | April | May | June | July | August | September | October | November | December |
|---|-------------|------------|------------|-------------|-------------|-------------|-----------|-------------|------------|------------|------------|------------|------------|
| Spitting £50 | 292 | 59 | 30 | 11 | 13 | 3 | 5 | 8 | 17 | 53 | 46 | 30 | 17 |
| Idling £50 | 1363 | 318 | 396 | 113 | 70 | 31 | 31 | 48 | 29 | 48 | 85 | 102 | 92 |
| Urinating/defecating £50 | 92 | 5 | 11 | 5 | 10 | 9 | 6 | 12 | 4 | 7 | 16 | 3 | 4 |
| BBQ's/Fires £50 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Drinking/ Drugs PSPO £50 | 184 | 11 | 10 | 6 | 1 | 6 | 3 | 15 | 44 | 32 | 37 | 10 | 9 |
| Feeding birds £50 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 |
| Begging £50 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Being verbally abusive £50 | 151 | 5 | 6 | 6 | 12 | 26 | 26 | 0 | 0 | 0 | 33 | 17 | 20 |
| Dog Fouling £50 | 3 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 2 |
| More than 4 dogs | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Dogs off Lead £80 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 0 |
| Fishing £100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Having more than 4+dogs in a persons | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Car meets/racing PSPO | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Being verbally abusive £50 | 49 | 0 | 0 | 0 | 0 | 0 | 0 | 19 | 12 | 18 | 0 | 0 | 0 |
| Amplification (PSPO) £50 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Distribution of free printed matter £10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Motorised electric Veh (PSPO) (50.00) | 229 | 10 | 4 | 7 | 2 | 0 | 2 | 29 | 49 | 6 | 23 | 24 | 73 |
| Abatement Notice | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Obstruction | 9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 3 | 2 |
| PSPO PHV in resident area | 6047 | 0 | 0 | 948 | 972 | 1027 | 0 | 1109 | 537 | 535 | 528 | 391 | 0 |
| Footpath Obstruction PSPO | 404 | 1 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 401 |
| Total for the Year | 8827 | 409 | 458 | 1096 | 1080 | 1103 | 74 | 1242 | 693 | 699 | 773 | 580 | 620 |

Figure 1: PSPO FPNs by offence type

Looking at Figure 1, above, last year, the Council issued **8,827** FPNs across PSPO and allied street-scene enforcement. Enforcement action was dominated by the Public Spaces Protection Order (PHV in resident areas), which accounted for 6,047 notices (68.5%), reflecting the Council's focus on hire-and-reward vehicles waiting or parking in restricted residential zones. Engine idling remained a strong and consistent strand of activity, contributing 1,363 FPNs (15.4%).

Additional PSPO categories - Footpath Obstruction (404; 4.6%), Spitting (292; 3.3%), Motorised e-vehicles in restricted places (229; 2.6%), Verbal abuse (151; 1.7%), and Urinating/defecating (92; 1.0%) - supported wider public realm standards, Anti-Social Behaviour and town-centre management.

Seasonality and operational deployment shaped the profile of issuing. The highest months were July (1,242 FPNs), May (1,103), March (1,096) and April (1,080), with a low in June (74). PHV PSPO activity concentrated from March to November, with zeros in January, February, June and December, indicating targeted deployments. A notable town-centre compliance operation in November led to 401 Footpath Obstruction FPNs (virtually the full-year total) in a single month.

What this means for 2025/26 is that the PSPO remains an effective instrument for deterring PHV waiting/parking in sensitive residential areas, while idling and other PSPO behaviours require continued, visible enforcement - particularly in colder months and in town-centre settings. The data supports intelligence-led deployments to known hotspots and the continuation of short, high-impact operations ahead of seasonal peaks.

Fixed Penalty Notice Income (PSPO)– Overview

| Charge | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec |
|--------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| £1.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £1.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £25.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £25.00 | £0.00 | £0.00 |
| £30.00 | £360.00 | £240.00 | £480.00 | £150.00 | £240.00 | £420.00 | £450.00 | £240.00 | £330.00 | £210.00 | £180.00 | £90.00 |
| £40.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £50.00 | £11,400.00 | £15,200.00 | £27,050.00 | £36,250.00 | £35,400.00 | £55,550.00 | £48,300.00 | £34,650.00 | £26,950.00 | £27,650.00 | £21,700.00 | £25,450.00 |
| £60.00 | £480.00 | £660.00 | £180.00 | £240.00 | £120.00 | £660.00 | £960.00 | £840.00 | £2,520.00 | £360.00 | £660.00 | £720.00 |
| £80.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £85.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £90.00 | £180.00 | £180.00 | £90.00 | £0.00 | £90.00 | £0.00 | £0.00 | £0.00 | £90.00 | £90.00 | £90.00 | £90.00 |
| £100.00 | £8,000.00 | £6,800.00 | £7,400.00 | £9,000.00 | £8,400.00 | £9,700.00 | £11,400.00 | £11,600.00 | £10,700.00 | £8,000.00 | £7,200.00 | £8,900.00 |
| £110.00 | £0.00 | £0.00 | £0.00 | £110.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £120.00 | £0.00 | £120.00 | £0.00 | £0.00 | £0.00 | £120.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £150.00 | £1,650.00 | £2,250.00 | £2,250.00 | £4,050.00 | £3,450.00 | £7,500.00 | £6,750.00 | £1,950.00 | £150.00 | £0.00 | £300.00 | £150.00 |
| £180.00 | £180.00 | £0.00 | £180.00 | £180.00 | £180.00 | £0.00 | £0.00 | £360.00 | £540.00 | £360.00 | £1,260.00 | £900.00 |
| £200.00 | £8,400.00 | £10,600.00 | £6,600.00 | £3,400.00 | £1,800.00 | £5,000.00 | £2,400.00 | £2,600.00 | £6,600.00 | £8,000.00 | £6,400.00 | £8,800.00 |
| £225.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £225.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £240.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |
| £250.00 | £750.00 | £500.00 | £1,500.00 | £1,000.00 | £1,750.00 | £2,250.00 | £250.00 | £2,250.00 | £500.00 | £0.00 | £0.00 | £0.00 |
| £300.00 | £0.00 | £600.00 | £600.00 | £0.00 | £300.00 | £900.00 | £0.00 | £0.00 | £0.00 | £300.00 | £0.00 | £900.00 |
| £400.00 | £400.00 | £1,200.00 | £2,400.00 | £800.00 | £0.00 | £400.00 | £400.00 | £400.00 | £0.00 | £2,800.00 | £2,400.00 | £1,200.00 |
| £1,000.00 | £0.00 | £0.00 | £1,000.00 | £2,000.00 | £2,000.00 | £1,000.00 | £0.00 | £1,000.00 | £1,000.00 | £1,000.00 | £1,000.00 | £0.00 |
| Total | £31,800.00 | £38,350.00 | £49,730.00 | £57,180.00 | £53,730.00 | £83,726.00 | £70,910.00 | £55,890.00 | £49,380.00 | £48,795.00 | £41,190.00 | £47,200.00 |
| Refunds | £0.00 | £0.00 | £0.00 | £-50.00 | £0.00 | £-1.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 |

Figure 2: PSPO FPNs issued by month (trend and seasonality)

From Figure 2, above, total income from Fixed Penalty Notices in the last year was **£627,830** net (gross £627,881 less £51 refunds). Income exhibits moderate seasonality with an average of £52,323 per month and peaks in June (£83,726) and July (£70,910), reflecting the typical one-month lag between issuing and payment cycles.

Overall, April–September accounted for ~59% of annual receipts, aligning with the Council’s enforcement deployments over spring and summer. The November town-centre compliance activity continued to yield receipts into December, with some items settling in January, while refunds were negligible across the year.

What this means for 2025/26 is that the Council can continue to rely on a predictable collections lag following major operations, while focusing on early-payment prompts to improve settlement within 14/28 days and reduce escalation costs. Seasonal operations (spring/summer and pre-Christmas) should be retained, with communications and signage refreshed to maximise early compliance.

Figure 3, below, shows monthly FPN income (bars, left axis) and FPNs issued (line, right axis). Note the ~1-month lag between issue volumes and receipts.

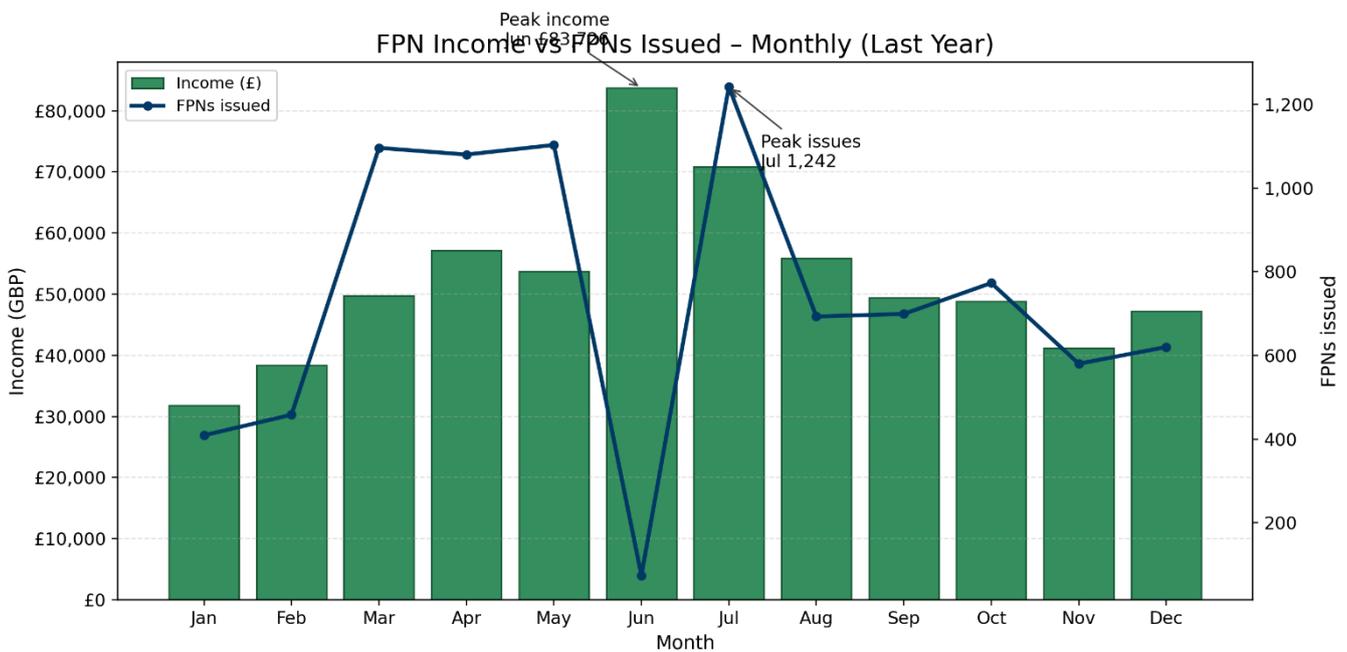


Figure 3: Monthly FPN income (bars, left axis) vs FPNs issued (line, right axis)

Business related Fixed Penalty Notices

| Offence | Amount |
|--|------------|
| Contravention of condition of street trading licence or temporary licence contrary to s34 (1) of the London Local Authorities Act 1990 (as amended) | 21 |
| 09 - Contravention of condition of street trading licence or temporary licence contrary to the Clean Neighbourhoods and Environment Act 2005 | 3 |
| Displaying advertisement in contravention of regulations, contrary section 224 (3) of the Town & Country Planning Act 1990 | 459 |
| 15 - Displaying advertisement in contravention of regulations, contrary to the Town & Country Planning Act 1990 s224(3) | 112 |
| Failing to produce street trading licence on demand contrary to section 34(4) of the London Local Authorities Act 1990 (as amended) | 4 |
| 08A - Failure to comply with a waste receptacles Notice contrary to the Environmental Protection Act 1990 section 46 | 2 |
| 08B - Failure to comply with a waste receptacles Notice contrary to the Environmental Protection Act 1990 section 47/47za/47zb | 2 |
| Failure to produce waste documents (waste transfer notes) contrary to section 34 (5) of the Environmental Act 1990 & Regulations made under s34 (6)/34 (a) | 103 |
| 07 - Failure to produce waste documents (waste transfer notes) contrary to section 43 of the Anti-Social Behaviour Act 2003 | 33 |
| Unlicensed Street Trading contrary to section 38 (1) the London Local Authorities Act 1990 (as amended) | 14 |
| 11 - Unlicensed Street Trading contrary to the London Local Authorities Act 1990 (as amended) Section 38(1) | 9 |
| Total | 762 |

Figure 4: Business-related (non-PSPO) FPNs by offence type

As Figure 4, above shows, last year, the Council issued **762** business-related FPNs outside of PSPO enforcement. Advertising offences account for 571 notices (74.9%), making this the

primary driver of business FPNs. Waste duty of care/documentation is the second largest category at 136 notices (17.8%). Street Trading licensing issues - unlicensed trading (23) and licence condition contraventions (24) - represent smaller but recurrent volumes.

CASE STUDY – Street Trading (Shop Front) Application Refused on Suitability Grounds (2024)

A town-centre homewares retailer in Ruislip applied for a temporary street trading shop-front licence to display goods up to 2.0 metres from the frontage (plastic storage, flowerpots, suitcases). A statutory consultation ran for three weeks in April–May 2024, generating 15 objections (pedestrian flow and highway safety concerns). Prior to the application being determined, the business had been warned and then issued a Fixed Penalty Notice (paid) for trading without a street trading licence. At the 2024 Sub-Committee hearing, the applicant did not attend. A potential mitigation proposed by Highways - reducing the depth to 1.0 metre on one side - could not be explored with the applicant due to this non-attendance.

Decision: The Sub-Committee refused the application, citing the London Local Authorities Act 1990 (as amended) and the Council's Street Trading Policy. The Committee placed significant weight on suitability including the recent FPN for unlicensed trading and procedural non-compliance and the lack of reassurance from non-attendance that licensing requirements would be observed. Relevant policy paragraphs referenced included 3.2 (suitability and enforcement history) and 10.5(b) (discretionary refusal: unsuitable to hold

CASE STUDY – Street Trading (Pitch) Application: Private Land with Covenant (2026)

A Hayes hot food retailer applied for a pitch street trading licence to place display/serving equipment on the frontage. The area of land was private but within 7 metres of the public highway and so required a street trading licence. The landowner had indicated consent; however, the frontage area was subject to an existing restrictive covenant that prohibits trading on that strip of land. Legal advised that the London Local Authorities Act 1990 (as amended) does not explicitly preclude the Council from granting a licence in these circumstances and that, in principle, a licence could be granted with conditions to protect the authority. However, the Council also has discretion under the Act and its Street Trading Policy to refuse where consent is not "sufficient" in practice or where doing so could be seen as tacitly permitting a breach of a known covenant. Legal advice highlighted that, given the Council now has notice of the covenant, it would be preferable to require the applicant to resolve/remove the covenant before a licence is considered. The operators also had a history of being served a number of fixed penalty notices for trading without a licence. Prosecution had also been considered as well as Planning issues being detected. Following a review of options, the recommendation was to refuse the current application and to review policy wording to ensure clear, consistent handling of applications where private-law encumbrances (such as covenants) conflict with operational trading.

CASE STUDY – Licensed Pitch: Boundary Non-Compliance (2025)

A licensed pitch trading near a major transport hub was the subject of repeated complaints that goods and ancillary materials were encroaching beyond the approved pitch. Initial concerns were raised in late 2024, and again in late 2025, with the Leader's Office requesting checks to be carried out and, if necessary, clear demarcation of the licensed area. Licensing Officers attended and measured the layout against the approved plan. On a number of visits officers confirmed goods, structures and waste (e.g., display tables, gazebo, cardboard) outside the authorised

boundary. Photographs were taken; staff on site were advised to bring stock back within bounds. Officers noted that existing ground markings were faded and appeared to reflect a previous footprint, increasing the risk of inadvertent drift. Further monitoring patrols were carried out by Officers which led to a total of 3 FPNs being issued. Officers held a meeting with the licence holder and advised them of the history and potential consequences if future breaches were detected. This included the consideration of prosecution and objections being raised against any future renewal application. All 3 FPN's have now been fully paid and further monitoring continues.

CHALLENGES

Delivering visible, proportionate enforcement requires balancing resource capacity against demand spikes across parks, town centres and ward areas. Evidential robustness including clear signage, contemporaneous notes, and body worn video footage is essential to support FPNs and prosecutions, particularly where behaviours are contested or exemptions are claimed. Public perception needs careful management, pairing enforcement with education and engagement. Seasonality and events drive peaks requiring pre-planned operations and flexible rostering. Finally, data integration across complaints, patrol logs, FPNs and legal outcomes is necessary to maintain a reliable single-view dashboard for performance and hotspot analysis.

OPPORTUNITIES & NEXT STEPS

There is scope to intensify targeted enforcement campaigns in the top hotspots, aligning patrols to evenings/weekends and peak footfall periods. A signage and communications refresh including update to web pages for reporting and licence applications would simplify resident engagement and trader compliance. Policy alignment can be pursued through a review of the Street Trading Policy which is being planned, designated streets and commodities, ensuring conditions remain fit-for-purpose. Technology enhancements such as dashboards, heatmaps, and payment funnels will make performance more transparent and actionable. Furthermore, regular refresher training in relation to the legislation, enforcement policies and customer engagement is always beneficial.

FINANCIAL & LEGAL IMPLICATIONS

Enforcement generates income from licence fees and FPNs, though FPN receipts are not a substitute for resourcing and should be understood within legal parameters. Operational costs include patrol staffing, signage, mapping, legal file preparation and court time. Legally, the Council must continue to comply with statutory powers and due process for PSPOs and Street Trading (consultation, publication, signage sufficiency, and PACE-compliant evidence gathering). Sensitive case material should be anonymised with consideration for Part 2 classification where appropriate, and Legal Services consulted for live matters.

CONCLUSION

PSPOs and the Street Trading framework, enforced through proportionate use of FPNs and prosecution where necessary, continue to be effective tools to protect Hillingdon's public spaces and support town centre vitality. Enforcement has been intelligence led, responsive to resident concerns, and grounded in robust legal processes.