

1. Petitioner information

In the box below, give the name and address of each individual, business or organisation submitting the petition.

Anthony William Fox
Upminster

In the box below, give a description of the petitioners. For example, “We are the owners/tenants of the addresses above”; “My company has offices at the address above”; “Our organisation represents the interests of...”; “We are the parish council of...”.

I am an owner of the address above, which is within The London Borough of Havering.
I am the customer of a very small-scale fishmonger.

2. Objections to the Bill

In the box below, write your objections to the Bill and why your property or other interests are **directly and specially affected**. Please number each paragraph.

Only objections outlined in this petition can be presented when giving evidence to the Committee. You will not be entitled to be heard by the Committee on new matters not included in your written petition.

Re: City of London (Markets) Bill 2023

1. This is a petition against further amendments to the Bill which might result from the prior petition ('prior petition') lodged by the London Borough of Havering ('Prior Petitioner').

Faulty standing

2. The Prior Petitioner misleads Parliament with the statement: "Under the Royal Charter of the Liberty of Havering granted by King Henry III in 1247 of which we are the current beneficiary no other market is permitted to set up within six and two-thirds miles (the 'radius') of Romford Market" (prior petition para 1).
3. It is conceded that there was a writ to the Sherriff of Essex in 1247 creating market rights at Romford, ultimately vested in the Crown; this was in the royal manor of Havering. It is anachronistic to conflate that with the Liberty of Havering (see Close Rolls, 1242-7, 536).
4. The present petitioner finds that the document relied upon by the Prior Petitioner does not exist.
5. More than 200 years later, there was a Charter for the Liberty of Havering ('The Liberty') in 1465 under King Edward IV. This Charter was confirmed several times afterwards. There have been minor amendments made to it passim. In general, the charters refer to the Lordship or Manor of Havering, and not to a 'liberty', until the 15th century. It is conceded that the term Liberty of Havering was well-established by the late 18th century.
6. It is conceded that the prior petitioner may be a beneficiary of rights therein, and de facto does operate Romford Market. However, The Liberty was ultimately vested in the Crown, and it has not been demonstrated that the Prior Petitioner owns the rights, nor to what extent Prior Petitioner may exercise without constraint any rights that it may have.

Over-reach, Disproportionality and Perverse Effect of proposed amendment

7. Prior Petitioner requests amendment restricting proposed new Billingsgate Market to wholesale sales, and to prohibit retail sales.
8. The relocation of the Market would thus be prevented from being an amenity to the general public by implementing the proposed amendment.

9. Such an amendment, restricting the market to wholesale purchasers, conflicts with the present Billingsgate Market which is open to the general public.
10. In its eight centuries or more, Romford Market has never been a fish market. The Prior Petitioner exaggerates when it imagines (para 4): ‘...the said markets (sic) would threaten the integrity and ongoing viability of Romford Market’. There is no evidence for this imaginary threat. Direct observation of both markets will make it blindingly obvious that they do not compete in the sale of any category of goods.
11. There has never been a formal definition of wholesale trade in fish. The prior petitioner presents no evidence of any capability to provide one. As a customer of a very small-scale fishmonger, it would seem that permitting the general public into Billingsgate Market provides such a fishmonger to buy small quantities of fish, and even a single fish on order, from his customer. A licence being needed from the London Borough of Havering to do so is an action that is ultra vires, especially as the proposed site of the new Billingsgate Market is not in that Borough.
12. Such an amendment will damage public credibility of local government, relying upon misquoted ancient documents that are irrelevant to the modern-day operation of Romford Market.
13. By analogy, Smithfield Market has retail facilities in its environs; those are amenities for the general public, and create harm neither to that wholesale market, nor any other market, even where meat is traded.
14. It is perverse for a local authority to object to a project in a different London Borough that can improve local economic activity and usefully develop a brown-field site. There can then be benefit to the general public both directly and indirectly, and this applies to the residents of both of the concerned London Boroughs.
15. It is disproportionate that Billingsgate Market, which is of national importance, and pivotal in the UK fishing industry, should be vulnerable to the discretion of the London Borough of Havering to award, and renew, some sort of licence.

3. What do you want to be done in response?

In the box below, tell us what you think should be done in response to your objections to the Bill. You do not have to complete this box if you do not want to.

You can include this information in your response to section 3 'Objections to the Bill' if you prefer. Please number each paragraph.

1. The prior petition should be set aside.
2. In the alternative, Parliament should create a statutory exception to whatever licence the Prior Petitioner claims to be needed, and this should be in perpetuity.
3. Prior Petitioner should, at the very least, be required to: i) present documents it is relying upon, and ii) demonstrate specific language that it is the beneficiary and/or in possession and/or capable of exercising the rights claimed, because the prior petition is false in this regard.
4. In the extreme alternative, and risking redundancy, the recommendation of the prior petition should be severely narrowed, and made to support strictly the general objectives of the radius claimed, and the contemporary nature of Romford Market because of the absence of competing trade in fish, as has been the case for 800 years or more.