# Combined Equity Impact Assessment

## Introduction

The #2035 Combined Equality Impact Assessment (CEIA) brings together anti racism/discrimination, climate and health to ensure officers plan programmes, policies, and services that focus on what matters to communities.

Westminster City Council is working to reduce what was the highest life expectancy gap in the Country – this is now 15-years. 80% of Health Outcomes are impacted by things like access to decent housing, employment, our environment, and social issues like discrimination or exclusion. 20% relate to health services which is why this is a partnership between the Council and the NHS.

Completing a CEIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions, and it reduces the risk of legal challenge. This toolkit should be carried out at the earliest stages of planning and then updated as the policy or review develops.

**When do I need to complete an CEIA?** You need to complete an CEIA when:

- Planning, developing or amending services including business services, policies, strategies, procured or commissioned services, practices and plans
- Considering a change management process or organisational review
- Planning or developing a consultation or engagement campaign resident leaflets, guidance, or codes of practice
- When considering and developing a tender document for procurement or commissioning of services

## Who should complete an CEIA?

The person completing the CEIA should know the project or proposal closely likely the. For programmes or projects this will likely be the manager or Head of Service. Work that needs a decision e.g. Lead Member decision or Leadership Team should be signed off by the Executive Director. Anything that is not going through a formal decision-making process can be signed off by Head of service.

## Where can I get support to complete an CEIA?

Email any queries to equalities@westminster.gov.uk

If your CEIA is community related: Andre Johnsen – Community Equalities Manager (ajohnsen@westminster.gov.uk ). If your CEIA focuses on workforce changes or development, then contact Jennifer Samuels (jsamuels2@westminster.gov.uk ).

**Please note the CEIA is a live document which means it must be regularly reviewed and updated considering new evidence or information.**

## SECTION 1: Programme details

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| **Name of the policy, project, service, or strategy being assessed** | Westminster Street Trading and Markets Transformation Programme 2027 - combined CEIA for the draft Markets Strategy 2027-2030, Street Trading Policy 2027-2030, revised Standard Conditions, draft market fee changes, and related delivery documents covering markets, isolated pitches, temporary/event trading and exhibition sites. |
| **A brief overview of its aim or the change taking place (2-4 sentences, please avoid acronyms) assume the reader of this is not a subject matter expert in your service.** | The draft programme refreshes how Westminster manages street trading across its six council-managed markets, its wider estate of isolated pitches, temporary and event trading, and the two licensed open-air exhibition sites. It introduces a differentiated market strategy, a new city-wide policy framework for markets and non-market trading locations, updated trader standards and enforcement arrangements, and revised market fee proposals for the six council-managed markets and market-related event trading. The overall aim is to create a safer, cleaner, more accessible, more financially sustainable and more place-sensitive street trading service, while also widening routes into trading, improving trader support, strengthening public realm quality and supporting lower-emission operation. |
| **CEIA Author** | Jonathan Russell Lloyd |
| **Contact Email** | jrlloyd@westminster.gov.uk |
| **Director** | Mark Wiltshire |
| **Department** | Public Protection & Licensing |
| **Directorate** | Environment & Communities |
| **Where is this CEIA stored? (This is to ensure colleagues can pick this up in your absence)** | PPL Markets Team - Documents - Drafts - All Documents |
| **Is this CEIA accompanying a report that is going through a formal decision** | Yes. This CEIA is intended to support the coordinated 2026 draft street trading and markets decision programme, including Licensing Committee reports to consult on the draft Street Trading Policy 2027-2030, Westminster Markets Strategy 2027-2030, revised Standard Conditions, and fee review. It should remain a live document and be refreshed for the |

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| **process, if so, which meeting, is it going for a decision?** | final adoption / determination reports and any later linked statutory decisions. |
| **Programme context for reviewers** | This CEIA covers a coordinated programme rather than one physical works project. It assesses the draft Street Trading Policy 2027, Westminster Markets Strategy 2027-2030, revised Standard Conditions, draft market fee changes and related trader-facing delivery documents. The different workstreams remain legally distinct: policy and strategy consultation, fee consultation, standard-conditions consultation and any later designation, relocation, infrastructure or event decisions will each follow the relevant approval route.<br>For review purposes, the main places affected are the six council-managed markets (Berwick Street, Church Street, Maida Hill, Rupert Street, Strutton Ground and Tachbrook Street), the wider estate of isolated pitches, temporary/event trading and the Bayswater Road and Green Park exhibition sites. |
| **Key terms used in this CEIA** | **Lower-barrier entry routes:** practical routes that reduce administrative, financial, confidence or experience barriers to first or occasional trading, without removing licensing, safety or compliance controls. Examples include approved casual trader registration, temporary licences, event and pilot opportunities, clearer guidance, assisted applications and targeted trader support.<br>**Youth-oriented incubation:** low-risk, time-limited market opportunities, mentoring and starter support aimed at younger or newer traders, particularly through programmed activation spaces such as Maida Hill and through selected events or pilots.<br>**Place-sensitive programming:** choosing market days, themes, commodity mix, trading hours, safety controls, support and communications by reference to the local community, customer base, market role, public realm, air-quality context and equality evidence, rather than applying one uniform model across all places. |
| **Resident voice and how it will be measured** | Resident and user voice has informed the CEIA through the 307-response resident and user survey, the opportunity-assessment fieldwork, resident/user comments gathered through market studies, historic consultation review and ongoing operational feedback. These resident/user inputs sit alongside trader, business, officer and partner evidence.<br>During consultation, resident voice will be measured by response route, market/location, topic and theme. The outcome report will summarise resident and user feedback separately where material, include a you said / we did schedule, and identify whether further engagement is needed for any market or affected group. Post-implementation, resident voice will be monitored through complaints, compliments, safety/accessibility feedback, market-user sentiment, market forums, ward/stakeholder feedback and annual review evidence. |
| **Minimum inclusive-delivery expectations** | References in this CEIA to support being available on request, where appropriate or case by case should be read against the following minimum expectations: public-facing consultation and trader materials will include a plain-language summary, accessible digital documents, paper or printable response routes, email/post options, assisted completion, a named contact route for reasonable adjustments, physically accessible engagement locations where sessions are held, and proportionate translation or interpretation support where a barrier is identified and it is reasonably practicable to provide it.<br>Requests for accessible formats, reasonable adjustments or non-digital routes should be logged, triaged and responded to within reasonable timescales. Underrepresentation should be reviewed during consultation |

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| | and after implementation, with targeted reminders or additional support where monitoring shows that relevant groups may be missing. |

## SECTION 2: Assessing the Impact

Please use this section to assess the impact of the programme on those with protected characteristics. Please answer the following questions in your assessment for each characteristic.

1. **How many people currently use the service? Or who and how many people will be affected by the policy or strategy?** While data is included, this may not apply to your decision, in that case please provide relevant data and sources that are evidencing your proposal. Data and insights can also be found in the Community Equality Resource Hub.

2. **What engagement have you completed to involve service users in creating this change? Or what other relevant data have you gathered to support your work?**

   You can also speak with the Consultation and Engagement Team for further support and advice around engagement with communities.

3. **How will you ensure that the policy, project, service, or strategy will be accessible to all groups and how will you address or break down any barriers to achieving this? While the outcomes of your proposal may intend to help protected groups, this is about practical steps you will take to achieve those outcomes or to improve participation or accessibility within the work.**

4. **How are the groups impacted? What evidence do you have to support this claim? Determine whether the proposed activity will have a positive, neutral or negative impact.**

5. **If the impact is negative, what mitigations will you put in place to reduce the this?**

6. **If the impact is positive, what actions have you taken to achieve this?**

Add your data and resident insights into this section and then consider what you need to do to improve your planning. This may also include identifying what you don't know and engaging with relevant community groups.

**Equalities and Anti-racism**

For more data and insights see the Community Equality Resource Hub

<table>
<tr><th>Topic</th><th>Westminster Data and Guidance notes</th><th>Your Project Data</th></tr>
<tr><td>Age</td><td>2021 census: 75% of Westminster is working age (+6 over the London average). Our last census data saw a change in under 5-year-olds by -30% but an increase in 11 – 16-year-olds by and 20 – 24-year-olds by 5% and 11% respectively. Relative to the rest of London, Westminster has 6% more young people (16 – 34 years).<br>The age breakdown of our population is:
<table>
<tr><td>Westminster</td><td></td></tr>
<tr><td>0 – 4 years</td><td>4%</td></tr>
<tr><td>5 - 9</td><td>4%</td></tr>
<tr><td>10 - 15</td><td>5%</td></tr>
<tr><td>16 – 24 years</td><td>13.9 %</td></tr>
<tr><td>25 – 34 years</td><td>21.6 %</td></tr>
<tr><td>35 – 64 years</td><td>37.4 %</td></tr>
<tr><td>65+ years</td><td>12%</td></tr>
</table></td><td>Who is affected / evidence: The draft changes affect residents, traders, prospective traders, event participants and exhibition applicants of all ages. Westminster has a comparatively large working-age population, but the resident and user survey also had a strong older-age profile, showing that older residents are important market users. The draft suite is also relevant to younger people because it promotes lower-barrier entry routes, temporary and event trading, start-up opportunities and youth-oriented incubation, especially at Maida Hill.<br>Engagement and evidence: The wider evidence base includes 1,459 visitor / consumer responses, 297 business responses, 97 trader responses and a separate 307-response resident and user survey. Across the evidence base, people asked for cleaner and safer spaces, better signage, more seating, more variety and stronger themed activity. These issues matter to both older users and younger entrants.<br>Likely impact: Positive overall. For older residents and visitors, clearer layouts, cleaner environments, better wayfinding, visible management and more seating should improve usability and confidence. For younger people, start-ups and young traders, the strategy and support documents create clearer routes into trading through temporary, casual, event, activation and incubation formats.<br>How we will reduce barriers / mitigate risk: Maintain the minimum inclusive-delivery expectations set out in Section 1, including paper, assisted-completion, non-digital and reasonable-adjustment routes. Keep market and event information clear and easy to find. When isolated pitches are reviewed, and when attendance or non-use issues arise, consider age-related mobility or access needs in accordance with the documented decision-making framework rather than applying changes mechanically.<br>Linked Action Plan commitments: AP1 (inclusive access and minimum expectations), AP3 (isolated-pitch and non-use decision</td></tr>
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| | | safeguards), AP5 (monitoring who benefits from new opportunities) and AP9 (resident voice and feedback loop). |
| **Disability** | 2021 census: 18% of residents in the borough said they had a long-term condition or disability that limited their life in some way. With the highest proportions in Church Street (21%), Westbourne (19%), and Queen's Park (18%), these rates are three times higher than our most affluent wards. It is important to bear in mind these same wards are the most likely to have unpaid carers (8-10% of residents). These same wards have a life expectancy of 76 years, 18 years less than the most affluent wards. | **Who is affected / evidence:** Disabled residents, carers, disabled traders and people with fluctuating health conditions can be affected by market and isolated-pitch layout, clutter, queueing, seating, pitch access, consultation methods, digital processes and enforcement interactions. The template data notes that 18% of Westminster residents report a limiting long-term condition or disability, with higher prevalence in places such as Church Street, Westbourne and Queen's Park.<br>**Engagement and evidence:** The resident survey and wider opportunity work repeatedly pointed to the need for cleaner and tidier environments, improved public realm, better looking stalls, clearer routes and more places to sit and eat. The draft strategy treats accessibility, inclusion, legibility and comfort as core parts of market quality, while the draft policy provides for reasonable adjustments across applications, consultations, communications, hearings, site visits, payment and compliance activity.<br>**Likely impact:** Positive overall, with some implementation risk. The proposed direction should improve accessibility through better layouts, reduced clutter, stronger management, clearer instructions and a more explicit policy basis for accessibility. However, stricter pitch-management, isolated-pitch review, kiosk controls or relocation could adversely affect some disabled traders if not handled carefully.<br>**How we will reduce barriers / mitigate risk:** Keep reasonable adjustments as a live operational requirement, not only a policy statement. Minimum expectations include accessible digital material at launch, paper or printable information, assisted completion, a named contact route for adjustments, accessible venues for any sessions and a log of accessibility issues and responses. Build accessibility checks into market operation plans, event briefs, pitch reviews and any isolated-pitch relocation or de-designation process. Monitor disability-related feedback, complaints and requested adjustments as part of the live CEIA and annual review.<br>**Linked Action Plan commitments:** AP1 (inclusive access and minimum expectations), AP3 (isolated-pitch safeguards), AP4 (visible reporting and escalation routes), AP5 (monitoring who benefits) and AP9 (resident voice and feedback loop). |
| **Gender reassignment** | Gender identity refers to a person's sense of their own gender, whether male, female or another category such as non-binary.<br><br>In Westminster 0.75% (1,329) of people do not identify with the same sex as their registered birth. | **Who is affected / evidence:** Trans and non-binary residents, traders and visitors can experience disproportionate safety, dignity and confidence barriers in public space and in public-facing service systems. The template data notes that 0.75% of Westminster residents recorded a gender identity different from their sex registered at birth, with likely under-reporting.<br>**Engagement and evidence:** Gender reassignment was not commonly raised as a stand-alone issue in engagement, but repeated |

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| | This is lower than the London figure of 0.91% but higher than the England figure of 0.55%. In Westminster this was 9% which should be kept in mind when considering these results because the trans population may be higher than reported. | themes around safer public space, respectful conduct, visible management and inclusive environments are directly relevant. This matters across markets, isolated pitches, events and exhibition sites, especially where crowding, later-day activity or unmanaged behaviour can reduce confidence.<br>**Likely impact:** Positive overall. The draft policy includes zero tolerance for harassment, discrimination, victimisation, abusive or threatening behaviour and hate-related behaviour. The draft strategy also supports safer, more inclusive public spaces and selected-site rather than blanket later-day activity.<br>**How we will reduce barriers / mitigate risk:** Reporting and escalation routes for harassment, hate-related conduct and safety concerns should be visible and usable across markets, isolated pitches, exhibitions and events. As a minimum, trader-facing documents, event briefs, market information, consultation material and relevant on-site notices should signpost how to report issues to the Markets / Licensing team, on-site officers or event staff, and when to contact the Police in urgent or criminal situations. Use inclusive language in consultation and trader-facing material. Review whether particular locations, events or later-day activity create safety issues in practice, and update operating controls, stewarding or event conditions if needed.<br>**Linked Action Plan commitments:** AP4 (harassment, hate-related conduct and safety reporting), AP1 (inclusive communication routes) and AP9 (feedback loop). |
| **Marriage and Civil Partnership** | 54.4% of Westminster Adults have never been married, a 3% increase since the last census, despite this figure now including same-sex marriages. | **Who is affected / evidence:** No clear evidence has been identified at this stage that the proposals affect people differently because they are married or in a civil partnership. The changes relate to public-space management, trading routes, conditions, fee structures, isolated-pitch management and exhibition / event operation rather than relationship status as such.<br>**Engagement and evidence:** Consultation and engagement have highlighted the value of markets and specialist trading sites as local, sociable and community-facing places, but no differential impact specific to marriage or civil partnership has emerged.<br>**Likely impact:** Neutral overall. The programme should improve the usability and quality of public spaces for a broad range of households and relationship circumstances, but no protected-characteristic-specific differential has been identified here.<br>**How we will reduce barriers / mitigate risk:** Keep the position under review during consultation and implementation. If consultation evidence later identifies a relationship-status-related issue, update the action plan and live CEIA accordingly. |

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| **Pregnancy and maternity** | General trends in census data show less births on average in Westminster over the past decade. | **Who is affected / evidence:** Pregnant people, new parents, people on maternity, paternity or adoption leave, and carers of infants and young children can be affected by crowding, seating, access to fresh food, ease of movement with prams or buggies, and how flexible the trading system is for existing licence holders. This is relevant both to market users and to traders.<br>**Engagement and evidence:** The evidence base points strongly to the need for cleaner environments, safer and more legible layouts, more seating and better access to fresh food and everyday goods. Those issues are relevant to pregnancy and maternity even where they were not labelled that way by respondents. The draft policy also expressly proposes fee waivers for pregnancy, maternity, paternity and adoption leave where notice is given and no trading takes place during the leave period.<br>**Likely impact:** Positive overall. Better layouts, seating, wayfinding and neighbourhood food access should support pregnant people and parents / carers using the markets. For traders, the express leave-related fee-waiver provision is a positive equality measure.<br>**How we will reduce barriers / mitigate risk:** Consider buggies, rest opportunities, visibility and ease of movement when finalising market layouts, event plans and public-realm changes. Keep non-digital access routes available. Review consultation responses to identify whether further maternity- or family-related mitigations are needed in implementation. |
| **Race and ethnicity** | In 2021, 28% of the population were 'White: British', and 25% was 'White: European or Other'. The next largest ethnic groups identified as 'Indian and Bangladeshi' (17%), 'Arab' (8%), and 'Black' (8%) and 7% of residents identifying with more than one ethnicity. When considering ethnicity and data it is important to note there can be major disparities within those groups. For instance, Indian and Bangladeshi communities have big differences in outcomes but have been grouped together.<br>When considering ethnicity, it is important to consider that 20% of Westminster households do not have an adult or child who uses | **Who is affected / evidence:** Westminster is highly diverse and around one fifth of households do not have an adult or child who uses English as their main language. Markets, event trading and exhibition spaces can be important routes into entrepreneurship, cultural participation, affordable shopping and community visibility for racially and ethnically diverse communities.<br>**Engagement and evidence:** The opportunity work, resident survey and wider documentary review consistently show that different markets serve materially different local communities and should not be managed as though they are interchangeable. Respondents asked for more variety, more culturally resonant food and goods, better quality, stronger communications and clearer local identity. The draft policy and strategy support place-sensitive programming, curation and communications rather than a one-size-fits-all model.<br>**Likely impact:** Positive overall, with some delivery risk. The programme should support more inclusive participation through lower-barrier routes into trading, better public information, culturally relevant activation and targeted business support. Risks remain if communications are too complex, if opportunities are only promoted digitally or in English, or if curated |

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| | English as their primary language. Besides English the most spoken languages are Arabic, French, Spanish, Italian and Portuguese. | allocation processes are not sufficiently transparent and accessible.<br>**How we will reduce barriers / mitigate risk:** Apply the minimum inclusive-delivery expectations set out in Section 1. Use clear language, paper and non-digital routes, and proportionate translation / interpretation support where a language or literacy barrier is identified and it is reasonably practicable to provide support. Publicise opportunities through trusted local channels as well as formal digital routes. Monitor complaints, take-up and stakeholder feedback to understand whether some communities are underrepresented or disadvantaged in practice.<br>**Linked Action Plan commitments:** AP1 (inclusive access), AP5 (monitoring who benefits), AP6 (anti-racism and outreach) and AP9 (resident voice and feedback loop). |
| **Anti- Racism** | The Council and its partners have made a commitment to anti-racism. What actions have been included in this project to address racism and improve life chances for global majority people? | The programme includes several anti-racism-relevant actions, but this should remain a live improvement area rather than treated as complete. Positive features already within the draft suite include: zero tolerance for harassment, discrimination and hate-related behaviour; lower-barrier entry routes into trading; active recruitment and outreach rather than relying only on legacy networks; support for culturally relevant and community-facing programming; and business support that is practical, market-based and easier to access than formal classroom-only provision. To strengthen the anti-racism dimension further, implementation should: use clear and accessible communications; ensure market and event opportunities are promoted through channels that reach global-majority communities; keep under review whether portfolio review, curation or digital-first processes unintentionally disadvantage some groups; and monitor complaints or conduct issues relating to racism or exclusion. The service should also consider whether trader-diversity monitoring, where lawful and proportionate, can be improved over time to test whether widened entry routes are translating into more representative outcomes.<br>**Minimum delivery point:** reporting routes for racism, harassment and hate-related behaviour should be visible in trader-facing guidance, event briefs and on-site or market-level communications, and should explain how issues will be escalated to Markets / Licensing, City Inspectors, event staff, Community Safety or Police where appropriate.<br>**Linked Action Plan commitments:** AP4 (reporting and escalation routes), AP5 (monitoring who benefits), AP6 (anti-racism and outreach) and AP9 (resident voice and feedback loop). |
| **Religion/belief** | Westminster is generally more Religious (73%) compared to London (63%) and England (53%). The most common religions are Christianity (37%) and Islam (20%). | **Who is affected / evidence:** Westminster has a comparatively high proportion of residents who identify with a religion or belief. Markets, temporary events and exhibition activity can be experienced differently depending on food offer, event timing, representation, cultural visibility and whether the space feels welcoming and respectful. |

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| | | **Engagement and evidence:** Religion or belief was not usually raised as a stand-alone issue in the engagement, but the evidence does highlight the importance of local fit, culturally appropriate goods and food, and inclusive programming. Exhibition and specialist non-market sites also require careful consideration of public display, heritage sensitivity and site character.<br>**Likely impact:** Positive overall. The draft documents support more place-sensitive curation, more varied and representative programming, and safer and cleaner environments. These changes can help different faith and belief groups feel better reflected in the public realm. Risks remain if programming or communications assume a single dominant norm or overlook important local context.<br>**How we will reduce barriers / mitigate risk:** When programming events, activation or themed trading, consider local community context and avoid avoidable exclusion. Keep consultation routes open to faith and community stakeholders where relevant. Review whether any specialist site guidance, exhibition requirements or operating controls need refinement in light of consultation feedback. |
| **Sex** | Westminster has an equal number of men and women. | **Who is affected / evidence:** Women are a significant part of the customer base and of the neighbourhood usership of Westminster's markets, but current service insight indicates that women are underrepresented in parts of the trader base, particularly among longer-standing and permanent traders. Safety, visible management, caring responsibilities, later-day operation and the practical usability of public space are therefore relevant to this characteristic.<br>**Engagement and evidence:** The wider evidence base repeatedly highlights cleanliness, safer and more welcoming environments, better public realm, stronger stewardship and clearer visibility. Maida Hill in particular has a strong evidence case for a changed model focused on activation, safety and visibility. The draft strategy also states that any later-day pilots must be designed with safety, stewarding and violence against women and girls considerations in mind.<br>**Likely impact:** Positive overall. The draft direction should support women as users through safer and better-managed spaces and may also support women traders by widening lower-barrier, temporary and curated entry routes. Risks remain if later-day activity, isolated-pitch controls, event operation or enforcement practice are not implemented safely and proportionately.<br>**How we will reduce barriers / mitigate risk:** Keep safety and conduct standards visible and enforce them consistently. Ensure any later-day or event activity has clear operating controls, stewarding and reporting routes. Reporting routes should be included in event briefs, trader guidance and relevant market information so that concerns can be raised with the Markets / Licensing team, on-site officers, event staff, |

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| | | Community Safety or Police as appropriate. Use recruitment and support activity to widen participation and monitor whether women are able to access new opportunities in practice.<br>**Linked Action Plan commitments:** AP4 (safety reporting and escalation), AP5 (monitoring opportunity take-up) and AP9 (resident voice and feedback loop). |
| **Sexual Orientation** | 2021 census information on sexual orientation is only captured for people aged 16 and above. Approximately 5% of Westminster residents identify as LGBT+, slightly higher than the London average, and almost double the national average with the West End and Soho having the highest proportion (11%). It is important to note 9% of residents do not respond to this question, thus, numbers are under-reported. | **Who is affected / evidence:** Westminster includes areas, especially Soho and the West End, with a strong LGBTQ+ population and cultural presence. This is particularly relevant to Berwick Street and Rupert Street, but respectful and inclusive public-space management matters across the whole network.<br>**Engagement and evidence:** Sexual orientation was not commonly raised as a separate theme, but respondents consistently asked for safer, better-managed and more welcoming spaces. The draft policy's zero-tolerance position on harassment, discrimination and hate-related behaviour is directly relevant here.<br>**Likely impact:** Positive overall. The draft documents should support more inclusive and better-managed street-trading environments, including in locations with strong LGBTQ+ relevance. No adverse differential impact specific to sexual orientation has been identified from the draft proposals themselves.<br>**How we will reduce barriers / mitigate risk:** Maintain clear behaviour standards and visible reporting routes. Keep Soho / West End community context in mind when implementing Berwick Street, Rupert Street and related event proposals. Use consultation and ongoing engagement to identify any LGBTQ+-specific concerns that need further action, including whether signage, online information or event materials make escalation routes clear enough.<br>**Linked Action Plan commitments:** AP4 (harassment, hate-related conduct and safety reporting), AP1 (inclusive communications) and AP9 (feedback loop). |
| **Socio-economic**<br>How will your work impact people with low incomes? | Westminster has the highest wealth gap in the country The unemployment rate is 4%, same as the London figure, but higher than that of England at 2.9%. The area with the highest unemployment rate is in the Westbourne 10%, | **Who is affected / evidence:** Westminster has very high wealth inequality. Markets and some specialist trading routes can provide access to affordable goods, fresh food, informal public space and lower-barrier self-employment. This matters particularly in neighbourhoods such as Church Street and parts of North Paddington. At the same time, some existing and prospective traders have low financial resilience and may be more exposed to fee increases, compliance costs or loss of poorly performing opportunities.<br>**Engagement and evidence:** The evidence base shows strong demand for more fresh food and grocery, cleaner and safer environments, and practical trader support rather than a passive licensing-only model. Resident/user voice has been gathered through the 307-response survey and will be tested further through consultation. The draft market fee review is separate from isolated pitches and covers only the six council-managed markets and market-related event |

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| | | trading, but it is still relevant to socio-economic impact because smaller and newer traders may be affected differently by any final fee decision.<br>**Likely impact:** Mixed but expected to be positive overall if implemented carefully. Positive features include lower-barrier routes into trading, practical business support, incubation and event opportunities, improved neighbourhood access to food and local shopping, and the potential to promote Healthy Start voucher use for fruit and vegetables at participating Westminster markets. Church Street is already a relevant model for Healthy Start use and should be explicitly referenced in the final strategy and implementation material as a low-income food-access mitigation.<br>**How we will reduce barriers / mitigate risk:** Keep fee, condition and isolated-pitch decisions transparent, evidence-based and separate where statute requires. Test affordability and implementation impacts through consultation by asking traders about likely fee impact, commodity, market, trading pattern, business resilience and whether support or phasing would be needed. Monitor arrears, vacancies, underuse, applications, casual bookings, event opportunities, business-support take-up and complaints by market and commodity, and by equality or socio-economic indicator where lawful and proportionate. Use targeted trader support, clear communication, case-by-case discretion, reasonable adjustments and time-limited / lawful support measures where justified.<br>**Linked Action Plan commitments:** AP2 (affordability impact testing), AP5 (monitoring who benefits from new routes), AP7 (Healthy Start and fresh-food access), AP8 (food-led location risk) and AP9 (resident voice and feedback loop). |
| **Care Leavers**<br><br>How will your proposal support care leavers? | Westminster City Council currently has 177 Looked After Children and 348 care leavers who are aged between 18-25 years. | **Who is affected / evidence:** Westminster supports looked-after children and care leavers aged 18-25 who are statistically more likely to face barriers to employment, low financial resilience and weaker access to informal networks. Markets, event trading and activation spaces can provide practical, lower-barrier routes into enterprise and confidence-building.<br>**Engagement and evidence:** There has not yet been dedicated engagement with care leavers as a stand-alone audience, but the wider evidence strongly supports low-barrier trial routes, temporary and event opportunities, practical mentoring and visible entry points. This is especially relevant to Maida Hill's incubation vision and to the prospectus emphasis on short, practical support and progression routes.<br>**Likely impact:** Positive overall, but benefit will depend on active connection rather than passive availability. The draft direction creates routes that could work well for care-experienced young people, but they may not benefit unless those opportunities are clearly signposted and supported. |

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| | | **How we will reduce barriers / mitigate risk:** Explore links with youth, employment and care-leaver support services during implementation. Keep entry routes practical, visible and supported by mentoring or stall-side advice where possible. Review whether future targeted outreach is needed if the programme moves into more deliberate young-trader or incubation activity. |

## #2035: What are the Health Impacts of your work?

### Health

Give Every Child the Best Start in Life

**How does this project support better outcomes for children and families?**

Common Progress Measures (StoryMap)

Factors residents see as important to this priority

| Issues & Factors Key | | |
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| 1 | Effective Health & Care Services | 24% |
| 2 | Play & Early Years Activities and Spaces | 18% |
| 3 | Support for Parents & Guardians | 14% |
| 4 | Healthy Relationships | 10% |
| 5 | Accessible Information | 6% |
| 6 | Housing | 6% |
| 7 | Primary Schools | 6% |
| 8 | Affordable, high-quality Childcare | 4% |
| 9 | Access to Nature | 4% |
| 10 | Security | 3% |
| 11 | Support for Special Needs | 3% |
| 12 | Policy | 2% |
| 13 | Nutrition | 2% |

The programme is not a direct children's service, but it can support this priority through better neighbourhood food access, safer and more welcoming public spaces, and clearer family-friendly market environments. The evidence base shows strong public demand for more fresh food / grocery, cleaner and tidier environments, better public realm and more seating. If delivered well, neighbourhood markets and curated event activity can support routine local shopping, informal family use and community participation.

**Low-income mitigation:** The Healthy Start scheme should be more explicitly embedded in the final Markets Strategy and trader-facing implementation material. Eligible families can use Healthy Start vouchers for fruit and vegetables at participating Westminster markets, and Church Street provides a relevant example. Promotion should be developed with Public Health and Markets so that the mitigation is visible to residents and fresh-produce traders.

The main delivery considerations are safe layouts, pram / buggy movement, seating, visibility, access to healthier and affordable food options, and ongoing resident/user feedback on whether families feel markets are usable and welcoming.

**Linked Action Plan commitments:** AP7 (Healthy Start and fresh-food access), AP9 (resident voice and feedback loop).

### Housing

**Will the Initiative have impact on housing or living conditions including financial worries?**

Common Progress Measures (StoryMap)

Factors residents see as important to this priority

**The draft changes do not alter housing tenure or housing conditions directly. Their main housing-related impact is indirect:** markets and other street-trading locations can support everyday affordability, access to local goods and low-barrier self-employment close to home. This can be helpful in neighbourhoods experiencing financial pressure. The main risk is

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| | **Issues & Factors Key**<br>1 Barriers to Quality Housing 25%<br>2 Community Isolation 15%<br>3 Activities and Services 12%<br>4 Poverty 9%<br>5 Safe Streets 6%<br>6 Intergenerational Activity 8%<br>7 Information & Communication 6%<br>8 Outdoor Spaces 6%<br>9 Positive Policing 6%<br>10 Access to Community Spaces 5%<br>11 Art 2%<br>12 Inclusion 1% | that any final fee changes or tighter conditions could be difficult for some traders with low financial resilience. That is why the fee review is being handled through a separate lawful process, with consultation, targeted support and ongoing EQIA review. |
| **Fair Employment and Good work**<br><br>**Can the project support employment opportunities and career progression for excluded groups?** | Common Progress Measures (StoryMap) Factors residents see as important to this priority<br><br>**Issues & Factors Key**<br>1 Support for Young People 28%<br>2 Poverty Trap & System Failures 12%<br>3 Cost of Employment 10%<br>4 Council Polices 10%<br>5 Education & Training 10%<br>6 Employment Practices 10%<br>7 Access to good jobs 6%<br>8 Purpose 6%<br>9 Discrimination 5%<br>10 Economy 4%<br>11 Technology 2% | This is one of the clearest positive areas. The draft suite treats stalls and other opportunities as business platforms rather than simply licensed spaces. It supports targeted recruitment, lower-barrier entry routes, temporary and event trading, incubation, practical business support, digital support, progression routes into wider enterprise support and, where suitable, movement into premises or meanwhile space. This should widen access to self-employment and micro-enterprise, particularly for start-ups, young traders, local residents and underrepresented entrepreneurs. The service should not assume that these benefits will occur automatically. Who benefits from new opportunities should be tested through consultation and then monitored post-implementation. Measures should include take-up of casual registration, temporary licences, events, exhibitions, activation opportunities and trader support, together with feedback from underrepresented communities and evidence about whether applicants understand and can access the routes available.<br>**Linked Action Plan commitments:** AP5 (monitoring who benefits), AP6 (anti-racism and outreach) and AP9 (resident voice and feedback loop). |
| **Maximising Citizen Capability and Control** | Common Progress Measures (StoryMap) | The draft documents should improve people's ability to understand and navigate the service. They provide a clearer policy structure, a more |

<table>
<tr>
<td>Can the project improve the ability of people to make decisions about their life?<br><br>How does the project support social inclusion, independence and participation by residents?</td>
<td>Factors residents see as important to this Priority<br><br>
<table>
<tr><th colspan="3">Issues & Factors Key</th></tr>
<tr><td>1</td><td>Access to Effective Support</td><td>13%</td></tr>
<tr><td>2</td><td>Education</td><td>12%</td></tr>
<tr><td>3</td><td>Exclusion from Opportunities</td><td>12%</td></tr>
<tr><td>4</td><td>Mental Health</td><td>12%</td></tr>
<tr><td>5</td><td>Income</td><td>10%</td></tr>
<tr><td>6</td><td>Self-Esteem/Self Belief</td><td>8%</td></tr>
<tr><td>7</td><td>Spaces for Young People</td><td>8%</td></tr>
<tr><td>8</td><td>Online</td><td>5%</td></tr>
<tr><td>9</td><td>Safety</td><td>5%</td></tr>
<tr><td>10</td><td>Access to Opportunities</td><td>5%</td></tr>
<tr><td>11</td><td>Information</td><td>4%</td></tr>
<tr><td>12</td><td>Food</td><td>4%</td></tr>
<tr><td>13</td><td>Employment Support</td><td>4%</td></tr>
</table>
</td>
<td>legible trader handbook, planned website improvements, non-digital and assisted routes, and an explicit reasonable-adjustments framework. They also embed consultation, regular engagement and a live CEIA / EQIA approach.<br>Resident voice has informed the CEIA through the resident/user survey, market studies, historic consultation review and operational feedback. It will be measured during consultation by monitoring response volume, source, market/location, equality and inclusion themes where available, and by coding resident/user comments separately from trader, business and organisational submissions where material. The post-consultation report should show how this feedback changed, confirmed or challenged the programme.<br>Linked Action Plan commitments: AP1 (accessible routes), AP5 (monitoring who benefits) and AP9 (resident voice and feedback loop).</td>
</tr>
<tr>
<td>Healthy Living for All<br><br>Can the project help people to be physically active, choose healthy food, or reduce drinking and smoking.<br><br>Will this project help reduce demand for health and social care?<br><br>For example, GP’s, Hospital, Community Services, Mental Health services and Social Services?</td>
<td>Common Progress Measures (StoryMap)<br><br>Factors residents see as important to this area<br><br>
<table>
<tr><th colspan="3">Issues & Factors Key</th></tr>
<tr><td>1</td><td>Access to High Quality Health & Social Care Services</td><td>20%</td></tr>
<tr><td>2</td><td>Housing</td><td>11%</td></tr>
<tr><td>3</td><td>Sense of a Community</td><td>11%</td></tr>
<tr><td>4</td><td>Inclusion</td><td>9%</td></tr>
<tr><td>5</td><td>Activities and Opportunities</td><td>8%</td></tr>
<tr><td>6</td><td>Knowledge & Information</td><td>6%</td></tr>
<tr><td>7</td><td>Affordable & Healthy Food</td><td>6%</td></tr>
<tr><td>8</td><td>Clean Air</td><td>5%</td></tr>
<tr><td>9</td><td>Family Conflict</td><td>5%</td></tr>
<tr><td>10</td><td>Education</td><td>5%</td></tr>
<tr><td>11</td><td>Access to Community Spaces</td><td>3%</td></tr>
<tr><td>12</td><td>Sustainable Employment</td><td>3%</td></tr>
<tr><td>13</td><td>Access to Green Spaces</td><td>2%</td></tr>
<tr><td>14</td><td>Environment</td><td>2%</td></tr>
<tr><td>15</td><td>Transport</td><td>2%</td></tr>
<tr><td>16</td><td>Cost of Living</td><td>2%</td></tr>
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</td>
<td>The programme has a positive health direction. The evidence base shows strong demand for more fresh food and grocery, cleaner and tidier markets, better public realm and more seating. The draft policy and strategy also support lower-emission and lower-waste trading, tighter smoke / odour / grease controls, reduced idling and a shift toward electric-first operation where feasible. If implemented well, the package should support healthier local food access, more comfortable public spaces, better walkable local shopping and reduced nuisance.<br>Low-income mitigation: Healthy Start vouchers can be used for fruit and vegetables at participating Westminster markets, with Church Street already providing a relevant local example. The final Markets Strategy and implementation material should explicitly embed Healthy Start promotion and trader engagement as part of the affordability and healthy-food-access response, alongside retention/recruitment of fresh produce and clear information for eligible families.<br>It is not a direct health-care intervention, but it supports wider determinants of health and may help reduce pressure created by poor-quality public-space environments. Health impacts should be monitored through resident/user feedback,</td>
</tr>
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| | | fresh-food access, affordability evidence, complaints about smoke/odour/noise, and Public Health input to review points. **Linked Action Plan commitments:** AP7 (Healthy Start and fresh-food access), AP8 (air quality and emissions), AP9 (resident voice and feedback loop). |
| **Environmentally Sustainable places**<br><br>**More data is available here Environmental Justice Measure \| Westminster City Council** | | |
| **New Buildings**<br><br>**Does the project involve demolition of an existing building and / or the construction of a new building?** | If 'YES'<br><br>- Have you completed the tests under the Council's retrofit first policy to justify why demolition and / or new construction is appropriate?<br><br>- Have alternatives been considered? E.g. Repurpose another building / empty space<br>- Will the new build be aligned to Net Zero Carbon Buildings Standard?<br><br>- Has the project embedded environmental design principles? E.g. Sustainable drainage, biodiversity, air-quality positive and overheating mitigation? | No direct demolition or new-building project is created by the draft policy, strategy, standard conditions or fee proposals themselves. If future market or isolated-pitch proposals move into new permanent structures, major capital works or new-build facilities, those schemes should be subject to a separate project-level assessment covering retrofit-first, net-zero and environmental design requirements. |
| **Existing Buildings**<br><br>Does your project involve alteration or redevelopment of an existing building? | If 'YES'<br><br>- Have you considered alternative ways of delivering the service / project without alteration or redevelopment?<br><br>- Have you considered opportunities to:<br><br>- Use sustainably-sourced, low carbon or re-used materials? E.g. Recycled construction materials; timber in place of concrete | The draft package does not itself redevelop an existing building. Some future projects may involve trader facilities, storage, utilities or associated premises, but those are not determined by these draft documents. Any later physical scheme affecting an existing building should be considered through its own option appraisal and environmental assessment. |

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| | - Improve the energy-efficiency of the building? E.g. Wall and roof insulation, replacing old windows, addressing gaps and draughts been considered?<br>- Improve the health and comfort of building occupants? | |
| **Buildings & Clean Energy**<br>Is there a strategy in place to maximise the use of 'clean energy' in buildings and avoid the need to use gas? | - Has the opportunity been considered to connect new / existing buildings up to a district heat network?<br><br>- Will any new or refurbished buildings increase the supply of local renewable energy E.g. Through installation of Solar PV<br>Planning householder retrofit how-to guides \| Westminster City Council | The main clean-energy implication of the draft suite is indirect but important. The policy and strategy support electric-first and lower-emission trading models, and market documents envisage infrastructure upgrades such as improved power provision and cleaner trading equipment.<br>**Minimum implementation expectation:** when new or upgraded market power infrastructure, trader facilities or event infrastructure are brought forward, the default design assumption should be electric-first and lower-emission, unless site constraints, safety, capacity or cost-recovery evidence show that another approach is necessary. New or renewed hot-food/event trading should be assessed against electric-first or lower-emission options where practicable, and high-emission generators or unnecessary gas reliance should not be expanded where a safe, viable and affordable lower-emission alternative exists.<br>Future building or utility projects should maximise clean-energy options, avoid locking in unnecessary gas dependence, and be monitored through AP8 and the live CEIA review cycle. |
| **Construction & Development (Non-Building )**<br><br>What measures have been taken to ensure materials and processes used are sustainable? | - Has there been an assessment of the impact of the materials used and inform decision-making?<br><br>- Has the project explored how sustainable materials could be adopted E.g. re-used or recycled construction materials; timber in place of concrete<br><br>- Has the project considered how to adopt sustainable processes E.g. use of electrical machinery instead of petrol/diesel. | No significant construction activity is approved by this draft package alone. However, later market or isolated-pitch infrastructure works - such as power, storage, layout or public-realm improvements - should use sustainable procurement, durable and reusable components, low-carbon materials where feasible, and electric rather than petrol / diesel equipment where practical. |

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| **Waste & Consumption (Non-Construction)**<br><br>What impact will your project have on energy & material consumption and the generation of waste? | - Has this project considered ways to reuse existing goods and materials before acquiring newly manufactured ones?<br>E.g. Procuring second-hand equipment<br><br>- Does this project engage or enable others to make sustainable choices within their lifestyles? E.g. Sustainable food and purchase choices<br><br>- Waste reduction: Is there a plan to reduce / minimise waste associated with the project? E.g. Avoid single-use items<br><br>- If the procurement of materials or services are required, have steps been taken to ensure they have been procured responsibly?<br><br>**Responsible Procurement Policy** | This is a strong positive area. The draft policy introduces clearer expectations on waste separation, lawful disposal, spillages, oils, smoke, odour, packaging and good-neighbour operation. It also allows market-specific waste rules, low-waste packaging controls and prioritisation of reuse, refill, repair, plastic reduction, electric and lower-emission models where lawful and appropriate. The service should continue to favour durable, reusable and modular equipment and avoid unnecessary single-use materials in events, activation and market management. |
| **Travel & Transportation**<br><br>**Will your project have any impact on how & how often:**<br>**- People travel**<br>**- Materials are transported**<br>**- Vehicles are used to deliver a service** | Transport Sustainability - Power BI<br><br>-Have steps been taken to avoid unnecessary journeys or maximise the efficiency of those that are required. E.g. Using last mile delivery to optimise routes<br>- Have any steps been taken to ensure that any vehicle services / machinery being procured have zero tailpipe emissions? E.g. Using electric fleets as opposed to petrol<br>- Will this project encourage people to use active or low-carbon transport? E.g. cycling, walking, switching to electric transport | The draft direction is broadly positive. Local markets and neighbourhood trading can reduce the need for longer retail journeys and support walkable local shopping. The strategy also seeks to cut unnecessary vehicle movements, manage loading more effectively and support healthy streets and active travel where layouts are redesigned.<br>**Minimum implementation expectation:** market operation plans, event briefs and site instructions should set out loading, servicing, idling and access controls proportionate to the location. Where changes introduce new event activity, later-day operation or a different trading pattern, transport and access arrangements should be assessed before implementation and monitored afterwards through resident, trader and operational feedback.<br>**Linked Action Plan commitments:** AP8 (emissions and air-quality review) and AP9 (resident voice and feedback loop). |

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| **Greening & Biodiversity**<br><br>**Will your project have any impact on the use, quality or access to Westminster's green spaces?** | **Greening and Biodiversity Strategy \| Westminster City Council**<br><br>Road Verge & Green Space - Management Best Practice - Plantlife<br><br>Urban Butterfly Brochure FINAL.pdf<br><br>-Will there be any impact on the amount of green space within the borough as a result of this project?<br>- Will the project result in an increase in habitat for nature (e.g. trees, wildflower grassland, ponds) or improved connectivity between habitats (e.g. tree planting between green spaces).<br>- Will the project result in changes to the use / management of a green space that can have a negative impact on nature? E.g. Use of pesticides<br>- What impact will the project have on the access and use of green space for local communities? E.g. Modifying green space to make it green spaces safer | **The draft documents do not directly remove green space or create major biodiversity impacts. Their likely effect is indirect:** better public realm, cleaner operation, reduced clutter and more thoughtful layout can improve the overall environmental quality of market spaces. Where future projects include shade, planting, seating or public-realm improvements, opportunities to support biodiversity and climate comfort should be considered alongside operational need. |
| **25. Climate Resilience & Adaptation**<br><br>**Has your project considered the impact of climate change & extreme weather?** | -Have you included climate-related risks (the likelihood of extreme weather events such as flooding, storm winds or extreme heat) in your project's risk assessment? Westminster's Environmental Justice Measure provides maps of 'Environmental Risks' that showcase this for different locations in the borough.<br>-Has your project put measures in place to ensure business continuity and resilience if extreme weather events do occur, during the project delivery and after completion? | The draft strategy supports a more climate-resilient market network by linking infrastructure, shade, seating, greener public realm, cleaner operations and more practical management of weather-sensitive public space. Because markets and isolated pitches operate outdoors, future operation plans, event briefs and infrastructure decisions should continue to consider heat, storm events, heavy rainfall, business continuity and safe operation during extreme weather. |

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| | -Does this project incorporate any design features, nature-based solutions or community interventions that proactively help keep the community safe from extreme weather and build climate resilience? E.g. Implementing rain gardens to hold water and minimise flooding in public spaces, providing public shading and cool indoor spaces to protect people from extreme heat.<br><br>**Environmental Justice Measure \| Westminster City Council** | |
| **Air Quality**<br><br>**What impact could your project have on outdoor or indoor air quality and people's exposure to it?** | -Will the project have any impact on exposure to poor air quality and who would be most impacted by any changes?<br>-What impact will the project have on air pollution emissions? E.g. Negative impact caused by increased emissions from building use (heating),<br>commercial cooking or transport sources?<br>-Does the project consider the impact of indoor air quality?<br>-Will any measures be put in place to reduce potential negative impacts on air quality during and after the project's completion? E.g. Promoting active travel instead of vehicle use<br><br>Air quality data \| Westminster City Council<br><br>Air Quality Action Plan<br><br>WHO standards (Pages 4 & 5)<br><br>**Environmental Justice Measure \| Westminster City Council** | Overall direction is positive, but there is implementation risk in food-led or food-growth locations. The key locations for more detailed air-quality and emissions consideration are Berwick Street and Rupert Street in Soho / the West End, Strutton Ground in Victoria, Tachbrook Street in Pimlico, Church Street as the largest market with produce and hot-food clusters and higher deprivation / health-inequality considerations, and Maida Hill as an activation and incubation space where food-led activity may grow from a low base.<br>These locations should be cross-checked against the Council's Air Quality data and Environmental Justice Measure before final adoption and again when market operation plans, event briefs or infrastructure projects are prepared. This will test whether food-led locations also sit in areas of existing high air pollution, higher deprivation, disability prevalence or health inequality, and whether additional safeguards are needed. The draft suite should move beyond a general aspiration to reduce gas and high-emission cooking. Minimum implementation expectations should include electric-first infrastructure planning where feasible; no unnecessary idling; restrictions on visually intrusive, polluting or unsafe generators; stronger grease, smoke, odour and waste controls; food-trader evidence requirements; and monitoring of complaints, smoke/odour incidents, generator use, |

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| | | infrastructure constraints and trader transition barriers. **Linked Action Plan commitments:** AP8 (food-led location assessment and emissions-reduction plan), AP7 (healthy-food access), AP9 (resident voice and feedback loop). |

## SECTION 3: Action Plan

Have you identified the need to take an actions to improve outcomes or to find out things you don't know? This could include engaging with protected groups to find out what they need you to do differently?

If so, complete the Action Plan below to show the work that is planned.

| Issue identified | Planned Action | Lead Officer and Timeframe |
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| AP1. Accessibility, language or digital barriers could reduce fair participation in consultation, applications, events, exhibitions or ongoing service access. | Apply the minimum inclusive-delivery expectations in Section 1: plain-language summary, accessible digital documents, paper/printable response routes, email/post options, assisted completion, a named reasonable-adjustment contact, accessible engagement venues where sessions are held, and proportionate translation or interpretation support where a barrier is identified and it is reasonably practicable to provide it. Monitor underrepresentation during consultation and deploy targeted reminders or additional support where gaps emerge. | Jonathan Russell Lloyd - before consultation launch (target July 2026), mid-consultation check, post-consultation review before final reports, then annual review. |
| AP2. Fee changes, tighter standards or more active management could disproportionately affect smaller, newer or lower-resilience market traders. | Test affordability impacts through consultation and final fee/implementation reports. Analyse responses by trader type, market, commodity, trading pattern and stated financial resilience where available. Monitor arrears, vacancies, underuse, applications, casual bookings, event opportunities and support take-up after implementation. Keep trader support, signposting and practical stall-side support available, and consider whether communication, phasing or other lawful transitional measures are needed before final decisions are taken. | Jonathan Russell - consultation design and final fee determination; quarterly implementation checks during first year; annual review thereafter. |
| AP3. Isolated-pitch review, relocation, non-use controls or de-designation could adversely affect some existing traders, including older or disabled traders and traders with caring responsibilities. | Apply case-by-case decision-making against a documented minimum process: early communication where possible, reasonable-adjustment consideration, opportunity to provide relevant information, documented exceptional circumstances, and use of relocation, temporary arrangements or lawful waivers where | Shannon Pring - as isolated-pitch decisions arise; issues and learning to be reviewed before final adoption/determination reports and in the first annual review. |

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| | justified. Do not apply non-use or relocation controls mechanically where equality or health evidence is relevant. | |
| AP4. Women, LGBTQ+ people, trans people, disabled people, global-majority communities and other groups may be deterred if harassment, hate-related conduct or safety concerns are not easy to report or escalate. | Make reporting and escalation routes visible across markets, isolated pitches, exhibitions and events. As a minimum, consultation material, trader-facing guidance, event briefs, market operation plans and relevant on-site information should explain how concerns can be raised with the Markets / Licensing team, on-site officers, event staff or Community Safety, and when Police contact is appropriate for urgent or criminal matters. Build safety, stewarding, VAWG, accessibility and hate-related conduct controls into any later-day or event pilot and review complaints and feedback by site. | Jonathan Russell Lloyd - before consultation publication and before any later-day/event pilot; quarterly review in first implementation year. |
| AP5. The service does not yet have complete data on who benefits from new entry routes, exhibitions, activation opportunities and trader support. | Create a proportionate benefits-monitoring approach. Track take-up of approved casual trader registration, temporary licences, event opportunities, exhibitions, activation programmes, business support and progression routes by market, commodity and trader stage, and by equality or socio-economic indicator where lawful and proportionate. Use consultation to test whether prospective traders understand and can access the routes available. | Jonathan Russell Lloyd - baseline at consultation launch; first formal review post-consultation; six-month implementation review; annual review thereafter. |
| AP6. Potential anti-racism and inclusion gains may not be realised if opportunities are not publicised through trusted local routes or if curation is not sufficiently transparent. | Use a mix of local, partner, trader, community and digital channels to publicise opportunities. Keep selection criteria, site guidance and event briefs clear. Monitor feedback from underrepresented communities and review whether targeted outreach, translated/visual material or support with applications is needed. Escalate racism, discrimination or hate-related conduct through the AP4 routes. | Jonathan Russell Lloyd - communications plan before consultation launch; ongoing implementation; annual review. |
| AP7. Low-income families may not benefit fully from fresh-food access if Healthy Start and affordability routes are not explicit in the Strategy and implementation material. | Embed Healthy Start explicitly in the final Markets Strategy and trader/resident-facing implementation material. Promote the fact that Healthy Start vouchers can be used for fruit and vegetables at participating Westminster markets, using Church Street as a current local example. Work with Public Health and Markets to engage fresh-produce traders and improve resident awareness, alongside wider work on fresh-produce retention and recruitment. | Jonathan Russell Lloyd - include before final Strategy adoption; promote during implementation; review at six months and annually. |
| AP8. Food-led markets and new food activity may increase emissions, smoke, odour or air-quality exposure if electric-first infrastructure and operating controls do not keep pace. | Prepare a market-specific food-led location and air-quality/emissions note before final adoption, covering Berwick Street, Rupert Street, Strutton Ground, Tachbrook Street, Church Street and Maida Hill. Cross-check against Air | Jonathan Russell Lloyd - assessment before final adoption; implementation plan for first year; six- |

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| | Quality data and the Environmental Justice Measure. Develop minimum implementation expectations for electric-first infrastructure, generator restrictions, no-idling, gas/high-emission cooking transition, smoke/odour/grease controls and monitoring of complaints and incidents. | month and annual review. |
| AP9. Resident voice may not be sufficiently visible in final decision-making or post-implementation review. | Continue to code consultation and feedback by stream, market/location and respondent type so resident/user voice can be reported alongside trader and business evidence. Publish a consultation outcome report with a you said / we did schedule. Post-implementation, monitor resident/user feedback through complaints, compliments, market-user sentiment, accessibility/safety feedback, ward/stakeholder feedback and market forums. | Jonathan Russell Lloyd - weekly monitoring during consultation; outcome report before final adoption; six-month and annual review. |

## SECTION 4: Sign-off

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| Director/ Head of Service Name | Wayne Chance-McKay, Strategic Lead – Markets  |
| Contact Email | Wcmckay@westminster.gov.uk |
| Date of sign off | 2nd June 2027 |
| **Review**<br>**It is important to consider equalities issues at every stage of the process. Remember an CET is a live document which means it must be regularly reviewed and updated considering new evidence or information, for example, have you now completed your consultation or has there been news on funding. Please ask your Director or Head of Service to sign-off at every review stage. You can have as many reviews as are appropriate for your work.** | |
| Date of 1st Review | |
| Name of Reviewer | |
| Director signature | |
| Date of 2nd Review | |
| Name of Reviewer | |

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