City of Westminster

Licensing Committee Report

Date:	Thursday 11th June 2026
Classification:	For General Release
Title:	Fees and charges for street trading for markets, isolated pitches and wider street trading activity in Westminster 2027
Report of:	Director of Public Protection & Licensing
Wards Affected:	All
Cabinet Member Portfolio	Cabinet Member for Enforcement Cabinet Member for Growth and Planning
Financial Summary:	This report seeks approval to undertake statutory consultation on a revised fee schedule for Westminster's six council-managed street markets, isolated pitches, exhibitions, portrait artists and wider street trading activity. Consultation only is requested at this stage. This is the financial sustainability and fairness strand of the wider street trading refresh. It is not a stand-alone revenue exercise. If later approved following consultation, the proposed schedule would materially improve modelled billed income compared with the current schedule, subject to actual occupancy, case volumes, cash collection and final Committee decisions. Current-occupancy modelling indicates that the service would still operate with an estimated deficit against direct staffing, waste and cleansing costs.
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1 Executive Summary

1.1 This report forms part of a coordinated street trading refresh intended to move Westminster from a largely reactive licensing model to a clearer, place-led and actively managed stewardship model. This report seeks approval to undertake statutory

consultation on a revised schedule of fees and charges for Westminster's six council-managed street markets, isolated pitches, exhibitions, portrait artists, wider street trading activity and related special market event activity. The consultation covers application fees, daily pitch fees, casual registration and booking charges, event trading fees and ancillary or other lawful charges connected with street trading. The proposal brings all principal street trading fee lines into a clearer and more coherent cost-recovery framework.

1.2 The proposed schedule moves Westminster away from legacy fee structures that are too flat, too inconsistent and no longer aligned to the different costs generated by different trading routes. It proposes a differentiated model by fee family, regime, location, day and commodity. That approach reflects the City of Westminster Act 1999 charging framework and aligns with Westminster's latest Market Strategy, Street Trading Policy and Standard Conditions.

1.3 The fee model is the financial sustainability strand of the wider Street Trading and Markets Transformation Programme. It supports a more place-sensitive and actively managed service by linking charges more transparently to the trading routes, locations, days and commodities that generate service costs. Taken together, the reports seek approval to consult on a coordinated refresh of Westminster's street trading model: clearer places, clearer rules, clearer fees, clearer support and stronger delivery.

1.4 Application fees are based on mapped application-processing tasks, on-costed hourly rates and the relevant process steps for each application type. They do not include the running costs of market management, enforcement, cleansing or wider transformation activity. Daily pitch fees are based on regime, location, day and commodity, reflecting the different levels of cleansing, waste, administration, compliance, public realm and management pressure generated by different forms of trading.

1.5 The proposed schedule also includes a more structured approach to casual and event trading and lawful ancillary charges. It also proposes consultation on an annual fee-review approach, including an annual increase, but any future annual change would be taken through the Council's lawful fee-setting process, including statutory notice and consultation where required.

1.6 This report recommends statutory consultation on the proposed schedule. A further report will then be presented for decision, setting out the consultation responses received, any revised recommendations and the proposed implementation approach.

1.7 At current activity and occupancy, all-regime modelling indicates that the proposed fees would improve total projected street trading income from approximately £2.016m to £2.840m. Against the direct staffing, waste and cleansing cost envelope of approximately £4.461m, the proposed fees would reduce the indicative direct-service deficit from approximately £2.445m to approximately £1.621m. At full market occupancy, with non-market volumes and direct costs unchanged, the remaining deficit would be approximately £0.665m. These figures are modelling scenarios, not guaranteed cash collection.

2 Background and context

2.1 The criteria for determining fees and charges for street trading in Westminster are set out principally in section 22 of the City of Westminster Act 1999 (“the Act”). The Act provides the basis on which the Council may recover certain reasonable costs by way of application fees, daily charges and certain other related charges.

2.2 The current published market fee structure was approved in 2018 and implemented in two phases between 2019 and 2020. Additionally, the existing street trading charges were introduced in 2006 and have not been updated since. Overall, these fees have not been comprehensively reviewed or uplifted in recent years. This review therefore updates the fee schedule to better reflect current operating costs, market conditions, and Westminster’s broader street trading and market transformation approach. This means the current fee framework has not kept pace with the way the service now operates, particularly the growth in food-led trading, waste, cleansing and compliance demand.

2.3 Within the Act, the Council may recover certain costs associated with the administration of street trading applications and certain ongoing operational costs including cleansing, waste, administration and enforcement. Any fee review must remain anchored to those lawful cost-recovery principles. Application-side costs and ongoing running costs are therefore kept separate in the proposed schedule to avoid double recovery.

2.4 The current market and wider street trading fee structures no longer reflect current operating costs or the differing operating realities of Westminster’s markets, isolated pitches, exhibitions, portrait artist sites, casual/event trading and specialist locations. The 2018 fee report itself recognised that the adopted option would continue to leave an annual deficit, with a figure of £234,705.33 from year 1 alone. More recent internal and external review work has confirmed the need for a more sustainable and differentiated approach.

2.5 This review sits within Westminster’s wider Street Trading and Markets Transformation Programme and should be read alongside the latest Market Strategy, Street Trading Policy and Standard Conditions. Together, those documents establish a differentiated, vision-led and actively managed street trading network, with stronger expectations around curation, occupancy, presentation, compliance, equality, accessibility, sustainability and good-neighbour management. The fee review is therefore part of the service reset: clearer places, clearer rules, clearer charges and clearer support.

2.6 The review has been informed by a broad evidence base, including officer-cost assumptions, pay-scale data, market occupancy and vacancy data, waste and cleansing cost data, internal financial modelling, Bloomberg / The Retail Group transformation evidence and engagement with traders, businesses, residents, market users and other stakeholders.

2.7 This report relates to Westminster's council-managed street markets, isolated pitches, exhibitions, portrait artists, wider street trading activity and market-related event trading. It does not determine designations, de-designations or standard conditions, which are addressed through separate statutory or governance processes where required.

2.8 The current position for isolated pitches and wider street trading activity is that the fees charged do not cover operating costs. Over the past 20 years since fees were last reviewed, administrative costs have increased significantly. In addition, the post-pandemic shift from non-food to food trading has led to greater administrative requirements, including an increased need for annual food safety inspections, as well as higher waste management and cleansing costs. As a result, the overall cost of operating these services has risen substantially.

2.9 The approach also reflects the continuing relevance of the Hemming litigation and the Provision of Services Regulations 2009. Fees must therefore remain lawful, reasonable and proportionate, may not be used as an economic deterrent and may not be used as a general revenue-raising measure outside the statutory framework.

3 Recommendations

3.1 That approval be given for statutory consultation on the proposed fee schedule as the financial sustainability and cost-recovery strand of the coordinated street trading refresh, including consultation with relevant stakeholders on the following:

- the proposed market, isolated pitch and wider street trading application fees for temporary licences, permanent market or isolated-pitch applications where used, variations, approved casual trader registration, exhibition applications, portrait artist applications and event trading;
- the proposed daily pitch fee structure for registered traders by market, exhibition, isolated pitch location, day and commodity, and the related casual daily booking fee structure;
- the proposed ancillary and other lawful charges connected with street trading;
- the proposed approach to annual fee review from 1 April each year, subject to the Council's lawful fee-setting process and statutory notice or consultation where required, and the rationale for Sunday fee lines (for markets) as dormant consulted rates that apply only where Sunday trading, a Sunday pilot, or event-led Sunday trading is separately authorised or booked;
- the proposed approach to invalidated or withdrawn applications, under which the retained fee element would reflect the work actually undertaken, with one third retained in ordinary cases for validation, initial review and applicant correspondence already carried out; and
- the right for representations to be made in accordance with the statutory procedure set out in section 22(9) of the City of Westminster Act 1999.

3.2 That the proposed fees and charges be brought back to the Licensing Committee following full consultation, together with the results of consultation and officer recommendations for implementation. This is an approval-to-consult decision only. Final adoption, prescription or implementation will return after consultation to the Licensing Committee.

4 Principles for setting fees and charges

4.1 Within the legal framework of the Act, Westminster intends that this review should be based on the following principles:

- Lawfulness and cost recovery. Fees and charges should recover only those costs that are lawfully recoverable under the Act, taking one year with another.
- Transparency and clarity. The schedule should be structured in a way that traders and stakeholders can understand, with a clear distinction between application fees, daily charges, casual or event charges, and other ancillary items.
- Fairness and proportionality. Street Trading in Westminster operates in different places, on different days, and with different commodity impacts. A single flat rate is not the fairest way to allocate cost recovery.
- Strategic alignment. The fee structure should support Westminster's adopted market roles, curation objectives, active market management model and the wider aims of the Street Trading and Markets Transformation Programme. Place-sensitive investment. The fee structure should support the basic service conditions needed for successful trading places, including administration, compliance, waste, cleansing and active management.
- Value for money. The Council will continue to review procedures, delivery models and procurement arrangements so that costs are managed efficiently and avoidable expenditure is reduced where possible.
- Supporting enterprise. The fee model should be transparent and defensible, while sitting alongside trader support that helps traders adapt, improve sales, strengthen presentation and progress where opportunities arise.
- Consultation and engagement. Traders and representative bodies should continue to be engaged on proposed fee changes and on the practical impact of the charging structure, with formal consultation carried out where required by statute.

The schedule is not designed to generate a profit, to cross-subsidise unrelated regimes, or to discourage a particular lawful application route. It is intended to allocate recoverable costs more transparently between application, daily, casual, event and ancillary fee families.

4.2 The proposed fee schedule has been built as a series of distinct fee families rather than as a single headline charge. This distinction is important because different parts of the street trading regime recover different types of cost under section 22 of the City of Westminster Act 1999. The schedule has also been structured so that market, isolated pitch, exhibition, portrait artist, casual, event and ancillary charging streams are considered transparently and do not cross-subsidise unrelated regimes.

4.3 Application fees are intended to recover the reasonable cost of dealing with applications. They are calculated by identifying the process steps required for each application type, the officer roles involved, the estimated time required and the relevant on-costed hourly rate. Application fees do not include the ongoing cost of running, cleansing, managing or enforcing the market, isolated pitch or other street-based activity once a licence has been granted.

4.4 Daily pitch fees are different. They are intended to recover, taking one year with another, the reasonable ongoing costs of operating the street trading licensing regime. Those costs include administration, management, compliance, enforcement, waste, cleansing and other services or operational costs properly attributable to licensed street trading. The daily fee structure is therefore not calculated as a simple officer-

time application fee. It is a structured cost-recovery tariff that allocates recoverable operating costs across markets, isolated pitch locations, exhibitions, portrait artist pitches, trading days and commodity types in a more transparent way than the current flat or legacy fee structure. This is why the daily fee structure distinguishes between markets, isolated pitch locations, exhibitions, portrait artists, trading days and commodity impacts rather than applying a single undifferentiated charge.

4.5 The Council has not used the proposed schedule to set a rent, generate a profit, penalise particular traders, deter lawful applications or fund general improvements outside the statutory charging framework. The purpose of the proposed schedule is to distribute recoverable street trading costs more fairly and transparently across the trading routes, commodities and market settings that give rise to those costs.

4.6 The proposed daily fees have been tested against current occupancy and full tradable occupancy to check whether the resulting structure is reasonable in aggregate. Those projections are modelled billed-income figures only. They are not guaranteed cash collection and they do not remove the need for continued work on occupancy, debt recovery, underuse, operational efficiency and market management.

4.7 Contextual comparisons with shop occupation costs and other London borough market charges may assist members and consultees in understanding relative position and proportionality. They are not the legal basis for the proposed fees. The legal basis remains Westminster's own cost model, officer-time model, market and street trading operating evidence and the statutory cost-recovery framework.

5 How the fees support the wider strategy, policy and operating model

5.1 The proposed Market Strategy that sits alongside this report adopts a differentiated, vision-led network model for Westminster's six markets. The proposed market fee structure aligns with that approach by replacing a largely uniform daily market fee with a market, day and commodity-based structure that can better reflect the different roles, operating contexts and management needs of each market.

5.2 The proposed Street Trading Policy that sits alongside this report requires a more active, place-sensitive approach to market management and to the wider street trading estate, including isolated pitches, exhibitions, temporary trading, event trading and other specialist routes. It provides for temporary, pilot, casual, event and day-part arrangements where lawful and operationally justified, while making clear that permanent market opportunities will not ordinarily be offered. The proposed fee families support that policy structure by distinguishing between application, daily, casual, event and ancillary charges.

5.3 The proposed Standard Conditions that sit alongside this report strengthen requirements around presentation, waste, utilities, sustainability, safety, trader conduct, good-neighbour management and the use of market or street trading infrastructure. The differentiated fee model supports those expectations by better reflecting the cost of administering and enforcing higher-impact trading, particularly food-related activity.

5.4 The proposed fee structure should be understood as the charging element of the wider refresh. The strategy defines the place vision, the policy defines the decision

framework, the conditions define the operating rules, and the fee schedule defines how lawful recoverable costs are allocated. This is intended to support a cleaner, safer and better managed service, not to raise a profit or deter lawful trading. Wider trader-support activity will sit alongside the fee structure and be funded or delivered only where it is separately lawful and resourced.

6 Summary of proposed changes

6.1 The proposed schedule separates application fees from daily charges and introduces a clearer family of charges than exists in the current published market and wider street trading fee pages.

6.2 For applications, the proposed schedule distinguishes between temporary market applications, permanent market applications where exceptionally used, permanent isolated pitch applications, variations, approved casual trader registration, exhibition applications, portrait artist applications and event trading. Different categories attract different fees where the underlying officer process differs materially.

6.3 For registered market traders, the proposed daily charge is no longer a single market rate. Instead, it is a differentiated matrix based on market, day and commodity. The structure uses a non-food base rate for each market/day, with a £5 premium for fresh produce and a £9 premium for hot food / takeaway.

6.4 For casual daily trading, the proposed structure takes the equivalent registered daily rate and applies a further uplift to reflect same-day allocation, administration, attendance management and compliance work. Casual trading is also a growth route: it supports start-ups, trial trading, vacancy backfill, event programming and curation. The additional uplift reflects the extra operational work required to keep that flexible route viable and managed.

6.5 For event trading, the proposed schedule distinguishes between event trading within established markets and event trading in non-market event spaces, reflecting the different levels of planning, coordination and operational management involved.

6.6 For isolated pitch trading, the proposed structure builds on the existing charging model, where fees already vary by location and day of the week. It introduces an additional fee matrix that accounts for the type of commodity sold, reflecting the differing administrative, enforcement, and waste and cleansing requirements associated with each category. Commodity differentials are not proposed as penalties. They are a fairness and cost-recovery tool reflecting the different waste, cleansing, food-safety, smoke, odour, grease, litter, queueing and compliance impacts normally associated with different commodities.

6.7 The proposed schedule also includes a limited number of ancillary or other lawful charges connected with street trading.

6.8 The report also recommends consultation on the principle of an annual fee review. Any future annual adjustment would be applied only through the Council's lawful fee-setting process, including statutory notice and consultation where required.

6.9 The table below illustrates what the daily rates would have been had an annual uplift been applied to the current published fees since the relevant last review point. In this example an RPI uplift has been used.

Regime	Day	Adjusted RPI figure
Markets (Licence)	Monday to Saturday	£33.03
Markets (Registration)	Monday to Thursday	£41.92
	Friday	£62.52
	Saturday	£65.20
Isolated Pitches (W1/WC2)	Monday to Thursday	£54.27
	Friday	£99.42
	Saturday	£117.50
	Sunday	£126.54
Isolated Pitches (Non W1/WC2)	Monday to Thursday	£41.81
	Friday	£79.41
	Saturday	£96.15
	Sunday	£104.51
Exhibitions	Weekends & Bank Holidays	£16.39

6.10 For markets, a Sunday line is included within the daily matrices for transparency and future flexibility only. It does not authorise Sunday trading and does not create a right to trade on Sundays. No Sunday daily pitch fee would be charged where a market is not authorised or operated on a Sunday. The Sunday line would apply only if a Sunday pilot, event-led Sunday trading, or future Sunday operation were separately authorised or booked.

6.11 The Sunday line is higher than the Monday to Thursday base because Sunday trading would be non-routine for most of the market network and would be expected to require separate booking, attendance management, weekend officer or contractor deployment and separate waste and cleansing arrangements rather than being absorbed into the ordinary weekday market rhythm. The fresh-produce and hot-food Sunday figures use the same fixed £5 and £9 commodity premiums as the rest of the registered daily matrix.

7 Application fees

7.1 The proposed application fees have been calculated using an officer-time model. For each application type, officers have identified the main processing and determination steps, the officer role normally required, the estimated time required for that role, and the relevant on-costed hourly rate. The resulting calculation is: application fee = sum of officer time required for the application process x relevant on-costed hourly rate.

7.2 The process steps included in the application fee may include, depending on application type:

- initial receipt, logging and validation;
- checking whether the correct application route has been used;
- reviewing identity, insurance and supporting documents;
- checking the proposed goods, equipment, pitch, trading format and market fit;
- reviewing food safety or Environmental Health material where relevant;
- seeking clarification or further information where the application is incomplete;
- preparing the officer assessment and decision record;
- issuing the licence, registration, variation or refusal documentation; and
- updating the relevant licensing, market and payment records.

7.3 The application fee does not recover ongoing market or street trading running costs. It does not include routine cleansing, waste collection, general market management,

ongoing compliance monitoring, public realm improvement, trader support or other wider transformation costs. Those matters are addressed, where lawfully recoverable, through daily charges or other relevant fee families.

7.4 The officer-cost assumptions used in the supporting workbook are shown below.

Officer-cost assumption	Roles aligned to that rate in the workbook	On-costed hourly rate
Band 3	Senior Licensing Officer; Market Development Officer; Street Market Officer; Environmental Health Officer; Members Services	£40.08/hour
Band 4	Principal Licensing Officer; Street Licensing Team Leader; Market Development Team Leader; Street Market Team Leader; Legal Services	£53.72/hour
Band 5	Head of Service	£76.93/hour

NB: these rates are direct on-costed hourly assumptions used for the fee model. They do not include unrelated running costs, wider transformation costs or other operational charges that are recovered separately where lawful.

7.5 Different application fees are proposed because the work required differs by application type and commodity. Hot-food applications require more food-safety and operational assessment than fresh-produce or non-food applications. Fresh-produce applications involve a greater food, waste and handling assessment than non-food applications. Non-food applications are generally the lightest-touch route.

7.6 Permanent market and isolated pitch applications are materially more expensive than temporary applications because they require a substantially heavier determination process. A temporary licence is time-limited and is normally assessed against a defined pitch, vacancy, pilot, event or short-term operational opportunity. A permanent application, by contrast, requires consideration of longer-term market or site fit, commodity balance, pitch allocation, implications for the adopted policy or market vision, potential displacement or precedent, senior review, legal and governance input and, where relevant, committee or member-service support.

7.7 The higher permanent-application fees are not proposed as a deterrent. They reflect the additional process work required where a permanent market or isolated pitch application is made or exceptionally invited. Westminster's draft policy position is that new permanent market opportunities will not ordinarily be offered, but the Act permits permanent street trading licences and the Council may, in an exceptional case, decide that a permanent route is operationally justified. It is therefore appropriate to include permanent application fee lines in the schedule, provided those fee lines reflect the additional work involved in determining such applications. Where the determination route does not require a committee or member-service stage assumed in the model, the retained or refundable element should be adjusted so that the final charge reflects the work actually undertaken.

7.8 Approved casual trader registration fees are also derived from officer-time inputs. They are separate from the casual daily booking fee. The registration fee covers the cost of assessing whether a trader can be admitted to the approved casual trader route. The daily casual fee then covers the additional operational work involved in booking and managing a casual trading day.

7.9 For market event trading, Westminster's latest policy position is that traders will normally already be on the approved casual trader register before being considered for a market event opportunity, unless expressly invited for a defined event, partnership,

pilot or strategic purpose. The event-fee lines in Appendix H should be read in that context.

7.10 Where an application is withdrawn by the applicant or is invalidated and not made valid within the period specified by the Council, the retained element of the application fee will reflect the work actually undertaken. In ordinary cases this is expected to be one third to reflect validation, initial review and applicant correspondence. A higher proportion would be retained only where substantive further work has already been carried out, and a lower amount may be appropriate where little or no processing has occurred or fairness requires it.

8 Daily charges

8.1 Section 22 of the Act provides that the Council may recover from licence holders such charges as may be sufficient in the aggregate, taking one year with another, to cover the reasonable costs of collection, removal and disposal of refuse or other services rendered to licence holders, the cleansing of streets attributable to street trading, reasonable administrative costs not otherwise recovered, and the cost of enforcing the provisions of the Act.

8.2 Registered daily pitch fees recover a different type of cost from application fees. Application fees recover the cost of dealing with a specific application. Registered daily pitch fees recover the ongoing costs of operating, administering, cleansing and enforcing licensed street trading, taking one year with another.

8.3 The proposed registered daily fee structure has therefore been built as a differentiated tariff rather than as a simple officer-time calculation. The Council first identified a non-food base rate for each market, isolated pitch and trading day. That base rate reflects the relative operating burden of the market, isolated pitch and day, including market size, tradable capacity, current and expected activity, market-management input, cleansing and waste requirements, operational complexity, compliance demand and the extent to which the market is routine or requires additional management.

8.4 Commodity premiums are then added to the non-food base rate:

Regime	Commodity	Premium applied to the non-food base	Rationale
Markets	Non-food	£0	Base rate. Lowest typical waste, food-safety and cleansing impact.
	Fresh produce	+£5	Higher on-market waste, stock handling and food-compliance requirement than non-food
	Hot food / takeaway	+£9	Highest day-to-day compliance burden, food-safety input, smoke/odour/oil risk and wider off-site litter / receptacle impact
Isolated Pitches	Non-food	£0	Base rate
	Fresh produce	+£5	Increased waste, stock handling and food-compliance requirements
	Hot food / takeaway	+£15	Highest day-to-day compliance burden, food-safety input, smoke/odour/oil risk generates off-site litter / receptacle impact

8.5 The commodity premiums are not intended to penalise particular goods. They reflect the additional costs and management pressures normally associated with those forms of trading. The draft Street Trading Policy and Standard Conditions also recognise that fresh produce and hot food trading require stronger waste, cleansing, food-safety, smoke, odour, oil, grease, wastewater, packaging and good-neighbour controls. Those requirements create a greater ongoing service and compliance burden than most non-food trading.

8.6 The market, isolated pitch location and day differentials are also cost-recovery distinctions rather than rent or demand pricing. Westminster's markets and isolated pitches operate in different locations, with different levels of activity, pitch numbers, infrastructure, cleansing requirements, waste patterns, public realm pressures, customer flows, compliance demands and management needs. A single flat rate does not reflect those differences. The proposed matrix therefore allocates recoverable costs by reference to the different operating realities of each market and trading day.

8.7 The Council has also considered total contribution in aggregate. A market, isolated pitch or specialist trading route with a lower per-pitch fee may still make a substantial contribution to total recoverable costs where it has a larger pitch base or greater tradable capacity. Conversely, smaller or more management-intensive locations may justify a higher per-pitch rate even where their total location cost is lower. The proposed fee matrix should therefore be read as a structured allocation of recoverable costs across the relevant regimes and locations, not as a simple one-location, one-cost calculation.

8.8 The proposed casual daily fee structure is shown in Appendix D. The proposed casual daily fee is calculated by starting with the equivalent registered daily pitch fee and adding a commodity-weighted casual operating uplift:

Commodity	**Casual uplift added to equivalent registered daily market rate**
Non-food	+£6
Fresh produce	+£7
Hot food / takeaway	+£9

8.9 This uplift reflects the additional administrative and operational work created by casual trading when compared with a regular registered trader occupying an established pitch on a predictable pattern.

8.10 Permanent or temporary traders usually have a fixed licence record, known trading days, established invoicing arrangements, an allocated pitch, a known commodity and an existing compliance history. Casual trading is more flexible and therefore requires more day-to-day management. Depending on the market and booking, additional work may include checking casual trader approval and insurance status; confirming the correct market, date, commodity and pitch availability; matching the trader to a suitable pitch and market mix; taking or confirming booking payment; issuing booking confirmation and day-specific instructions; managing late changes, cancellations, no-shows and reallocations; checking attendance and documents on the day; dealing with equipment, loading, waste, queueing or pitch-fit issues; resolving conflicts with

permanent or temporary traders; and carrying out additional compliance checks where the trader is less familiar with the market.

8.11 The uplift is commodity-weighted because the additional casual-management burden is not the same for all commodities. A casual hot-food booking is more likely to require equipment, food-safety, power, waste, fire-safety, queue-management and cleansing checks than a casual non-food booking. Fresh produce sits between non-food and hot food because it normally generates more waste and handling requirements than non-food, but less food-safety and cooking-related management than hot food.

8.12 The casual uplift is not a penalty for casual status. It is a cost-recovery adjustment for the additional work created by a flexible, short-notice and day-by-day trading route. That route remains important because it supports trial trading, vacancy backfill, start-up opportunities, themed markets, activation and market curation. The proposed fee structure preserves that route while making the additional cost of administering it more transparent.

8.13 Where casual trading is authorised in a non-market event space for a special market event, a higher non-market event-space line is included. That reflects the additional planning, coordination and operational management required where trading takes place outside an established market setting and cannot rely on ordinary market infrastructure, pitch allocation, cleansing arrangements or routine supervision.

8.14 Sunday fee lines are included as dormant or contingent rates only. They do not create a right to Sunday trading at any market, and they do not mean that a trader will be charged for a Sunday on which they are not authorised to trade.

8.15 A Sunday charge would apply only where Sunday trading is separately authorised through the relevant licence, temporary licence, event approval, pilot, seasonal programme, activation, market operation plan or other lawful route. Where a market is not ordinarily operational on Sundays, the Sunday line provides a pre-consulted and transparent charge that can be applied if the Council later authorises Sunday trading for that market or for a defined Sunday event. It avoids the need to create an ad hoc charge at the point of approval and allows consultees to comment on the Sunday fee basis now.

8.16 The Sunday registered daily rate is set at £2 above the equivalent Saturday registered daily rate. That modest differential reflects the fact that Sunday trading is not currently part of the ordinary routine operating pattern for most Westminster markets. Where Sunday trading is authorised, it is therefore more likely to require additional or non-routine operational arrangements, such as specific officer scheduling or weekend cover; additional booking and attendance management; separate cleansing and waste planning; coordination with weekend public realm, traffic or event activity; additional trader communications; market set-up, pack-down and supervision outside the normal weekly rhythm; compliance checks for traders operating on a non-standard day; and reactive management where Sunday trading is introduced as a pilot, event or activation rather than a routine market day. Sunday lines should therefore be described as dormant or contingent rates, not as an expansion of ordinary Sunday trading.

8.17 The Sunday casual fee is calculated in the same way as the other casual daily fees: it starts with the equivalent Sunday registered daily rate and then adds the relevant commodity-weighted casual uplift. This means that the Sunday casual line reflects

both the non-routine Sunday operating burden and the additional cost of administering a casual booking.

8.18 If Sunday trading becomes a regular operating day for any market, the Council will keep the Sunday rate under review through the approved fee-review process. The rate may need to be revisited if actual Sunday operating costs, occupancy, cleansing requirements, compliance demand or market-management requirements differ materially from the assumptions used in this consultation schedule.

8.19 On current market occupancy data, the proposed registered daily market pitch fee structure would increase annual billed pitch-fee income from approximately £0.870m to £1.383m at current occupancy, an uplift of approximately £0.513m. At full occupancy of currently tradable pitches and days, the equivalent modelled uplift is approximately £0.697m, moving from approximately £1.641m to £2.339m. The detailed market projections are set out in Appendix J.

8.20 The market pitch projections in Appendix J relate to registered daily market pitch fees. Wider all-regime income and cost-recovery projections are set out in Appendix L. Application income, casual registration and booking income, event income and ancillary income depend on annual case volumes, so those lines are modelled separately from the market occupancy model.

8.21 The figures above show billed income, not guaranteed cash collection. Fee reform therefore needs to sit alongside stronger debt collection, underuse controls, and licence-renewal or allocation controls.

9 Waivers, annual review and trader support

9.1 Reductions, waivers and adjustments of fees will continue to be applied only where lawful and in accordance with Westminster's Street Trading Policy and any approved fee schedule. The proposed policy approach is that Westminster will not normally grant fee waivers on medical grounds, although certificated absence may still be relevant for attendance and review purposes.

9.2 The revised fee structure should be understood as part of a broader trader support framework. Westminster’s approach is based on transparent fees plus targeted support, rather than using hidden subsidy within the fee system as the principal means of support.

9.3 The Council will normally review the fee schedule annually, where justified by the lawful cost-recovery position, but no annual uplift will be applied automatically without the Council considering and following the statutory notice, consultation and decision-making requirements that apply at the time.

9.4 Any illustrative worked example of what annual uplifts would have produced under the historic schedule will be refreshed in the final decision report using the latest available relevant costs.

10 Consultation

10.1 Under section 22(9) of the Act, before charges are determined or varied the Council must give notice in writing to all licence holders who would be affected by the proposal and to anybody which appears to the Council to represent such licence holders.

10.2 The notice must give details of the proposed charges, state that representations may be made regarding the proposed charges by a date specified in the notice, which must be not less than 28 days after the notice has been given and be accompanied by a statement showing how the proposed charges have been computed.

10.3 Affected licence holders and any representative bodies should therefore be written to advising them of the consultation, the proposed schedule and how to provide comments. The consultation material should also be published on the Westminster website together with details of how to respond during the consultation period.

10.4 The statutory consultation should be supported by continued trader engagement and, where appropriate, further meetings or discussions with representative bodies or affected traders.

10.5 Following the consultation period, the proposed fees and charges should be brought back for decision, with a full report setting out the consultation responses received, any further legal or financial analysis, any revisions to the computation statement, and officer recommendations for implementation.

11 Financial and service implications

11.1 This report seeks approval to consult only. It does not itself implement the proposed fee schedule.

11.2 If the proposed registered daily market pitch fee structure were implemented without further change, the market-only billed-income modelling in Appendix J indicates a material uplift compared with the current structure at both current occupancy and full occupancy of currently tradable pitches and days. The actual financial impact will depend on final approved rates, occupancy, case volumes, cash collection and the outcome of consultation.

11.3 Wider all-regime modelling applies the proposed fee structures to current market occupancy and current non-market volumes for isolated pitches, exhibitions, portrait artists and application / administration activity. On that basis, projected proposed income is approximately £2.840m against direct staffing, waste and cleansing costs of approximately £4.461m, giving an indicative deficit of approximately £1.621m and 64% cost recovery.

11.4 If the existing market estate were occupied at full currently chargeable capacity, while non-market volumes and direct costs were held constant, total projected street trading income would rise to approximately £3.796m. On those assumptions the direct service envelope would reduce to a deficit of approximately £0.665m and 85% cost recovery.

Scenario	Projected income	Direct staffing, waste and cleansing costs	Surplus / deficit	Cost recovery
Current market occupancy + current non-market volumes	£2,839,742	£4,460,579	-£1,620,855	64%
Full market occupancy + current non-market volumes	£3,795,615	£4,460,579	-£664,982	85%

11.5 The proposed charging approach supports service sustainability by aligning charges more closely with the lawfully recoverable costs of application processing, market

administration, cleansing, compliance, enforcement, infrastructure use and other services provided to licence holders. The decision sought enables consultation on a more transparent, proportionate and legally grounded fee framework that better supports the Council's active management model, reduces hidden subsidy and aligns charges with the costs generated by different forms of street trading.

11.6 The Council will continue to seek value for money by reviewing procedures, service delivery and procurement arrangements, including in areas such as events, specialist support and shared market services.

12 Equality, accessibility and climate implications

12.1 The proposed fee consultation should be read alongside Westminster's live Combined Equality Impact Assessment and the consultation EqIA. The fee structure forms part of a broader transformation programme that also includes trader support, accessibility, management, public realm and communications improvements.

12.2 The Council recognises that fee changes may affect different traders differently in practice, particularly smaller traders, start-ups and traders with lower financial resilience. That is why the fee structure is intended to sit alongside targeted support and formal consultation, rather than operate in isolation. The consultation should test affordability impacts, whether lower-barrier trading routes remain accessible and which trader groups benefit from new opportunities.

12.3 No direct climate implication arises from consulting on the schedule itself. More broadly, the proposed structure supports Westminster's direction of travel towards cleaner, lower-emission, better managed markets, including more structured charging for utilities and support for electric-first trading where infrastructure and policy allow.

13 Legal implications

13.1 The legal implications are set out throughout the body of this report. For clarity, the principal statutory basis is summarised below.

13.2 Section 22(1) of the City of Westminster Act 1999 allows the Council to charge fees to applicants for the grant or variation of street trading licences sufficient in the aggregate, taking one year with another, to recover the reasonable costs of dealing with such applications.

13.3 Section 22(2) allows the Council to recover from licence holders such charges as may be sufficient in the aggregate, taking one year with another, to cover the reasonable costs of refuse collection and other services rendered to licence holders, street cleansing attributable to street trading, reasonable administrative costs not otherwise recovered, and enforcement.

13.4 Sections 22(3) to 22(5) also permit the Council to charge for approved identity or pitch plates, temporary-register administration and certain additional services provided to a market or area where lawful. Section 22(8) permits the Council to charge on application for temporary licences. Sections 22(9) and (10) set out the consultation requirements which must be satisfied before charges made under section 22(2) are determined or varied.

13.5 Section 23 and section 25 of the Act remain relevant for receptacle and removal powers, and support any later schedule of ancillary charges relating to receptacles, bins, containers and their storage or removal.

13.6 Street trading is also affected by the Provision of Services Regulations 2009. Charges under an authorisation scheme must remain reasonable and proportionate to the cost of the procedures and formalities. The decision of the Supreme Court in Hemming remains relevant to the distinction between recoverable application costs and ongoing operational or enforcement costs and that distinction is reflected in the structure of the proposed schedule.

13.7 The annual review mechanism is also framed as a consultation proposal rather than an automatic uplift: if charges are determined or varied in a later year, the Council will follow the statutory notice and representation requirements that apply at that time. The Sunday fee lines should be described in consultation material as contingent or dormant rates that apply only where Sunday trading is separately authorised or booked; they do not themselves authorise Sunday trading or create a charge where no Sunday market operation takes place.

Appendices:

Appendix A – Current published Westminster fees and charges

Appendix B – Proposed application fees and casual registration fees

Appendix C – Proposed registered daily pitch fee matrix

Appendix D – Proposed casual daily pitch fee matrix

Appendix E – Proposed Isolated Pitch daily pitch fee matrix

Appendix F – Proposed Exhibition Pitch daily pitch fee matrix

Appendix G – Proposed Portrait Artist Pitch daily pitch fee matrix

Appendix H – Proposed event fees and ancillary charges

Appendix I – Comparison with the current published Westminster fee structure

Appendix J – Market Income projections from the proposed registered daily pitch fee structure

Appendix K – Annual market waste and cleansing costs

Appendix L – All-regime income and direct service cost projections

APPENDIX A – Current published Westminster fees and charges

The tables below summarise the current published Westminster street trading fees used as the comparator in this report across the relevant regimes.

Markets	Charge	With 5% Direct Debit discount
Monday to Saturday daily charge	£22.00	£20.90

Isolated Pitches (W1/WC2)	Charge	With 5% Direct Debit discount
Monday to Thursday	£24.72	£23.48
Friday	£45.32	£43.05
Saturday	£53.56	£50.88
Sunday	£57.68	£54.80

Isolated Pitches (Non W1/WC2)	Charge	With 5% Direct Debit discount
Monday to Thursday	£19.06	£18.11
Friday	£36.20	£34.39
Saturday	£43.83	£41.64
Sunday	£47.64	£45.26

Approved registration of casual trading	Daily charge	
Monday to Thursday	£19.44	
Friday	£28.50	
Saturday	£29.72	

Applications / Licences Markets	£
New / Variation to sell hot take away food	£260.00
New / Variation to sell fresh produce	£126.00
New / Variation to sell non food items	£96.00
Minor variation to remove or add trading days or commodities within the same category	£60.00
Registration to be on approved list of casual traders	£60.00
Registration of Assistant for existing licence holders	£19.00
Replacement Licence / Licence Plate	£19.00
Application for further temporary licence	£19.00

Applications / Licences Isolated Pitches	£
New / Variation to sell hot take away food	£260.00
New / Variation to sell fresh produce	£126.00

Applications / Licences Isolated Pitches	£
New / Variation to sell non food items	£96.00
Minor variation to remove or add trading days or commodities within the same category	£60.00
Registration to be on approved list of casual traders	£60.00
Registration of Assistant for existing licence holders	£19.00
Replacement Licence / Licence Plate	£19.00
Application for further temporary licence	£19.00

Events and other current fees	£
Event street trading - standard pitch	£190.00
Event street trading - food pitch	£333.00
Duplicate Licence	£15.45
Fee for ID plate	£2.06

APPENDIX B – Proposed application fees and casual registration fees

Temporary market application fees

Fee line	Proposed fee	Current fee	How the figure is built
New temporary licence - hot food	£348.00	£260.00	Using para 7.2 rates: validation, document and insurance checks, applicant correspondence, market-fit review, food-safety / equipment review by Environmental Health, senior decision check. Application processing only.
New temporary licence - fresh produce	£267.00	£126.00	Using para 7.2 rates: validation, document and insurance checks, applicant correspondence, market-fit review and lighter Environmental Health review than hot food. Application processing only.
New temporary licence - non-food	£187.00	£96.00	Using para 7.2 rates: validation, document and insurance checks, applicant correspondence, market-fit review and decision preparation. No Environmental Health food input.
Further temporary licence	£67.00	£19.00	Using para 7.2 rates: shorter repeat process, previous licence / compliance check, applicant correspondence and decision update.
Change Registered Assistants	£20.00	£19.00	Using para 7.2 rates: administrative verification, record update and confirmation of registered assistant details.
Replacement Licence/Plate	£20.00	£19.00	Using para 7.2 rates: administrative replacement, record update and issue of replacement licence or plate.

Permanent market application fees and variations

Fee line	Proposed fee	Current published position	How the figure is built
New permanent licence - hot food	£1,245.00	£260.00	Using para 7.2 rates: fuller validation, market-fit / strategic assessment, hot-food Environmental Health review, senior and Head of Service review, committee / member services, legal input and detailed decision documentation. Costed by process, not deterrence.
New permanent licence - fresh produce	£1,125.00	£126.00	Using para 7.2 rates: same permanent process with lower food-compliance input than hot food, including validation, market-fit assessment, senior review, legal / committee input and decision documentation. Costed by process, not deterrence.
New permanent licence - non-food	£964.00	£96.00	Using para 7.2 rates: same permanent process excluding Environmental Health food input, including validation, market-fit assessment, senior review, legal / committee input and decision documentation. Costed by process, not deterrence.
Transfer to Next of Kin	£147.00	N/A	Using para 7.2 rates: proposed-change assessment, senior review, record update and decision documentation. Application processing only.
Variation	£314.00	£260.00 / £126.00 / £96.00	7.5 hours using para 7.2 rates: proposed-change assessment, commodity and market-fit review, any Environmental Health input, senior review and decision documentation.
Minor variation	£87.00	£60.00	Using para 7.2 rates: lighter-touch change to days or commodities within the same category, with validation, record update and decision confirmation.
Change in RA	£20.00	£19.00	Using para 7.2 rates: administrative verification, record update and confirmation of registered assistant details.

Fee line	Proposed fee	Current published position	How the figure is built
Replacement Licence/Plate	£20.00	£19.00	Using para 7.2 rates: administrative replacement, record update and issue of replacement licence or plate.

Permanent Isolated Pitch application fees and variations

Fee line	Proposed fee	Current published position	How the figure is built
New permanent licence - hot food	£763.00	£93.73	Using para 7.2 rates: fuller validation, strategic assessment, hot-food Environmental Health review, senior and Head of Service review, committee / member services, legal input and detailed decision documentation. Costed by process, not deterrence.
New permanent licence - fresh produce	£723.00	£93.73	Using para 7.2 rates: same permanent process with lower food-compliance input than hot food, including validation, senior review, legal / committee input and decision documentation. Costed by process, not deterrence.
New permanent licence - non-food	£656.00	£93.73	Using para 7.2 rates: same permanent process excluding Environmental Health food input, including validation, senior review, legal / committee input and decision documentation. Costed by process, not deterrence.
Variation - hot food	£495.00	£55.11	Using para 7.2 rates: proposed-change assessment, hot-food Environmental Health review, senior review, legal / committee input where required and decision documentation. Costed by process, not deterrence.
Variation - fresh produce	£415.00	£55.11	Using para 7.2 rates: proposed-change assessment, lighter food-compliance review than hot food, senior review, legal / committee input where required and decision documentation. Costed by process, not deterrence.
Variation – non-food	£415.00	£55.11	Using para 7.2 rates: proposed-change assessment excluding Environmental Health food input, senior review, legal / committee input where required and decision documentation. Costed by process, not deterrence.
Transfer to Next of Kin	£147.00	£93.73	Using para 7.2 rates: proposed-change assessment, senior review, record update and decision documentation. Application processing only.
Minor variation	£80.00	£17.51	Using para 7.2 rates lighter-touch change to days or commodities within the same category, with validation, record update and decision confirmation.
Change in RA	£20.00	N/A	Using para 7.2 rates: administrative verification, record update and confirmation of registered assistant details.
Replacement/Duplicate Plate	£40.00	£2.05	Using para 7.2 rates: administrative replacement, record update and issue of replacement licence or plate.
Replacement/Duplicate Licence	£40.00	£15.45	Using para 7.2 rates: administrative replacement, record update and issue of replacement licence or plate.

Approved casual trader registration fees

Fee line	Proposed fee	Current published fee	How the figure is built
Casual registration - hot food	£187.00	£60.00	Using para 7.2 rates: registration validation, insurance and document checks, commodity / suitability review, Environmental Health food-safety input and principal review. Registration does not guarantee a booking.

Fee line	Proposed fee	Current published fee	How the figure is built
Casual registration - fresh produce	£127.00	£60.00	Using para 7.2 rates: registration validation, insurance and document checks, commodity / suitability review, lighter Environmental Health input and principal review. Registration does not guarantee a booking.
Casual registration - non-food	£107.00	£60.00	Using para 7.2 rates: registration validation, insurance and document checks, commodity / suitability review and principal review. No Environmental Health food input. Registration does not guarantee a booking.

Exhibition licence application fees

Fee line	Proposed fee	Current published fee	How the figure is built
New	£200	£93.73	Using para 7.2 rates: registration validation, insurance and document checks, suitability review, and principal review.
Replacement/Duplicate Licence	£40	£15.45	Using para 7.2 rates: administrative replacement, record update and issue of replacement licence or plate.
Replacement/Duplicate Plate	£40	£2.06	Using para 7.2 rates: administrative replacement, record update and issue of replacement licence or plate.

Portrait Artist licence application fees

Fee line	Proposed fee	Current published fee	How the figure is built
New	£120	N/A	Using para 7.2 rates: registration validation, insurance and document checks, suitability review, and principal review.
Renewal	£81	N/A	Using para 7.2 rates: administrative, review history, record update and issue of new licence.
Replacement/Duplicate Plate	£40	N/A	Using para 7.2 rates: administrative replacement, record update and issue of replacement licence or plate.

NB: where an application is withdrawn or invalidated and not made valid within the period specified by the Council, the retained element of the application fee will reflect the work actually undertaken. In ordinary cases this is expected to be one third to reflect validation, initial review and applicant correspondence. A higher proportion would be retained only where substantive further work has already been carried out, and a lower amount may be appropriate where little or no processing has occurred or fairness requires it.

APPENDIX C – Proposed registered daily pitch fee matrix

Market	Mon-Thu (NF / FP / HF)	Fri (NF / FP / HF)	Sat (NF / FP / HF)	Sun (NF / FP / HF)
Berwick Street	£30 / £35 / £39	£31 / £36 / £40	£33 / £38 / £42	£35 / £40 / £44
Strutton Ground	£30 / £35 / £39	£31 / £36 / £40	£33 / £38 / £42	£35 / £40 / £44
Tachbrook Street	£27 / £32 / £36	£28 / £33 / £37	£30 / £35 / £39	£32 / £37 / £41
Church Street	£25 / £30 / £34	£26 / £31 / £35	£28 / £33 / £37	£30 / £35 / £39
Rupert Street	£26 / £31 / £35	£27 / £32 / £36	£29 / £34 / £38	£31 / £36 / £40
Maida Hill	£22 / £27 / £31	£23 / £28 / £32	£25 / £30 / £34	£27 / £32 / £36

NB: Sunday lines provide future flexibility where Sunday or event-led trading is separately authorised or booked. They do not in themselves create a right to Sunday trading at any market, and no Sunday daily pitch fee would be charged where a market is not authorised or operated on a Sunday. The Sunday rate is a dormant consulted rate intended to reflect the expected marginal costs of non-routine Sunday operation, including separate booking, attendance management, weekend officer or contractor deployment, cleansing and waste arrangements outside the normal market rhythm, and reduced weekday economies of scale.

APPENDIX D – Proposed casual daily pitch fee matrix

NB: market casual rates are calculated from the equivalent registered daily rate plus a commodity-weighted casual operating uplift: +£6 for non-food, +£7 for fresh produce and +£9 for hot food / takeaway. The non-market special event space line includes a further non-market coordination uplift and applies only where such space is separately authorised for a special market event.

Market	Mon-Thu (NF / FP / HF)	Fri (NF / FP / HF)	Sat (NF / FP / HF)	Sun (NF / FP / HF)
Berwick Street	£36 / £42 / £48	£37 / £43 / £49	£39 / £45 / £51	£41 / £47 / £53
Strutton Ground	£36 / £42 / £48	£37 / £43 / £49	£39 / £45 / £51	£41 / £47 / £53
Tachbrook Street	£33 / £39 / £45	£34 / £40 / £46	£36 / £42 / £48	£38 / £44 / £50
Church Street	£31 / £37 / £43	£32 / £38 / £44	£34 / £40 / £46	£36 / £42 / £48
Rupert Street	£32 / £38 / £44	£33 / £39 / £45	£35 / £41 / £47	£37 / £43 / £49
Maida Hill	£28 / £34 / £40	£29 / £35 / £41	£31 / £37 / £43	£33 / £39 / £45
Non-Market Space (Special Market Events only)	£50 / £56 / £62	£51 / £57 / £63	£53 / £59 / £65	£55 / £61 / £67

APPENDIX E – Proposed Isolated Pitch daily pitch fee matrix

Location	Mon-Thu (NF / FP / HF)	Fri (NF / FP / HF)	Sat (NF / FP / HF)	Sun (NF / FP / HF)
W1/WC2	£30 / £35 / £45	£35 / £40 / £50	£45 / £50 / £60	£50 / £55 / £65
Non W1/WC2	£20 / £25 / £35	£25 / £30 / £40	£35 / £40 / £50	£40 / £45 / £55

APPENDIX F – Proposed Exhibition Pitch daily pitch fee matrix

Location	Weekends and Bank Holidays
Green Park	£20

APPENDIX G – Proposed Portrait Artist Pitch daily pitch fee matrix

Location	Daily
Leicester Square	£10

APPENDIX H – Proposed event fees and ancillary charges

Event licence fees and replacement licence / plate charge

Fee line	Proposed fee	Current published comparator	How the figure is built
Event licence on a market - hot food	£405.00	£333.00	Composite fee: event-specific hot-food application element (£367.53) + representative registered hot-food daily rate (£37.75)
Event licence on a market - fresh produce	£321.00	£190.00	Composite fee: event-specific fresh-produce application element (£287.38) + representative registered fresh-produce daily rate (£33.75)
Event licence on a market - non-food	£196.00	£190.00	Composite fee: event-specific non-food application element (£167.14) + representative registered non-food daily rate (£28.92)
Event licence on a non-market event space - hot food	£492.00	£333.00	Market-event hot-food fee + additional non-market coordination / planning uplift
Event licence on a non-market event space - fresh produce	£408.00	£190.00	Market-event fresh-produce fee + additional non-market coordination / planning uplift
Event licence on a non-market event space - non-food	£283.00	£190.00	Market-event non-food fee + additional non-market coordination / planning uplift
Replacement Licence/Plate	£20.00	£19.00	Using para 7.2 rates: administrative replacement of licence or plate by Senior Licensing Officer. Application / administration processing only.

APPENDIX I – Comparison with the current published Westminster fee structure

Fee family	Current published structure	Proposed structure	Comment
Registered daily market pitch fee	£22.00 Mon-Sat (£20.90 by direct debit)	£22 to £44 by market, day and commodity	Current structure is uniform across markets and goods. Proposed structure differentiates by location, day and commodity.
Casual daily market fee	£19.44 Mon-Thu, £28.50 Fri, £29.72 Sat	£28 to £53 for market pitches by market, day and commodity; £50 to £67 for non-market event space where separately authorised	Current structure is day-based only. Proposed structure adds market and commodity weighting. Sunday lines are dormant consulted rates for future authorised Sunday trading only.
Market application fee	Single published fee per commodity: £260 hot food; £126 fresh produce; £96 non-food	Split into temporary and permanent pathways, plus commodity-specific casual registration	Permanent applications are now costed separately and are materially higher because the heavier determination process is modelled separately. The fee is costed by process and is not intended as a deterrent. Under the latest policy, permanent opportunities are not ordinarily expected to be the normal route.
Event street trading fee	£190 standard pitch; £333 food pitch	£196 to £492 depending on market / non-market setting and commodity	Proposed structure distinguishes market events from non-market events and introduces a fresh-produce tier.

APPENDIX J – Market Income projections from the proposed registered daily pitch fee structure

These tables model annual market registered pitch fee income from the proposed daily pitch fee card. They do not include casual daily income, application income, event income or ancillary income because those lines depend on annual case volumes rather than pitch occupancy

Scenario	Annual income	Incremental vs current occupancy/current fees	Notes
Current occupancy + current fees	£869,959	£0	Market registered pitch fee income only.
Full occupancy + current fees	£1,641,432	£771,473	Full occupancy of currently chargeable market pitches and days.
Current occupancy + proposed market fees	£1,382,672	£512,713	Uses current commodity breakdowns by market and day.
Full occupancy + proposed market fees	£2,338,548	£1,468,589	Fills current vacancies using current market-level commodity shares.

Market	Current occupancy of tradable capacity	Current fees at current occupancy	Proposed fees at current occupancy	Current fees at full tradable occupancy	Proposed fees at full tradable occupancy
Berwick Street	84.0%	£97,263	£270,517	£183,514	£324,771
Church Street	45.5%	£523,536	£577,534	£987,805	£1,249,102
Maida Hill	19.4%	£43,228	£21,639	£81,562	£112,450
Rupert Street	33.3%	£54,035	£56,314	£101,952	£167,379
Strutton Ground	100.0%	£69,044	£229,429	£130,272	£229,429
Tachbrook Street	89.1%	£82,853	£227,239	£156,327	£255,419
TOTAL		£869,959	£1,382,672	£1,641,432	£2,338,548

NB: the tables above show billed income, not guaranteed cash collection. Fee reform therefore needs to sit alongside stronger debt collection, underuse controls and licence-renewal or allocation controls.

APPENDIX K – Annual market waste and cleansing costs

Market	Cleansing	Waste	Total
Berwick Street	£44,246.17	£36,667.80	£80,913.97
Church Street	£442,057.97	£97,171.36	£539,229.33
Maida Hill	£30,698.39	£9,464.00	£40,162.39
Rupert Street	£36,838.19	£15,087.80	£51,925.99
Strutton Ground	£28,242.62	£39,322.40	£67,565.02
Tachbrook Street	£40,521.99	£30,175.80	£70,697.79
Isolated Pitches	Nil	£179,020.40	£179,020.40
TOTALS	£622,605.33	£406,909.56	£1,029,514.89

NB: these are 2025/26 waste and cleansing figures and do not factor in inflationary increases, changes to London Living Wage assumptions, wider non-market street trading costs, or waste generated by hot food sales outside of the immediate market vicinity. Wider staffing, waste and cleansing cost-recovery modelling is set out in Appendix L.

APPENDIX L – All-regime income and direct service cost projections

This appendix summarises the all-regime income and direct service cost model at current occupancy/current volumes and at full market occupancy. It covers markets, isolated pitches, exhibitions, portrait artists and application / administration income. It excludes storage income and pavement licences. Event trading income is not projected where annual event volumes have not been supplied.

L1. All-regime income at current occupancy / current volumes

Measure	Current	Proposed	Uplift
Daily / pitch income	£1,969,619	£2,702,710	£733,091
Application / administration income	£46,258	£137,032	£90,774
Total projected street trading income	£2,015,877	£2,839,742	£823,865

L2. Direct service cost and break-even position under proposed fees

Measure	Amount
Projected proposed income at current occupancy/current volumes	£2,839,742
Staffing costs	£3,431,082
Waste costs	£406,910
Cleansing costs	£622,605
Total direct service costs	£4,460,597
Projected surplus / deficit	-£1,620,855
Cost recovery	64%

L3. Full market occupancy sensitivity

Scenario	Total projected income	Direct service costs	Surplus / deficit	Cost recovery
Current market occupancy + current non-market volumes	£2,839,742	£4,460,597	-£776,220	64%
Full market occupancy + current non-market volumes	£3,795,615	£4,460,597	-£664,982	85.0%

NB: the full market occupancy scenario is modelled only against currently chargeable market capacity. It does not assume new Sunday trading, storage income, pavement licence income, additional non-market volumes, additional trading days, or changes to staffing, waste or cleansing costs.