

**DRAFT PUBLIC LONDON CHARTER**

**A response by CPRE London to the Mayor’s consultation paper**

**15 January, 2021**

1. CPRE London welcomes the opportunity to comment on the draft Public London Charter (PLC) prepared by the Mayor of London as part of the suite of guidance associated with the emerging London Plan. We have been pleased to facilitate discussion with a range of interested organisations during earlier stages in developing the Charter. A joint statement supported by a number of public interest groups with an interest in this matter is included as an annex to this submission.

2. We strongly support measures to promote and enhance public access and use of land in London. We therefore welcome the preparation of the Public London Charter and we are keen to help ensure the effective application of its principles across the capital.

3. We have the following general comment on the draft Charter and its context:

* The Charter principles should be applied as widely as possible to existing public spaces, including reclaimed road space, as well as new publicly accessible private space created through the planning process;
* The introduction of the Charter should be used to promote the protection and extension of existing public rights of way to enable more of London’s land to be accessible for public enjoyment;
* Consideration should be given to adding a further principle to stress the growing importance of sustainable development and public health, and the use of nature-based solutions to tackle climate change, including sustainable urban drainage, soft landscaping, trees, hedges, and other green and blue infrastructure provision such as green walls and rooves and water-based features. While these might be considered as aspects of design, CPRE London believes they are of sufficient and growing importance to be addressed explicitly within the Charter principles;
* The launch and implementation of the Charter should be accompanied by a powerful public information campaign to promote the public benefit of free access to public land and new publicly accessible private space. This should be accompanied by a new code for users, akin to the longstanding Countryside Code.

4. We have the following more detailed comments to make on the draft Charter principles:

* *Public Welcome* - we welcome the emphasis here on inclusiveness but we believe explicit recognition should be given here to the needs of children by referring to places ‘to stop, rest and play’; to the benefits of green infrastructure by referring to ‘natural features’ after ‘public amenities’; and to the need to restrict access by motorised vehicles by referring to ‘car-free spaces’.
* *Openness* – we welcome reference to the ‘highest level of public access possible’ and suggest adding ‘including safeguarding existing and providing new public rights of way’ at the end of the first sentence.
* *Unrestricted Use -* we welcome the encouragement of a wide range of activities provided these do not cause nuisance to others. Adherence to the ‘no nuisance’ requirement should enable effective control of amplified buskers and similar intrusive activities.
* *Community Focus* – we welcome the focus on community-led activities that reflect London’s diversity. We have concerns about the indiscriminate design and location of permanent artworks in public spaces that should be addressed by adding ‘appropriate and well designed’ before public art.
* *Free of Charge* - we strongly support the principle of free use of public space but are concerned about the vague reference to a ‘balance’ being struck between free and private or commercial events without any indication or guideline for the appropriate extent of commercial use either in terms of time or space. We suggest that this principle refers to restricting the use of space for commercial events to no more than 14 days each year and less than 25% of the area of public space. There should also be a requirement that the space used is returned in at least as good an environmental condition as it was found.
* *Privacy and Data* - we are concerned about the use of existing and new technologies such as CCTV and biometric scanning to restrict or discourage appropriate use of public space. We believe this principle should be strengthened to allow the use of such technologies only where clearly justified, as well as in line with regulators’ codes of best practice.
* *Transparency* – we are concerned to limit any unnecessary and intrusive signage on site relating to the PLC. Any such signage should be minimal and consistent with best practice design principles and limited to a simple and distinctive loo or kitemark with a link to ownership and/or management responsibility.
* *Good Stewardship* – we welcome the emphasis on appropriate management and maintenance of public space. This should be backed up with explicit reference in the principle to an environmentally sustainable, long term management plan that should be subject to regular review taking account of feedback from users and local communities.

5. Overall, we welcome the development of the Public London Charter. The proposed improvements outlined above would significantly strengthen its ability to deliver its ultimate aim *‘of ensuring that London’s public spaces are safe, accessible, inclusive, attractive, well-connected and easy to understand, well maintained and serviced.’*

CPRE London, January 2021

Annex:

**JOINT STATEMENT SUPPORTED BY CPRE LONDON, OPEN SPACES SOCIETY, LONDON FORUM OF AMENITY SOCIETIES, LONDON FRIENDS OF GREEN SPACE NETWORK, LONDON LIVING STREETS, THE RAMBLERS, AND PROFESSOR ANTONIA LAYARD**

We welcome the preparation of the Public London Charter as an historic opportunity to extend and promote public access to and use of land in London and to increase its public benefit.

We have come together to emphasise the following shared opportunities:

1. The Charter should explicitly address the growing importance to public health of green and blue infrastructure, car-free spaces and outdoor play areas for children.
2. The Charter should be mandatory for new public spaces and its adoption should be sought for all existing ones. It should include land used for servicing or operational activities other than exceptional exclusions for reasons of public safety.
3. On site signage to support the Charter should follow best practice design principles and be limited to the provision of a simple, attractive and distinctive logo or kitemark with links to both a repository of best practice and details of ownership and/or management responsibility.
4. The use of public space for private or commercial events should be strictly limited and consistent with the overarching objective of promoting public benefit and sustainable long term management, leaving the space in at least as good an environmental condition as it was found.
5. Mechanisms should be put in place to secure feedback from public space users and local communities on the value and scope for improvement of the Charter principles over time.

The Public London Charter should be seen as the beginning of a programme for enhancing the public benefit from public spaces across London and promoting it as a model for use in other cities.

CPRE London, January 2021