

Public London Charter LPG

Consultation summary report

September 2021

Copyright

Greater London Authority

September 2021

For more information about this document, please contact:

The London Plan Team, GLA Planning

Greater London Authority

City Hall

The Queen's Walk

More London

London

SE1 2AA

www.london.gov.uk

Tel 020 7983 4100 OR 020 7983 4000

Email planningsupport@london.gov.uk

Minicom 020 7983 4458

Other formats and languages

For a large print, Braille, disc, sign language video or audio-tape version of this document, please contact us using the details above.

You will need to supply your name, your postal address and state the format and title of the publication you require.

If you would like a summary of this document in your language, please phone the number or contact us at the address above.

Table of contents

1.	Introduction	1
2.	Who took part?.....	1
2.1.	Respondent demographics	2
3.	Consultation feedback and GLA response.....	4
4.	Equality impacts.....	25
5.	Next steps and monitoring	26
	Annex A Summary of Engagement	27

1. Introduction

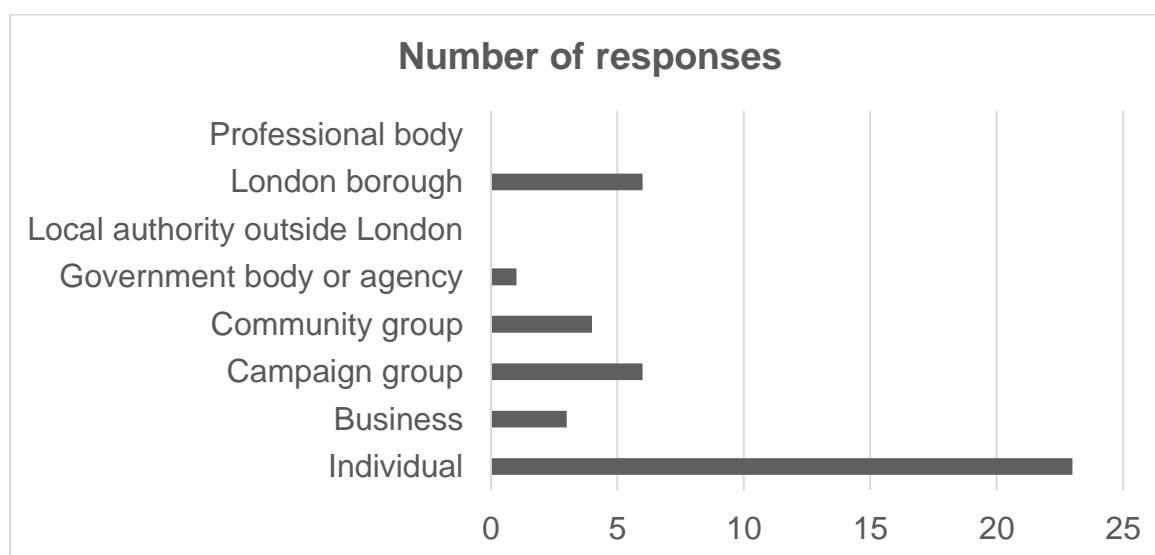
Between (13 October 2020) and (15 January 2021), the Greater London Authority (GLA) carried out a consultation on the Mayor's draft Public London Charter (PLC) guidance.

In total, there were 43 responses to the consultation. This includes 31 direct responses to the online survey and twelve written responses. This document provides a summary of the consultation responses received. The Mayor would like to thank everyone who took part for engaging with the guidance.

2. Who took part?

Respondents to the formal consultation survey were asked what type of organisation they represent or whether they were responding as an individual.

Respondent type	Number	Percentage
Individual	23	53%
Business	3	7%
Campaign group	6	14%
Community group	4	9%
Government body or agency	1	2%
Local authority outside London	-	0%
London borough	6	14%
Professional body	-	0%
Total	43	



No responses were received from organisations that referred to representing a protected characteristic group.

Other engagement was undertaken as follows:

- An in-depth virtual presentation and discussion with people between the ages of 15 to 25 years old (Peer Outreach Workers¹).
- Four webinars (presentation followed by question and answers), two were open to everyone, one was for boroughs, and one for developers, property owners and managers.
- A meeting with the inclusive design and access panel speaking with disabled people and older people.
- A meeting at LSE with representatives of the Brent Youth Council.
- Three roundtables with local authority, civic interest and landowner and developer representatives.
- A quick poll.

The key issues raised via these channels are also summarised in this report.

2.1. Respondent demographics

Formal consultation survey

¹ <https://www.london.gov.uk/peer-outreach-workers>

Respondents to the formal consultation survey were asked equality monitoring information to assess how representative respondents were compared to the demographics of Londoners. Twenty-five respondents answered some of these questions and the information below only relates to these that responded and the options they selected for each question. For many of the questions there were options not selected by any respondents.

A larger proportion of respondents were white British (54 per cent) compared to Londoners (39 per cent). Black, Asian and Minority Ethnic groups were underrepresented compared to Londoners with 13 per cent of respondents being Mixed Other. Thirteen per cent of respondent were Other. No other non-white ethnicities were reported.

The majority of respondents (69 per cent) did not identify as having a disability that impacts on daily life. This is slightly lower than for all Londoners (81 per cent). Eight per cent of respondents identified as having a physical impairment (including arthritis, cerebral palsy and using a wheelchair) and eight per cent identified as having a sensory impairment (including hearing, sight and speech impairments). Fifteen per cent of respondents preferred not to say.

Respondents fell into a range of age groups between 25 – 65+. Thirty nine per cent the respondents were between 25-49 years old which is representative of Londoners. Thirty per cent of respondents were between 50-64 and 17.4 per cent over 65 which are higher percentage than the general Londoner population. Thirteen per cent of respondents preferred not to say. There were no respondents younger than 25 to the formal survey, however specific engagement was undertaken with young people as summarised below.

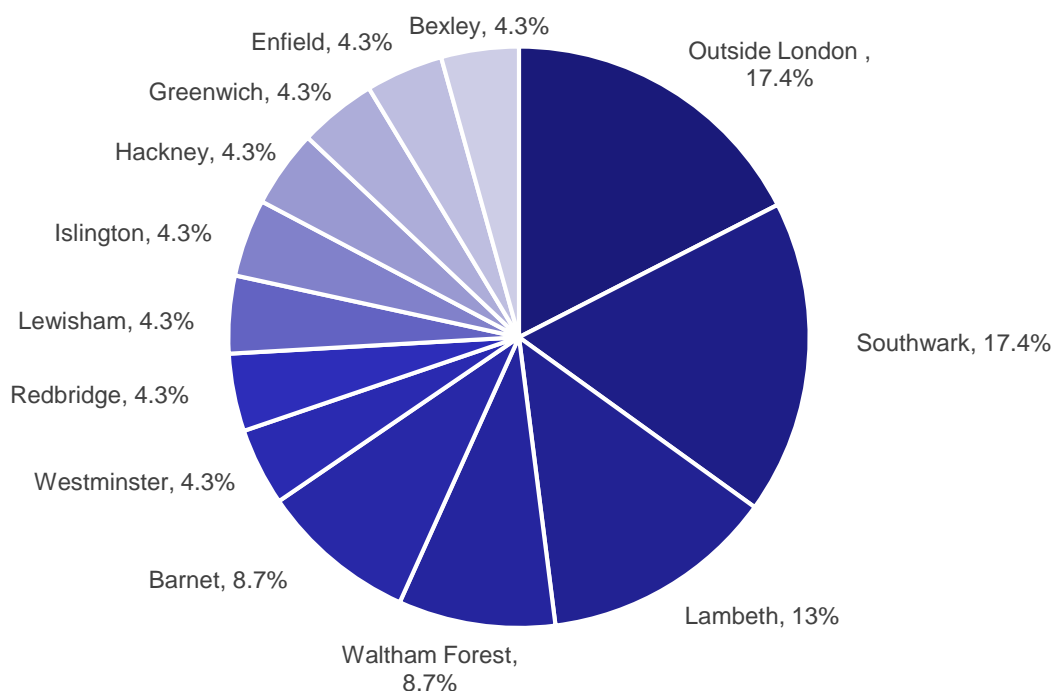
The majority of respondents identified as male (50 per cent). A further 36 per cent of respondents identified as female and 14 per cent preferred not to say.

The majority of respondents (70 per cent) stated that their gender identify is the same as the sex that they were assumed to be at birth, while four per cent stated that it is different. Twenty six per cent of respondents preferred not to say.

The largest group preferred not to disclose their sexual identity (43.5 per cent). Of those that did the largest group identified as heterosexual or straight (34.8 per cent), which is lower than for all Londoners. 8.7 per cent of respondents identified as a gay man, 4.3 per cent identified as bisexual, 4.3 per cent as other, 4.3 per cent as 'don't know'.

The majority (82.6 per cent) of respondents have not been pregnant, on maternity or paternity leave or breastfeeding within the last six months. The other 17.4 per cent of respondents preferred not to say. None of the respondees confirmed they did meet this characteristic in the last six months.

Respondents identified as residents of the following places:



Other engagement

Specific demographic information was not sought for the other engagement. However, young people, disabled people and older people were specifically engaged with, recognising the specific relevance for these groups and the importance of their advice for the development of the guidance.

In relation to the work with the Peer Outreach Workers, this group is made up of 30 young Londoners aged 15 - 25yrs old from diverse backgrounds and life experiences. They are commissioned by the Mayor to engage, inspire and gather the opinions of other young people in the capital. Their work helps shape the policies, strategies and services.

3. Consultation feedback and GLA response

As part of the engagement on the draft guidance, respondents were asked to submit responses to specific questions. This section also includes responses through other engagement channels.

Overall approach

Question 1: It would help us to know what type of user of public space you are? (select as many responses as appropriate)

Forty-six responses were received to this question (note that the question allowed for respondents to select multiple options). Twenty-seven respondents identified as a user of public space, seven as a manager of public space and six identified as an owner of public space. Twenty one respondents also selected the 'other' option.

Response	Number	Percentage
A user of public space	27	60%
A manager of public space	7	15.6%
An owner of public space	6	13.3%
Other	21	46.7%
Prefer not to say	0	-
Total	46	

Question 2: Would the Charter make you feel more confident about what your rights and responsibilities are when you are in a public space?

Twenty-nine responses were received to this question, with the majority answering yes.

Response	Number	Percentage
Yes	24	82.8%
No	5	17.2%
Total	29	

Question 3: Would the Charter make you feel more confident about what the responsibilities of the manager/owner of a public space are towards you in said space?

Twenty-nine responses were received to this question, with the majority answering yes. Seventeen respondents did not respond to this question.

Response	Number	Percentage
----------	--------	------------

Yes	26	89.7%
No	3	10.3%
Total	29	

Question 4: Do you think that you would be more likely to use of spend time in a public space that is signed up to the Charter?

Twenty-seven responses were received to this question. About 70 per cent of people answered yes. Nineteen respondents did not respond to this question.

Response	Number	Percentage
Yes	19	70.4%
No	8	29.6%
Total	27	

Question 5: To what extent to you agree or disagree with the Principles in the Charter?

Twenty-eight responses were received to this question. For each of the eight principles, over 70 per cent of respondents answered that they either somewhat or strongly agreed with each of the principles.

Response	Public Wel-come	Open-ness	Unrestr-icted use	Comm-unity focus	Free of charge	Privacy and data	Trans-parency	Good steward-ship
Don't know	-	-	-	-	-	-	-	-
Strongly Disagree	-	-	-	1 (3.6%)	1 (3.6%)	5 (17.9%)	3 (10.7%)	1 (3.6%)
Somewhat disagreed	-	1 (3.6%)	2 (7.1%)	2 (7.1%)	1 (3.6%)	2 (7.1%)	1 (3.6%)	1 (3.6%)
Neither agree no disagreed	1 (3.6%)	1 (3.6%)	2 (7.1%)	1 (3.6%)	-	-	1 (3.6%)	2 (7.1%)

Somewhat agree	4 (14.3%)	4 (14.3%)	7 (25.0%)	7 (25.0%)	4 (14.3%)	4 (14.3%)	3 (10.7%)	6 (21.4%)
Strongly agree	22 (78.6%)	21 (75.0%)	15 (53.6%)	16 (57.1%)	20 (71.4%)	16 (57.1%)	18 (64.3%)	16 (57.1%)

Key issues from other engagement:

- General support for the concept of a charter comprising a set of high-level principles, accompanied by additional supporting guidance.
- The charter could be supported by more detailed guidance, which could potentially take account the differences between different types of public spaces.
- It is important to define what is considered ‘public space’ in the context of the charter.
- Public spaces include cathedrals, royal parks, and canal towpaths. The Charter needs to work across a wide range of areas and define carefully what is covered.
- Investment in the public realm should extend beyond the red line of the development (in the context of the rise of large-scale redevelopment projects and particularly in the context of high social and economic inequality).
- Specific references to accessibility and disabled people are needed to ensure this is not missed.
- A definition of ‘inclusive’ that emphasises disabled people should be used.
- The requirements of disabled people and people with a range of impairments need to be considered.
- All people should be able to comfortably use areas; people aren’t all the same.
- The very different requirements of people with mental health issues and neurodiverse conditions need to be considered in how spaces are managed.
- The charter needs to be more people and user focussed rather than legal or ownership based.
- Young adults want to get involved in shaping their physical environments.

GLA Response

The charter is a high-level set of principles. It also provides some **guidance** on how each principle can be implemented. This creates a consistent standard across a very diverse range of types of spaces and reduce ambiguity around use and regulation while also allowing flexibility around the application of site-specific rules where required.

The scope of the charter is limited to the public spaces proposed in a development. It does not extend to all **public realm** and cannot be a retrospective requirement for an existing public space. The Charter explains how these spaces will be defined via the planning application process.

The introduction to the charter states that public spaces should be places that all Londoners – regardless of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation – can spend time in and enjoy, in comfort and safety both day and night, avoiding separation or segregation. The charter principles are clear that public spaces should be **open to all** and offer the highest level of public access and use possible, and all users, should be able to move through the public space and spend time in it.

In recognition that **people have different requirements** the Charter states that any staff engaged in supervisory activities should undertake appropriate training with an emphasis on equality, diversity and inclusion so that all people feel welcome. The guidance explains that achieving inclusivity will sometimes be dependent on providing different types of space or experience for different user groups, and that the **needs of particular groups** need to be anticipated in the planning and management of the space.

The charter asks that an assessment of the impacts any closures would have, and the mitigation needed to address such impacts, be undertaken and clearly set out in the management plan for the public space, in particular for **people with limited mobility** or with certain **neurodiverse conditions** who may have difficulty navigating the changes in their environment.

Public Welcome principle

Question 6: If you think the principle of Public Welcome in the Charter needs changing, can you tell us how and why?

Question 7: Are there any changes you would make to the guidance for the principle of Public Welcome?

Fourteen responses were received to question 6 and 15 to question 7. Respondents made the following points:

- The principle should extend to include natural features and a traffic free requirement.
- The Charter should make clearer reference to the important contribution that the public realm makes towards climate change mitigation.
- The Mayor should ban the use of intrusive biometric surveillance technologies (including live facial recognition) within CCTV systems for public spaces covered by this policy.
- The Charter should be clear on the importance of ensuring that spaces are inclusive and reflect the needs and experiences of different groups for example spaces for children to play.

Key issues from other engagement:

- There are a lot of barriers to use of public space: the space is not for people like me, territorial, class issues. These are very real and also extend to policing of spaces. Consideration needs to be given to how an invitation to a space is created so it is inclusive, and how to include people in the process of design, operation and management of spaces.

GLA Response

The Public London Charter addresses management and maintenance of new public spaces. This specific scope does not include the design of public space which elements such as the location of **natural features** in a space and **traffic free** design fall under. However, the guidance has been amended to reference GLA guidance on the design of public spaces.

In response to feedback the guidance on the Principle of Public Welcome has been updated to reflect and reinforce the link between certain elements of successful public spaces and the **climate emergency**.

The Charter aims to ensure that public spaces are **inclusive**. This can sometimes be dependent on providing different types of space or experience for different user groups, for example shelter and places to stop and rest for older people or spaces for children to play. The principle and guidance for public welcome have been updated to reflect this with the inclusion of reference to play.

The Charter principles work together and the principles for Privacy and Data and Good Stewardship address managing security of spaces and the use of smart **technologies** (including live facial recognition and CCTV) in spaces. These are addressed in this report under the section addressing these principles. No change has been made to the guidance for this principle on this issue.

Question 8: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Seventeen responses were received to this question, with the majority answering no. Twenty-nine respondents skipped this question.

Response	Number	Percentage
Yes	6	35.3%
No	11	64.7%
Total	17	

Question 9: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

Six responses were received to this question. Respondents suggested the following spaces:

- Granary Square near Kings Cross – felt welcome and children’s play possible.
- Spaces across Westminster.
- Sheldon Square and Merchant Square and the Grand Union Canal basin within the Paddington Opportunity Area.
- London parks.

GLA Response

The Public London Charter addresses management and maintenance of new public spaces. This specific scope does not include the design of public space which elements such as the location of **natural features** in a space and **traffic free** design fall under. However, the guidance has been amended to reference GLA guidance on the design of public spaces.

In response to feedback the guidance on the Principle of Public Welcome has been updated to reflect and reinforce the link between certain elements of successful public spaces and the **climate emergency**.

The Charter aims to ensure that public spaces are **inclusive**. This can sometimes be dependent on providing different types of space or experience for different user groups, for example shelter and places to stop and rest for older people or spaces for children to play. The principle and guidance for public welcome have been updated to reflect this with the inclusion of reference to play.

The Charter principles work together and the principles for Privacy and Data and Good Stewardship address managing security of spaces and the use of smart **technologies** (including live facial recognition and CCTV) in spaces. These are addressed in this report under the section addressing these principles. No change has been made to the guidance for this principle on this issue.

Feedback was sought on examples of existing spaces in London that respondents felt aligned with each of the Charter principles or where they felt each principle was already being applied in practice. The intention of gathering this information was to signpost to good practice examples through the Charter. However, as the management and maintenance arrangements in place in the spaces identified are not able to be verified at this stage, and in order to better future proof the document, it is not considered appropriate to signpost to specific spaces.

There may be a future project in bringing together best practice examples in one place as a resource once the Charter has been published and developments are secured to the charter principles.

Openness principle

Question 10: If you think the principle of Openness in the Charter needs changing, can you tell us how and why?

Question 11: Are there any changes you would make to the guidance for the principle of Openness?

Thirteen responses were received to question 10 and nine responses to question 11. Respondents made the following points:

- The charter should be clear on the importance of spaces being accessible for all including disabled people, cyclists, and pedestrians and should be promoting active travel.
- Openness is about 'use' as well as 'access' and the principle should be amended to reflect this.
- Opening times should be determined at the local level with input from local stakeholders as the default of 24 hour access may not be practical or safe.
- The Mayor should ban the use of intrusive biometric surveillance technologies (including live facial recognition) within CCTV systems for public spaces covered by this policy

GLA Response

The principles of openness and unrestricted use are clear that public spaces should be open to all and offer the highest level of public access and use possible, and all users should be able to move through the public space. People of all needs and backgrounds should be able to feel confident to be able to physically access a space and then once there be able to use and spend time in it. Safe **cycling** is referred to in the list of uses that should be allowed in the public space. Not all public spaces will function as routes that would facilitate **active travel** – for example, the space may be an enclosed courtyard with one entrance. So although the Charter will facilitate walking and cycling in the public space, it is not considered appropriate for the Charter to specifically promote active travel as this will depend on circumstances.

The principle has been updated to reference **use as well as access**. The guidance has also been updated to explain that where night-time and other times of **closures** are proposed, applicant should explain why closures are necessary and what measures have been explored to avoid the need for them. The guidance now requires the measures and justification to be agreed with the local planning authority and detailed in the management plan for the space as well as the associated legal agreement.

The guidance has been updated to provide additional detail to explain how justified site-specific restrictions in relation to **opening hours** should be developed and agreed, including the process and level of stakeholder engagement.

The Charter principles work together and the principles for Privacy and Data and Good Stewardship address managing security of spaces and the use of smart **technologies** in spaces. Concerns about these issues are addressed in this report under the section

addressing these principles. No change has been made to the guidance for this principle on this issue.

Question 12: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Fourteen responses were received to this question, with the majority answering no. Thirty-two respondents skipped this question.

Response	Number	Percentage
Yes	2	14.3%
No	12	85.7%
Total	14	

Question 13: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

Five responses were received to this question. Respondents suggested the following spaces:

- Parks in general.
- Coram's Fields suggested as a good example of private open space.

Unrestricted Use principle

Question 14: If you think the principle of Unrestricted Use in the Charter needs changing, can you tell us how and why?

Question 15: Are there any changes you would make to the guidance for the principle of Unrestricted Use?

Twelve responses were received to question 14 and 10 to question 15. Respondents made the following points:

- It is right for the LPG to require the development of site-specific rules through consultation and in transparent ways.
- The inclusion of a non-exhaustive list of allowable activities will lead to enforcement issues.
- More detail is needed about the process of developing any site-specific rules and how to address the need for later amendments.
- To create inclusive spaces, the guidance should specify that children and young people should be allowed to play in public space.

Key issues from other engagement:

- Designing for young adults must translate into management that allows for congregation and dwell time in the space.

GLA Response

Although some respondents suggested that the inclusion of a non-exhaustive list of **allowable activities** could still lead to confusion other respondents felt that there is significant variation of appropriate activities between different spaces. Thus the Charter promotes a contextual approach to the management of new public spaces. The guidance has been updated to clarify that all rules should be developed in consultation with the local community.

The central premise of the Public London Charter is to ensure appropriate management and maintenance arrangements are in place for public space that maximise public access and minimise rules governing the space to those required for its safe management. In response to consultation feedback the guidance has been updated to clarify the approach to the management of public new spaces should be **inclusive**. Additional detail clarifies when additional rules may be required as well as how these should be developed subsequently.

The Charter specifically provides for the community to inform the creation of spaces and the management and rules that govern them under a number of the principles. This should include engagement with young people.

Paragraph 4.3.5 specifically notes that people from all ages should be free to “gather, talk and play games”.

Question 16: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Fourteen responses were received to this question, with the majority answering no. Thirty-two respondents skipped this question.

Response	Number	Percentage
Yes	4	28.6%
No	10	71.4%
Total	14	

Question 17: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

Five responses were received to this question. Respondents suggested the following spaces:

- Trafalgar Square.
- Public parks.

Paternoster Square was cited as an example of a space that doesn't align with the principle of unrestricted use because of intimidating security reprimanding users in space with few people and stopping young children playing with a ball.

Response from other engagement:

- Olympic Park was cited as a best practice example for accessibility and use by disabled people.

Community Focus principle

Question 18: If you think the principle of Community Focus in the Charter needs changing, can you tell us how and why?

Question 19: Are there any changes you would make to the guidance for the principle of Community Focus?

Twelve responses were received to question 18 and 11 responses to question 19. Respondents made the following points:

- It is right for the community to have input into the management arrangements for new public open space.
- The Guidance lacks detail about management and enforcement and community involvement.
- The Guidance should ensure developments take a contextual approach to public art and cultural activity, which might not be appropriate in some instances.
- Support for community involvement in the design of public spaces with suggestion that the Mayor could publish guidance on inclusive and community-led design for such spaces.

Key issues from other engagement:

- Include young adults in the long term programming of these spaces.

GLA Response

It is important that local communities can have an active and meaningful role in the planning and delivery of activities across the day and night in public spaces. The guidance has been updated to clarify how landowners and managers of public space can identify local community representation such as community groups and ensure that they have an active and valuable role in the **management** of spaces. Specific provision is also made to engage with the community to ensure the programming of the spaces encourages greater diversity of visible representation. This diversity includes young people.

Public art can be a key element of a successful public space. The guidance has been updated to clarify that where appropriate public art is one way that greater diversity of visible representation across the public realm can be encouraged.

The Public London Charter addresses management and maintenance of new public spaces. This specific scope does not include the **design** of public space. However, the guidance has been amended to reference GLA guidance on the design of public spaces.

Question 20: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Twelve responses were received to this question, with the majority answering no. Thirty-four respondents skipped this question.

Response	Number	Percentage
Yes	3	25%
No	9	75%
Total	12	

Question 21: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

Three responses were received to this question. Respondents suggested the following spaces:

- Public parks.
- The Queen Elizabeth Park – large enough to have a wide variety of areas of different character and use for all community groups.

Free of Charge principle

Question 22: If you think the principle of Free of Charge in the Charter needs changing, can you tell us how and why?

Question 23: Are there any changes you would make to the guidance for the principle of Free of Charge?

Ten responses were received to question 22 and 13 to question 23. Respondents made the following points:

- Generally supportive of the principle with agreement that public space should be for use primarily free of charge but that commercial activity in spaces can help to meet the costs of things like stewardship, maintenance and community activities in spaces - balance is needed.

- Ticketed or commercial events must consider the needs of the local and wider community, and also to minimise the impact of accessibility of space for regular users.
- The guidance should include more detail in relation to the amount of space and time that public spaces should be allowed to restrict access for events.
- Events should leave the space in at least as good an environmental condition as it was found.

GLA Response

Feedback was generally supportive on the principle (and related guidance) of Free of Charge. Respondents did raise the point that events should consider the needs of the community and minimise accessibility issues for regular users of public space. The guidance has been updated to clarify that public space should maximise overall **accessibility** and primarily be free to use and otherwise spend time in.

Responses were mixed in relation to the level of detail the Charter should provide about **closures** affecting a public space. Given that this is a context specific issue that requires nuance the guidance has been updated to clarify how temporary closures should be planned for and managed.

The arrangements for required remediation of the **condition** of spaces following any events will need to be considered on a case by case basis and be agreed between the event organiser and land owner. This is not within the scope of the Charter. No change to the guidance required on this issue.

Question 24: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Ten responses were received to this question, with all but one respondent answering no. Thirty-six respondents skipped this question.

Response	Number	Percentage
Yes	1	10%
No	9	90%
Total	10	

Question 25: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

One response was received to this question, noting that Local Authority run parks were a type of space that align with the principle of Free of Charge. Maintenance was noted as a challenge still due to funding issues.

Privacy and Data principle

Question 26: If you think the principle of Privacy and Data in the Charter needs changing, can you tell us how and why?

Question 27: Are there any changes you would make to the guidance for the principle of Privacy and Data?

Twenty responses were received to question 26 and 15 to question 27. Respondents made the following points:

- It is right that the Guidance ties the approach to privacy to the Regulators Code of Practice.
- Data Protection Impact Assessments should be shared with City Hall for publication on the London Datastore.
- Prohibit the use of intrusive biometric surveillance technologies (including live facial recognition) within CCTV systems for public space.
- The principle and guidance should be strengthened to clarify that where smart technologies are justified, they must protect people and property in a way that is both legal and compliant with regulators' codes of practice.
- The Guidance should address the design of spaces, including design approaches that address environmental issues such as green infrastructure, urban greening and climate change.

GLA Response

The Public London Charter set out the expectations of the use of smart and digital **technologies** to comply with all relevant laws and codes of practice. Additions have been made to the Charter to further emphasise the requirements under the Data Protection Act 2018, the UK General Data Protection Regulation, and advice from the Information Commissioners Office.

People need to be able to trust the way personal data is used so that the technologies can provide genuine and inclusive benefits. The Data Protection Act (2018) closely regulates the collection and use of personal data. In line with this, the processing of personal information requires a Data Protection Impact Assessment (DPIA). The Charter states that DPIAs should be shared publicly with City Hall so they can be published on the London Datastore.

The principle has been updated to clarify that smart technologies must be justified. The guidance has been updated to further clarify the responsibilities of land owners and managers when using CCTV in public spaces. To further emphasise the high bar set for the collection and use of personal data the Charter makes reference to the tests outlined in the UK Information Commissioner's Office recent Opinion on the use of Live Facial Recognition in public spaces by non-law enforcement bodies.

The Charter now notes that the Mayor is developing a draft Emerging Technology Charter setting out London's expectations on innovators and buyers on how data-enabled technologies should be trialled and deployed in the city, including adherence

to three important principles: working in the open, respect for diversity and trustworthiness with data. The Emerging Technology Charter sets out the responsibilities landowners and managers of public spaces have prior to the use of new and emerging technologies in the public realm.

The Public London Charter addresses management and maintenance of new public spaces. This specific scope does not include the **design** of public space. However, the guidance has been amended to reference GLA guidance on the design of public spaces.

The scope of the Charter does not extend to addressing **environmental design** issues. London Plan Guidance addressing a range of environmental issues can be found at [London Plan Guidance and SPGs | London City Hall](#). No change to the guidance has been made in this regard.

Question 28: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Fourteen responses were received to this question, with all but one respondent answering no. Thirty-two respondents skipped this question.

Response	Number	Percentage
Yes	1	7.1%
No	13	92.9%
Total	14	

Question 29: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

Two responses were received to this question.

Both noted examples of spaces that did not align with the principle. One was unnamed, the other identified as the Sky Garden due to privacy intrusion.

Transparency principle

Question 30: If you think the principle of Transparency in the Charter needs changing, can you tell us how and why?

Question 31: Are there any changes you would make to the guidance for the principle of Transparency?

Eighteen responses were received to question 30 and 15 to question 31. Respondents made the following points and suggested changes:

- Agreement for the requirement for those responsible for managing and maintaining public spaces to be fully transparent in communicating rules and regulations.
- The process for changing any agreed rules needs to be clearly set out in the Charter.
- It would be good to identify spaces that have signed up to the Charter or meet the principles with a logo, kitemark or QR code instead of on-site signage which can be visually intrusive.
- The guidance should be clarified and strengthened in relation to the requirements for on-site signage.
- The process for how management plans will be agreed, and later variations managed should be clarified.
- Suggestions that the Mayor should put resources into supporting the Charter and publishing a search tool about new public spaces and their rules.
- The Charter should clarify the role of local stakeholders and LPAs in the process for setting rules and regulations and any later amendments.
- To support implementation, publish a digital mapping search tool or platform with information relating to public spaces across London which are secured to the Public London Charter.

Key issues from other engagement:

- The Blueprint Collective is preparing a vision and plan for public space, representing young people.

GLA Response

The principle and guidance have been updated to refer to 'rules' rather than 'regulations' in order to be consistent with the language used in the London Plan.

The Charter makes it clear that those responsible for the management and maintenance of a public space must be transparent when it comes to the **communication of rights and regulations** to all users of the space. This will give all stakeholders a clear understanding of what is expected of them in relation to either the management and maintenance or use of the space. The guidance has been updated to clarify the process that should be followed by landowners for developing any site-specific rules for a public space. Further detail in relation to implementation and management of spaces (in a transparent manner) has been addressed under Section 2 How the Charter should be secured in planning applications.

The Charter guidance is clear that the manager of a public space must provide the details of the owner and management company of the space, along with the principles of the Charter and any site-specific regulations that apply both on-site and online. This information should be clearly communicated in an accessible format and manner and be kept up to date. The provision of information both physically at the site and online ensures that this is as accessible as possible and will enable a direct line of communication between users and other relevant stakeholders (such as stewards and maintenance staff) and the managers of a space which can be used to report incidents

of non-compliance with the Charter principles that the manager can then act to resolve. It is important that on site signage is clearly visible so that it can be easily located and clearly understood. However, the guidance has been updated to explain that a positive and welcoming sign strategy should be considered that sets out where particular activities are encouraged, and to clarify that excessive on-site signage should be avoided. We are also exploring the development of a **logo or kitemark** program to be launched after the Public London Charter is published.

In regard to requests for a **digital search tool or platform** with information relating to public spaces across London which are secured to the Public London Charter the GLA are investigating current resources and potential new opportunities that could be taken to share data following the Charter's publication.

Reference to the work by the Blueprint collective has been added to the Charter.

Question 32: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Twelve responses were received to this question, with the majority answering no. Thirty four respondents skipped this question.

Response	Number	Percentage
Yes	2	16.7%
No	10	83.3%
Total	12	

Question 33: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

Three responses were received to this question. Respondents suggested the following spaces:

- National Trust – link between a logo and quality and nature of the public space noted.
- Park entrances signage. Issue over lack of enforcement.
- Redeveloped areas of Heygate and Aylesbury estates suggested as spaces that do not align with this principle – approved on the basis of being open to the public but by the time of completion they were fenced and accessible only for private use.

Good Stewardship principle

Question 34: If you think the principle of Good Stewardship in the Charter needs changing, can you tell us how and why?

Question 35: Are there any changes you would make to the guidance for the principle of Good Stewardship?

Eleven responses were received to question 34 and ten to question 35. Respondents made the following points and suggested changes:

- Clarify the wording of the section to resolve issues with ambiguity for example in relation what informal stewardship means and how this will be determined.
- Good Stewardship also needs to mean dignity for stewards and the principle needs to be reflected in the job titles and uniforms of those managing the public space.
- Youth engagement training will important for those managing space in London given the city's demographic and the experience of exclusion young people often face in public spaces.
- Management and maintenance of spaces should be considered and agreed through the management plan and legal agreement in order to ensure that adequate funding is secured.
- Privacy concerns in relation to the use of smart technologies such as CCTV and facial recognition technology in spaces as this mode of securitisation might also be deemed 'stewardship'.
- Environmental sustainability should be addressed in the management plan of the space.

Key issues from other engagement:

- Young adults look for privacy but equally visual safety

GLA Response

The reference to informal stewardship in the guidance has been amended to clarify what the principle is meant to represent, which is that day-to-day supervision should be friendly and not officious in manor.

The guidance has been updated to clarify how this principal can be implemented in a space including the importance of **community involvement** in their stewardship. The guidance has also been updated to clarify how businesses that front public space can play an informal role in fostering more familiar and community-friendly stewardship, particularly when they are there for a long time.

Any staff engaged in supervisory activities in a public space secured to the Charter should undertake appropriate training – including unconscious bias training – and be considerate i.e. finding ways where reasonable to enable people to continue using the space rather than asking them to leave. In response to feedback the guidance has been updated to note the importance of **youth engagement training** given the experience of exclusion young people often face in public spaces.

The implementation and monitoring section of the guidance have been amended to address the need for a management plan to be in place to ensure the long-term **management and maintenance** of the space and implementation of the Charter principles.

The Charter principles work together and the principles for Privacy and Data and Good Stewardship, address managing security of spaces and the use of **smart technologies** in spaces. The guidance for the principle of Good Stewardship has been updated to clarify that to ensure inclusive and accessible public space, day-to-day supervision should not be officious and that spaces that give undue emphasis to safety and security concerns should be avoided. Additional detail addressing privacy concerns in relation to the use of smart technologies in spaces is set out under the principle Privacy and Data.

The scope of the Charter does not extend to addressing **environmental design** issues. For London Plan guidance on environmental issues refer to Whole Life-Cycle Carbon Assessments Guidance, Circular Economy Statements guidance, Be Seen (energy monitoring) guidance and Urban Greening Factor which are currently being developed and can be found at [London Plan Guidance and SPGs | London City Hall](#). No change to the guidance has been made in this regard.

Specific reference within this principle (para 4.8.2) seeks to achieve the right balance between safety and security and the use and enjoyment of spaces. This is complemented by other principles in the Charter ensuring that the rules that apply to spaces must be necessary and should be developed with the community (which includes young people).

Question 36: Do you know of any examples of existing public space in London where you think this principle is already being applied?

Nine responses were received to this question, with all but one respondent answering no. Thirty seven respondents skipped this question.

Response	Number	Percentage
Yes	1	11.1%
No	8	88.9%
Total	9	

Question 37: If you answered yes, can you tell us which space(s) these are and what you feel makes them align with this principle?

Two responses were received to this question. Respondents suggested the following spaces:

- Public parks.

- Paternoster Square cited as a space that does not align with the principle as enforcement of restrictions are not appropriate and reasonable.

Implementation and other comments

Question 38: Do you have any comments on how we propose to implement the Charter? Please refer to Section 3.

Fourteen responses were received to this question. Respondents suggested:

- Need for more detail and clarity in relation to the implementation of the Charter, including the proposed use of legal agreements and the proposed changes to the planning system.
- Monitoring and enforcement need to be addressed, in particular how the Charter will be enforced and managed on an on-going basis. This is linked to concerns related to resourcing.
- Querying the scope of the charter and why it will not apply retrospectively to existing public spaces.
- The process for changing any agreed rules needs to be clearly set out and clarified.

GLA Response

Section 2 How the Charter should be secured in planning applications is intended to provide guidance and support for those implementing the Public London Charter such as local planning authorities and applicants. This section has been amended to clarify the scope of the Charter (including the spaces that it will apply to), and the process for securing the Charter in a new development (**legal agreement**), as well as the role of management plans and on-going monitoring of the guidance.

The GLA supports the **implementation** of the Charter by providing example text for inclusion in a legal agreement as well as detailing the process by which the principles and management plan should be agreed and secured. The guidance has been clarified to explain that the responsibility for resourcing and funding the long term management and maintenance of the public space lie with the landowners and that the local planning authority will need to be satisfied that suitable contractual arrangements which are sustainable for the life of the development have been put in place (secured through a management plan) in order for a development to be occupied.

The mechanism for implementing the Charter is via the planning process and the London Plan policy requirement, which only applies to development. Thus the Charter cannot be a **retrospective** requirement for an existing public space. However, the Charter principles could be applied to existing public if the landowners or managers of the space were willing to do so and the guidance has been updated to reflect this.

It is expected that the land owner and management company (and their successors) will abide by the provisions of the management plan for the life of the development and that any later changes will need to adhere to the principles of the charter and may require further consultation with the relevant local planning authority and relevant

stakeholders in order to ensure **transparency** and as inclusive a process as possible. The guidance has been updated to reflect this.

Question 39: Do you have any further comments to make on the Public London Charter?

Thirty-one responses were received to this question. Respondents made the following points and suggestions:

- Support overall for the Charter with respondents noting that "the Public London Charter is a fantastic achievement and provides an excellent opportunity to curate best practice", and that "The Public London Charter will be a useful tool in providing a set of overarching principles to influence how public open spaces are both designed and managed". Respondents also support the thread of inclusivity throughout.
- The scope of the Charter and definition of the spaces that it will apply to needs further clarification.
- The Charter would benefit from the inclusion of more detail in the guidance section including in relation to implementation and process, and ongoing compliance and monitoring, events and other closures of spaces, design and environmental issues, the use of smart technologies in spaces.
- The Charter could include additional stand-alone principles for example addressing the issues of urban greening, sustainability, and human scale.
- The GLA should commit resources to supporting the implementation and ongoing management of the Charter e.g. the drawing up of legal agreements, and to the monitoring of compliance for applications that are referable to the Mayor.

GLA Response

The **scope of the Charter**, namely the type of spaces that it will apply to and the issues that it addresses has been clarified through amendments to Section 1 About this document and Section 2 Implementation and monitoring of the Charter. The overall document has been amended to make it clearer and more concise.

The section How the Charter should be secured in planning applications is intended to provide some examples and information on how each Charter principle can be implemented. Further detail has been included where required, and the text had been amended to for **clarity**. This section of the document has also been renamed in order to further clarify what its purpose is.

Further detail has been included throughout the document to clarify and resolve ambiguity around issues including implementation and process, and ongoing **compliance and monitoring**, events and other closures of spaces, design and environmental issues, the use of smart technologies in spaces. Please refer to the specific questions addressing individual sections of the document above for further information.

The **additional principles** suggested by respondents address issues that are outside of the scope of this piece of guidance and therefore have not been brought forward.

The GLA supports the implementation of the Charter by providing example text for inclusion in a **legal agreement** as well as detailing the process by which the principles and management plan should be agreed and secured. Through the applications that are referred to the Mayor he will help ensure the Charter is applied to all schemes with new public spaces.

4. Equality impacts

Respondents raised the following potential equality impacts arising in relation to the draft guidance:

- Potential for facial recognition technology to misidentify transgender people.
- The importance of inclusive spaces particularly for children and who can feel excluded in public spaces and not feel welcome to play.

GLA Response

The Charter was already clear that it is expected that the use of **smart and digital technologies, including facial recognition technology**, will comply with all relevant laws and codes of practice, and that landowners and managers of public spaces should be clear about the purpose of any personal data collection and undertake a 'privacy by design' approach which endorses data protection and privacy compliance from the beginning. The principle of Privacy and data has been updated to clarify that smart technologies must be justified. The guidance has been updated to clarify the responsibilities of land owners and managers when using CCTV in public spaces and the UK Information Commissioner's Office Opinion on the use of Live Facial Recognition in public spaces by non-law enforcement bodies. The guidance has also been updated to reference the Emerging Technology Charter and the responsibilities landowners and managers of public spaces have prior to the use of new and emerging technologies in the public realm. This will help to **create a travel environment in London that feels safe to all users**.

The Charter encourages spaces to be open, accessible and inclusive and respondents were generally supportive of the Charter's approach. This can sometimes be dependent on providing different types of space or experience for different user groups for example shelter and places to stop and rest for older people or spaces for children to play. The principle and guidance for public welcome have been updated to reflect this with the inclusion of reference to play. The guidance for the principle of Good Stewardship has been updated to note the importance of youth engagement training given the experience of exclusion young people often face in public spaces.

5. Next steps and monitoring

There was a significant level of interest in the development of the Public London Charter both at pre-consultation stage and during the consultation and we would like to thank everyone who took the time to contribute to the development of the guidance and respond to the consultation survey. All views that were shared with us have been taken into consideration in the development of the final Public London Charter document and we have aimed to summarise these in this consultation summary report.

The final version of the Public London Charter is expected to be published in Autumn 2021. Monitoring information will be available from local planning authorities records of planning permissions and legal agreements through which the charter principles have been secured. The GLA will explore ways to add this data to the Planning London Datahub.

For any queries please email the Londonplan@london.gov.uk mailbox.

Annex A Summary of Engagement

Informal and/or early engagement

Activity Type	Participation	Representation
Roundtable	Local authority representatives, civic interest groups, landowners and developers*	65 people

*The three roundtables were hosted by London Councils, Campaign to Protect Rural England (CPRE) and London First respectively and were supported by the Mayor's Design Advocates.

Formal consultation stage

Date	Activity Type	Participation	Representation
13 Oct – 15 Jan 2021	Consultation survey and written responses	All	43 responses
13 Oct – 15 Jan 2021	Consultation quick poll	All	28 responses
4 Nov 2020	Webinar	All	12 people and 32 YouTube views of the recording (common to Webinars on 4 th and 19 th November)
5 Nov 2020	Webinar	People aged between 15 and 25 years (Peer Outreach Workers)	7 people
18 Nov 2020	Webinar	Boroughs	10 people
19 Nov 2020	Webinar	All	15 people
25 Nov 2020	Webinar	Developers, property owners and managers	18 people

