

## Appendix A - Summary of consultation

### Generalised, procedural or Issue based comments

#### Key to Respondents

CEG and HLM	Commercial Estates Group and Hallam Land Management
HCS	Harlow Civic Society
HEG NPG	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group
PfP	Places for People

Issue	Comment	Respondent making comment	Response	Amendment proposed to draft Charter
General comment in objection	EHDC should not adopt the Charter, it is not needed for the Gilston Area and not in the interests of the residents of East Herts.	HEG NPG	The Charter sets out strategic and high level principles for the delivery of stewardship arrangements across the Garden Town. It is acknowledged, of course, that detailed arrangements for the Gilston Area are emerging through the strategy submitted by the applicants (Gilston Area Stewardship and Governance Strategy)	No amendment proposed.

			and the arrangements to be set out in the Gilston Area s106 Planning Obligation Agreement. The Charter does not seek to cut across emerging arrangements. Given the strategic nature of the principles it is considered that these will support ongoing development of stewardship arrangements at Gilston and therefore the Charter remains relevant to the interests of existing and new residents in the Gilston Area and across the Garden Town.	
Flexibility	Sufficiently flexible to be applied to a range of developments with differing circumstances.	HCS	Acknowledged	No amendment proposed.
	The draft Charter sets out various activities, actions and outputs at various stages. It is acknowledged that these have been introduced to secure early thinking and the Charter is to be material to the determination of planning applications. However, there should be flexibility associated with the scale	CEG and HLM	Acknowledged – the aim of the Charter is to establish high level principles and steps that should be undertaken to ensure stewardship	Amended wording to the fifth bullet on page 11 under Successful new places as part of Harlow and Gilston Garden Town as follows:  This Charter is required to be considered in the determination of

	<p>and delivery arrangements of individual schemes allowing stewardship arrangements to evolve and be finalised appropriately. It should be pragmatic and flexible. This would not dilute overall delivery and would recognise different delivery models. There are differences between Gilston and Latton Priory. Latton Priory sets out one possible approach to stewardship. North Weald Bassett Parish Council has expressed an interest in involvement in this. The TCPA acknowledges that local circumstances are different so flexibility is to be retained and the Charter applied pragmatically.</p>		<p>arrangements of an appropriate quality and robustness are implemented. It is also intended to be flexible in its application – but ensuring that acceptable quality outputs are achieved. Noted that the current checklist and timeline arrangements may appear inflexible.</p>	<p>planning applications relating to the Garden Town. <del>and, as such,</del>  <b>The requirements of the Charter can be interpreted and applied flexibly, provided all proposals for stewardship arrangements can</b> <del>must</del> demonstrate that they have had regard to its Principles <b>and deliver outcomes that are aligned with them. Local site and delivery circumstances will be taken into account when the Principals of the Charter are applied.</b> Where stewardship arrangements are secured.....<i>(no further change to para)</i></p>
	<p>It is important to note that there is a need for flexibility in how the Charter is applied in the planning process. A different range of measures may be required for different sites and proposals, and it is important that the Charter has flexibility to adapt to those different characteristics. The stewardship arrangements need also to be attuned to development feasibility, development viability and long-term revenue viability.</p>	<p>Pegasus Group on behalf of Martin Grant Homes, Persimmon Homes and TW, Water Lane</p>	<p>Noted and response as above</p>	<p>Amendment as above.</p>
<p>Democracy and Governance</p>	<p>The Charter fails to give any recognition to local democracy in the form of the Parish Councils (Hunsdon and Eastwick and Gilston). The Gilston Area Stewardship and Governance Strategy accepted that Parish Councils will have an important role to play, but the Charter does not mention this. The</p>	<p>HEG NPG</p>	<p>The Charter does not seek to define governance arrangements. It only seeks to set out principles in relation to transparency and</p>	<p>Amendment to para 4.3 to add:  <b>Governance arrangements can build on and/or involve existing structures in place, eg Parish Councils.</b></p>

	NPG question whether this is a policy position that EHDC are willing to support		<p>accountability.</p> <p>Governance arrangements for the Gilston Area will continue to emerge through the requirements of the s106 Planning Obligation Agreement. The Charter does not preclude the involvement in this of the existing Parish Councils.</p> <p>Acknowledged that a lack of wording to this effect may appear to give no recognition to this possibility.</p>	
Community involvement	Meaningful participation of local people in the complete stewardship process will be one of the keys to its success.	HCS	Acknowledged	No amendment proposed.
Funding	The draft Charter fails to address the need for an equitable balance to the funding of a stewardship body between service charges and capital endowment. The Charter has to recognise that such endowments will be required particularly as forthcoming legislation may limit the level of service or estate charges.	HEG NPG	Para 5.5 refers to a diversity of income sources including endowment of the stewardship body with income generating assets. Acknowledged that this does not	<p>Amendment of para 5.5 as follows:</p> <p>.....This diversity of income sources will include <b>capital endowment and</b> the endowment of the Stewardship Body with physical assets.....</p>

			specify capital endowments.	
Endorsement and adoption	The Charter must be adopted by all planning authorities so that it becomes a material consideration in planning application determination.	HCS	Acknowledged. It is anticipated that the Charter will be adopted by all the Garden Town partners.	No amendment proposed.
	Consideration to be given to how the Charter can be applied to all developments in the GT area	HCS	<p>The introduction to the Charter indicates that it is primarily expected to apply to the four new Garden Town communities but that it is also to be taken into account in relation to other development proposals coming forward in the Garden Town.</p> <p>Anticipated that its applicability to sites outside of the four new Garden Town communities will be considered in relation to proposals as they come forward.</p>	No amendment proposed.

	The Principles in the Charter should be carried through into development plans and delivery.	HCS	Acknowledged. It is proposed that the Charter is material to the consideration of development proposals and the delivery of them.	No amendment proposed.
Implementation	Appropriate conditions would need to be applied in relation to planning permissions, which are then monitored and enforced.	HCS	Acknowledged – it is anticipated that appropriate arrangements will be secured through either or both of s106 Planning Obligation Agreements and conditions.	No amendment proposed.
	Stewardship processes should start from the earliest stages in the development process, through to first occupation and beyond.	HCS	Acknowledged and agreed. This is set out in the Foreword of the Charter.	Foreword will be updated generally to reflect the draft final status of the Charter, retaining this point.
	Early proactive and ongoing engagement with landowners and developers is essential to get them to adopt the Charter principles, ensure awareness of the requirements and for developments to be successful.	HCS	Acknowledged and agreed. Landowners and developers to be reminded of requirements of the Charter once finalised.	No amendment proposed.
Monitoring	Lack of clarity in relation to whether consultation will take place regarding the Quality Monitoring Framework.	PfP	QoL Monitoring Strategy is to be subject to appropriate stakeholder consultation.	No amendment proposed as this will become an historical procedural matter.

QRP review of the draft Charter	Neither the public nor the EHDC Executive have seen the outcome of the review of the draft Charter by the QRP. It appears strange that the draft has proceeded to consultation in advance of the incorporation of the advice from the QRP. That advice should be published	HEG NPG	The draft Charter was permitted to proceed to consultation in advance of the publication of the QRP advice as a result of respective timing. The QRP advice will be published alongside this draft Charter consultation feedback and amendments made to the draft Charter as a result of the QRP advice.	See separate details of amendment the Charter as a result of the advice of the QRP.
Status	Clarity is required as to the status of this document and how it relates to the Adopted Epping Forest Local Plan. It is assumed that this is a guidance document to set out the aspirations of the Council. The Inspector examining the Local Plan referred to the status of Garden Town Documents and stated that it is not sound to require applications to be 'in general conformity' with these unexamined non-statutory documents. Therefore, proposals should 'have regard to' the Stewardship Charter only rather than general compliance.	Pegasus Group on behalf of Martin Grant Homes, Persimmon Homes and TW, Water Lane	The Charter currently sets out in the Introduction that it is intended to be guidance to support landowners, developers and site promoters. It will be taken into account when assessing the acceptability of development proposals coming forward as part of the Garden Town; as such it is intended to be a	No amendment proposed.

			material planning consideration in the determination of planning applications. In the section regarding Successful New Places the Charter sets out that all proposals for stewardship arrangements must demonstrate that they have had regard to its Principles. The Charter does not require proposals to be in general conformity with its requirements.	
General comments in support	Need for development around Harlow is recognised and the overall Vision, guidance and policies of HGGT are supported.	HCS	Acknowledged	No amendment proposed.
	Stewardship is at the heart of the Garden City model, creating healthy, thriving new communities, empowering people to have a say and providing opportunities for active citizenship. Charter is welcomed.	HCS	Acknowledged	No amendment proposed.
	Support the process and comprehensive principles covering key areas.	HCS	Acknowledged	No amendment proposed.

	Implementation of the charter will provide the opportunity to contribute to the creation of sustainable high quality communities.	HCS	Acknowledged	No amendment proposed.
	Developers will benefit from the implementation of the Charter as their developments will be places where people want to live and be active in the community.	HCS	Acknowledged	No amendment proposed.
	To be hoped that the process set out in the Charter will become a natural part of the planning and delivery of developments in the Garden Town so that places are created where people and the environment can flourish.	HCS	Acknowledged	No amendment proposed.
	Supportive of long term stewardship and the creation of high quality environments at Latton Priory and integration with the existing communities in HGGT.	CEG and HLM	Acknowledged	No amendment proposed.
	Recognised that long term stewardship requirements are embedded in policies SP2 and SP3 of the Epping Forest Local Plan.	CEG and HLM	Acknowledged	No amendment proposed.
	These principles refine the emerging Stewardship Principles and Objectives which were published in 2022 and which HLM and CEG have confirmed their commitment to following in the Latton Priory Strategic Masterplan Framework, and which will be included in any Section 106 agreement secured as part of an outline application.	CEG and HLM	Acknowledged	No amendment proposed.

	<p>Welcome proposals to help ensure quality of stewardship across the Garden Town and they reflect the ambitions that PfP have set at Gilston in the Gilston Area Stewardship and Governance Strategy.</p>	PfP	Acknowledged and noted that PfP indicate alignment and synergy between the Charter and the Gilston Area Stewardship and Governance Strategy.	No amendment proposed.
	<p>Welcomed and sets out a direction of travel that is supported.</p>	PfP	Acknowledged	No amendment proposed.
	<p>Support the arrangements for high quality, long -term stewardship of the new garden communities. We support the six principles as set out in the Charter as non-statutory guidance.</p>	Pegasus Group on behalf of Martin Grant Homes, Persimmon Homes and TW, Water Lane	Acknowledged	No amendment proposed.

#### Location specific comments

Location/ Issue	Comment	Respondent making comment	Response	Amendment proposed to draft Charter
Relationship between Charter and the emerging arrangements for stewardship in the Gilston Area, including as set out in the	The NPG is concerned and puzzled that the HGGTB seems to be usurping the legal powers and functions of EHDC in publishing its own Charter, with the intention that it applies to the Gilston Area.	HEG NPG	The Charter is high level and strategic in nature. It seeks to set out Principles that will guide the stewardship arrangements that are developed for sites coming forward. The Charter is not	<p>The amendments set out above in relation to the fifth bullet of page 11 (Successful new places) are considered to further clarify this point. As above, amendment proposed is as follows:</p> <p>This Charter is required to be considered in the determination of planning</p>

<p>Gilston Area Stewardship and Governance Strategy (submitted by the Gilston Area applicants, Places for People and Taylor Wimpey)</p>			<p>prescriptive and seeks to be suitably adaptable and flexible so that the most appropriate detailed arrangements for each site can come forward.</p> <p>The Charter will not result any individual partner legal powers being overridden. In relation to Gilston, the arrangements that East Herts DC, as the Local Planning Authority for the Gilston Area, has set out in the proposed conditions to be applied to the planning permissions and the proposed s106 Planning Obligation Agreement will not be altered by the Charter.</p>	<p>applications relating to the Garden Town. <del>and, as such,</del>  <b>The requirements of the Charter can be interpreted and applied flexibly, provided all proposals for stewardship arrangements can</b> <del>must</del>-demonstrate that they have had regard to its Principles <b>and deliver outcomes that are aligned with them. Local site and delivery circumstances will be taken into account when the Principals of the Charter are applied.</b> Where stewardship arrangements are secured.....<i>(no further change to para)</i></p>
	<p>How will the Charter fit with the granting of planning permissions in the Gilston Area and the associated conditions and s106 Agreement?</p>	<p>HEG NPG</p>	<p>The Charter will not amend the arrangements proposed for the Gilston Area, by virtue of the conditions to be applied to the Gilston Area planning</p>	<p>No amendment proposed.</p>

			<p>permissions and the s106 Planning Obligation Agreement. It is anticipated that the outline planning decisions will be released in advance of the finalisation of the Charter. There will be no requirement to retrospectively consider the materiality of the Charter in relation to the Gilston Area stewardship planning application proposals.</p>	
	<p>How will decision makers be expected to reconcile the two sets of rules?</p>	<p>HEG NPG</p>	<p>The Charter is not considered to be inconsistent with the emerging arrangements proposed for the Gilston Area, or emerging in relation to any other Garden Town site. The Charter establishes a set of high level principles. More detail will come forward through the proposed conditions to be applied to planning permissions and s106 Planning Obligation</p>	<p>No amendment proposed.</p>

			<p>Agreements. It is not anticipated that there will not be a requirement for two sets of rules to be reconciled. It is not uncommon for detailed development and implementation arrangements to be formulated within the context of wider policy and guidance documents.</p>	
	<p>By endorsing the Charter, EHDC will potentially place itself into a conflict of interest and legal difficulty not to mention planning uncertainties which will be open to exploitation in the future?</p>	<p>HEG NPG</p>	<p>The draft Charter, the Gilston Area Stewardship and Governance Strategy and the emerging stewardship arrangements for the Gilston area are not seen as being in conflict and presenting any legal difficulties in that respect.</p> <p>The Charter seeks to establish high level principles. More detail is provided in the Gilston Area</p>	<p>No amendment proposed.</p>

			<p>Stewardship and Governance Strategy, proposed planning conditions and through the s106 Planning Obligation Agreement.</p> <p>Detailed stewardship arrangements for the Gilston Area will be established in the s106 Planning Obligation Agreement and the conditions applied to the planning permissions. These arrangements will be definitive once settled and there would not be any planning uncertainties as a result.</p>	
Assets which potentially serve a broad area and function	The Gilston Area Stewardship and Governance strategy does refer to some assets which serve a broader public and function than the Gilston Area. However, the Charter does not refer to that and covers the Gilston Area in its entirety.	HEG NPG	The Charter is proposed to be applied to the entirety of the Garden Town. Otherwise, its principles will only be applicable to parts of the area, which would not be appropriate. The Charter does not seek to establish the role and function of assets, but is	No amendment proposed.

			focused on delivery, quality and community involvement. There is not considered to be any inconsistency between the Charter and the Gilston Area Stewardship and Governance Strategy in this respect.	
	No attempt has been made to limit the Charter to shared community assets and, in any event, this would not be the place where such assets should be identified.	HEG NPG	Noted. It is anticipated that the Charter should apply to all asset types. It sets out high level principles only, so does not seek to define the type, scope and operation of any of the assets.	No amendment proposed.
	Any shared assets with Harlow can be dealt with by the (Gilston Area) stewardship body, whose main priority will be to look after the interests of residents of the Gilston Area. This (Gilston Area stewardship arrangement) would not preclude collaboration, where appropriate.	HEG NPG	This is noted and agreed. The Charter does not seek to define the type, scope and operation of assets.	No amendment proposed.
Gilston Area characteristics	The draft Charter fails to recognise the particular characteristic of the Gilston Area in that many hundreds of hectares	HEG NPG	The draft Charter does not seek to differentiate between the types and	No amendment proposed.

	<p>of land are to be retained undeveloped and held for the community in trust. This is far from the green wedge policies of Harlow which are mentioned in the draft</p>		<p>scales of assets. It seeks to apply a set of high level principles to all of them. Individual characteristics of assets are recognised and it is not anticipated that the Charter treats them any more or less favourably as a result.</p>	
<p>Princess Alexandra Hospital</p>	<p>PAH is progressing a Business Case for the delivery of its preferred development option comprising a new and modern state-of-the-art acute Hospital, in the form of a Health and Well-Being Campus on approximately 19 hectares of land located north of the adjacent M11 Motorway Junction 7a and south of Pincey Brook.</p> <p>Given the specific function and nature of an acute hospital, it is intended that PAH would retain ownership, management and maintenance responsibility for the public open space areas within the development, and that these would not be transferred to an external Stewardship Body.</p> <p>With the above background position in relation to PAH in mind, although we are broadly supportive of the Stewardship Charter's intentions with regard to ensuring community assets are planned, provided</p>	<p>PAH</p>	<p>It is anticipated that the Charter will be sufficiently flexible to accommodate and respond to the different characteristics of the sites coming forward for development in the Garden Town.</p> <p>The Charter does not seek to determine responsibility of stewardship arrangements, only to establish a set of high level principles which will ensure that stewardship arrangements of an acceptable quality will be implemented. The particular characteristics of the proposed acute hospital development are</p>	<p>No amendment proposed.</p>

	and maintained to a high standard, it should be acknowledged that parts of the requirements set out in the draft Charter are not applicable or appropriate to the operation and function of the proposed acute hospital development.		acknowledged. It is anticipated that proposals for the development of the acute hospital site should continue to have regard to the Principles set out in the Charter.	
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### Comments on specific points in the draft Charter

Charter Reference	Comment	Respondent making comment	Response	Amendment proposed to draft Charter
Timeline (page 12)	Add box to pre-application column setting out 'principles for stewardship in relation to the proposed site'.	PfP	Acknowledged and agreed that reference to early setting out of principles for stewardship is appropriate.	<p>Amendment to the first box on the timeline under pre-application stage as below:</p> <p>Action: Initiate engagement and ensure continuation through all stewardship stages. Set out <b>principles for stewardship for the site and</b> engagement processes in strategy</p> <p>Output: Engagement Strategy <b>and Principles for Stewardship.</b></p> <p>Amendment to para 1.4 as follows:</p> <p><b>Principles for Stewardship, Aan</b> Engagement Strategy and Stewardship Delivery Programme</p>

				will be produced early in the consideration of development proposals.
	Outline pp – request for clarification in relation to what is to be monitored under ‘outcome monitoring and quality assurance’	PfP	This part of the timeline is indicating that consideration should be given to that point, that is, what indicators should be monitored. The Charter is not establishing the indicators but seeking that site developers etc, give consideration to the matter.	No amendment proposed.
	Full or RM column – financial planning will depend on what assets are coming forward. Some financial planning matters would be dealt with through Asset Management Plans.	PfP	Acknowledged. The Timeline is anticipated to be applied in a flexible way in relation to the details for delivery at individual sites.	No amendment proposed.
	Suggest the word business be added before financial planning.	PfP	Acknowledged and agreed.	Amendment to include the word <b>Business</b> in the Financial Planning boxes on the timeline.
	Would not anticipate need for community development and social value strategy for each application. These would be site wide with a programme for the Trust to deliver each year.	PfP	Acknowledged. Flexible application of the requirements of the Timeline will be associated with the way in which proposals come forward. Community Development and Social Value Strategies would not be expected in association with numerous reserved matter applications, if they were provided as part of	No amendment proposed.

			outline planning application proposals.	
	No definition for Terms of Reference and suggest adding 'or equivalent' depending on the legal entity.	PfP	Noted, however considered that reference to Terms of Reference is sufficiently generic to be understood as the definition of the scope and remit of any group or project.	No amendment proposed.
	Construction/ implementation - Clarification would be helpful with regards when a business plan would be required versus an asset management plan.	PfP	Considered that both would be required in the significant majority of cases, unless proposals are only providing a limited number of assets. Further details are included in the detail relating to Principle 5 – Financial Sustainability. Business planning would deal with the entirety of financial and business sustainability for stewardship proposals. Asset Management Plans would be focussed around the sustainability of specific assets.	No amendment proposed.
	Occupation column – suggest that reference is amended to be that stewardship body is operational rather than in place. In place could be satisfied by a company being registered – but it may not be operational.	PfP	Agreed.	Amendment to Governance and Representation box under Occupation section of the Timeline as follows:  Stewardship Body <b>operational</b> in place

Para 1.3	Refers to four areas – believe that there should be a fifth – developing community wellbeing and capacity building. This is equally important.	PfP	Noted and Agreed. This is the main focus of Principle 3 of the Charter – community development. Agreed that reference can be made to this important element of activity in this early section of the Charter in relation to collaboration.	Amendment to the fourth bullet under para 1.3 as follows:  <ul style="list-style-type: none"> <li>• Ongoing Care and Management: Caring for social and physical assets, including their enhancement and / or replacement, <b>community development, wellbeing and capacity building</b> and providing stewardship services in perpetuity.</li> </ul>
Para 1.4	As stewardship responsibility for the publicly accessible areas to be provided within the proposed health and wellbeing campus would be retained by PAH, the requirement for community engagement in the development of PAH’s management plan is not considered to be applicable in this instance. As such, PAH would not propose to prepare an Engagement Strategy in relation to its management plan, as set out at paragraph 1.4.	PAH	Position noted. Appropriate time for consideration to be given to the matter will be through the assessment of the planning application for the hospital proposals and any stewardship arrangements emerging through those proposals.	No amendment proposed.
Para 1.6	A Stewardship Delivery Programme could be prepared, in accordance with the requirements set out at paragraph 1.6, to identify when PAH would provide detailed proposals for the long-term management and maintenance of the	PAH	As above	No amendment proposed.

	publicly accessible parts of the new hospital site.			
Para 1.7	PAH will also be undertaking a community engagement exercise prior to submitting an outline planning application for the proposed hospital development, which will seek views on the design and development on the overall scheme, including the publicly accessible areas, which meets the requirements set out at paragraph 1.7. Details of this engagement would be included in a Community Consultation Statement to be submitted as part of the planning application.	PAH	As above	No amendment proposed.
	With regard to the reference to strategies and plans for ecology and Biodiversity net gain (BNG), there should be an awareness that BNG is not readily compatible with any recreational uses as its focus is habitats. It is suggested changing this to 'ecology and green infrastructure' and then reference GI Framework.	Homes England	Acknowledged and agreed. The draft Charter sought to capture this point by referring (in para 1.7) to exploring the relationship between ecology and biodiversity net gain and recreational uses. Wording can be amended to better capture this point.	Amend wording of third bullet under para 1.7 as follows:  <ul style="list-style-type: none"> <li>• Ecology, <del>and</del> Biodiversity net gain <b>and green infrastructure</b> – which should explore the opportunities potentially available to ensure ecological outcomes, the relationship with recreational uses, <b>guidance in the Green Infrastructure Framework</b>, future dynamic approaches to land managed by a Stewardship Body and positive financial outcomes this may enable;</li> </ul>

Para 1.8	Should also include a review of any Governance and Stewardship Strategy.	PfP	Para 1.8 sets out the proposed approach to monitoring stewardship outcomes. The point regarding reviewing Governance and Stewardship strategies is noted and that may be a result of outcome monitoring. However, it is not considered it is necessary to be explicit in relation to that in the Charter.	No amendment proposed
Para 2.3	Could be clearer that collaboration with the community is set within the context of applicable current planning policies.	PfP	Acknowledged. Planning policies will set a context for much of the guidance set out in the Charter and it is considered that this addressed in the Introduction and Context sections of the Charter.	No amendment proposed
	As discussed above, PAH's community consultation exercise will seek views on the planning, design and delivery of the publicly accessible parts of the overall health and wellbeing campus, which will be taken into account in the development of the scheme's design, as required by paragraph 2.3 of the draft Charter.	PAH	Acknowledged	No amendment proposed
Para 2.6	Incomplete	HEG NPG	Acknowledged that the first sentence of para 2.6 is missing.	Include at the beginning of para 2.6:

				<b>Alongside planning and design, Asset Management Plans will also be required to.....</b>
Para 2.7	The proposed Management Plan for the publicly accessible parts of the development would meet the requirements set out at paragraph 2.7, as it would set out the standards to which these areas would be delivered.	PAH	Acknowledged	No amendment proposed
Para 2.9	A good management company is careful to audit the condition of the landscape before taking it on; and this extends to undertaking soil surveys to check compatibility of planting to soil type and its health.	Homes England	Acknowledged and agreed	No amendment proposed
Para 2.10	Contrary to the requirements of paragraph 2.10, it is not proposed to transfer ownership of the publicly accessible areas within the health and wellbeing campus, which would remain in PAH's ownership as custodian of the acute hospital and its environs.	PAH	Noted	No amendment proposed
Principle 3	The requirements of Principle 3 are not considered to be relevant to PAH's proposals, as they do not represent a community project. Therefore, the details of Principle 3 are not considered further in this response.	PAH	Noted	No amendment proposed

	<p>The definition of 'development of the community' is questioned. This would be expected to have included the opportunity for personal development, upskilling, re-skilling, of individual and collective members of the existing and new community, as much as being about being involved in asset management.</p> <p>The focus seems to be on asset management covering the animation and management of the spaces and assets. but what about personal growth and opportunity?  Much can be done during the development process of these places and create economic legacy for community members. The language regarding social value in this principle is too loose and ambiguous.</p>	Vinci Dev'ts	Point acknowledged. The section of the draft Charter referred to community development projects, which can include people focussed projects. Given the strategic nature of the Charter it is not considered necessary to be specific in relation to the aims and outcomes for any projects coming forward. The Charter references Social Value strategies within which more specific outcomes can be identified.	No amendment proposed
Para 3.8	Point 3: we recommend broadening the list as the stewardship body will utilise a range of communication tools including website, newsletter, noticeboards, and social media to share information.	PfP	The para refers to examples of communication tools and is not intended to be exhaustive. The use of additional communication channels is welcomed.	No amendment proposed
Principle 4	As the publicly accessible parts of the proposed health and wellbeing campus are not proposed to be transferred to a Stewardship Body, the majority of	PAH	Noted	No amendment proposed

	<p>requirements set out for this principle would not be applicable.</p> <p>Similarly, setting up a Shadow/ Advisory Stewardship Body would not be applicable in this instance. A Planning Performance Agreement (PPA) is in place between PAH, Epping Forest District Council (EFDC), Harlow District Council (HDC) and Essex County Council (ECC) to progress the planning elements of the Hospital development at the pre-planning application stage in advance of a related planning application(s) on the identified site. As part of this process, workshops will be held with representatives from the above local authorities to discuss various aspects of the proposals, including the publicly accessible areas and their long-term maintenance and management.</p>			
	<p>A lot of text through the document can apply to governance structures of both community stewardship bodies and management companies while seeming perhaps to be about community stewardship organisations without explicitly saying so. Can this be made more explicit?</p>	<p>Homes England</p>	<p>The guidance in the Charter is intended to apply to all elements of stewardship arrangements as would be appropriate.</p>	<p>Amendment by addition of a further bullet in the Introduction and Context section under Who and What is this Charter for as follows:</p> <ul style="list-style-type: none"> <li>• <b>The guidance in the Charter is intended to apply to all elements of stewardship</b></li> </ul>

				<b>arrangements as would be appropriate.</b>
	Can indicative model structures with typical representative examples be included to help the community challenge developer proposals for such approaches?	Vinci Dev'ts	This is considered to be too definitive for this Charter. Appropriate representative models would be explored in the delivery of stewardship arrangements.	No amendment proposed
Para 4.1	Point 5: Clarification requested as to the aims and objectives behind this point and, in particular, we question what is meant by 'integrate'? We would like to emphasise that Places for People will prioritise the setting up of a Trust that works well at Gilston Park, (an enormous task in itself) and whilst we support the Trust in any work undertaken alongside other stewardship bodies we do not support the suggestion that integration will be imposed upon the Gilston Park Trust.	PfP	This point seeks to set out that Stewardship Bodies should be sufficiently flexible to consider adapting their arrangements in relation to future circumstances. Position of PfP to support Gilston stewardship arrangements to work alongside and other stewardship body noted. The Charter does not seek to impose any integrated arrangement.	No amendment proposed
Para 4.4	Point 2: Community development activity can also be delivered independently of assets through festivals or similar events, we suggest adding further text to confirm this.	PfP	Acknowledged and noted. The point being conveyed in this bullet is that community development should not be given a lower priority that asset development. Acknowledged that it can take place independent of assets.	Amendment to text as follows:  <ul style="list-style-type: none"> <li>• Community development and asset development <b>should both be</b> are progressed <del>together</del> to optimise value</li> </ul>

Para 4.7	For clarity it is not possible to pay a salary for charitable trustees conducting their role on the board, whereas reasonable expenses are accepted by the Charity Commission.	PfP	Acknowledged. The text refers to the potential for remuneration for community representatives. Noted that appropriate regulations will be adhered to where any remuneration is considered.	No amendment proposed
Para 4.8	It is rare for a community asset to be in place before first occupation as the body who is to own/manage it needs to be in place first, we recommend deleting 'or completion of the first community asset'.	PfP	Noted that it may be rare for community assets to be delivered prior to residential occupations. However, there would appear to be potential for it to occur, for example through early delivery of green space.	No amendment proposed
Para 5.1	The draft Charter requires the publication and circulation of a Business Plan relating to the stewardship arrangements for publicly accessible land (paragraphs 5.1-5.3). However, as stewardship responsibilities would remain with PAH for the Hospital development, it is not considered necessary for PAH's business plan to be published or circulated.	PAH	Noted	No amendment proposed
Para 5.4	Please note that this paragraph states that asset management plans must be agreed before the transfer of assets to the stewardship body, which appears to be at odds with earlier statements in the draft charter.	PfP	Earlier text has been checked for inconsistency and none identified. Earlier references are to the development of asset management plans during construction and delivery of the asset. It is expected they would	No amendment proposed

			be completed by the time of transfer of the asset.	
	The requirement to provide an Asset Management Plan (paragraph 5.4) would be met by the Management Plan to be prepared and secured as part of the planning application for the hospital development. The Management Plan could include allowance for independent monitoring of the condition of the publicly accessible parts of the Hospital development, and this would be discussed as part of the pre-application and application stage liaison with the LPA.	PAH	Noted	No amendment proposed
Para 5.6	It is important that a definition of 'reasonable' is provided to avoid ambiguity.	PfP	This refers to the level of service or estate charges. For the Charter a reference to reasonable is considered sufficiently definitive in relation to other costs that householders and businesses would be expected to bear. More precision in relation to the level of charges and a consideration of their reasonableness will emerge as stewardship arrangements crystallise.	No amendment proposed

Para 5.10	Please clarify the process i.e. would concerns be raised to the Stewardship Body first and then the Local Authority?	PfP	The Charter does not seek to establish the arrangements, noting that different arrangements may be appropriate in the case of different sites. It seeks to establish that such arrangements should be devised, as appropriate, and be implemented.	No amendment proposed
Checklist box after para 5.10	Outline Business Plan – please clarify if this refers to submission or approval Asset Management Plan – please see earlier comment about timing.	PfP	As indicated in relation to earlier comments, It is anticipated that the Charter is to be applied flexibly in relation to the particular circumstances of individual sites. In general, earlier actions are encouraged, so this would include both the submission and the approval of the Outline Business Plan by outline planning application stage. However, it is expected that Outline Business Plans will subsequently evolve into detailed plans.  In relation to Asset Management Plans see earlier response above.	No amendment proposed
Para 6.5	It would be unrealistic to expect the Stewardship Body to achieve these alone, a combination of partners will need to	PfP	Acknowledged. It is expected that stewardship arrangements implemented would strive to	No amendment proposed

	participate. Please be mindful these could become an overburden for the Trust.		secure high environmental and social outcomes aligned with the Garden City principles on which design and development is to be based. It is acknowledged that Stewardship Bodies would seek to collaborate with other partners and stakeholders to achieve outcomes. The Charter seeks to quote monitoring examples and other outcomes can be identified and secured as appropriate when stewardship arrangements and the assets for which they are responsible are crystallised.	
Principle 6	Targets for the achievement of positive outcomes from the publicly accessible areas within the proposed health and wellbeing campus, as envisaged by Principle 6, could be incorporated within the Management Plan to be prepared as part of the associated planning application. As such, the requirements of this Principle would be met.	PAH	Noted	No amendment proposed
	Suggest that climate mitigation and resilience is moved out from the indicator list into a quality target list; then some more explicit expression of what could be achieved be set out in the indicator list eg	Homes England	The text seeks to set out a range of areas from which indicators could be drawn. It would be expected that more definitive indicators would be identified through emerging stewardship	No amendment proposed

	well placed trees along active travel routes.		arrangements and it would be inappropriate to be specific in the Charter.	
Glossary	There is a definition in the main body of the charter for 'community assets'. This is different to the definition of 'assets' in the glossary.	PfP	Acknowledged – amendment of the reference in the Glossary	Amendment of text in the Glossary as follows:  <b>Community Assets</b> or Assets
	The definition of community development is limited in the Glossary. We believe it is much more than this; building the community, building capacity, resilience, community engagement and consultation. We recommend a more rounded definition is included to reflect the jointly held ambitions.		Acknowledged	Amendment to the text of the Glossary as follows:  Actions undertaken to enhance the community being created as a result of the development, its awareness of and sense of ownership and control over the new places being created. <b>Community building, building capacity, resilience, community engagement and consultation.</b>

#### Comments not directly related to content of the draft Charter

Issue	Comment	Respondent making comment	Response	Amendment proposed to draft Charter
Planning application notification	Ensure all local residents are notified of all planning applications and their dates so local residents can object in time	Resident (assumed)	Each of the Garden Town partners will have adopted a Statement of Community Involvement (SCI) setting out	No amendment proposed

			arrangements for consultation in relation to planning applications. These arrangements will usually include for the notification of local residents where they are close/adjacent to the site of a planning application. This zone of notification will frequently be expanded where proposals of a significant nature are under consideration.	
Consultation website	No one has been informed of this website or how to make comments	Resident (assumed)	Notification of the consultation was provided to all identified HGGT stakeholders. Usual social media channels were also utilised to ensure that residents could feedback to the consultation.	No amendment proposed
Document accessibility	Your documents above are impossible to read due to the size of the print	Resident (assumed)	Acknowledged.	Final version of the Charter to be subject to accessibility check and font size amended accordingly.