

Appendix C - HGGT Draft Stewardship Charter

Consideration of advice given by QRP and amendment to the draft Charter as a result.

QRP Feedback	Garden Town Charter Team Response	Amendments to the draft Charter
Terminology used in the Charter is considered to be correct.	Noted	No amendment proposed
The Principles included in the Charter are appropriate, however, stronger wording should be used when establishing the principles to follow. For instance, using 'consider' could allow for interpretation and not be direct enough.	On review it is considered that many of the requirements set out in relation to the Principles are set out in a definitive way. However, the amendments set out in the next column are proposed.	<p>Amendments as follows:</p> <p>Page 7 in the section: Who and What is this Charter for, first bullet:</p> <p>This Charter is for to be used by landowners, developers,</p> <p>fourth bullet:</p> <p>as such it is intended to be a material planning consideration in the determination of planning applications.</p> <p>Page 9 in the section: New Garden Communities, fifth bullet:</p> <p>All of these elements should are to be delivered in a way that ensures they are accessible to existing residents in the area. Similarly, the residents of the new community developments</p>

		<p>should are to be able to easily access and support the ongoing services</p> <p>Page 10 in the section: Successful New Places as part of the Harlow and Gilston Garden Town, fourth bullet:</p> <p>In other words, stewardship at Harlow and Gilston Garden Town should and will is to be more than just the management and maintenance of public areas and green spaces</p> <p>fifth bullet:</p> <p>This Charter is required to be considered taken into account in the determination of planning applications relating to the Garden Town <i>(Note – this further amends this bullet, but is consistent with amendments proposed in relation to consultation feedback)</i></p> <p>Page 12, Timeline, under the Outline Planning heading amend Action details in the first and third boxes as follows:</p> <p>Consideration Identification of actions to be undertaken</p> <p>Consideration Identification of indicators to be used...</p> <p>Page 15, para 1.4:</p>
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<p>The right balance has been achieved between detail and brevity. The Panel cautions against making the Charter any longer as it could be off-putting to users.</p>	<p>Noted and acknowledged</p>	<p>No amendment proposed</p>
<p>The Panel feels that the Charter provides a fantastic opportunity to embed community ownership measures within the newly planned Garden Town neighbourhoods.</p>	<p>Noted and acknowledged</p>	<p>No amendment proposed</p>
<p>Further clarification of the requirements and expectations for different stakeholder groups would be beneficial.</p>	<p>Agreed and amendment proposed to the Charter as set out in the column to the right.</p>	<p>Page 7, Who and What is this Charter for, add at the end of the second bullet:</p>

<p>The Panel feels that expectations and responsibility for differing parties need to be clarified.</p> <p>The panel would like to see a clearer breakdown of stakeholders and user groups that will be affected by stewardship arrangements across the Garden Town. It suggests that the Charter should clarify responsibilities and risks for each group, to understand how stewardship principles will affect the new communities that live and work here.</p>		<p>It is expected that landowners/ developers/ applicants will be responsible for initiating the actions set out in this Charter. They must engage with existing new and emerging communities in all processes. It is anticipated that communities will take a more proactive role once a Shadow/ Advisory Stewardship Body is formed and thereafter.</p>
<p>Testing different scenarios would help inform the guidance and ensure that worst case situations are anticipated.</p> <p>Scenario testing the Charter and its principles will help manage risks and support the Garden Town in getting the right outcomes. Working back from these potential scenarios will also help establish stewardship priorities and understand the scope for negotiations with developers.</p>	<p>A separate exercise which could test scenarios as follows:</p> <ul style="list-style-type: none"> - Asset rejected by stewardship organisation - Assets retained by applicant or handed elsewhere without reference to stewardship org - No level of local representation - Seek to charge excessive service charges/ draconian collection measures - No/ limited community collaboration/ co-design/ development 	<p>No amendment proposed prior to testing exercise.</p>
<p>The formation of an umbrella body overseeing the whole of the Garden Town seems sensible. The panel agrees that a strategic view should be taken across the Garden Town, to address what assets are best to be controlled at this</p>	<p>Noted and the HGGT partners are continuing to consider the potential for any strategic stewardship arrangements across the Garden Town. No decisions have been taken in relation to that matter at this stage and it is considered</p>	<p>No amendment proposed</p>

<p>level and how to provide economies of scale for their operation and maintenance.</p> <p>Establishing an umbrella organisation seems crucial to achieving some uniformity of service, control and governance of the various stewardship bodies across the Garden Town.</p> <p>There could be tension between stewardship bodies and the umbrella group, as the latter could be seen as less representative than the individual groups in each area. The terms of reference will need to be managed carefully to clarify roles and responsibilities.</p>	<p>that any reference to emerging thinking in the Charter would become dated once any strategic work is concluded.</p> <p>Point noted and care will be taken to ensure that roles and responsibilities are clearly defined. Whilst acknowledged, this is a point to be dealt with when and if any strategic stewardship arrangements are concluded and it is not considered that amendment to the Charter is required.</p>	
<p>Clear communication will be crucial to ensure that the community have a sense of control over spending decisions.</p>	<p>Clear and effective communication will be an essential requirement of any Stewardship Body that is put in place to ensure understanding of the arrangements by the community and the ability to provide resident input.</p>	<p>Addition to second bullet, page 27, para 4.1 as follows:</p> <ul style="list-style-type: none"> • Be transparent in the way they are run and governed and communicate clearly and effectively;
<p>The panel feels that a clear fallback position or strategy for negotiations should also be in place, should stewardship measures fail.</p> <p>A fallback position should be considered, in case stewardship arrangements fail. Clarity about what organisation would act as the ombudsman or negotiator in this circumstance would be helpful and worth addressing considering in relation to the financial support</p>	<p>Agreed</p>	<p>Amendment to page 32, para 5.10 as follows:</p> <p>5.10 Potential arrangements should also be considered The process to be followed, should a Stewardship Body, experience financial difficulties, or become insolvent should be identified.</p> <p><i>(Note – this further amends this para, but is consistent with amendments proposed earlier in the document in relation to QRP advice).</i></p>

<p>that may be needed in the some term. This body should provide a clear process for the residents and businesses involved, should stewardship principles not be met or under-perform. While this will likely sit outside the Charter, the panel feels that this should be addressed alongside its development.</p>		
<p>Setting defined expectations of what needs to be demonstrated through the design, planning and delivery stages will be important and should be included in the document.</p>	<p>This has been further considered. It is felt that the details set out in relation to the individual Principles and as summarised in the Timeline give sufficient definition. There is a requirement to also ensure a degree of flexibility as the differing sites will have individual characteristics and circumstances.</p>	<p>No amendment proposed.</p>
<p>The Gilston Villages will provide a perfect opportunity to test stewardship at scale and inform the development of the document.</p>	<p>Noted</p>	<p>No amendment proposed.</p>
<p>The panel feels that there needs to be a proactive approach to stewardship embedded in the masterplanning process for the Garden Town. The Charter could do more to allow and enable these kinds of opportunities.</p>	<p>Overall it is considered that the Charter seeks and demonstrates how a proactive and collaborative approach to stewardship should be implemented and what it could achieve. In relation to master planning, the requirements for it are referred to in para 2.3 (Principle 2). It is considered unnecessary to further identify the potential of this element of the planning process when it is important that stewardship is considered at all stages.</p>	<p>No amendment proposed.</p>

<p>Focussing too closely on current standards, technologies and design approaches which could quickly become out of date.</p>	<p>Agreed and not considered that the Charter does this</p>	<p>No amendment proposed.</p>
<p>The panel would like to see further consideration of how the Charter will be enforced, along with the mechanisms for this, such as planning conditions or Section 106 agreements. The document could be clearer about these gateways.</p>	<p>Noted, the fifth bullet on page 10 in relation to Successful New Places already refers to securing arrangements in s106 Agreements. There could be a further addition relating to conditions.</p>	<p>Amendment to the second part of the fifth bullet in the section Successful New Places, page 10 as follows:</p> <p>Stewardship arrangements will be secured and enforced through planning conditions and s106 Legal Obligation Agreements. Where stewardship arrangements they are secured through s106 Legal Obligation Agreements related to planning permissions, these will be binding on both initial and subsequent site developers, should land be sold on whilst development is taking place.</p>
<p>The panel feels that it is currently difficult to assess viability of stewardship at scale. For example, it questions whether Latton Priory could perform as a single stewardship model, given that community assets in this location may not be sufficient to support the extent of upkeep expected.</p>	<p>Noted and understood. It is not considered a purpose of the Charter to explore and determine arrangements for the individual sites, taking into account their characteristics. That will take place as arrangements for each site are considered in detail.</p>	<p>No amendment proposed.</p>
<p>As the key threshold for establishing a stewardship body may be linked to the quantum and tenure of homes, as well as key assets, the panel feels that governance measures will need to be adaptive to changing scenarios.</p>	<p>Noted and understood. The Charter does not seek to apply definitive arrangements in relation to each of the sites coming forward. Instead arrangements, such as the timing of implementation of Stewardship Bodies can be flexible and responsive to matters such as occupations and home tenures. The Charter</p>	<p>No amendment proposed.</p>

	<p>seeks a Shadow or Advisory Body in advance of the formal Stewardship Body. This provides an avenue through which timing for the implementation of formal arrangements can be considered.</p>	
<p>Further thought should be given to how relationships with development partners will develop over time, particularly in terms of responsibility and risk management.</p>	<p>This is considered to be a matter for detailed consideration given the characteristics and circumstances of each site. It is not appropriate for the Charter to give a definitive approach.</p>	<p>No amendment proposed.</p>
<p>The Panel would like to see further information on how focussing on ensuring income works alongside partnerships with developers. For example, if stewardship-owned assets are given priority locations, this could affect the viability of operator-owned commercial units and have an impact on investment returns.</p>	<p>This is considered to be a matter for detailed consideration given the characteristics and circumstances of each site. It is not appropriate for the Charter to give a definitive approach.</p>	<p>No amendment proposed.</p>
<p>The type and number of assets that will be controlled by the stewardship bodies should also be considered. This will affect potential costs and risks, which could be significant.</p>	<p>This is considered to be a matter for detailed consideration given the characteristics and circumstances of each site. It is not appropriate for the Charter to give a definitive approach.</p>	<p>No amendment proposed.</p>
<p>The team should consider how financial support will be provided during the delivery and build out of the Garden Town.</p>	<p>Noted and understood. Whilst important, this is not considered to be a matter to be addressed in the Charter. It may be appropriate for such consideration to be had when determining if there is any role for strategic stewardship arrangements across the Garden Town.</p>	<p>No amendment proposed.</p>

<p>Arrangements for how and what services are billed should be presented with clarity. The panel feels that there is a risk that a stewardship levy could be seen as duplication, particularly if there are also ground rents, council tax, and other fees to consider. Clear communication will be vital to manage expectations, demonstrate decision-making, and address accountability.</p>	<p>Noted, in addition to the amendment proposed above in relation to clarity and transparency a further addition is proposed as set out to the right.</p>	<p>Addition to page 31, para 5.6 as follows:</p> <p>5.6 Any service and estate charges (residential and/or commercial) will be set at and maintained at a reasonable level that is commensurate with the level of cost that is incurred in maintaining or servicing the relevant assets. Charges must clearly identify the purposes and services for which they are levied to ensure clarity in relation to other charges that occupiers may be responsible for.</p>
<p>There will also be a need for ongoing clear communication, as people leave and new people arrive into the area.</p>	<p>Noted and agreed. It is considered that the earlier amendments proposed in relation to transparency and clarity, and the current text of para 5.7, ensure this matter is covered.</p>	<p>No amendment proposed.</p>
<p>The term 'community' should also be clarified, to understand how this might look within different areas of the Garden Town and over time,</p>	<p>In the Charter the term community is intended to encompass the current community of the Garden Town area and what it will become as the new development sites take place. That is, an expanded community comprising of existing and longer term residents and those who are newly moved to the area.</p>	<p>Amendment of the third bullet on page 7 section Who and What is this Charter for, as follows:</p> <p>It is also for use by the community (which means all existing residents and those who come to live in the Garden Town) new and existing communities, so they can understand how they can expect to be involved.</p>
<p>The panel appreciates that there is work to be done to improve the perception of community influence and agency across the Garden Town.</p>	<p>Noted and anticipated that this will continue to be developed as the new sites come forward for development.</p>	<p>No amendment proposed.</p>
<p>Understanding how communities are embedded in the new places created, as well as</p>	<p>This is primarily the subject area of Principle 3, Community Development. It is not considered</p>	<p>No amendment proposed.</p>

<p>how they can be involved with cultural events, community assets and wider societal benefits, should be clarified.</p>	<p>necessary for the Charter to be further specific in relation to this matter and for the stewardship arrangements which emerge for each site to address this in more detail.</p>	
<p>The panel feels that the section of the Charter which relates to community communication is currently too specific and risks becoming out of date quickly.</p>	<p>Noted and agreed.</p>	<p>Amendment to page 23, para 3.8 as follows:</p> <p>3.8 The stewardship body will also be responsible for delivering communication tools and community events, including: welcome packs and events, festivals, celebrations and appropriate and responsive communication channels.</p> <ul style="list-style-type: none"> • Welcome packs to new residents and carrying out associated welcome events • Community events such as art, cultural, and sport festivals and celebrations • Maintaining a website, newsletter, and community noticeboards to share information
<p>The panel suggests strengthening the wording used around inclusion. As the approach to stewardship relies on good representation across the various communities in the Garden Town, the team will need to be proactive and identify likely barriers for inclusion.</p>	<p>Noted and agreed. There is already considerable reference to inclusivity in the Charter. The section on Successful New Places (page 10) refers to diversity and inclusivity. Principle 2 relates to collaborative and inclusive asset planning and Principle 3 to inclusion as part of community development. It is recognised that there can be barriers to inclusion and this is referred to in para 4.7 regarding representation. In addition to the above, it is proposed that amendments can be</p>	<p>Amendment to page 15, para 1.5 and page 23, para 3.4 as follows:</p> <p>1.5 The Engagement Strategy will set out which stakeholders will be engaged, how they will be engaged and when in relation to the programme. It should ensure inclusivity.</p> <p>3.4 Developers, and subsequently the stewardship bodies who will inherit the responsibility, should collaboratively plan and deliver community development initiatives with</p>

	made to the proposed Charter to further strengthen references to inclusion.	existing, emerging and neighbouring communities ensuring inclusivity . <i>(Note – this further amends this para, but is consistent with amendments proposed earlier in the document in relation to QRP advice).</i>
The Panel would like to see more emphasis on evaluation. It suggests considering the use of impact-based modelling, to identify lessons from the process and to drive up standards.	Noted. Principle 6 relates in part to the requirements for monitoring. The approach of the Garden Town to monitoring remains under consideration and development, including through the Quality Monitoring Strategy, referred to in the Charter.	No amendment proposed.
The team could refer to the Human Learning Systems framework, developed by Toby Lowe, which may be relevant to the Charter.	The Human Learning Systems framework approach acknowledges that outcomes result from a complex and inter-related set of inputs and pressures. As a result, an approach focussed on a single outcome is unlikely to be successful overall. The relationship of this to potential stewardship arrangements and outcomes is noted. This advice relates to the work of the Garden Town Charter preparation team, rather than to the content of the Charter itself.	No amendment proposed.