

1. Which of these proposals do you agree with (and why)? [250 words max.]

(We focus on Section (1) of the paper as this is the area of our organisation's expertise - environmental asset management.) Using the tax system to incentivise use of empty property and land is potentially positive. It underscores the importance of assets as sites of productivity for public good and promotes responsibility for asset use amongst owners.

Extending the Social Value Act is a potentially useful measure that could stem the flow of public assets into privatisation, retaining their value to communities and reconfiguring the way assets are perceived (as sites obliged to produce communal good, not just private profit).

Mutual and common ownership models should certainly be considered for the ownership of the Land Registry. There should also be consideration given to making Land Registry data more transparent, removing the fee for registry searches and focusing income generation on innovative uses of the data rather than charging for access. The fact that it is so difficult to establish who owns land in the UK mitigates against an informed debate about its use, value and availability.

Setting up an independent Royal Commission on Land Reform would be a welcome recognition of some of the structural problems of land ownership and management in the UK. Topics it should address include: the concentration of land ownership, land valuation and taxation and the impacts and potential for reform of land use categories in planning, which mitigate against sustainable productive use of land (e.g. erection of temporary structures, polytunnels etc.)

2. Which, if any, do you disagree with (and why)? [200 words max.]

Other than mentions of management orders and management under the Public Services Act, all the proposals focus on improving asset ownership arrangements. Many community groups/social enterprises cannot afford (financially, time-wise etc.) the demands of taking on asset ownership, or the finances to purchase assets for community use. Many environmental assets (e.g. waterways, public parks, woodlands) could benefit from social enterprise management. Focus on ownership limits the possibilities for socially productive asset management, risks locking out disadvantaged groups who are willing to engage in stewardship, governance and management, but not ownership.

The paper focuses on land for housing development. There is also a rapid rise in demand from community/social enterprises for land for other uses (e.g. food growing, woodland management, wood fuel production, renewable energy generation, activities that contribute to improved health and wellbeing). These uses are at least as important to well founded growth as housing – and will support more sustainable and resilient communities in new housing developments. It should also be noted that farmland prices are rising rapidly. The value of British farmland is

outperforming most other assets, [rising by 270% in the past decade](#). This prevents new entrants to small-scale, socially productive forms of land management.

3. Which of these proposals are the most important? [200 words max.]

The setting up of a Royal Commission on Land Reform to address deep, structural problems in the UK's land ownership and management system.

4. What have we missed? Are there any proposals or ideas that you would like to add? [300 words max.]

As mentioned, focus on ownership will exclude certain assets and potential land stewards. A 'Community Right to Manage' alongside the government's existing '[Community Right](#)' legislation, could remedy this. Discussed by [POPse ThinkTank](#), such policy could allow communities to propose new management arrangements, use land for social/economic productivity without fragmenting ownership, compromising robust governance or putting community stewards under unnecessary strain. An alternative approach to this would be to encourage local authorities to adopt a 'presumption in favour of community management for sustainable development' in relation to land they own that is undermanaged.

The key role of local authorities and the planning system with respect to land use is underdeveloped in this paper. In local planning, land is either: ancillary to buildings, protected for leisure, for biodiversity, designated as agricultural, or part of a 'green infrastructure plan' which often focuses on active transport. There is rarely good quality information on what land local authorities own and its management is fragmented across departments. This creates a planning system which gives little consideration to land uses described in (2) which could make a significant contribution to sustainable, people-powered local economic development. Reform of land use classes and guidance or requirements for local authorities to enable productive use of green spaces would be welcome.

The paper conflates assets that should arguably be separated: there are differences between the management of building/brown sites and that of land/waterways/other environmental assets. From our work with social enterprises/communities, land is often experienced as a 'bare necessity' to their varied work: the base for energy generation, food growing, mental health, educational, sports services. We suggest separating land issues from other assets, and potentially linking them to strands from other Alliance themes (e.g. 'Bare Necessities' stream) to gain greater clarity on the issues at play, and appropriate policies.

5. Which proposals need further work or refinement (and how)? [200 words max.]

Aside from this general refocusing, the 'reforming of the legal framework for local authorities and others to use management orders, CPOs and the Community Right

to Reclaim Land' needs to become more specific and the acute need, and a potential agenda, for a Royal Commission on Land Reform needs to be outlined

Relevant to both the extension of the Social Value Act and to support the introduction of a 'blight tax', criteria to encourage and monitor for socially valuable asset use could be developed, to ensure that assets were working for public good.

The real potential of a new approach to land stewardship could also be further explored here. A commitment to develop socially enterprising land management models at scale, moving beyond small-scale voluntary stewardship, opens up opportunities- not least in more deprived areas of the UK- for employment, training and local economic growth. A different approach to land management could unlock rural growth and form the touchstone of a well-founded economy.

**6. Do you have any evidence to support or refute the claims made in this paper?
[200 words max.]**

Our practice and research in the UK's land-based social sector, including work with community food enterprises, community renewable energy generation and woodland based social enterprise, has shown us the particular nature of land and environmental assets. It has demonstrated why these assets are different from others and need to be treated as such. We would question the conflation of buildings and land assets in this paper based on this evidence. We suggest a recognition of land as different, and as an underlying requirement for any social enterprise/community project that requires space in which to operate.

Our research into the management of local authority owned woodlands highlighted the lack of information that local authorities hold on their ownership and management of woodlands (and other green spaces) and barriers that exist to putting in place productive shared management agreements with social and community enterprises.

Our recent research into [woodland social enterprise](#) in [England](#), Scotland and Wales demonstrates the rapid increase in land based social enterprise, the range of activities which they are delivering which contribute to well founded growth and the extent to which they are managing land that they do not own, developing shared management and stewardship arrangements with land owners.