



Community Land Trust Network
34-35 Butcher Row, Shrewsbury, SY1 1UW

Miatta Fahnbulleh MP
Secretary of State (Minister for Devolution, Faith and Communities)
Ministry of Housing, Communities and Local Government
2 Marsham Street, London, SW1P 4DF

29th October 2025

Dear Ms Fahnbulleh,

I am writing to ask that you incorporate "environmental interests" and "environmental wellbeing" into the definition of Assets of Community Value (ACVs) in the English Devolution and Community Empowerment Bill.

We are a network of 100s of community land trusts seeking to acquire and develop assets for community benefit. We are excited about the introduction of a Community Right to Buy. But we fear that the exclusion of environmental interests undermines the core purpose of the scheme.

In the bill committee you rejected an amendment that sought to add environmental interests to the face of the bill. You argued that the amendment would "wedge" in purposes - such as natural flood defences - that are not relevant to a scheme that aims to empower communities to take on assets. But these are among the purposes that communities in our network are already trying to acquire assets, and were acknowledged by Steve Reed when a shadow minister when he announced a set of nature policies that included CRTB to "empower communities to create new parks and green spaces... help them purchase and restore derelict land and green space of community value."

You were right to point out, in committee, that "many of the community and environmental assets that they would want to take on are already permissible in the existing community right to buy".

These two arguments could also be said of "economic interests" - there are other policy instruments to further local economic wellbeing, and it is already permissible to register assets with economic interests as ACVs. But the consequence of these arguments is that communities must rely on arguments about "social interests" alone, with one hand tied behind their back.

To illustrate what this might look like, and to make the point that this is central to how communities can take on assets, we can look at examples from Scotland such as the successful registration of "Poet's Neuk" in St Andrews. This is a derelict piece of land within the town which

the community wanted to turn into a community garden. The community was able to set out how the registration would further the economic, social and environmental aspects of sustainable development. On the environment they touch on litter, a green breathing space, more green space per capita, and tackling air pollution and CO₂ through planting. It would have made no sense for the community to propose a garden without reference to these environmental aspects, and without these aspects the case would be weaker and so more easily rejected by the local authority.

We need the government to align the definition of ACVs with the government's standard tripartite definition of sustainable development. The current definition, providing only for "social interests", was always anomalous with – for example – the planning system which conditions the valuation of those assets, and duties on public bodies that dispose of assets. In Scotland, the model that the Scottish Labour government introduced similarly frames the right in terms of sustainable development. The Co-operative Party recommended the tripartite model in its Unleashing Community Ownership report last year.

We understand the concern that communities might try to list lots of land around their settlement as an ACV to block development, or to (in your example) protect peat bogs without any reference to social or economic interests. But this can easily be resolved in the guidance (as provided for in clause 86X), which could make clear that:

(1) ACVs cannot be accepted on land that is allocated in the Local Plan, except where the proposed use is congruent with the use intended in the Local Plan.

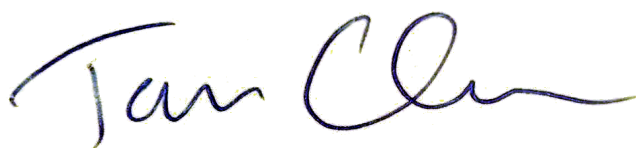
(2) ACVs cannot be used for proposals that are purely about environmental protection; they must include social and economic interests.

(3) ACVs cannot be used to indiscriminately register parcels of land within an area, and communities must make a case as to why a specific piece of land is of importance to the community.

In summary, I urge you to amend the bill to include environmental interests. Failing to do so will critically undermine your objectives with the scheme.

I look forward to hearing from you.

Yours sincerely,

A handwritten signature in blue ink, reading "Tom Chance". The signature is fluid and cursive, with the first name "Tom" and last name "Chance" clearly distinguishable.

Tom Chance, Chief Executive, Community Land Trust Network