

**From:** [REDACTED]  
**To:** [Housebuilding](#)  
**Subject:** Private management of public amenities on housing estates working paper  
[REDACTED]

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Dear Sir/Madam,

I am writing to follow up our previous submission to your study, to provide comments in relation to two questions in this latest consultation paper. Before that, as requested,

**Please supply a brief summary of the interests or organisations you represent, where appropriate.**

I represent 358 Community Land Trusts across England & Wales that are in the business of buying and developing land for community benefit. A significant number of these are, or are planning to be, responsible for the management of public amenities in addition to homes that they own. They range from very small schemes with a small amount of amenity recreation space around half a dozen homes, to a 500 home Garden Village where the CLT will adopt the roads, open space, SUDS and a new village commercial centre, and a 670 home social housing estate where the CLT owns and manages a public park, private shared gardens and a community centre.

**Please consider whether you are providing any material that you consider to be confidential and explain why this is the case.**

None of the material I am sending you is confidential, and I am content for it to be published.

#### **Question 5**

**a) What measure, or combination of measures would provide the best solution to our emerging concerns? Please give reasons for your views.**

**c) Are there any options that may be more effective in addressing our emerging concerns than those that we have proposed?**

In your paper you cover concerns that resident management companies (RMCs) place liabilities and administrative burdens on directors. You cite another respondent suggesting that the RMC arrangement 'usually ends up relying on a few individuals and if they no longer have the time or energy to put into management efforts or sell their properties, efforts can languish.' You also cite concerns that directors would lack expertise in the functions of the management company.

We recognise these concerns, but do not believe them to be fatal.

The Community Land Trust approach to this question can help in four ways.

First, whereas an RMC will typically be set up to focus on the 'red line' of an individual development, a CLT usually extends across the wider neighbouring geography. This offers a wider pool of people able to bring their time and energy to bear.

In the example of Kennett Garden Village in East Cambridgeshire, the CLT draws membership from, and has a duty to, the community of the wider parish of Kennett. Another local example, Stretham & Wilburton CLT, covers two adjoining villages and it will manage two separate developments of 75 and 120 homes respectively with roads and amenity space. Care is taken to ensure that the governance and charging structures are

appropriate where residents in new homes pay estate charges.

Second, by operating at a larger scale, and by often owning income-generating affordable homes and commercial spaces as well as liabilities such as open space, it is more likely that the CLT will be able to sustain staff. Even being able to pay an administrator significantly reduces the burden on non-executive directors.

Third, because the purpose of the CLT is not just to 'cut the grass' but to continue to develop assets, it attracts a different sort of volunteer. We typically see, for example, CLTs in rural areas attract volunteers from within communities that struggle to fill parish council posts. The opportunity to both manage existing assets important to them, and to develop new exciting projects, is more likely to attract the time and energy of people to make a success of the organisation. CLTs invest their time, energy and money in community development work to develop an inclusive culture of participation across the estates, and in the best cases this is provided for in the stewardship strategy, with an endowment and income sufficient to fund this work at least in the early years after first occupation.

Fourth, and finally, CLTs can access peer support and networking, resources, and training in governance and operations from our network. We support CLT directors to understand their role, particularly where they are contracting or partnering with third parties to carry out technical services, and to gain the skills and knowledge necessary to discharge the role properly.

#### **Question 7**

**a) Would the determination of common, adoptable standards support an increase in the adoption of amenities by local authorities?**

**b) Are there existing standards that could be used to support the determination of common adoptable standards?**

This 'community-led structure' which you reference briefly in your consultation paper is not widely adopted or understood. There are similar models of community trust that do not, strictly, meet the statutory definition of a CLT. Many of the early garden villages/cities fit this mould, as do more recent community trusts such as the Chilmington Green Community Management Organisation. The TCPA's Garden City principles promote the community ownership and democratic governance of public amenities.

But there is considerable industry interest in it. We are currently working as part of a consortium with water companies, a local authority, a large housebuilder and others on an Ofwat-funded project to establish how the CLT model can best support long-term stewardship of 'water smart' assets including SUDS, water recycling/reuse and demand reduction.

There is a 'missing market', or an underdeveloped market, in approaches other than private management companies and RMCs.

We therefore believe that the CMA should recommend that DLUHC support the further development of new approaches to the adoption and management of public amenities. This work should pick up the concerns and overarching principles you have set out.

Yours faithfully,





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