

# **Derbyshire County Council's Non-Operational Property**

**Review by Derbyshire County Council -  
Improvement and Scrutiny Committee – Resources**



**Final Report of the Review Working Group**

**14 November 2013**

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Cllr. Paul Dunn (Committee Vice-Chairman)  
Cllr. Steve Marshall-Clarke  
Cllr. Tony Kemp  
Cllr. David Lomax**

# Contents

1. Introduction.....	3
2. Background to the Review.....	4
3. Initial Research.....	5
4. Streamlining Proposals.....	8
5. Residential Property.....	10
6. Financial Implications.....	14
7. Legal Implications.....	16
8. Review Conclusions.....	18
9. Recommendations.....	19

## Acknowledgements –

The Chairman and Members of the review working group would like to thank the Members and Officers of Derbyshire County Council who have contributed to this review and also the following people from the Council's partner organisations for their involvement:-

Sue Li	Empty Homes Officer - Amber Valley Borough Council
Graham Parker	Housing Renewal Officer - Erewash Borough Council
Tim Braund	Head of Environmental Health - Derbyshire Dales District Council

***Front cover photograph – Depot and Residential Properties – Duffield***

# 1. Introduction

**Councillor Clive Moesby**, Chair of the Improvement and Scrutiny – Resources Committee and Chair of the Review Working Group, introduces this report;

*“This review of the County Council’s non-operational property has been undertaken against a background of severe budget cuts imposed on the Council over the forthcoming years. The Council is faced with the task of making substantial savings whilst endeavouring to minimise the impact on services. The Council’s Improvement and Scrutiny function is working to support the Council to achieve its financial targets and this review aims to help minimise costs and maximise income from the Council’s property portfolio.*

*Members and Officers of Improvement and Scrutiny, Property, Finance and Legal Services teams, as well as representatives of our partner organisations, have worked together to bring this review to a conclusion and I would like to thank all those involved for their assistance and contributions.”*

**Councillor Brian Ridgway** – Cabinet Member for Council Services (including Corporate Resources and Property) has commented on the review and its outcomes;

*“The review of non-operational properties, as conducted by the Improvement and Scrutiny, Resources Committee, will bring a number of recommendations regarding their future. The strategic plan will be to maximise use and income generation, and the needs of Derbyshire service users and local communities must be taken into account. There will be difficult and unpopular decisions to take but those decisions will be made with a background of consultation, recommendation and strategic aims”*

## 2. Background to the Review

The Chair and Vice-Chair of the Improvement and Scrutiny (I & S) – Resources Committee, in July 2013, met with the County Council’s Directors and other senior officers whose service areas linked to the Committee’s responsibilities.

When meeting with the Director of Property Services, they discussed his proposals to streamline the Council’s non-operational property holdings. “Non-operational” defined any property which was **not** used for direct service provision and, as such, could be considered for disposal.

It was agreed that a task-and-finish scrutiny review of non-operational property currently held by the Council would enhance the streamlining programme and would help to ensure that the County Council selected the best option for all those properties which were considered suitable for disposal.

A working group of Members of the I & S – Resources Committee was established to undertake the review, with final outcomes and recommendations being presented to the Committee at its meeting in November 2013. Members appointed to the working group were **Councillors Moesby, Dunn, Marshall-Clarke, Kemp and Lomax.**

### 3. Initial Research

The working group had a preliminary meeting with the Director of Property and his Assistant Director (Asset Management) to consider all the properties which were not currently used by the County Council to directly provide its services.

The Director of Property welcomed the Improvement and Scrutiny Committee's involvement in his proposal to streamline the Council's portfolio of non-operational property. The review working group wished to ensure that sufficient investigation was given to each individual property to establish;

- what property should be disposed of or retained?
- which method of disposal would achieve best value?
- if alternative options were available to retain ownership or control over a property whilst reducing management costs

The working group Members were informed that, due to the budget constraints which were currently being imposed on the Council, all Strategic Directors were tasked with reducing their revenue expenditure wherever possible, whilst limiting the impact on service provision. With cuts to the Council's budget of £127m over the next 5 years, and a proposed additional £30m announced by the Government in August 2013, the need to find ways in which to reduce expenditure was becoming more crucial.

For the Director of Property, the day to day management and maintenance of the Council's property holdings was a considerable charge against his departmental budget. In common with all Chief Officers, he had a responsibility to minimise revenue expenditure wherever possible, and consider ways in which costs could be reduced with minimum impact on Council services.

A prime area for potential expenditure reduction would be to dispose of any property which was not used directly for providing the Council's services (for example, those **not** used for offices, public amenities, libraries or service provision locations such as homes for older people and day centres).

The County Council's property portfolio is diverse. It includes a wide variety of land and buildings, some of which have been in the Council's ownership for many years. Some properties had been built or acquired by the Authority to provide services efficiently and were now redundant for their original purpose. Examples of these are school houses, usually attached to school premises, which were originally provided to house teaching or caretaking staff. Employees were no longer provided with such accommodation and the houses became redundant for that purpose. The same situation applied to other properties which had been available for employees who, historically, had

to live near their place of work (eg. adjacent to highways or other works depots).

Other property (both land and buildings) had been acquired by the Council, usually through Compulsory Purchase Orders (CPOs) in order to undertake highways improvements such as road widening or improvements to junctions. There were a number of residential properties and parcels of land which had been held for such purposes for many years and the subsequent cancellation of some highways schemes made these properties surplus to requirement.

As well as residential premises, the Council owns industrial estates, individual industrial units, grassland, woodland, parkland, highways verges, reclamation land and numerous recreational sites.

The Director and his team had identified 331 individual properties which were non-operational and therefore could be considered for possible disposal. This initial list of properties can be broken into categories as follows;

• Parcels of agricultural land	8
• Caravan sites	4
• Parcels of miscellaneous Highways land	120
• Industrial estates	24
• Reclamation sites	49
• Recreation sites	44
• Miscellaneous residential properties	57
• Woodland sites	21
• Telecom sites	4

It should be noted that;

**Caravan Sites** include 3 sites for Travellers which the County Council provides in order to meet its responsibilities in respect of the provision of temporary and permanent facilities for Traveller families. The 4<sup>th</sup> site is a recreational/leisure camping site at Grinlow near Buxton.

**Industrial Estates** were originally developed by the County Council as part of economic regeneration projects. These developments were aimed at helping new businesses to establish and grow in order to provide employment, particularly in the areas of the county worst hit by the closure of coalmining and associated industries. Many of the industrial facilities were now well established with settled businesses offering stable employment. It was therefore timely to consider selling these properties which would generate capital income.

**Reclamation Sites** are made up of land left over from the county's industrial past and is mostly comprised of dis-used colliery workings, spoil heaps,

quarries and tips. Often contaminated or otherwise hazardous, these sites were placed in the custodianship of the County Council to ensure they were made safe and secure for the local communities. Over the years, most reclamation land is returned to a safe and natural state with an on-going commitment from the Council of general maintenance and management. It is these plots of land that may be suitable for further development, or continued guardianship, by a third party (eg. the provision of community open space or nature conservation site).

**Recreation Sites** are varied, ranging from fishing ponds and canal wharfs to playing fields, heritage sites and woodland. Over many years the County Council had been the recipient of land and properties that had been bequeathed to the Authority by individuals for various reasons. Mostly it was to ensure that land was kept in public ownership to enable public access, prevent development or provide wildlife habitats. The Council had taken on ownership of numerous properties that had caveats as to their future use or disposal. However, it could be possible to transfer ownership or managerial responsibility, for example, to District, Borough or Parish Councils, or voluntary groups, providing the original owners' reasons for bequeathing the property were protected.

**Recommendation** - *The proposal to dispose of the County Council's non-operational property holdings be supported, subject to the additional recommendations of this report.*

## 4. Streamlining Proposals

### a. Consultation with Strategic Directors

The Director of Property was asked to consult Strategic Directors on those properties falling within their Directorates, to ascertain which properties they considered could be listed as suitable for disposal. They were asked to consider each property against retention criteria which the Director of Property provided and which is as follows;

#### Retention Criteria

**Statutory** – *There is a current legal obligation by which the Council is required to hold the property.*

**Financial** – *There is a clear and substantial overriding financial benefit to the Council holding the property*

**Strategic** – *The property is required for a strategic reason, (for example, the property is required for an active future road or other Council scheme that is fully funded and has Cabinet approval – and is not just a future aspirational scheme)*

At the same time the officers from Adult Care, Children and Younger Adults and Environmental Services Departments (the Council's biggest property using Departments) who make up the Council's Accommodation Project Board were invited to contribute to the review.

The Strategic Directors' responses were used to produce a revised list of properties which could be considered further for disposal, either by selling out right, or transferring management responsibilities to third parties.

### b. Consultation with County Councillors

Once the Strategic Directors' responses had been taken into account, a defined list of surplus properties was circulated to all County Council Members to seek their opinions on the proposed disposal of land and buildings in their electoral divisions. Members were also asked to take account of the Retention Criteria but were invited to submit suggestions for local solutions, for example, transferring management to local community groups.

Responses from Members have been collated and submitted to the Director of Property with a request that he liaise with those who had concerns or suggestions over the future of some of the properties identified for disposal.



Those properties which warranted further consideration before disposal are listed in **Appendix 2** to this report.

**Recommendation** – *The Director of Property should liaise with local Members who have expressed concerns, or offered suggestions, in respect of those properties which are deemed to be surplus within their Divisions and report back to this Committee on the outcomes of their discussions.*

## 5. Residential Property

The County Council owns 57 individual residential properties which are considered “surplus for disposal”. They are located across the length and breadth of the county and are split between the District and Boroughs as follows;

<i>AMBER VALLEY -</i>	28
<i>BOLSOVER -</i>	3
<i>CHESTERFIELD -</i>	10
<i>DERBYSHIRE DALES -</i>	3
<i>EREWASH -</i>	3
<i>HIGH PEAK -</i>	4
<i>NORTH EAST DERBYSHIRE -</i>	4
<i>SOUTH DERBYSHIRE -</i>	2

A map showing the postcode locations of these properties throughout the county is shown at the end of this section (page 13).

The responsibility for ensuring the provision of an adequate housing stock, and the provision of affordable and social housing, rests with District and Borough Councils. There is a growing concern, nationally, over the number of domestic dwellings that are empty and not used for residential purposes. There are numerous reasons why properties are left empty by their owners and, increasingly, District and Borough Councils are committing resources to reduce the number of abandoned homes and help owners to bring properties back into residential use.

Given the number of residential dwellings owned by the County Council, the review working group invited officers of District and Borough Housing Departments to explore the potential future use of the County Council’s houses. Officers from Amber Valley Borough, Erewash Borough and North East Derbyshire District Councils attended a meeting on 15 August when the following issues were discussed;

- District and Borough Councils, having a responsibility for ensuring that local housing needs were met, worked with partners such as Housing Associations and developed strategies which included private sector provision as well as social housing.
- District/Borough authorities shared concerns on the issue of empty properties as premises in this state not only represented a waste of potential accommodation, but often led to the blight of their immediate area through lack of maintenance, rodent infestation, vandalism, fly-

tipping and the encroachment of weeds and other invasive plants/shrubs.

- Increasingly, Councils actively pursued and encouraged owners of empty properties to renovate their premises and place them back into the housing stock, either independently or through third parties. They had Compulsory Purchase powers which were used in extreme cases but they also assisted owners, where appropriate, with loans to undertake improvement work prior to disposal.
- Apart from Bolsover, High Peak and South Derbyshire, all other District Authorities in the county had transferred their housing stock to housing associations or similar organisations. On many occasions, arrangements have been made whereby these partner organisations have either purchased outright empty properties, or entered into lease arrangements with owners, to bring vacant premises back into residential use.
- Although the “purchase outright” option did not usually reflect the full market value of any property, lease arrangements allowed a freeholder to retain ownership and receive some income from a property. Another benefit of the leasing option was that it *might* provide access to improvement grants. The District/Borough officers offered to help the County Council investigate the possibility of leasing arrangements with their partner housing providers for any DCC property that would benefit from this option. Additional information was supplied by Derbyshire Dales District Council on the leasing scheme operated by Waterloo Housing Group. Information on their current leasing scheme is given in **Appendix 1** to this report.
- Another option open to owners who were unable to – or didn’t wish to - maintain empty properties was “Homesteading”. This is where a dwelling is let to a local family on a peppercorn rent in exchange for them being responsible for maintaining the property to an agreed level.
- It was noted that, as well as empty dwellings, the District and Borough authorities would be interested in land and other buildings which DCC has for disposal. There were a number of methods by which the local authorities and their housing provider partners could use parcels of land and redundant commercial premises. They would therefore be interested in any property which could be used as building land or for conversion for housing use. Conversion of disused commercial property was particularly attractive as it offered an alternative to schemes on green-field sites.

- The meeting concluded with an identified opportunity for closer partnership working between District and Borough authorities and the County Council. It would be mutually beneficial to explore the potential of DCC surplus properties in respect of adding to the stock of affordable housing throughout the county, particularly in partnership with social housing providers. The provision of affordable homes, whilst pre-dominantly a District/Borough responsibility, also contributed to the aims of the County Council in improving and strengthening local communities. Members of the working group therefore agreed that the opportunity to work with District and Borough Councils and their partners on this issue should be embedded in the outcomes of the scrutiny review.

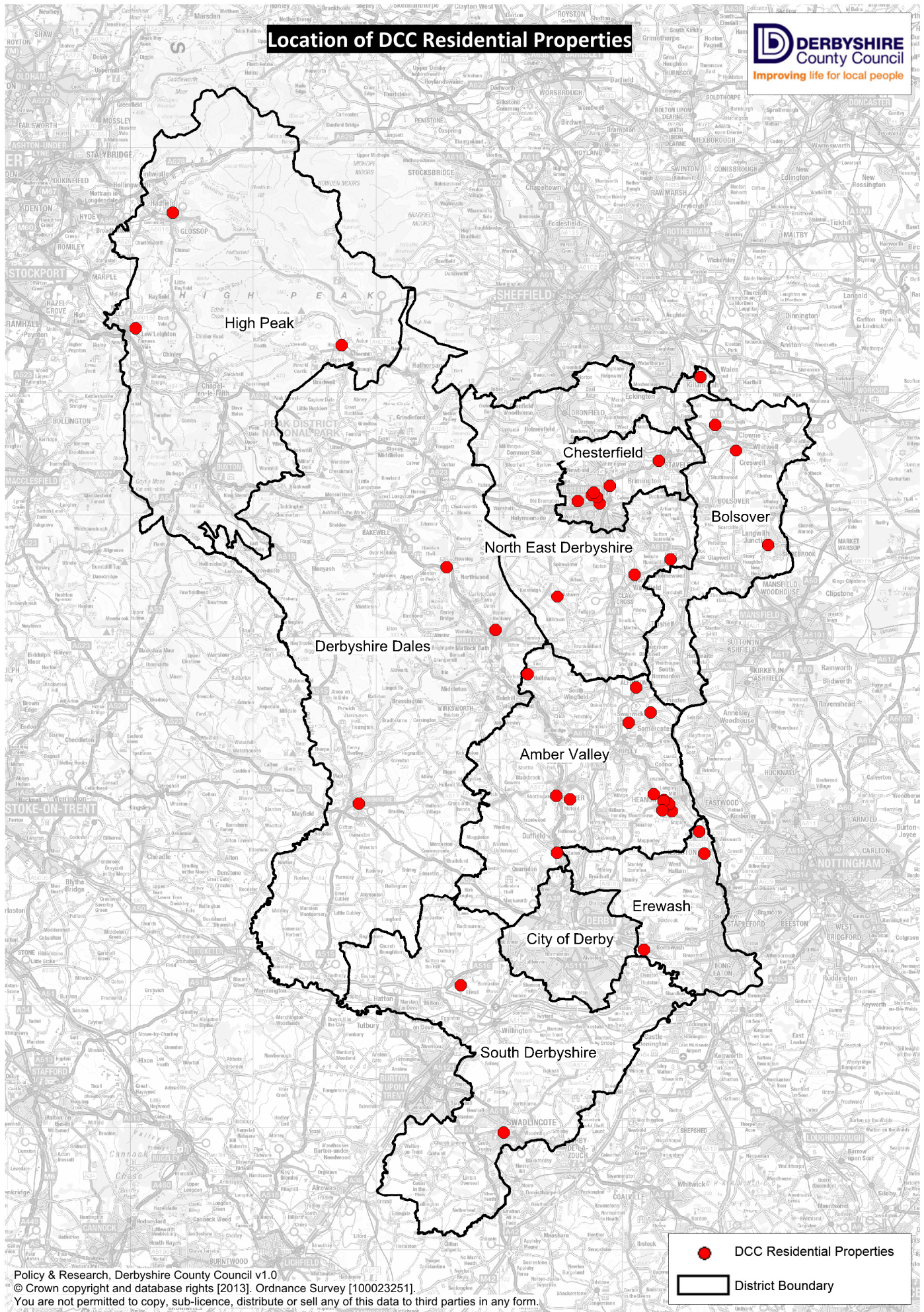
During subsequent discussions with the County Council's Director of Finance (see section 6 of this report) the working group Members were advised that any such use of the Council's surplus houses should be assessed by referencing this option to financial modelling.

**Recommendation** – *The Director of Property, in consultation with the Director of Finance and Legal Services, pursues the opportunity to dispose of appropriate properties to social housing providers.*

**Recommendation** – *The Director of Property liaises with the county's District and Borough Councils and other public sector organisations to adopt a partnership approach to the future of the County Council's non-operational property, whether for housing or other uses.*



## Location of DCC Residential Properties



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## 6. Financial Implications

In order to assess the financial implications of the future of the Council's non-operational property, the working group met with the Director of Finance. The following points were noted;

- Given the current, and projected, budget situation, it is sensible to review the Council's need to retain properties which are no longer required
- However, consideration should be given to the long term potential for each property – and weigh up any benefits to retain against the immediate benefits of disposal. To facilitate this, a more structured asset management system should be adopted by which each individual property (above an agreed certain value) should be measured.
- Such an assessment, considering projections over a 25 year period, would be reasonable and, if no demonstrable benefit exists to support retention over that period, immediate disposal would be appropriate
- The assessment should ensure that the Council is getting the best value out of any property, whether it is retained or disposed of.
- Closer partnership working with District and Borough Councils over their local plans (especially for housing development needs) would assist decisions in respect of DCC land and property held for potential access or future development
- If a structured "asset assessment" facility is devised, this should also be applied, on a regular basis, to **operational** properties to give a continual appraisal of their requirement and suitability for purpose. Such an assessment, undertaken with the operational services' senior management, would keep a check on all property holdings and identify any surplus properties at an early stage.

Although out of the scope of this review, reference was also made to the concept of Corporate Landlord. This is the practice of placing *all* operational properties under the *total* management of a central point (eg the Director of Property Services) rather than each service head managing their own premises. The consolidation of property management, rather than a piecemeal approach, should make savings for the Council through pooling of resources and removing the burden (and cost) of responsibility from service managers. It was agreed that this should be considered further in consultation with the Director of Property.

**Recommendation** – *The Director of Property, in consultation with the Director of Finance and Director of Legal Services, develop a structured Asset Management system to assess each individual property (above an agreed appropriate value) against 25-year projections in order to measure best-value options for its future use or disposal,*

**Recommendation** – *The Asset Management system also be used to assess operational property on a regular basis to give a continual appraisal to its usage/requirement.*

**Recommendation** – *The concept of “Corporate Landlord” be explored further by the Director of Property in consultation with Strategic Directors and a report on this be brought to this Committee in due course.*



## 7. Legal Implications

The legalities of property ownership are embedded in the County Council's management processes. Any sales, tenancies or transfer of responsibilities are subject to legal procedures, for example, property sale conveyancing, tenancy agreements and contractual arrangements. The County Council has property law specialists in its Legal Services Division who work with the Director of Property to ensure the Council's properties were managed legally and that the interests of the Council were protected.

In respect of this review, there were two specific areas which were of particular note. These are;

### 7.1 Property Held "in Trust"

As discussed earlier in this report, some property has passed into the ownership of the County Council via bequests from individuals. Usually, such property is given to the Council with provisions that the Council must act as custodian on behalf of the public. This is often to ensure that public access to land is maintained, that private development is prevented, or that the property is retained for a particular use. Whilst the County Council has undertaken a moral obligation in these cases, management and maintenance of such properties does incur costs. The Director of Property was, therefore, considering alternatives for the future of these types of "in-trust" holdings.

Providing the previous owners' reasons for donating their property to the County Council were protected, the working group considered that it could be beneficial to transfer the management of these properties to third parties and this should be investigated further by the Director of Property and the Director of Legal Services in each individual case.

**Recommendation** – *The disposal of property held by the County Council "in trust" is supported, providing the previous owners' wishes and intentions, when originally donating the property to the County Council, are protected.*

### 7.2 Leasing of individual Dwellings

The concept of leasing arrangements for dwellings owned by the County Council, which would transfer the management, maintenance and use of residential property to a housing organisation in exchange for a rental income, has been referred to earlier in this report.



The working group is keen that the potential of this is considered further and this will form a recommendation of this review.

The Director of Legal Services was informed of the working group's interest in this approach and was invited to submit his opinion on the concept.

Based on the information initially provided by Derbyshire Dales District Council, the Director of Legal Services considers that letting properties to a Housing Association, or similar organisation, could be advantageous to the County Council. The County Council would retain ownership, would receive a revenue income and have the property renovated and maintained to meet the "decent homes" standard.

The County Council's interests would need to be protected by conditions set out in a lease for each property. Proposed improvement works could be documented either by way of an *agreement for lease* (if works were to be carried out before completion of the lease) or *under licence* to carry out works following completion. There would be a provision in the lease to allow subletting on a short term residential basis to facilitate the property being let to tenants by the Housing organisation.

Before entering into such arrangements, however, the County Council should consider the following points further;

- What figure would each individual property be likely to achieve if sold at the present time?
- How much added value is an upgrade likely to achieve on each property?
- What rental income could be expected from the Housing organisation for each property?
- What are the County Council's legal and other costs in respect of managing the lease of each property?

The latter point, especially, should be considered carefully as a saving in the Director of Property's budget might be offset by increased costs for the Director of Legal Services and/or the Director of Finance's budgets. All 3 Directors should therefore have an input into any such proposals.

However, the working group proposes to recommend that, once the answers to these questions are determined, and there still remains a benefit to the County Council, this opportunity should be taken up with the appropriate housing organisations wherever possible.

## 8. Review Conclusions

The review working group has considered the implications of proposals to streamline the County Council's non-operational property holdings.

Members acknowledge the need to reduce revenue expenditure, particularly in consideration of the level of budget reduction recently imposed on the Council for the forthcoming years. The need to protect frontline services, whilst making these budget reductions, is of paramount importance to the Council.

The review working group therefore supports the Director of Property's endeavours in identifying those property holdings which are not currently used for service provision and arranging for their disposal.

However, it is also considered that, in order for this process to effectively contribute to budget savings, each property should be scrutinised to ensure that the best possible value-for-money is obtained. This can either be achieved through outright disposal through sale, or by transferring management responsibility to a third party (for example, a community group or social housing provider).

The local knowledge of each County Councillor has been applied during this review. Every Member has been asked for their opinion on the future of those properties in their electoral division which are considered surplus for the purpose of direct service provision. The working group has received their input and, where they support transference to a third party or retention for a local use, the review working group will be recommending that the Director of Property considers local Members' concerns and suggestions further, prior to making a final decision on each property.

In respect of the properties which are suitable for domestic housing, the working group is mindful of the current housing market situation. Outright sale at the current time, whilst making immediate savings on maintenance and management costs, may not offer the best possible capital receipt. With national house price indicators predicting a recovery in the housing market over the next year or so, it may be prudent to retain ownership of such properties until the value increases.

The opportunity of leasing these properties to housing organisations for the purpose of social housing should be pursued. The concept offers many benefits – the retention of capital assets for the County Council (but without managerial costs and responsibilities), an increase in the local social housing stock and closer partnership working with District/Borough Councils and their housing provider partners.

## **9. Recommendations**

The review working group Members make the following recommendations which the Improvement and Scrutiny – Resources Committee is asked to accept and refer to Cabinet for approval and implementation of the proposals;

- 9.1** The proposal to dispose of the County Council's non-operational property holdings is supported, subject to the additional recommendations of this report.
- 9.2** The Director of Property liaises with local Members who have expressed concerns, or offered suggestions, in respect of those properties which are deemed to be surplus within their Divisions and report back to this Committee on the outcomes of their discussions.
- 9.3** The Director of Property, in consultation with the Director of Finance and Legal Services, pursues the opportunity to dispose of appropriate properties to social housing providers.
- 9.4** The Director of Property liaises with the county's District and Borough Councils and other public sector organisations to adopt a partnership approach to the future of the County Council's non-operational property, whether for housing or other uses.
- 9.5** The Director of Property, in consultation with the Director of Finance and Director of Legal Services, develop a structured Asset Management system to assess each individual property (above an appropriate value) against 25-year projections in order to measure best-value options for its future use or disposal,
- 9.6** The Asset Management system also be used to assess operational property on a regular basis to give a continual appraisal to its usage/requirement.
- 9.7** The concept of "Corporate Landlord" be explored further by the Director of Property in consultation with Strategic Directors and a report on this be brought to this Committee in due course.
- 9.8** The disposal of property held by the County Council "in trust" is supported, providing that the previous owners' wishes and original intentions, when donating the property to the County Council, are protected.

## **APPENDIX 1**

### **INFORMATION FOR OWNERS OF EMPTY PROPERTIES (WATERLOO HOUSING)**

#### **The property owner will agree to:**

- Lease the property to Waterloo Housing Group for a period of 6 years.
- Obtain permission for the lease from any lender with a charge on the property.
- If you lease a flat, you will also need permission from the freeholder.

#### **Waterloo Housing Group will:**

- Carry out agreed works to bring the property up to a let-able standard.
- After completion of these works let the property at an Affordable Rent on a fixed term tenancy.
- Pay to the owner an agreed rent on a monthly basis.
- The rent will be reviewed on a yearly basis.
- Maintain, manage and insure the property during the term of the lease (a deduction will be made to cover this cost).
- Pay its own legal fees in relation to the lease and will pay a reasonable and agreed sum to cover the owners legal fees.
- At the end of the lease return the property to the owner in good condition subject to fair wear and tear.
- Rents – these will be agreed after advice from an independent valuer but are likely to be in the region of:
- £250 per month for a 2 bed property
- £300 per month for a 3 bed property

#### **Benefits to you:**

- You will receive rental income on a property that otherwise would be vacant over 6 years. Based on a 2 bed property this could be up to £13,800
- You won't have to pay out for maintaining and insuring the property during the length of the lease. Certain aspects of the lease may vary if you have a flat

- The property will be let and managed by our local housing team based in **\*\*LOCATION\*\*** and they will deal with any issue which might arise.
- On termination of the lease the property will be returned to you with up to £10,000 worth of improvements.
- The improvements made to the property may increase its overall value.

## APPENDIX 2

### Properties which are to be considered further at the request of local Members.

The following properties have been referred back to the Director of Property following consultation with local Members during this review. The Director has been requested to supply more information to the Members, and/or consider their suggestions, prior to a decision being taken on future use or disposal. (UPRN is Unique Property Reference Number).

	UPRN*	Local member	Property/land
1	2699	Cllr Paul Smith	Former Swanwick Colliery site
2	1008	Cllr Paul Smith	Somercotes Infant School House
3	4517	Cllr Paul Smith	Land at Hall Street Alfreton
4	4184	Cllr Celia Cox	Land at Hands Road Heanor
5	2576	Cllr Jim Coyle	Land at Broadmeadows
6	3304	Cllr Jim Coyle	Reserved school site, Kirkstead Rd Pinxton
7	1253	Cllr Mike Longden	Rowsley School House
8	1568	Cllr Mike Longden	Greenway Centre
9	4025	Cllr Mike Longden	Storage land, Bakewell Rd, Matlock
10	0023	Cllr Andrew Lewer	Land at Sudbury
11	1791	Cllr Andrew Lewer	Mayfield Rd Ashbourne
12	2600	Cllr Andrew Lewer	Clifton Rd Ashbourne
13	2770	Cllr Andrew Lewer	St John's St. Ashbourne
14	2891	Cllr Andrew Lewer	Land at Snelston
15	2931	Cllr Andrew Lewer	Dovedale Avenue, Ashbourne
16	2936	Cllr Andrew Lewer	Clifton Rd Ashbourne
17	3353	Cllr Andrew Lewer	Mayfield Rd Ashbourne
18	4319	Cllr Andrew Lewer	Land at Kniveton
19	4391	Cllr Roland Hosker	73/75 Regent St Long Eaton
20	2553	Cllr Damien Greenhalgh	Brookfield Industrial Estate
21	2587	Cllrs Dunn, Lauro, Bambrick & Southerd (submitted joint comments)	12 Vicarage Rd Swadlincote
22	2102	As above	Land at Ryder Close
23	2918	As above	Former Church Gresley Colliery
24	3241	As above	Land on A444
25	3413	As above	Land at Nelson St Swadlincote
26	3512	As above	Hillside tanker turning area
27	4336	As above	Quarry adjacent to UPRN 3512
28	3560	As above	Land at Mount Pleasant
29	4218	As above	Traveller site
30	4442	As above	Park Road tree plantation, Newhall
31	2827	Cllr Celia Cox	Land at Nottingham Road Codnor

<b>32</b>	Not stated	Cllr Beth Atkins	Mousley Bottom Tree Scheme
<b>33</b>	4010	Cllr Beth Atkins	Bus turning circle New Mills
<b>34</b>	3371	Cllr Beth Atkins	Sett Valley Trail area