



**Townhill Park Regeneration
Report of Consultations held in September 2012
Southampton City Council**

Townhill Park Regeneration Report of Consultations held in September 2012

1 Background and Previous Public Consultations

Work on the Townhill Regeneration Framework took place between July and January 2011-12. A series of public meetings were held during the study's development and local residents within the study area commented on and helped to shape the proposals.

The results of those consultations are contained in the report 'Community Involvement Statement' which has accompanied the Townhill Park reports to Cabinet and is available to the public.

2 Background to the September 2012 Public Consultations

The September 2012 consultations were carried out, by Southampton City Council, as part of the further development and evolution of the regeneration project. The meetings were arranged with local residents to cover a range of specific areas for consultation.

3 Process and Method of the Consultations

In August letters were sent to all residents, both in the study area and adjacent updating them on the Master Plan approval process of the Council. This included reference to public consultation meetings to which residents would be invited.

A leaflet followed delivered to each address both in the study area and to SCC residents who live adjacent to Townhill Park inviting them to the drop in meetings on 18th and 22nd September 2012 at Townhill Community Centre on Meggeson Avenue.

Separate invitations were sent to residents whose addresses are in Phase 1 setting out the proposals in accordance with the requirements of Section 105 of the 1985 Housing Act, seeking their comments and in addition inviting them to meetings on 11th and 15th September 2012 at the Townhill Community Centre.

The meetings were organised and staffed by Council officers and included a display of the Master Plan and various aspects of the regeneration proposals.

Visitors were encouraged to sign in and to fill in a questionnaire. The questionnaire contained 4 statements about project (see Appendix 1 Tables 1-3) and a section to leave additional comments.

In addition visitors were given the opportunity to leave comments on a board covering 'General Comments' and a board concerning the 'Proposed Link Road from Townhill Park to Cornwall Road at the junction of Litchfield Road.

4. Analysis of the Results of the Consultation

The information resulting from the meetings has been analysed by Council officers and the results are contained in this report.

Information has been analysed according to each meeting. Comments were received in a variety of ways:

- in the comments section of the questionnaire,
- on the 'Proposed Link Road Board' by 'Post it' note and
- on the 'General Board' by 'Post It' note

In order to analyse the vast array of comments they have been categorised by type and fall into 13 categories. (See Appendix 2 Key to Type of Comments).

Comments recorded do not relate to the number of people but the number of comments collected under each category. Also since people could make comments in a variety of places a person may have made the same comments in more than one place. The number of comments under any heading gives an indication of their importance to people at the time of attending these meetings.

Categories 1-7 are based on the Townhill Park themes agreed by residents working with the consultants on the Master Plan and categories 8-13 are based around the additional main themes emerging from the comments

5. Phase 1 Statutory Consultation (Section 105 Housing Act 1985)

Prior to scheme approval for the redevelopment of Phase 1 the Council as landlord must carry out statutory consultations with individual residents affected by Phase 1 proposals for redevelopment. Consultation depends on the points raised being *considered* before a decision made.

The consultation with Phase 1 residents has principally taken 3 forms:

- A letter to all Phase 1 SCC tenants and all leaseholders
- Visits by Tenant Liaison Officers to SCC Tenants homes
- Invitation to all Phase 1 residents to attend 2 drop in sessions on the 11th and 15th of September 2012
- Invitation to visit leaseholders who live in homes include in Phase 1

The Phase 1 statutory consultations with tenants included a letter to all tenants setting out the intention to redevelop their homes. In addition, and in order that tenants are fully aware of the proposal, visits were carried out by the Tenant Liaison Officers (TLO's).

6. Results of the TLO Visits

All 136 properties in Phase 1 were visited by the TLO's and leafleted with information. This included details of the 4 public consultations meetings to which Phase 1 tenants were welcome to attend and also a telephone number to ring to discuss any queries/information.

The TLO's were able to speak in person to 90 tenants out of the 115 total of Council tenants. Discussion with tenants includes the following topics:

- What redevelopment means including ensuring that tenants realise this includes demolition and that they will have to move
- How the process works; including examples of other Estate Regeneration projects and what has happened with tenants
- Likely timescales
- Financial information including home loss and disturbance allowances
- Options for moving including disturbance allowance or tailor-made removal service
- Priority points allocation and how to use Homebid
- Any questions

The following figures give details of the TLO consultation.

Tenure Characteristics	Number
Number of properties with Council tenants where information has been posted/handed to tenants by the TLO's	115
Number of Council Voids	6
Number of Leaseholders	15
Total	136

Phase 1 TLO Consultation	
Total Number of Council tenants seen and talked to about the redevelopment by the TLO's	88
Additional number of tenants who attended the Phase 1 public consultation	2
Total	90

Results of the face to face meetings	
Total number of tenants that have been visited by the TLO's or attended the Phase 1 consultation only	90
Number of tenants who do not agree with the proposal and do not want to move	3

Number of tenants that are unsure about the proposal and moving	2
Number of tenants who have stated that they are in agreement with the redevelopment and would be agreeable to move	85
Number of tenants who have received information but chosen not to make contact with the TLO's	25

74% of the 115 Council tenants accept the redevelopment of their homes and would agree to move.

25 Council tenants have not discussed the proposals with the TLO's. When comparing these consultations with the same stage carried out at Weston, these consultations have been fuller. Once the Weston redevelopment was agreed and further TLO meetings were held with all tenants around the details of the decanting only a small number were found who did not want to move. This gives an indication that it is unlikely that many of the 25 who have not contacted the TLO's will have objections.

No written representations have been received from SCC tenants.

7 High number of tenants that would like to Decant to Townhill Park/Bitterne

A high number of tenants visited (27 out of 90) wanted to decant within Townhill Park or Bitterne. The desire to remain in the area is higher than in previous Estate Regeneration TLO consultations. The main reasons given were the good schools, pre-schools, family nearby and access to work.

The high number wishing to remain in the area during redevelopment may pose problems in finding suitable decant accommodation which is dependent on what becomes available through 'Homebid'. The affect on Phases 2 and 3 may need early consideration.

8 Interest in the Option to Move back to Townhill Park

The chance to move back to Townhill was well received by tenants. Tenants understood that this may take 3 or 4 years before the offer of a return can be made. On the whole they did not expect to move back but were happy that consideration is being given to this aspect.

9 Affordable Rent

The TLO's explained the principle of Affordable Rent and that this would apply to new build properties in Townhill Park. The TLO's found that people have an expectation that Council rents will be going up to be equivalent to other social landlords and the market.

10 Interest in the wider Estate Regeneration improvements

Tenants visited were not particularly interested in engaging or commenting on the wider aspects of the Townhill Park improvements. The TLO's were not sure if this was because these tenants saw themselves as leaving the area for a number of years and therefore it was not relevant to them.

11 Phase 1 Leaseholders

There are 15 leaseholders in Phase 1. Leaseholders have received a letter informing them of the proposals and those who live in Townhill Park will be offered a visit which are currently being organised. There has been no response received from leaseholders to the letter sent to them.

A meeting has been offered to the 5 leaseholders who live in their homes currently affected by the Phase 1 proposals. It is not practical to visit all leaseholders as the remainder do not live in the address they own.

12 Phase 1 Public Consultation Meetings 11th and 15th September

Residents in Phase 1 were invited to attend 2 drop in meetings to view the Master Plan proposals and to discuss aspects of Phase 1 with Council officers including whether they were in favour of redevelopment of their home. In addition their views were sought about the idea of the link road between Townhill Park and Cornwall Road at the junction of Litchfield Road.

13 Results of the Phase 1 Public Consultation Meetings (11 and 15th September)

Analysis of the Questionnaire 4 Statements (Phase 1 Meetings)

A total of 36 residents attended the meetings. The low number is possibly a reflection of the success of the visits from the TLO officers to residents' homes and that residents felt that they had sufficient information already.

30 questionnaires were completed and Appendix 1 Table 1 shows that there was majority support for all 4 areas questioned: the vision and physical proposals being a benefit to the area and support for the road proposal and proposals for the use and replacement of open space. There were few negative responses, the greatest number being 8 not in favour of the road connection and 2 not in favour of the open space statement.

Analysis of the Comments on the Questionnaire's (Phase 1 Meetings)

Although 30 questionnaires were completed many of these did not contain additional comments. A fuller analysis of the all comments received at the 4 meetings is contained in a later section of the report.

14 Results of the Public Consultation Meetings on 18th and 22nd September 2012

171 residents were recorded as attending the consultation of 18th September 2012 and 128 residents were recorded as attending the consultations of 22nd September 2012.

Analysis of the Questionnaires 4 Statements

171 questionnaires were received from the consultation on 18th September 2012 and 128 questionnaires from the meeting on 22nd September 2012.

The result of the answers to the 4 statements is shown in Appendix 1 Tables 2 and 3. The results are very different from the Phase 1 meetings. As expected there is little support for the proposed road link with 99 and 109 (198 total) residents disagreeing with the proposal opposed to 8 and 23 (31 total) in support.

Figures for the other statements are as follows:

- the vision benefiting the area 59 and 77 (136 total) agree with 50 and 19 (69 total) disagreeing.
- The physical proposals benefiting Townhill Park 60 and 61 (121 total) agree with 45 and 36 (81 total) disagreeing
- The proposals for the use and replacement of open space being an improvement 47 and 50 (97 total) agree and 61 and 49 (110) disagree.

Although the vision and the physical improvements received more support than disagreement the results show a marginal lack of support for the statement that the proposals will improve open space.

This is believed to be largely due to the opposition to development on Frog's Copse and also to some extent on the grassland west of Hidden Pond. The proposal for development on these sites is still subject to further technical study before any decision can be made whether to take these forward.

Analysis of the Comments on the Questionnaire's

Many comments were received on the questionnaires from the meetings on the 18th and 22nd September 2012. An analysis of the comments received is contained in a later section of the report. Again the majority of comments received were against the 'Proposed Link Road' – 56 and 64 (120 total).

Analysis of Comments on the 'Proposed Link Road Board' 18th and 22nd September 2012

The table below shows the results of the 112 comments posted on the 'Proposed Link Road Board at the 2 meetings.

Type of Comment	Sat 18th Sept 2012	Sat 22nd Sept 2012	Total
Against the link road	51	57	108
In favour of the link road	1		1
Against opening Cutbush Lane	2		2
More parking at Junior School	1		1
Total Number			112

Analysis of Comments on the 'General Board' 18th and 22nd September

In order to achieve consistency all comments have been categorised under the types of comments categorisation.

A full commentary on these is included later in the report. However, the majority of comments received were around the 'Proposed Link Road and 'Opening up vehicular access to Cutbush Lane'.

14 and 17 (31 total) comments were received against the 'Proposed Road Link' and 16 and 8, (24 total) comments against opening up Cutbush Lane to vehicular traffic with only 1 in favour. The results again show that the vast majority of comments are against either road proposal.

15 Local Residents View as Reflected in the Comments Received at all 4 Meetings

This section of the report gathers together all comments made by residents at the 4 consultation meetings. The analysis of the ticks on the questionnaire statements is a separate document

The analysis carried out is by type of comment and not by the number of people who left a comment. The number and diversity of comments was extensive and so they have been categorised by subject type in order to facilitate analysis.

Comments have been sorted into the following type categories:

- 1-7 are based on the Townhill Park themes agreed by residents working with the consultants on the Master Plan
- 8-13 are based around the additional main categories emerging from the comments. Some of these would fall into 1-7 above but as 1-7 are general where there are a number of specific types of comments they have been given a separate category under 8-13 e.g. Frog's Copse, Proposed road link at Cornwall Road and Cutbush Lane.

Where comments received on an issue were few in number the issue is noted, but only further investigation with residents would establish whether the view is more widely held.

16 A fantastic community heart accessible for all (1)

It was difficult to select comments which could clearly fall into this category. Comments tended to be made in connection with shopping or proposals for Meggeson Avenue. The few comments received about the shops did not clearly show whether there was greater support for new shops and a new community heart located in the proposed new location or keeping the shops where they are currently. Also the few comments made about the new 'village green', which would be a focal point of the new community heart were made in the context of the traffic calming measures on Megesson Avenue.

17 Successful local shops and community facilities (2)

14 comments were received around this theme. A couple of people suggested that there was no need for the new 'village green' which relates to the community heart theme and one person suggested that it could be located opposite the existing shops. A couple of comments related to the poor state of the Ark pub and that it would be a good thing for it to be redeveloped and a new shopping centre provided.

A few comments concerning the existing shops suggested that they were expensive and opening hours restrictive. A comment asked how we would ensure that new shops would be successful.

Only a couple of comments were received concerning the community centres. One did not use Moorlands Community Centre and the other felt that Townhill Community Centre was inadequate if Moorlands was not available.

One comment expressed concern that there were no activities for young people in the area.

18 Healthy and well-designed socially rented and private homes that address a variety of needs with as many homes 'on the ground' as possible (3)

19 comments were received around the topic of housing. Several were in support of providing new affordable housing. These could be linked to several general comments that were made in support of the regeneration of the area.

A small number of comments asked for proposals for Rowlands Walk to be carried out earlier in the programme.

Several comments expressed concern about the proposed small redevelopment site at the end of Roundhill Close either as a loss of garages or providing increased local traffic.

A couple of comments request family accommodation to be located on the ground floor with easy access to open space.

There is concern from a number of residents on the Midanbury boundary with Townhill Park about the detail and height of new blocks.

19 A transformed park and wonderful local greens and play spaces (4)

20 comments were received around this theme. There is majority support for improving green space and providing more facilities for children and young people. However, residents do not want play areas outside their homes and do not want them located near roads. There were also comments in support of local wildlife and concerns that the proposals would adversely affect them.

Linked to open spaces are the sections on Frog's Copse and Hidden Pond.

20 Greater social and economic opportunities (5)

Residents did not really make comment around this theme. There were however, some concerns expressed around lack of facilities for young people and anti social behaviour around play area and shops.

21 Meggeson Avenue a safe and attractive public space with improved crossings (6)

10 comments were received concerning traffic calming and making Meggeson Avenue an attractive public space. There was support for traffic calming, but the impression from the comments is that a minimum treatment would satisfy. It is likely with the limited information provided by the Master Plan that residents do not have sufficient information to picture what traffic calming and improvement measures would look like.

Again the idea of diverting Meggeson Avenue round the new 'village green' may require further work to test how people really feel about this idea and that of the new community heart.

22 Better walking, cycling and public transport connections locally and to the rest of the city (7)

12 comments were received around this topic. There was encouragement for the importance of improving walking and for traffic calming in other roads in addition to Meggeson Avenue. There was acknowledgement of the

importance of the walking routes in the area and the connections they make not only in Townhill Park but to areas round about e.g. Moorlands School, Midanbury and Haskins.

The few comments received concerning the buses were around how the service was sufficient but not reliable.

23 Proposed Link Road form Townhill Park to Cornwall Road and Litchfield Road (8)

Number of Comments received on the Proposed Link Road from Townhill Park to Cornwall Road		
Comments For	0	
Comments Against	269	

The majority of residents attending the meetings are against the proposed road link. In addition to comments made the Council received a petition on 17th August 2012 signed by around 200 people and has also had numerous letters of objection.

The comments against the proposed road are many and various and can be summed up in the following e-mail received from a resident:

'We understand that the regeneration of the Townhill Park Estate is an important large scale project for the council and we largely support what you are trying to achieve. However, we hope by now that you understand more clearly just how opposed to the link road the residents of Midanbury are. To summarise the points made by our petition, emails, letters, phone calls and attendances at the two consultations:-

1/ the proposed new road is not needed to make the scheme viable, either socially, financially or for any improvement in traffic flow.

2/ The new road is there only as a planning nicety especially given the fact that within 200 metres of the proposed new road is Wakefield Road, which currently does, and can continue to, carry traffic between Townhill Park and Midanbury perfectly adequately.

3/ In addition to being a huge waste of public money, the new road will not improve anything for Townhill Park residents nor anything for Midanbury residents but only worsen the situation of anyone living anywhere near to the new road.

4/ Three people are to forcibly lose their homes, against their wishes, to make way for a new road which is just an architect's "nice to have". Would you like to lose your home in this way?

5/ Increased volume of traffic – will become a "rat run".

6/ Increased danger to pedestrians, children, pets etc. This area is used a lot by school children.

7/ Increased danger at several road junctions, especially at the top of Litchfield Road. This is already a really dangerous road junction, and it does not make sense to put more traffic into this junction. Bear in mind that Tesco intend to develop the Castle pub and this is a further cause for concern about this junction.

8/ Increased danger when the steep hill becomes icy. Litchfield Road is on the north side of the hill, and when it is icy or snows this road becomes unusable.

9/ More traffic noise.

10/ More exhaust fumes.

11/ Reduced property prices

12/ Litchfield Road is not strong enough to support heavy traffic. There will be problems with broken drains, and subsidence.'

24 Cutbush Lane opening up to traffic (9)

Number of Comments received on Cutbush Lane opening up to vehicular traffic		
Comments For	3	
Comments Against	56	

Those against the opening up of Cutbush Lane were very clear that it had been closed to prevent it being used as a rat run. Residents commented that when open it had been the scene of several accidents and residents cars being damaged by careless driving.

There was support for keeping it as a pedestrian route linking to the walkway network in the area, which provides safe and pleasant routes for school children, walkers, cyclists and horse riders.

25 Frog's Copse (Site 19) (10)

Site 19 Development on Frog's Copse		
Comments For	0	
Comments Against	29	

29 comments were received against the idea of developing on Frog's Copse. The majority of those objecting to the proposal live in the area north and west of Frog's Copse. The main objections include those on the grounds of:

- Loss of wildlife and ecologically valuable habitat
- Loss of views and peace

- Increased traffic on unsuitable roads

The Master Plan acknowledged that consideration of the idea of developing on a small section of Frog's Copse would be dependant on the outcome of further ecological work and consultation. The ecological work is currently underway and no decision will be made regarding Frog's Copse until this information is available and can be considered.

26 Hidden Pond (Site 25) (11)

15 comments were received about the development idea west of Hidden Pond on Site 25. 13 comments were against the idea and 2 were pointing out that it may not be possible for ecological and drainage reasons.

Those comments against were around either its loss as an open space/ecological area, spoiling the views of adjacent housing and causing unwanted increased traffic.

27 Improve parking (12)

18 comments were received concerning car parking. Most comments were raising the concern that there is already insufficient parking and that it is felt that the redevelopment will make matters worse. A comment was received that there is no disabled parking.

The problems of parking around the school hub was raised.

28 Other (13)

48 comments fell into the general area as they were difficult to place in any particular theme. They included the following:

- Woodmill requires traffic improvement
- There is not sufficient information about the detail of the regeneration and the timescales and it is taking too long
- There were several comments in support of the regeneration and others saying that it benefited Townhill Park but not the surrounding areas or private householders and several comments expressed concerns that property would be devalued.

29 Analysis of where residents live who attended the consultations

From the data provided it was possible to carry out an analysis of where in the local area residents who attended the consultations live. Within Townhill Park it was possible to make a good assumption whether they were private or Council tenants. This analysis is likely to contain a small degree of error, but

does show where the majority of people attending the consultations live. See Appendix 3 for the table showing the analysis of where people live.

It is estimated that 194 residents who attended the 2 wider consultation meetings were from outside the Townhill area and of these 137 were from the Midanbury area. This is not unexpected given the strength of feeling against the proposed road link.

It is estimated that 141 residents attended the consultation meetings from within the study area. The vast majority of the 36 residents attending the Phase 1 meetings were SCC tenants (31 out of 36).

In the other 2 wider meetings it is estimated that 21 of the 29 and 16 out of 39 attending from within the Townhill study area were SCC tenants.

Although there has been a wide spread attendance at the 4 meetings it appears that, apart from Phase 1, there is still an under-representation of SCC tenants. However, there was support from SCC tenants for the wider aspects of the Master Plan during the previous consultations carried out and contained in the Community Involvement Statement in Appendix 1 of the Townhill Park Regeneration Framework document.

Conclusions

30 Phase 1 Statutory Consultation

All tenants in Phase 1 have received the statutory information regarding the redevelopment of their homes. In addition to this the majority have received a visit or attended the consultation meetings and received information from Council officers. Leaseholders have all received the required statutory information and in addition those living in Phase 1 have been offered a visit.

The majority of SCC tenants have agreed to the Phase 1 redevelopment and there have been no comments received from the leaseholders.

31 Wider Public Consultations 18th and 22nd September

The wider consultations were attended by a wide range of local residents. The major focus was the issue of the proposed link road to Cornwall Road. Other areas of interest were Frog's Copse, Hidden Pond and opening up of Cutbush Lane to vehicular traffic. The majority of comments received were against the proposed link road to Cornwall Road and against the opening up of Cutbush Lane to vehicular traffic.

Although there is some concern over Frog's Copse and Hidden Pond any further decision on these areas is awaiting the outcome of the additional studies including ecology which are still being undertaken.

There is support for improving green spaces and play, traffic calming and improving cycling and walking.

A measure of general support was received for the regeneration of the area and the provision of new affordable homes. However, there is concern that redevelopment will not meet parking provision needs.

There was not strong opinion on the shopping proposals nor the idea of the 'village green' and these areas will require further consideration as the phases in which they are proposed are considered in more detail.

APPENDIX 1

Townhill Park Public Consultation
11 + 15 September 2012
(Proposed Phase 1 residents)

	Strongly agree	Agree	Tend to agree	Total Agree	Tend to disagree	Disagree	Strongly disagree	Total Disagree	No response	Don't Know	Total Other
The vision for the future will benefit the Townhill Park community and surrounding areas	16	10	1	27	0	0	0	0	3	0	3
The proposed physical masterplan proposals would benefit Townhill Park	14	12	2	28	0	0	0	0	2	0	2
The proposal for the new street connection to Cornwall Road will improve road links to the wider area	4	11	7	22	3	0	5	8	0	0	0
The proposals for the use and replacement of open space will improve the physical environment	9	13	4	26	2	0	0	2	2	0	2

Table 1

**Townhill Park Consultation
18 September 2012**

	Strongly agree	Agree	Tend to agree	Total Agree	Tend to disagree	Disagree	Strongly disagree	Total Disagree	No response	Don't Know	Total Other
The vision for the future will benefit the Townhill Park community and surrounding areas	19	18	22	59	8	7	35	50	14	1	15
The proposed physical masterplan proposals would benefit Townhill Park	20	17	23	60	10	7	28	45	16	3	19
The proposal for the new street connection to Cornwall Road will improve road links to the wider area	13	8	2	23	8	6	85	99	1	1	2
The proposals for the use and replacement of open space will improve the physical environment	17	16	14	47	8	15	38	61	14	2	16

Table 2

	Strongly agree	Agree	Tend to agree	Total Agree	Tend to disagree	Disagree	Strongly disagree	Total Disagree	No response	Don't Know	Total Other
He vision for the future will benefit the Townhill Park community and surrounding areas	22	22	33	77	8	5	6	19	21	0	21
The proposed physical masterplan proposals would benefit Townhill Park	14	23	24	61	9	6	21	36	20	0	20
The proposal for the new street connection to Cornwall Road will improve road links to the wider area	4	2	2	8	10	10	89	109	0	0	0
The proposals for the use and replacement of open space will improve the physical environment	15	12	23	50	20	5	24	49	18	0	18

Appendix 2 Townhill Park Public Consultations

Key to Types of Comments Received

1-7 are based on the Townhill Park themes agreed by residents working with the consultants on the Master Plan

8-13 are based around the additional main themes emerging from the comments

1	A fantastic community heart accessible for all
2	Successful local shops and community facilities
3	Healthy and well-designed socially rented and private homes that address a variety of needs with as many homes 'on the ground' as possible
4	A transformed park and wonderful local greens and play spaces
5	Greater social and economic opportunities
6	Meggeson Avenue a safe and attractive public space with improved crossings
7	Better walking, cycling and public transport connections locally and to the rest of the city
8	Link Road from Townhill park to Cornwall Road and Litchfield Road
9	Cutbush Lane opening up to traffic
10	Frog's Copse (Site 19)
11	Hidden Pond (Site 25)
12	Improve parking
13	Other

Appendix 3

Analysis of Areas where Residents live who attended the Townhill Park Public Consultation

	Phase 1 residents	18 th Sept Residents	22 nd Sept Residents	Totals
In the Study Area	35	50	56	141
Cornwall Rd Area	0	82	55	137
Cutbush Lane Area	1	23	6	30
Frog's Copse Area	0	11	11	22
Other	0	5	0	5

Total number of residents attending all the public meetings from the study area	141
Total number of residents attending all the public meetings from outside the study area	194
Total	335

Analysis of Residents within the Study area by tenure

	Phase 1 meetings		18 th Sept meeting		22 nd Sept meeting	
SCC tenants	31		21		16	
Private tenants	1		0		0	
Leaseholders	2	4 Total	10	29 Total	10	39 Total
Insufficient information Most likely private owner/tenant	2		19		29	
Totals	36		50		55	

