

**APPENDIX 1**

**PROGRESS UPDATE: Review of Planning (Development Management) and Adoption of Open Space**

<b>SCRUTINY MONITORING – PROGRESS UPDATE</b>	
<b>Review:</b>	<b>Planning (Development Management) and Adoption of Open Space</b>
<b>Link Officer/s:</b>	<b>Simon Grundy</b>
<b>Action Plan Agreed:</b>	<b>March 2023</b>

Updates on the progress of actions in relation to agreed recommendations from previous scrutiny reviews are required approximately 12 months after the relevant Select Committee has agreed the Action Plan. Progress updates must be detailed, evidencing what has taken place regarding each recommendation – a grade assessing progress should then be given (see end of document for grading explanation). Any evidence on the impact of the actions undertaken should also be recorded for each recommendation.

<b>Recommendation 1:</b>	That options for introducing a charge for pre-application advice for major developments, but not for households/individuals, are investigated.
Responsibility:	Planning Services
Date:	July 2023
Agreed Action:	Wider Benchmarking of response time for charging and non-charging Authorities Consideration of cost of providing service to inform future service charges Consideration of appropriate service standards / charging rates Assessment of likely income generation Cost/Benefit Analysis of charging for service Some engagement with applicants and developers on potential charging
Agreed Success Measure:	Investigation complete and appropriate action taken
Evidence of Progress (March 2024):	The council does not need to provide pre application advice as it is not a statutory requirement, it is strongly encouraged in the National Planning Policy Framework (NPPF) and is often a way of minimising future issues within the consideration of a planning application. Equally the council cannot make a developer engage with the council prior to submitting a planning application.  Under Section 93 of the Local Government Act 2003, the Council is able to charge for providing a discretionary service, such as pre-application planning advice. However, the associated charges are only permitted to cover the costs of delivering the service

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and those charges should be reviewed on a regular basis. The council is not able to make a profit on providing this service.

Recently the Planning Advisory Service (PAS) have undertaken research and provided a report on 'Pre-application advice and Planning Performance Agreements (PPAs)' which offers advice on national best practice in Local Authority approaches to pre-application discussions (March 2023).

That research identified that pre-application advice is seen as a way of smoothing the application stage by 'frontloading' the application and identifying constraints early to enhance the future quality of any planning application.

It was identified that the majority of local authorities offer and engage in pre-application advice although recently some councils had suspended or offered a reduced service due to resourcing challenges and prioritising resources to deal with planning applications, which includes those who charge for such services. At Stockton we have continued to offer and respond to pre-application enquiries despite resource pressures and have instead advised of delays in issuing responses.

PAS research also highlights frustration in the inconsistency of approach across LPAs in England given services range from informal service which tends to include a brief email exchange to a written response or a structured meeting. Equally developers didn't want to see unnecessarily long responses with regurgitated policy responses.

The PAS research identifies that approximately 30% of LPAs provide some form of free pre-application advice service and where fees were to be charged these are typically calculated on either;

- The scale of the development proposed
- No. of staff involved; or
- A combination of scale and staffing involved.

With regards to calculating the cost of the pre application services the PAS research highlights frustration at the inconsistency and variation in pre-app fees. PAS also comment on a lack of transparency over the cost of fee calculation.

#### **Benchmarking;**

Figures 1 and 2 below show pre-app benchmarking with neighbouring authorities and those with a similar population size to Stockton on Tees, with figure 1 being the original evidence provided and figure 2 being additional benchmarking evidence.

#### **Figure 1: original benchmarking for pre-app charging**

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PRE-APP CHARGING COMPARISON					
	Pre-app Service provided	Charges	Fees	Response Timeframes	Other
Stockton on Tees	Y	N	N/A	15 days	-
Gateshead	Y	Y	Householder: £26-£41 Minor: £46-£206 Major: £1030-£2060 Other: £52-£207	30 – 40 Days 15-25 days 25 Days 25 Days	Concessions for adaptations for disabled; registered charitable organisations and internal council funded projects.
North Tyneside	Y	Y	Householder: £50-£100 Minor: £200-£500 Major: £1800-£3500 Other: £60-£207	15 Days 15 Days Agreed individually 15 Days	No charge for listed buildings
North Lincolnshire	Y	Y	Householder: £50 Minor: £160 Major: £1200-£3600 Other: £160	Not specified	Concessions for adaptations for disabled; registered charitable organisations; Parish and Town Council schemes, listed buildings and council funded projects.
Blackburn with Darwin	Y	Y	Householder: £0-£360 Minor: £0-£565 Major: £1130-£4240 Other: £32-£94	28 days, or within 10 days of an arranged meeting.	If no pre-application advice has been sought or <u>taken into account</u> in a subsequent planning application, it is likely to be determined as submitted.
Darlington	Y	Y	Householder: £36 Minor: £50 -£400 Major: £600-£1200 Other: £25-126	within 6 weeks	No charge for listed buildings
M'Bro	y	N	N/A	N/A	
Hartlepool	Y	Y	Householder £55* Minor £158 - £427 Major £396 - £3168 Other £158- £427	15 days* 15 Days 25** 15 Days	*Optional 'fasttrack' service with a fee of £79 is offered. With 5 working days response time. ** Large scale majors subject to separate agreement
Redcar	Y	N	N/A	N/A	Advised that enquires <b>do not</b> take precedence over fee paying applications.

Figure 2: Further pre-app benchmarking

LPA	Charge for pre-app	Majors – app charges	Info	Response time
Barnsley	Yes	£750-£1500	Informal advice offered without <u>prejudice</u>	Within 28 days
Lancaster	Yes	Residential - £768 - £3960 Non residential - £355 - £2960	4 different engagement levels <u>inc</u> forum informal advice offered without <u>prejudice</u>	Within 4 – 5 weeks
Preston	Yes	£1500 - £2000	informal advice offered without <u>prejudice</u>	4 – 5 weeks
South Tyneside	Yes	£1369 - £2052	informal advice offered without prejudice	Within 28 days (reference majors may take longer)
York	Yes	£1900 (10-25 dwellings) £76.80 per units above 25 £3300 for major non residential	informal advice offered without prejudice	Within 20 working days

#### Costs assessments

Based on the PAS evidence highlighted above, it is considered in setting any associated pre-application advice fees for major developments then the most appropriate mechanism would be to define the scale of development and cost of the staff involved in providing that advice.

In processing a typical major pre-application enquiry it is anticipated that the following level of officer time would be required

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	Staff	Time spent (hrs)	Hourly rate	Cost
	Planning Support Officer	1	£30	£30
	Case Officer (Principal Planning Officer)	6	£50	£300
	Highway Engineer	3	£50	£150
	Lead Local Flood Authority	3	£50	£150
	Environmental Health	1	£40	£40
	Urban Design	2	£40	£80
	Landscape Officer	2	£40	£80
	<b>Total</b>			<b>£830</b>
	<p>In view of the above circumstances it is anticipated that the cost of providing pre-application advice from major planning applications would equate to approximately £830 per application</p> <p><b>Service standards</b>                      In terms of introducing service standards and maintaining the council's reputation, with the introduction of charging for pre-application advice it is reasonable to assume that there would be expectations from the associated users of the pre-application advice service, that the service delivery would be high and responses (from all parties) would be on time, credible and reliable.</p> <p>It would therefore be necessary to ensure that internal statutory consultees have the capacity and are fully engaged in providing high quality responses within identified timeframes. Failure to do so would result in delayed responses or lack responses of a suitable standard to add real value to the pre-application process.</p> <p><b>Potential income generation</b>                      Based on information which categories the type of pre-app enquires, within the councils database, the table below shows the number of 'major' pre-application enquiries received over the last four years (and based on a potential charge of £830 per major pre-application enquiry) what the level of potential income could be. However, this assumes that all those enquiries would still have been submitted with a charging regime in place. However, it is assumed that there would be some drop in the number of major pre-application enquiry cases received.</p>			
		<b>Year</b>	<b>No Major application</b>	<b>Potential income</b>
		<b>2020</b>	<b>14</b>	<b>£11,600</b>
		<b>2021</b>	<b>14</b>	<b>£11,600</b>
		<b>2022</b>	<b>20</b>	<b>£16,600</b>
		<b>2023</b>	<b>9</b>	<b>£7,470</b>
Assessment of Progress (March 2024):	1 - Fully achieved			

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(include explanation if required)	<p>In deciding what is an appropriate course of action regarding charging of major pre-application enquiries, it is a balance between recouping costs associated with staff time vs the wider public and community benefits for seeking to secure inward investment and economic growth for the Borough.</p> <p>The Council’s approach has been and will continue to be one which seeks to positively engage with those with an interest in the planning system and to try and build positive professional relationships with developers, applicants and agents who wish to bring forward development proposals within the Borough. Currently pre-application advice is given in a range of formats depending on the nature of an enquiry and can include multidisciplinary meeting(s) all of which aim to ensure that good quality development proposals come forward.</p> <p>With regards to the overall quality and reliability of pre-application responses, given the limited resources within other departments, improvements would need to be seen from a number of internal consultees to ensure that responses are timely, accurate and meaningful to justify the associated charges and ensure genuine value to the process.</p> <p>Whilst the financial aspects of charging may not present a significant barrier, anecdotally many businesses, developers and agents welcome the opportunity to engage with officers without the potential financial burden and no given certainty over the quality of a pre-application response.</p> <p>Furthermore, on the 6<sup>th</sup> March 2024, government introduced a new consultation on delivering ‘An accelerated planning system’ which may look to curtail the use of extension of time agreements. The role of pre-application advise may therefore become all the more important in ‘front loading’ development proposals and ensuring that the planning application process operates as smoothly as possible. As a council we would therefore want to continue to encourage pre-application discussions.</p> <p>In view of the relatively limited financial return from introducing a charging regime for major planning applications (as well as the associated costs of monitoring and annually reviewing the associated fees) it is on balance considered that there is limited merit in pursuing a charging regime at this time.</p>
Evidence of Impact (March 2024):	NA

<b>Recommendation 2:</b>	That the current response time of 15 working days for pre-application enquiries is re-evaluated to determine if it should be extended.
Responsibility:	Planning Services
Date:	July 2023
Agreed Action:	Wider Benchmarking of response time for charging and non-charging Authorities Consideration of appropriate service standards / response times

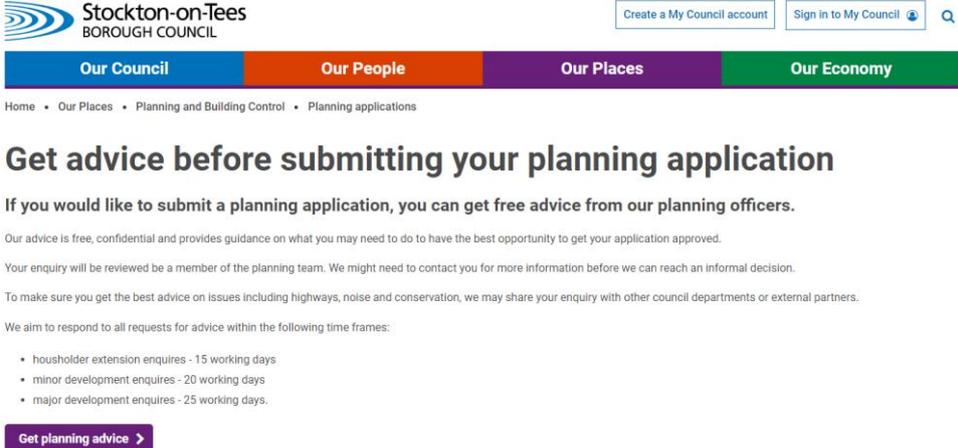
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		Consideration of above against SBC performance over last 5 years															
Agreed Success Measure:		Investigation complete and appropriate action taken															
Evidence of Progress (March 2024):	of	<p>Planning pre-application advice services is a free discretionary service which incorporates a range of requests from is planning permission required to requests for informal views on development proposals.</p> <p>Following a further review of other Local Planning Authorities approach to pre-application advice (see figures 1 and 2 above), regardless of whether authorities charge of the service or not, response times are typically between 3 weeks (15 working days) and 6 weeks (30 working days) with a larger amount of time being allowed for pre-application enquiries which are more complex.</p> <p>The council's 15 working day response time for all application type was therefore considered to be at odds with the wider range of local planning authorities approach to pre-application advice.</p> <p>Over the last five years Stockton Borough Council's average pre-application response times are shown below;</p> <table style="margin-left: 20px;"> <tr><td>2019</td><td>-</td><td>41 days</td></tr> <tr><td>2020</td><td>-</td><td>51 days</td></tr> <tr><td>2021</td><td>-</td><td>55 days</td></tr> <tr><td>2022</td><td>-</td><td>67 days</td></tr> <tr><td>2023</td><td>-</td><td>38 days</td></tr> </table> <p>The increased response times between 2020 and 2022 where largely as a result of the Coronavirus pandemic and staff shortages (whether through long term absence and/or vacancies).</p>	2019	-	41 days	2020	-	51 days	2021	-	55 days	2022	-	67 days	2023	-	38 days
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Assessment of Progress (March 2024): (include explanation if required)	of  if	<p>1 – Fully achieved</p> <p>In setting out timeframes from responses a key challenge is balancing out the need/desire for more realistic and increased response times to enable full consideration of enquires and to allow officers to balance out completing demands vs making responses time too great, so that it puts people off using the pre-application advice service. In some circumstances, it is instead expected that an application for planning consent would likely be submitted without any advice being sought. The latter having the potential to increase the amount of negotiation required during the planning application process.</p> <p>Rather than seek to introduce a single response time for all pre-application enquiries, it was felt to be more appropriate to introduce a new 'tiered' approach to responses times which would adequately reflect the complexity of the range of pre-application enquires received and also ensure the simpler enquires do not wait too long for a response.</p>															

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<p>Evidence of Impact (March 2024):</p>	<p>Following a similar approach to how planning applications are categorised it was therefore considered that breaking each response time down into ‘householder’; ‘minor’ and ‘majors’ was an appropriate way forward.</p> <p>The response time of 15 working days was considered to remain appropriate for householder enquires whilst allowing an extra week for a response time was appropriate for minor enquires, with a further additional week beyond that for major enquires.</p> <p>In view of those changes the Council’s website (A) has been updated accordingly with those changed timeframes along with the Planning Services shared inbox auto response (B).</p> <p>A</p>  <p>B</p> <p><b>PREAPPLICATION ENQUIRIES:</b> As our pre-application advice is a free discretionary service, priority is being given to determining planning applications. We will aim to provide responses to all requests for advice within the following time frames;</p> <p>Housholder extension enquires – 15 working days; Minor development enquires - 20 working days; Major development enquires - 25 working days.</p> <p>Unfortunately responses make take longer in certain circumstances, where responses are taking longer than those identified please contact the case officer in the first instance.</p>
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<b>Recommendation 3:</b>	That current planning enforcement powers are reviewed and the opportunity of employing an enforcement officer is explored.
Responsibility:	Planning Services
Date:	Sept/October 2023
Agreed Action:	Wider Benchmarking of approaches to planning enforcement of Local Authorities  Review of performance/approach based on temporary enforcement contractor

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	<p>Introduction of a Local Enforcement Plan setting out service standards/approach</p> <p>Cost/Benefit Analysis of employing dedicated planning enforcement officer.</p>																																										
Agreed Success Measure:	Investigation complete and appropriate action taken, (including potential recruitment if appropriate)																																										
Evidence of Progress (March 2024):	<p>As detailed within the original evidence provided, all of the neighbouring local planning authorities as have a dedicated planning enforcement officer. This is also common across the rest of the north east region, except where the resource may form part of a wider 'enforcement/regulatory control' service.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>DM Manager</th> <th>Team Leader</th> <th>Principal Planning Officer</th> <th>Senior Planning Officer</th> <th>Planning Officer</th> <th>Enforcement Officer</th> </tr> </thead> <tbody> <tr> <td><b>Redcar</b></td> <td>1</td> <td>-</td> <td>1</td> <td>1.5</td> <td>-</td> <td>1</td> </tr> <tr> <td><b>Hartlepool</b></td> <td>0.25</td> <td>1</td> <td>-</td> <td>3</td> <td>2</td> <td>1</td> </tr> <tr> <td><b>Middlesbrough</b></td> <td>1</td> <td>-</td> <td>2</td> <td>2</td> <td>1</td> <td>1</td> </tr> <tr> <td><b>Stockton*</b></td> <td>0.5</td> <td>-</td> <td>2</td> <td>-</td> <td>6</td> <td>-</td> </tr> <tr> <td><b>Darlington</b></td> <td>1</td> <td>-</td> <td>1</td> <td>-</td> <td>3</td> <td>1</td> </tr> </tbody> </table> <p>The temporary enforcement contractor was seen as being successful in introducing a dedicated resource and point of contact to address and investigate breaches of planning control.</p> <p>The benefits of repurposing a vacant planning officer role and re-introducing a permanent planning compliance role ensuring a dedicate resource and point of contact was therefore considered to offer an improved 'customer' experience. With the benefit of increases in productivity of responding to such planning compliance/enforcement queries. There was also deemed to be an added benefit of 'freeing' up some capacity of the planning officers to focus on planning applications and pre-application enquiries.</p> <p>The Local Enforcement Plan (LEP) has been completed and is attached for information purposes.</p>		DM Manager	Team Leader	Principal Planning Officer	Senior Planning Officer	Planning Officer	Enforcement Officer	<b>Redcar</b>	1	-	1	1.5	-	1	<b>Hartlepool</b>	0.25	1	-	3	2	1	<b>Middlesbrough</b>	1	-	2	2	1	1	<b>Stockton*</b>	0.5	-	2	-	6	-	<b>Darlington</b>	1	-	1	-	3	1
	DM Manager	Team Leader	Principal Planning Officer	Senior Planning Officer	Planning Officer	Enforcement Officer																																					
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Assessment of Progress (March 2024): (include explanation if required)	<p>1/2 – Fully complete/on track albeit some minor slippage re LEP's 'formal' introduction.</p> <p>As above the new Planning Compliance Officer role was created in July 2023, with the post being successfully appointed in August 2023 and the new officer commencing employment with the council in early October 2023.</p> <p>The Local Enforcement Plan (LEP) has been through its final draft and reviewed by CMT with their agreement being given to the content and introduction of the LEP.</p> <p>Following a review of the documentation and process associated with the planning compliance some additional minor changes have now been made to the LEP. The LEP is also being reported to planning committee on the 10<sup>th</sup> April 2024 with view to implementation date of the 1<sup>st</sup> June 2024.</p>																																										

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	<p>Alongside the drafting and introduction of the local enforcement plan, a review of the planning enforcement procedures has been undertaken with the introduction of some new process to aid consistency and prioritisation. Performance monitoring measure for of the identified service standards have also been developed in order that the new processes are embedded as one.</p>
Evidence of Impact (March 2024):	

<b>Recommendation 4:</b>	That <i>Maps@Stockton</i> is enhanced to provide information on those responsible for the maintenance of individual open spaces across the borough.
Responsibility:	Information & Intelligence
Date:	December 2023/January 2024
Agreed Action:	<p>Discussion with Information &amp; Intelligence over scope of information needed and timetables for implementation</p> <p>Provide relevant information from planning applications to inform mapping layer</p> <p>Information inserted into new mapping layers and assessed before going 'live'</p>
Agreed Success Measure:	Mapping layer is introduced
Evidence/Assessment of Progress (March 2024):	<p>Following changes in structure, management responsibilities and personal within the former Information and Intelligence service, the responsibility of the GIS function / 'I share' software now sits within the council's Performance Service.</p> <p>Nevertheless, dialogue has recently taken place and the associated actions discussed/picked up with the Business Partner – Performance, to discuss the requirements for the improvements to the 'I share' mapping software. Work on bringing forward the identified improvement has begun with a list of open space site requiring information to be drawn from the associated planning applications.</p> <p>Discussion have also centred on an additional tool available (a spotlight map), where residents of the borough can input their postcode and this will highlight nearby areas of Public Open Space (POS). This tool will become readily available once the 'master' data to produce the I share layer has been completed.</p> <p>Whilst regrettably this piece of work has slipped, it is not considered that it will take a significant amount of time to resolve and it is anticipated that the works and identified improvements should be complete by the summer.</p>

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Assessment of Progress (March 2024): (include explanation if required)	3 – Slipped. Anticipated revised timeframe of an additional three months.
Evidence of Impact (March 2024):	NA

<b>Recommendation 5:</b>	That Stockton-on-Tees Borough Council (SBC) provide guidance to town or parish councils, where approached, and continue to liaise with developers on adoption of open space.
Responsibility:	Planning Services/Community Services
Date:	January 2024
Agreed Action:	Guidance developed in accordance with planning regulations/ supplementary guidance alongside best practice on appropriate maintenance information/frequencies.
Agreed Success Measure:	Incorporated into future advice / guidance note as appropriate.
Evidence/assessment of Progress (March 2024):	<p>Draft document to be complete and signed off by community services in by the end of summer 2024</p> <p>Given existing resource pressures within the Planning Services Team it has not be possible to dedicate resource to finalising the above guidance.</p> <p>A broad framework for the document is in place and following the return of a Principal Planning Officer from maternity leave, it is considered that a draft of the document could be prepared relatively quickly for consideration, comments and associated amendments with the Community Services team.</p>
Assessment of Progress (March 2024): (include explanation if required)	3 – slipped.
Evidence of Impact (March 2024):	NA

<b>Recommendation 6:</b>	That planning conditions for maintenance of open space be reviewed and options for SBC to obtain a copy of the maintenance agreement for each new residential development is investigated.
Responsibility:	Planning Services
Date:	<ul style="list-style-type: none"> <li>a) July 2023</li> <li>b) July 2023</li> <li>c) September 2023</li> </ul>

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<p>Agreed Action:</p>	<p>Review of current planning condition(s) and benchmarking against other Local Authorities and Planning Inspectorate</p> <p>Internal consultation with colleagues in community services</p>
<p>Agreed Success Measure:</p>	<p>a) New ‘standard condition’ formulated.                  b) Condition circulated to development management team                  c) Condition incorporated into an updated ‘book of standard conditions’</p>
<p>Evidence/assessment of Progress (March 2024):</p>	<p>a) With regards to the formulation of a new standard condition, the revised condition as a result of a tweak to a previous condition is shown below with the additional wording identified below (underlined);</p> <p><b>On Site Public Open Space</b>                  Notwithstanding the submitted information, no development shall commence until a scheme has been submitted to and has been approved in writing by Local Planning Authority has the details of the Public Open Space (POS) within the site including:</p> <ul style="list-style-type: none"> <li>• The delineation and siting of the proposed POS including consideration of the [‘landscape for play’] approach;</li> <li>• The phasing for delivery of the POS across the site</li> <li>• Existing and proposed ground levels for all the POS and any associated mounding. Mounding details shall also include typical cross sections, at a minimum scale of 1:200 illustrating topsoil capping and core materials, side slope gradients that shall not exceed 1:5 and indicative heights. Placed soil materials shall be of a suitable depth and compaction to ensure successful grass, shrub and tree establishment.</li> <li>• The type and nature of the facilities to be provided within the POS which shall comprise of play equipment for all age groups including young children and teenagers which shall be supplied and installed to a specification as agreed by the local planning authority.</li> <li>• Details of the preparation, cultivation, grading and drainage of large grassed areas of POS;</li> <li>• Details of street furniture within POS;</li> <li>• The arrangements the developer shall make for the future management of the POS including water courses which pass through the site.</li> <li>• Where Title Transfer is not proposed the management details shall be prepared for a minimum period of 25 years from practical completion of the final phase of the POS works <b><u>and shall include details of the appointed management company.</u></b></li> </ul> <p>The open space shall be completed in accordance with the approved scheme and any phasing arrangements as agreed.</p> <p>b) the revised wording has been shared with the principal planning officers responsible for major large scale housing developments likely to feature new areas of public open space. The condition will also feature within the standard book of conditions which will feature on a shared drive once complete.</p>

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	c) Wider book of standard conditions is well underway and is to be reviewed against a recent copy of the Planning Inspectorates book of model conditions, which is considered to be a benchmark of good practice.
Assessment of Progress (March 2024): (include explanation if required)	a) 1 - fully achieved b) 1 - fully achieved c) 3 – slipped. Standard book of conditions to be complete by summer 2024
Evidence of Impact (March 2024):	

<b>Assessment of Progress Gradings:</b>	<b>1</b> Fully Achieved	<b>2</b> On-Track	<b>3</b> Slipped	<b>4</b> Not Achieved
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