Environment, Planning and Regeneration – Quarter 2 2012-13

1.1 SERVICE DASHBOARD

Revenue budget actual variance £000 ^[1]	Capital actual variance £000	•	Managing the Business	People Performance management	Key projects
1085	(1,372)	2.5	0.5	-3.5	2

1.2 TOP ACHIEVEMENTS AND ACTIONS

Top 3 Achievements

The Olympic Torch relay passed through Barnet on 27th July. Circa 170,000 people lined the streets. It was a fantastic event for the borough with many people in the Directorate contributing to its success including through event planning, street cleaning, stewarding, and supporting local community and business initiatives on the day. Staff in EPR also contributed over the wider Olympic period to supporting the pan-borough safety and security teams to ensure the Olympics were a success and passed off without incident. Also Food standard Agency Olympic food premises inspection programme was completed as well as the transition from "Scores on the Doors" to the FSA's Food Premises Rating Scheme.

Top three challenges	Actions required
Continued pressures on the parking budget, due to reduction in on-street and car parking, parking demand.	Parking Reviews continuing with traders in town centres and shopping parades to identify appropriate changes which, it is hoped, will improve demand.

Top 3 Achievements	Top three challenges	Actions required
Barnet Council becomes first council to implement a local tenancy strategy in July 2012	Working with Barnet Homes to reduce the use of emergency accommodation.	Understanding the impact of welfare refo and putting in place actions to provide ac and assistance to households who are a by the changes.
Adoption of Barnet Local Plan by Full Council – Sept 2012.	Negotiation with North London Waste Authority (NLWA) to ensure that final draft of the Inter Authority Agreement will be acceptable for signing by the Council.	Submission of Schedule B to NLWA, whi sets out the types and tonnages of waste we expect to deliver to NLWA for the nex years, subject to further modelling work a dialogue with bidders to the NLWA procurement.

1.3 SUMMARY OF THE SERVICES PERFORMANCE

Managing the budget gap remains a key issue for the directorate. Some progress is reported in closing the gap compared to quarter 1. However, it remains a significant challenge in the context of pressures on Parking income and the economic climate. Overall, the service reports positive progress against the corporate performance plan measures with particular challenges reducing the use of emergency accommodation.

Performance is also improving for FOI and Complaints managing the business measures, indicative of the efforts and additional resources to target the issues. However, reversing the negative trend in sickness absences continues to be a challenge into Q2. Increasing the levels of recycling in the borough and the impact of welfare reform on housing services also remain a key focus for EPR.

2. DELIVERING THE CORPORATE PLAN

2.1 How the service is performing against its Corporate Plan indicators

CPI NO	Indicator description	Period Covered	*Previous outturn	Target	Numerator and Denominator	Outturn	Target Variance	DoT Variance	Benchmarking
4001	A reduction in adult reoffending for those under probation supervision	Apr 11 - Mar 12	8.07%	7.85%	195/2585	7.54%	3.9%	6.5%	Ranked 16th out of 32 London Boroughs (Ministry of Justice Statistics Bulletin)
4002	Increase in community confidence in police and the local authority dealing with crime and anti-social behaviour.	This su			cted and therefore 24 2012/13, and a				ator will be developed to 13.
4003	Limit the residual average household waste to 710 kilograms per household	Apr 12 - Jun 12	719.7	725	24584/140050	702.1	3.2%	2.4%	Ranked 18th out of 22 London Boroughs (Waste DataFlow as at 16/10/2012
4004	Ensure that a minimum of 34% of household waste is recycled composted and reused.	Apr 12 - Jun 12	35.7%	36.1%	13299/37883	35.7%	1.1%	↔ 0.0%	Ranked 9th out of 22 London Boroughs (Waste DataFlow as at 16/10/2012)
4005	Repair 75% of 'intervention-level' pot holes defects within 48 hours	Jul 12 - Sept 12	84.7%	75.0%	141/159	88.7%	18.2%	4.8%	Not suitable for benchmarking
4006	Repair 95% of 'intervention-level' pot holes within 28 days.	Jul 12 - Sept 12	100.0%	95.0%	177/202	87.6%	7.8%	12.4%	Not suitable for benchmarking
4007	65% of planning permissions granted for homes that are suitable for families	Jul 12 - Sept 12	61.3%	65.0%	83/133	62.4%	4.0%	1.8%	Not suitable for benchmarking

CPI NO	Indicator description	Period Covered	*Previous outturn	Target	Numerator and Denominator	Outturn	Target Variance	DoT Variance	Benchmarking
4008 (A)	264 new affordable homes completed	Apr 12 - Sept 12	49	54.0	n/a	105.0	94.4%	n/a	Not suitable for benchmarking
4008 (B)	402 new dwellings on regeneration estates completed by 31 March 2013	Apr 12 - Sept 12	168	193	n/a	196.0	1.6%	n/a	Not suitable for benchmarking
4009	Reduce the average length of time spent by households in emergency accommodation to 26 weeks by 31 March 2013	Jul 12 - Sept 12	26.8	26	14500/509	28.5	9.6%	6.4%	Not suitable for benchmarking

^{*}The relevant previous outturn used will either be the previous quarter, or the same quarter of the previous year. The same quarter of the previous year will be used for annual indicators, cumulative indicators (where the numbers add up during the year and are reported as 'year to date') and if the indicator is affected by seasonal fluctuations.

CPI 4002 - CPI Increase in community confidence in police and the local authority dealing with crime and anti-social behaviour

The survey has now been amended and therefore does not capture this data. A new indicator will be developed for report in Q4 2012/13.

CPI 4004 - Ensure that a minimum of 34% of household waste is recycled composted and reused

Compared to the same quarter last year less has been collected for recycling. The amount collected for composting has remained about the same, and the amount of residual waste has decreased slightly. There are two probable reasons for the drop in recycling - there is less to be easily recycled such as fewer leaflets, and residents' participation in the services has decreased.

CPI 4006 - Repair 95% of 'intervention-level' pot holes within 28 days

Contractor resources under estimated for this period. Expectation is that target will be achieved in Q3. Relevant discussion with contractor has been held to improve performance during next quarter.

CPI 4007 - 65% of planning permissions granted for homes that are suitable for families

The proportion of family sized homes granted planning permission is still slightly below target but it has improved on the Quarter 1 result. The shortfall reflects a prevalence of one bed units being given planning permission over other units in the first two quarters of the year. Early in quarter 4 we expect a number of planning permissions to have been granted which include larger numbers of two bed or more units which should enable the target to be met.

CPI 4009 - Reduce the average length of time spent by households in emergency accommodation to 26 weeks by 31 March 2013

Performance declined during Quarter 2 with the average stay in emergency accommodation increasing from 27 weeks at the end of Quarter 1 to 28.49 weeks. Part of the reason for this increase has been additional demand for homes created by the need to decant 145 units on Stonegrove/Spur Road (93 have been re-housed so far this year), and 34 Notting Hill Group properties which commenced in August. In addition, homelessness applications have continued at a high level with 200 received in July and August, although this fell to 75 in September, and the supply of private rented homes has remained low due to landlord concerns about welfare reform and market conditions in London.

Barnet Homes have now put in place the following actions which are expected to impact positively on performance in quarter 3:

Making use of homelessness grant to offer a new set of incentives for private sector landlords willing to offer their properties to housing applicants which has already seen an increase in the number of private sector tenancies from 26 in quarter 1 to 56 in quarter 2.

A programme of occupancy checks targeting the most expensive Temporary Accommodation first. By 21st September there had been 65 occupancy checks completed which generated 7 terminations of the TA booking.

The setting up of a team to tackle of backlog of applicants waiting to be banded, with a focus on banding households who have been in emergency accommodation the longest, with the aim of re-housing these as quickly as possible.

A programme of targeted transfers of households in the most expensive emergency TA.

The introduction of an approval system for admissions into TA from 17th September

3. RESOURCES AND VALUE FOR MONEY (3.1 Revenue)

3. RESOURCES AND VALUE FOR MONET (3.1 Revenue)		Var	iations			
Description	Original Budget	Budget V1	Q2 Forecast 2012/13	Variation	Comments	% Variation of revised budget
Land Observes	£000	£000	£000	£000	I limb on the consequence of a discourse	0.00/
Land Charges	(964)	(964)	(989)		Higher than expected income	2.6%
Environmental Health/ Cem & Crem	1,238	1,250	1,171	, ,	Savings made on running costs and vacancies	-6.3%
Planning	478	533	511		Due to vacant posts not being filled and income being higher than projected	-4.1%
Strategy (Planning & Housing)	634	634	641	7	Small overspend due to pressures on staffing budget	1.1%
Building Control	(665)	(220)	(282)	(62)	Due to vacant post not being filled and lower than anticipated costs	28.2%
Housing	3,623	3,323	3,381	58	Pressure on cost of short term TA, partially offset by vacant posts and increased PSL income.	1.7%
Regeneration Service	(225)	(175)	(266)	(91)	Projected savings on consultancy costs	52.0%
Management and performance	1,311	1,311	1,473		Staffing Pressure	12.4%
Highways Inspection/Maintenance	2,265	2,529	2,839		Overspend due to underachievement of fee income and expected cost of winter maintenance	12.3%
Highways income budgets incl. NRSWA	(897)	(897)	(866)		Overspend due to reduction in expected FPN income	-3.5%
Greenspaces	4,869	4,882	4,884	2		0.0%
Cleansing	4,087	4,087	3,994		Underspend due to reduced staffing costs and pro-active management of agency staff	-2.3%
Refuse (domestic and trade waste)	3,271	3,271	3,345	74	Overspend includes staff transferred over from Street Cleansing and additional agency costs.	2.3%
Parking	(979)	(677)	(358)		Overspend due to continuing low usage of Council car parks even after tariff changes. Further tariff changes to be considered.	-47.1%
Transport	(165)	(165)	(309)	(144)	Underspend due to reduced transport and fleet costs	87.3%
Recycling	3,384	3,520	3,765		Recycling income projection has been reduced due to lower prices being received for materials. In addition there is cost pressure from contract inflation.	7.0%
Street Lighting	5,800	6,329	6,570	241	Savings delayed by legal process required for the contract change	3.8%
Community Safety	211	211	162	(49)	Savings due to vacancies	-23.2%
Community Protection	1,229	1,229	1,057		Savings due to running costs and vacancies	-14.0%
Leisure	863	1,363	1,363	-		0.0%
Environment, Planning & Regeneration	29,368	31,374	32,086	712		2.3%
Special Parking Account	(6,896)	(7,107)	(6,734)		Further changes to budget will be dependent upon the changes coming out of the town centre parking reviews	-5.2%
Environment, Planning & Regeneration Total (inc SPA)	22,472	24,267	25,352	1,085		4.5%

3.2 Capital

oiz oupitui	2012/13 Latest Approved Budget	Additions/ Deletions recommended to Dec CRC	Slippage / Accelerated Spend recommended to Dec CRC	2012/13 Budget (including Dec CRC)	Forecast to year end	Variance from Approved Budget	% slippage of 2011/12 Approved Budget
	£000	£000	£000	£000	£000	£000	%
Housing Association Programme	-	-	-	-	-	-	0%
General Fund Regeneration	12,470	-	-	12,470	12,470	-	0%
Disabled Facilities Projects	3,020	-	-	3,020	3,020	-	0%
Housing Management System	-	-	-	-	-	-	0%
Other Projects	2,225	-	(40)	2,185	2,185	(40)	-2%
Recycling Schemes	140	60	93	293	293	153	66%
Closed Circuit Television in Town Centres	461	-	-	461	461	-	0%
Other Environment & Transport Schemes	504	25	-	529	529	25	0%
Highways - non-TfL	10,617	(409)	(1,011)	9,197	9,197	(1,420)	-10%
Highways - TfL	6,537	(5)	(85)	6,447	6,447	(90)	-1%
Environment, Planning & Regeneration	35,974	(329)	(1,043)	34,602	34,602	(1,372)	-3%

4. MANAGING THE BUSINESS

4.1 How the service is managing its business

	<u> </u>							
	Indicator description	Period Covered	Previous relevant outturn	Target	Numerator and Denominator	Outturn	Target Variance	DoT Variance
Finance	Percentage of savings achieved	July 12 – Sept 12	92.6%	100%	2562/2768	92.6%	7.4%	↔ 0.0%
indicators	Percentage of the capital programme slipped	July 12 – Sept 12	8.1%	20%	1043/35974	2.9 %	85.5%	64.2%
HR	Reducing sickness absences to 6 days per employee (rolling 12 months)	Oct 11-Sept 12	8.5	6	6442/710	9.1	51.3%	7.4%
indicators	Qualitative assessment of Workforce stability	July 12 – Sept 12	Green	n/a	n/a	Green	n/a	↔
	Completion of individual objective setting	Apr 12 – Mar 13	n/a	100%	613/669	91.6%	8.4%	n/a
Complaints	Percentage of complaints responded to within policy guidelines (Statutory)	July 12- Sept 12	67.8%	80%	173/237	73%	8.8%	7.7%
FOI	Percentage of FOI requests responded to within 20 working days	July 12- Sept 12	54.9%	90%	100/114	87.7%	2.5%	5 9.8%

Percentage of savings achieved

Delivery of planned savings continues to be affected by shortfalls against projected parking income and an outstanding challenge via the European Commissioner to proposed changes to the Street lighting contract. Progress on EPR management team's recovery plan will be monitored closely to close the identified gap in planned savings.

Reducing sickness absences to 6 days per employee (rolling 12 months)

Sickness level trends continue to be above target and therefore been made a key focus of staff mid year performance reviews taking place during Q3. Briefings have taken place with managers who have been equipped with tools to aid effective management of sickness. Management will continue to monitor and introduce measures to arrest the current trend especially in specific services prone to relatively higher numbers of sickness absence.

4.2 Managing the business: People Performance management

Performance Indicator	Period covered	Target	Amber criteria	Q2 Actual (No.)	Q2 Actual % of total	Q2 (numerator/ denominator)	Target Variance	Q2 DoT	Council Average	Benchmarking		
Attendance												
Average number of sickness absence days per employee (Rolling year)	Oct 11 - Sept 12	6	6 - 6.5	9.1	N/A	6441.88/709.56	-51.3%	V 7.4%	7.7	10.1 days (CIPFA, All Members & other Unitary Authorities 2011)		
Average number of absence days per employee this quarter (target is seasonally adjusted)	July 12 - Sept 12	1.44	1.45 - 1.57	2.5	N/A	1641.52/658.06	-72.9%	V 38.3%	1.9	2.25 days (CIPFA, All Members & other Unitary Authorities 2011)		
% managers submitting a monthly absence return	July 12 - Sept 12	100%	>90%	85	100.0%	85/85	0.0%	2.6%	91.7%	N/A : measure applicable to LBB only		
	Performance Review											
% performance reviews completed and agreed for eligible staff only	Apr 11 - Mar 12	100%	>90%	615	83.1%	615/740	16.9%	2.1%	84.6%	86% (CIPFA, All Members & other Unitary Authorities 2011)		
% objectives set for eligible staff only	Apr 12 - Mar 13	100%	>90%	613	91.6%	613/669	8.4%	45.4%	91.1%	N/A : measure applicable to LBB only		
					Cost							
Variance of total paybill to budget	July 12 - Sept 12	£6,403,615	+/-5%	£5,886,646	-8.1%	5886646/6403615	8.1%	20.9%	-11.6%	N/A : measure applicable to LBB only		

Management Indicato	or	Period cove	red	Q2 Actual (No.)	Q2 Actual % of total	Q2 (numerator/ denominator)	DoT Q2 %	Counci average		nchmarking
Diversity Data										
Percentage of top 5% earners that are fema		As at 30 Sept 2	2012	8	22.2%	8/36	▲ 2.9%	49.0%	(CIPF &	en in leadership losts 49.9% FA, All Members other Unitary horities 2011)
Number of BME employees as % of tot employees	al	As at 30 Sept 2	2012	150	22.3%	150/673	▼ 2.2%	31.9%	Ethnic 33.1	ck and Minority local population (State of the ugh June 2011)
Number of declared disabled staff as % o total employees		As at 30 Sept 2	2012	18	2.6%	18/691	▼ 10.2%	2.8%	` &	2.33% FA, All Members other Unitary horities 2011)
				Employe	e Relations					
High Risk - Employed Relations cases as % total cases		As at 30 Sept 2	012	2	5.7%	2/35	▲ 48.6%	9.1%		/A : measure able to LBB only
As at 30 Sept 2012	ESTABL POSITION			LOYEES COVER HED POSITION	_	MSP RESOURCE AS HEADCOUNT		1SP RESOURCE A Headcount	s	AVAILABLE CASUAL RESOURCE AS FTE
	Total Established Positions (FTE)*	Occupied (FTE)	Permanent	Fixed Term, Temporary, Seasonal	TOTAL	TOTAL	Resource paid in the quarter	Consultants paid in the quarter	OTAL	Total
Environment, Planning & Regeneration	875.75	655.48	617.14	44.88	662.02	169	0	31	31	87.00

Average number of sickness absence days per employee (Rolling year) / Average number of absence days per employee this quarter (target is seasonally adjusted)

As stated above in 4.1, briefings have taken place with managers who have been equipped with tools to aid effective management of sickness though the Mid year performance review process. Monitoring of progress will continue in Q3 to ensure managers are using the tools effectively.

% performance reviews completed and agreed for eligible staff only

An analysis has been done to identify staff members who didn't have performance reviews completed and agreed in 2011/12. This information has been taken up by senior management to address the matter and lessons applied to more rigorous monitoring process for the 2012/13 cycle. The 2012/13 figures are expected to be significantly better.

Variance of total paybill to budget

This is indicative of vacancies being held in EPR to minimise redundancies that may arise from measures to meet budget saving targets. The variance is also due to vacancies held due to the TUPE transfers expected at the end of the ongoing DRS outsource process.

4.3 Key projects

There are three red rated projects in this service in guarter 2.

Project Name	Projected end date	Stage project is in	Planned stage progression next period	Current status Quarter 2	Direction of travel in Quarter 3	Forecast Quarter 3 Status	Comments / Risks / Finance
Grahame Park Regeneration Programme	23 November 2026	Delivery	Delivery	Red	Upwards	Amber	Transfer of Phase 0 Extension land slipped due to a reduced sales rate being experienced on the first phase (Phase 1a) of the Grahame Park regeneration scheme.
Dollis Valley Regeneration Programme	31 March 2020	Delivery	Delivery	Red	Upwards	Amber	Delays have been caused by 1) signing the regeneration agreement 2) the developers ongoing discussions with the GLA about their energy strategy and the affordable housing provision for the scheme.
Brent Cross & Cricklewood Regeneration	2035	Assessment	Assessment	Red	Upwards	Amber	Legal agreements need to reflect revised scheme proposals. Agreed Heads of Terms to be submitted to Cabinet for consideration in Feb 2013.

Out of the 17, two projects failed to provide a highlight report for quarter 2, these projects were the Highways Master Plan and Carriageway Resurfacing Project.

4.4. Risk Overview

The following is the 5 X 5 matrix 'heat map' highlighting the number of risks at a Directorate Level and where they are currently rated:

					IMPACT		
			1	2	3	4	5
		SCORE	Negligible	Minor	Moderate	Major	Catastrophic
PR	5	Almost Certain	0	1	2	1	0
PROBABILITY	4	Likely	0	2	1	1	0
ᅺ	3	Possible	0	4	9	3	0
	2	Unlikely	0	3	4	0	0
	1	Rare	0	0	0	0	0

Risk Commentary for Environment, Planning and Regeneration: The key risks for EPR continue to reflect the financial challenges that have arisen from the sector and economic climate. These are being closely monitored and managed within the service. A number of other risks arise from the potential outcomes of ongoing legal process and advice which are also being closely monitored and supported with legal expertise.

The following risk register lists those risks rated as 12 and above:

Risk	Current Assessment Impact Probability Rating			Control Actions	Risk Status	Target Target Assessr Date Impact Probability (Priority)			
ET0039 – Financial The risk that anticipated income levels for parking provision fails to align with set budgets. This arises from a number of factors including the ambitious budget set, the economic climate, levels of non compliance with parking restrictions	Major 4	Almost Certain 5	High 20	Officers to look at implications of all options raised by members In Progress (50% complete) Monitoring team to monitor NSL performance and report monthly In Progress (30% complete)	Tolerate	03/12/2012 (Normal) 31/03/2013 (Normal)	Major 4	Unlikely 2	Medium High 8

Risk	Current Assessment Impact Probability Rating			Control Actions	Risk Status	Target Date (Priority)	Target Assessment Impact Probability Rating		
and the nature of the service delivery contract with NSL.									
ET0057 - Financial A reduction in the supply of private rented sector properties available to households who receive housing benefit due to changes proposed to Local Housing Allowance.	Major 4	Likely 4	High 16	Work corporately to assess impact of welfare reform on households in Barnet. In Progress (70% complete) Targeting of Discretionary Housing Benefit Payments Target of 100% spend of additional resources received from Govt agreed with Barnet Homes In Progress (85% complete) Barnet Homes PRS procurement strategy - Monitor progress Strategy in place and being monitored. In Progress (50% complete)	Treat	14/08/2012 (Normal) 29/03/2013 (High) 01/10/2012 (High)	Moderate 3	Likely 4	Medium High 12
ET0062 - Financial Risk of claims in relation to element of search fees.	Moderate 3	Almost Certain 5	High 15	Legal advice pending.	Tolerate	Ongoing	Moderate 3	Almost Certain 5	High 15
ET0033 – Financial Likelihood that road and pavement conditions will deteriorate due to the lack of Capital and Revenue Funding and subsequent danger that the network will not be safe for the general public's use.	Moderate 3	Almost Certain 5	High 15	In relation to Revenue funding the current budget will only last for two months of the new financial year. In Progress (75% complete)	Tolerate	31/03/2013 (Normal)	Major 4	Possible 3	Medium High 12
ET0032 – Financial (Street Lighting) Energy charges are extremely volatile and there is a risk that they may increase substantially creating a pressure on the budgets.	Major 4	Possible 3	Medium High 12	Provisional prices have been provided by Laser to assist with budget monitoring and these highlight the likely increased costs from now until October 2012 and this is a large increase from the previous financial year as anticipated. An inflation bid is being prepared to account for the budget shortfall this creates. In Progress (75% complete)	Treat	31/03/2013 (normal)	Moderate 3	Possible 3	Medium High 9

Risk	Current Assessment Impact Probability Rating			Control Actions	Risk Status	Target Date (Priority)	Target Assessment Impact Probability Rating			
ET0041 - Financial Decision against Council in current Judicial Review process. The applicant for the Judicial Review has now received leave to proceed at the High Court.	Major 4	Possible 3	Medium High 12	Case to be reviewed. In Progress (0% complete)	Treat	31/07/2013 (Normal)	Major 4	Possible 3	Medium High 12	
Funding availability is affecting the housing market both in terms of public sector funding to support delivery and access to mortgage borrowing. As a result the housing market has stagnated.	Moderate 3	Likely 4	Medium High 12	Submission of infrastructure delivery plan and completion of draft community infrastructure levy tariff The Infrastructure Delivery Plan was published in November 2011 and considered as suitable by planning inspector. Reconciliation with the Council's Capital Programme is complete and this will enable more strategic allocation of capital funds. A Preliminary Draft Charging Schedule to enable introduction of a Community Infrastructure Levy was completed for September 2011, as part of the regeneration review the document was revised and then approved by Cabinet Resources Committee. Public consultation began on the preliminary draft charging schedule on 12 March 2012 and closed on 23rd April 2012. Second round of consultation during late summer with adoption Jan 2013 and implementation from April 2013 In Progress (90% complete) Appointment of partner for Granville Road development project Final evaluation completed. September CRC report will recommend preferred development partner. In Progress (90% complete) Procurement for a development partner at DV has been completed and		31/01/2013 (Normal) 30/09/2012 (Normal)	Moderate 3	Unlikely 2	Medium Low 6	

Risk	Current Assessment Impact Probability Rating			Control Actions	Risk Status	Target Date (Priority)	Target Assessment Impact Probability Rating			
				development agreement to be signed end June 2012 In Progress (95% complete)						
ET0058 - Financial The cremators have reached the end of their operational life and are liable to frequent breakdowns. New cremators must be fitted with mercury abatement which is a statutory requirement for all cremations by end of December 2012, unless subscription is made to a burden sharing scheme. There is therefore a risk of complete or significant breakdown of the existing cremators until this work is completed. Failure to abate mercury emissions by 2012 or subscribe to a burden sharing scheme will result in a loss of permit to operate, a risk of prosecution and reputational damage.	Major 4	Possible 3	Medium High 12	Tenders for replacement of cremators have been received and evaluated and a preferred supplier identified, subject to formal confirmation. Due to delays in the procurement process we will need to subscribe to the Burden Sharing Scheme as works will not be completed by 31st December 2012. In Progress (10% complete)	Treat	25/10/2012 (Normal)	Moderate 3	Rare 1	Low 3	