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To: Chief Executives

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**Dear Chief Executive,**

Over the past months, the department has been working closely with your council to ensure the smooth transition of planning functions. As part of this process, there has been much discussion about the quantum and nature of the resource to transfer to deliver the planning function. Both the department and local government are keen to conclude these discussions in good time to allow the district rate to be struck for 2015/16.

DoE provided indicative costs at the end of July, but further work has been done to quantify a more precise figure. I am now enclosing the latest resource report that details in some depth the allocations by council area. This will form the basis of the final budget allocations to each council, which we have undertaken to confirm by the end of October. Both planning and other local government reform staff will continue to engage with councils on the information contained in the report. Meanwhile, I would be grateful for any comments you have on the information contained in the attached report. Please return any comments by 3<sup>rd</sup> October to:

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I am copying this correspondence to all Council Chief Executives, NILGA and the Local Government Staff Commission.

**Yours sincerely,**

**Linda MacHugh**  
**Director Local Government Policy Division 1**

## **Local Government Reform: Transfer of Planning to Local Government**

### **1. Introduction**

#### ***Purpose of Paper***

- 1.1 The purpose of this paper is to set out the position on the financial and other resource consequences of the transfer of planning functions to local government, both for the sector as a whole and for each individual council. The paper will identify the proposed resource allocation to each council. The Department would welcome comments on the proposed resource allocation model by 3<sup>rd</sup> October 2014 and will confirm final allocations to shadow councils by the end of October 2014 to enable shadow councils to complete their budgetary processes and strike their District Rate for 2015-16.
- 1.2 In March 2014, a paper was presented to the local government sector providing details of the expected income and expenditure associated with those planning functions which are to remain in DOE and those which will transfer to the councils after 1<sup>st</sup> April 2015, based upon a number of assumptions. Various decisions have been taken in recent months and a clearer picture of the post reform planning structure has emerged. The aim of this paper is update the local government sector how these changes have impacted upon the financial resources transferring in April 2015 and to offer local government the opportunity to interrogate and comment on the proposals.
- 1.3 This paper includes details of the funding that will be transferring to councils to cover accommodation and other NICS-wide corporate costs. The figures used in this report are based upon the information provided by DFP to local government in August 2014.
- 1.4 Further, this paper highlights short term transitional costs that are associated with the transfer to councils, such as the cost of IT connectivity for council staff to the Planning Portal etc. Details of those transitional costs which will be funded by DOE are also included.

## ***Background***

1.5 The Northern Ireland Executive has agreed that planning-related functions will transfer from central to local government in April 2015. The key planning-related functions transferring to local government include:

- **Local development plans** – statutory power to make a development plan for an area which defines the local policy framework and land use proposals that will be used to determine development decisions within a specified area.
- **Development management** – regulatory process focused on the scrutiny and determination of the majority of planning applications including pre-application discussions.
- **Planning enforcement** - enforcing against all breaches of planning control, including unauthorised development, breaches of listed building, conservation area, hazardous substances, trees, advertisement control and issuing certificates of lawful use or development.

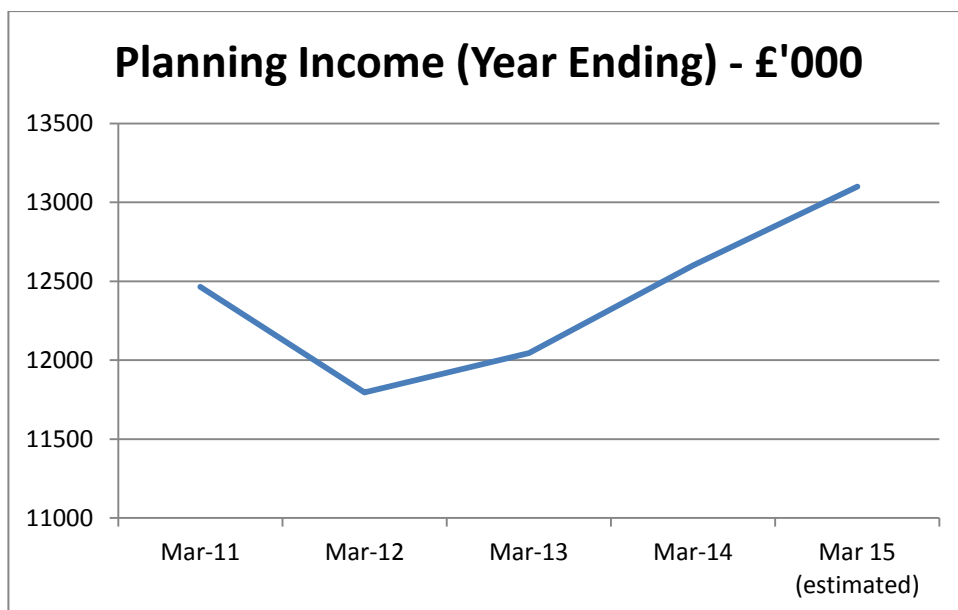
1.6 Planning expenditure is currently funded from planning fees received from applicants, supplemented by Executive funding allocated through the Department. During 2013-14 DOE Planning received £12.8m in income. Around 80% of Planning expenditure relates to salary costs. General administration costs such as stationery and other Programme costs each accounted for around 10% of expenditure.

1.7 By the end of October 2014 the anticipated 2015-16 income & expenditure associated with the planning functions transferring to the councils will be communicated by the Department to local government. The difference between the expected income and the expected expenditure will be removed from the DOE baselines in 2015-16. Each year, from April 2015 the Department will provide a grant to the councils to support the delivery of planning functions, as part of a wider Transfer of Functions Grant. In 2015-16 the value of this grant will be equal to the amount removed from the DOE baseline.

## **2. Overall Costs and Income**

### ***Income***

- 2.1 The March paper highlighted potential total income for 2015/16 of £12.6m, with £11.1m associated with those planning functions moving to councils. However, whilst the NI Executive agreed the general functions which will transfer to Local Government, the specific details of those applications which will transfer are being finalised as part of the Public Consultation on “Proposals for Subordinate Legislation”, which was issued at the end of May for public consultation. If accepted, the recommendation in the paper would result in a number of applications which would currently be handled by Strategic Planning Division within the Department of the Environment also passing to the councils. These recommendations would have the effect of increasing the value of income flowing to the councils compared with the amount indicated in the March Finance Paper.
- 2.2 During 2013-14 the value of actual Planning receipts received was £12.8m and growth continues in 2014-15. At present, current forecast of planning income for 2014-15 is circa £13.1m. This paper, however takes a conservative view on income and assumes that £12.8m in fees will be received during 2015-16 and therefore any income above this level will further benefit councils.



2.3 Details of the anticipated income set to transfer to Local Government and DOE are set out below.

**Forecasted 2015-16 Income:**

	<b>Local Government</b>	<b>DOE</b>
Local Applications	£10,600k	£ -
Property Certificates	£1,000k	£ -
Minerals	£200k*	£ -
Other Strategic Applications	£800k*	£200k*
<b>Total</b>	<b>£12,600k</b>	<b>£200k</b>

\* These figures are calculated based upon the recommendations in the Public Consultation Document and are subject to the outcome of the public consultation.

2.4 **Annex A** shows income allocated to specific council clusters (excluding the proposed shared services of Property Certificates and Minerals). This allocation is based upon an average percentage of planning receipts received by each cluster over a three year period. The income levels have been adjusted to reflect changes to council boundaries.

2.5 In addition to the annual income local government will receive there shall also be a one-off payment to fund councils for those applications which are received in DOE during 2014-15 but whose processing has not been completed by 1<sup>st</sup> April 2015. DOE operate a deferred income system with regards to monies received from planning applications and property certificates where income is 'recognised' as it passes through stages in the planning process. Whilst the final quantum will not be determined until March 2015, it estimated that the amount that will need to be transferred to councils will be circa £2m.

**Salaries**

2.6 The Department has developed a workforce planning model which identifies the staff complement required to process a specified number of planning applications. For the purposes of this paper, it is assumed that the volume of planning applications received

during 2015-16 will be in line with the actual volumes received in 2013-14. **Annex B** sets out the necessary staff requirement per council cluster to deal with the expected volume of applications, and comprises some 396 FTE staff to transfer to councils and 75 FTE posts remaining in the department to deliver residual planning functions.

- 2.7 As stated above, the public consultation, 'Proposals for Subordinate Legislation' (which provides details regarding those application which will transfer to Local Government and those which will remain the responsibility of DOE) recommendations transferring responsibility for a number of functions current performed by Strategic Planning to the councils.
- 2.8 To support the moving from Planning's current model to an 11 council structure will fund changes to staffing structures such as; the creation of additional Grade 6 and Grade 7 posts and a number of promotions to fill vacant posts. This process will be completed before transfer.
- 2.9 DOE will provide funding to cover the actual salary cost of the individuals transferring to each council. The allocation of staff to councils is ongoing, therefore in order to provide indicative figures the salary costs included in this paper are calculated by taking the average salary per grade, plus 30% to cover pensions and Employer's NIC, plus an additional 1.5% to cover a 2014 pay increase.

### ***Administration & Programme Costs***

- 2.10 In calculating the expected administration and programme costs for 2015-16 the department has based the calculation on the actual outturn in 2012-13. Since 2012-13 DOE Planning's administration and programme budgets have been reduced by around 7%. Using the historic 2012-13 figures will result in funding in excess of the amount currently consumed by the planning function for transfer to local government.
- 2.11 The majority of costs included within the definition of Administration and Programme are allocated between the councils and DOE based upon the percentage of staff transferring into each area.

2.12 A number of costs are not allocated on a 'per head' basis. The largest of these is the annual charge to cover the costs of the Voluntary Early Retirement (VER) scheme which was run in 2014.

### Allocation of Administration Costs between DOE & Councils

	DOE £'000	Local Government £'000
Costs Allocated Based Upon Staff Numbers	280	1,410
VER Liability	603	-
<b>Total</b>	<b>883</b>	<b>1,410</b>

### Allocation Of Programme Costs Between DOE & Councils

	DOE £'000	Local Government £'000
Costs Allocated Based Upon Staff Numbers	243	1,270
Grants	167	-
Development Plans Consultant Costs	-	110
Development Plans Publishing Costs	-	180
Provisions (including Legal Fees for Judicial reviews)*	480	-
<b>Total</b>	<b>890</b>	<b>1,560</b>



### ***Development Plans***

- 2.13 From April 2015 councils will be responsible for preparing development plans for an area which defines the local policy framework and land use proposals that will be used to determine development decisions with a specified area.
- 2.14 To support councils to develop Development Plans the department is proposing staffing resources to local government in excess of the current levels in DOE in order to ensure that councils are appropriately resourced to deliver this function.
- 2.15 In addition to the salary costs of the Plan Teams, the department proposes to provide £110k (i.e. £10k per council) annually in relation to Development Plan consultancy costs as part of the Transfer of Functions Grant. It is expected that the proposed level of funding allowing will cater for annual peaks and troughs in Development Plan expenditure, over the Development Plan life cycle.
- 2.16 It is proposed that the department will also provide funding of £180k annually to fund publishing and printing of development plans. This level of funding is set at a value so that allowing for annual peaks and troughs in Development Plan expenditure.

### ***Habitats Regulation Assessments***

- 2.17 NIEA currently undertakes assessments in relation to European sites designated in accordance with the European Habitats and Birds Directive. This includes undertaking the Habitat Regulations Assessments (HRAs) required under The Conservation (Nature Habitats, etc.) Regulations (Northern Ireland) 1995 before the competent authority makes decisions on development management and development plans. The function that will be transferring to councils is the competent authority aspect of HRA work currently carried out by three dedicated scientific staff in an integrated function within the Natural Environment Division of NIEA.
- 2.18 The Department is currently finalising options for transferring the capacity and skills to enable new councils to undertake HRA as competent authority for development management and development plans. It is anticipated that proposals to do so will be communicated to local government shortly.

## **DOE Corporate Overheads**

2.19 On the 28<sup>th</sup> January 2014 the Transfer of Functions Working Group agreed a number of guiding principles which will underpin the transfer of functions and powers to Local Government. One of the principles agreed by the TFWG related to notional charges and Corporate Overheads. It was agreed that upon transfer, where a notional charge or overhead to a department become a hard charge to the councils, funding will be provided to local government for these costs. It is expected that the transfer of planning functions will result in an overhead budget of £300k to local government.

### **Total Funding For Corporate Overheads Transferring To Councils**

	£'000
Finance	70
HR & Organisational Change	92
Information Management	20
ICT	-
CAL	30
Equality Unit, Carbon Reduction etc.	-
Miscellaneous/legal charges	88
	<b>300</b>

## **DFP Corporate Overheads**

2.20 DFP, through Enterprise Shared Services (ESS), currently provides a number of services to NICS departments in relation to; finance (Account NI), IT (IT Assist), payroll (HR Connect), accommodation (Properties Division) and training (Centre for Applied Learning).

2.21 The shared services in ESS were set up to provide a platform for the large number of users across government departments. As such they make extensive use of shared infrastructure such as IT networks and software as well as shared support and management services within DFP.

- 2.22 DFP is reviewing the costs of providing shared services and identifying potential saving that can be passed to local government. DFP has provided a breakdown of the funding that will transfer to the councils on a cost per person basis in August.
- 2.23 It is expected that DFP will propose offering to the councils around £2k per person to cover the cost of accommodation and the cost of the services provided by ESS.
- 2.24 Included within this £2k per figure is c£400 which relates to HR Connect charges. Currently DOE is hard charged for this service and therefore the department holds the budget for this charge. In 2015-16 it is expected that the DFP HR Connect charge to DOE will reduce by around £160k and DOE will lose £160k DEL cover. As this information has not been confirmed, therefore for the basis of this paper the full £2k per person is show as coming for DFP. The £400 per person is not included in the DOE overhead allocation.

### ***Overall Proposed Resource Allocations***

- 2.25 The table below outlines the proposed overall Income and Expenditure Resource allocations between the DOE and the Councils in 2015-16.

	<b>DOE</b>	<b>Councils</b>	<b>Total</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Salaries	3,650	15,550	19,200
Administration	883	1,410	2,293
Programme	890	1,560	2,450
DOE Overhead	-	300	300
DFP Notional Costs	-	840*	840
<b>Total Costs</b>	<b>5,423</b>	<b>19,660</b>	<b>25,083</b>
<b>Funded By:</b>			
Income	200	12,600	12,800
DFP Notional Costs	-	840*	840
DEL Funding	5,223	6,220	11,443

	<b>5,423</b>	<b>19,660</b>	<b>25,083</b>
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\*This figure includes £160k to cover the cost of HR Connect charges (see section 2.26).

## **Part 2**

### **Shared Services**

- 3.1 Post reform it is proposed that a number of functions which are transferring to new councils will be delivered under shared service arrangements by local government to maintain current expertise and avoid duplication of resources. Some details regarding these arrangements need to be finalised however details on the current position are set out below. In addition, there may be provision of shared services by the Department in support of council's responsibilities (eg Planning Portal).

#### ***Property Certificates***

- 3.2 A paper regarding the Property Certificate Service was endorsed by the Planning Reform and Transfer Project Board on Thursday 12<sup>th</sup> June 2014 and is being presented to the Planning Sub-Group at its next meeting on 1<sup>st</sup> August 2014, with onward transfer to the Transfer of Functions Working Group in August (date to be confirmed). The paper is based on the delivery of the function as a shared service seeking agreement/consideration from councils on location (based on the existing service in Enniskillen) and options for funding.

#### ***Minerals***

- 3.3 Currently planning applications for mineral extraction & associated development, enforcement and mining waste directive (MWD) compliance are dealt with centrally by a team within Strategic Planning Division based in Belfast (this includes any proposals for hydro-carbon extraction). The specialised team also deals with the small number of Hazardous Substance Consents received annually. There has been ongoing engagement on how this function will be taken forward when planning powers transfer to councils in 2015. Given the specialist nature of minerals planning there has been broad agreement that this function is best carried out by a dedicated team on a shared service basis.
- 3.4 A staff complement of 1 PPTO, 4 x SPTO and 4 x HPTOs has been identified as the optimum structure to deliver this shared service which would entail the team processing all planning applications for mineral extraction and associated development as well as investigating and reporting on enforcement cases. This model

envisages a regional minerals team processing planning applications on behalf of the eleven councils but where the final decision rests with the relevant council. Similarly, the team would carry out initial investigations in terms of enforcement with the final decision being made by the council. In terms of the MWD the team would advise councils on mining waste plans submitted for agreement by the relevant planning authority and continue to process hazardous substance consents.

- 3.5 The Subordinate Legislation Consultation Paper on Planning Reform and Transfer to Local Government proposes that only the most regionally significant applications will be determined by the Department. This reflects one of the key priorities of local government reform to create stronger, more effective local councils making key decisions affecting their local area. Therefore the priority now is to engage with local government to identify one of the eleven councils to manage this team on a shared service basis.

### ***Planning Portal***

- 3.6 From 1<sup>st</sup> April 2015 the Planning Portal will function as a 'shared service' with DOE maintaining the system on behalf of the other planning authorities on a day to day basis. It is proposed that the annual maintenance costs of the planning portal are allocated between DOE and each councils based upon a per head figure.
- 3.7 A written agreement will be required to ensure that all parties are aware of the costs that they are responsible for.
- 3.8 It is proposed that a Planning Portal Board will be established, which will include representation from all 11 councils, and this group will be responsible for the strategic management of the portal.

## Part 3

### Transitional Costs

#### **Overview**

4.1 It is recognised that the movement of functions and staff from DOE to councils will result in a number of transitional costs. Part 3 this paper will highlight these areas and the transitional costs that DOE will meet.

#### **IT Setup costs**

4.2 DOE will cover the cost of connecting one council building per new council to the planning portal. This includes the cost of:

- a network gateway to enable local government employees to use the planning portal,
- routers, switch costs and network racks.

#### **Connectivity / Security**

4.3 DOE will procure and fund a network gateway to ensure that planners can access the planning portal from council locations.

#### **Hardware**

4.4 It is recommended that to ensure that there are no compatibility issues with regards to other council IT hardware and software, transferring staff will have access to two PCs for a transitional period comprising their existing PC (which has access to the planning portal) and a new PC to be financed by councils which will be used to access council systems and the planning portal post 1<sup>st</sup> April 2015.

#### **Data Transfer**

4.5 A hand over of relevant electronic records not held on the Planning Portal will also be required at the time of transfer. DOE will meet these costs.

### ***Excess Fares***

4.6 With the movement of staff to council offices at management's request some staff will be eligible to claim Excess Fares for a three year period following reform. DOE HR are actively seeking to locate staff in the offices of their preference, which may be closer to their homes. This will reduce the numbers eligible to apply for excess fares. However, until the names of staff and their locations are agreed it is not possible to quantify this figure. DOE will meet this cost by making 3 annual payments to each council to cover the actual cost of excess fares to local government.

### ***Relocation Costs***

4.7 DOE will meet the relocation costs (rent of crates to store any items transferring and the cost of transferring the crates to new premises) incurred before 1<sup>st</sup> April 2015.

### ***Desks and Chairs etc.***

4.8 DOE will not pay for any desks, chairs or other office equipment.

### ***Fixtures & Fittings & Structural Changes to Council Buildings***

4.9 Any costs associated with fixtures and fittings (i.e. carpets) or structural changes to council buildings such as the removal of internal walls will be funded by local government.

### ***Public Liability Insurance***

4.10 In line with the other NICS departments transferring functions to the councils, DOE will not provide any funding to local government for insurance. This is based on the principle that the councils will already have public liability Insurance and the increase in cost of this service to the councils as a result of employing 30 extra planners is immaterial.



### ***Connectivity to Planning Portal***

4.11 DOE will meet the cost of connecting one site per council to the planning portal. If councils wish to have planning staff in more than one location the costs of connecting additional sites will be funded by the councils.

## Annex A – Income, Costs & DEL Funding Per Council & DOE Function

	ABC Council	Mid & East Antrim	Newtown abbey	Belfast	Causeway Coast & Glens	Derry & Strabane	Fermanagh & Omagh	Mid Ulster	Newry, Mourne & Down	North Down & Ards	Lisburn & Castlereagh	
<b>Expenditure</b>												
Salaries	1,375	1,225	1,245	1,585	1,370	1,335	1,265	1,420	1,420	1,245	1,395	
Other Expenditure	260	230	230	300	250	250	250	280	280	230	270	
Overhead Costs	30	20	20	30	30	30	20	30	30	20	20	
DFP Costs	70	70	70	80	70	70	70	80	70	70	80	
<b>Total Costs</b>	<b>1,735</b>	<b>1,545</b>	<b>1,565</b>	<b>1,995</b>	<b>1,720</b>	<b>1,685</b>	<b>1,605</b>	<b>1,810</b>	<b>1,800</b>	<b>1,565</b>	<b>1,765</b>	
<b>Funded By:</b>												
Income	1,250	810	790	1,390	910	840	1,090	1,270	1,280	720	1,050	
DFP Funding	70	70	70	80	70	70	70	80	70	70	80	
DEL	415	665	705	525	740	775	445	460	450	775	635	
<b>Funding</b>	<b>1,735</b>	<b>1,545</b>	<b>1,565</b>	<b>1,995</b>	<b>1,720</b>	<b>1,685</b>	<b>1,605</b>	<b>1,810</b>	<b>1,800</b>	<b>1,565</b>	<b>1,765</b>	

	Property Certificates	Minerals & Environmental Enforcement	Total
<b>Expenditure</b>			
Salaries	255	415	<b>15,550</b>
Other Expenditure	70	70	<b>2,970</b>
Overhead Costs	10	10	<b>300</b>
DFP Costs	20	20	<b>840</b>
<b>Total Costs</b>	<b>355</b>	<b>515</b>	<b>19,660</b>
<b>Funded By:</b>			
Income	1,000	200	<b>12,600</b>
DFP Funding	20	20	<b>840</b>
DEL	(665)	295	<b>6,220</b>
<b>Funding</b>	<b>355</b>	<b>515</b>	<b>19,660</b>

	<b>Casework &amp; Plan Scrutiny</b>	<b>Policy &amp; Legislation</b>	<b>Performance Management &amp; Continuous Improvement</b>	<b>Chief Planner &amp; Business Support</b>	<b>Total</b>
<b>Expenditure</b>					
Salaries	1,085	1,325	570	670	<b>3,650</b>
Other Expenditure	170	180	80	1,343	<b>1,773</b>
<b>Total Costs</b>	<b>1,255</b>	<b>1,550</b>	<b>650</b>	<b>2,013</b>	<b>5,423</b>
<b>Funded By:</b>					
Income	200	-	-	-	<b>200</b>
DEL Funding	1,055	1,505	650	2,013	<b>5,223</b>
<b>Total Costs</b>	<b>1,255</b>	<b>1,505</b>	<b>650</b>	<b>2,013</b>	<b>5,423</b>

### Annex B - FTE Planning Structure In DOE

	<b>Armagh, Banbridge &amp; C'avon</b>	<b>Mid &amp; East Antrim</b>	<b>Newtown abbey</b>	<b>Belfast</b>	<b>Causeway Coast &amp; Glens</b>	<b>Derry &amp; Strabane</b>	<b>Fermanagh &amp; Omagh</b>	<b>Mid Ulste r</b>	<b>Newry, Mourne &amp; Down</b>	<b>North Down &amp; Ards</b>	<b>Lisburn &amp; Castlereagh</b>	
Grade 6	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	
PPTO	2.0	2.0	2.0	3.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	
SPTO	5.0	4.0	4.0	6.0	5.0	5.0	4.0	5.0	5.0	4.0	5.0	
HPTO	9.5	7.5	8.0	12.0	10.0	9.0	8.0	10.0	10.0	8.0	10.0	
PTO	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5	
DP	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	
SO	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
EO2,EO1 or PS	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	
AO	4.0	4.0	4.0	4.0	4.0	4.0	4.0	5.0	4.8	4.0	4.0	
AA	3.0	2.0	2.0	3.0	2.0	2.0	3.0	3.0	3.3	2.0	3.0	
<b>Total</b>	<b>35.0</b>	<b>31.0</b>	<b>31.5</b>	<b>39.5</b>	<b>34.5</b>	<b>33.5</b>	<b>32.5</b>	<b>36.5</b>	<b>36.6</b>	<b>31.5</b>	<b>35.5</b>	

	<b>Property Certificate s</b>	<b>Minerals &amp; Environmental Enforcement</b>	<b>Total</b>
Grade 6	0.0	0.0	<b>11.0</b>
PPTO	0.0	1.0	<b>24.0</b>
SPTO	0.0	4.0	<b>56.0</b>
HPTO	0.0	4.0	<b>106.0</b>
PTO	0.0	0.0	<b>82.5</b>
DP	0.0	0.0	<b>11.0</b>
SO	0.0	0.0	<b>0.0</b>
EO2,EO1 or PS	2.0	0.0	<b>24.0</b>
AO	7.0	0.0	<b>52.8</b>
AA	0.0	0.0	<b>28.3</b>
<b>Total</b>	<b>9.0</b>	<b>9.0</b>	<b>395.6</b>

	<b>Casework &amp; PlanScrutiny</b>		<b>Policy &amp; Legislation</b>	<b>Performance Management &amp; Continuous Improvement</b>	<b>Chief Planner &amp; Business Support</b>	<b>Total</b>
<b>G. 3</b>					1.0	<b>1.0</b>
<b>G. 5</b>	1.0		1.0			<b>2.0</b>
<b>G.6</b>	1.0		1.0			<b>2.0</b>
<b>PPTO</b>	3.0		2.0	1.0	1.0	<b>7.0</b>
<b>SPTO</b>	8.0		6.0	4.0	1.0	<b>19.0</b>
<b>HPTO</b>	5.0		3.0	2.0	1.0	<b>11.0</b>
<b>PTO</b>						<b>0.0</b>
<b>G. 7</b>			3.0	1.0	1.0	<b>5.0</b>
<b>DP</b>	1.0		4.0	2.0	1.0	<b>8.0</b>
<b>SO</b>	1.0		3.0	1.0		<b>5.0</b>
<b>EO1</b>				2.0	1.0	<b>3.0</b>
<b>EO2</b>	1.0			1.0		<b>2.0</b>
<b>AO</b>	1.0			1.0	2.0	<b>4.0</b>
<b>AA</b>					2.0	<b>2.0</b>
<b>PS</b>	<b>2.0</b>		1.0		1.0	<b>4.0</b>
<b>Total</b>	<b>24.0</b>		<b>24.0</b>	<b>15.0</b>	<b>12.0</b>	<b>75</b>