

Housing & Property Services Portfolio Holder

Update on the last 12 months for Overview & Scrutiny Committee

Preamble

Since the presentation of this report to Overview & Scrutiny Committee, work has continued across the work strands with substantial progress being made on Homelessness.

In preparation for the introduction of the Homeless Reduction Act, a new temporary structure has been agreed alongside the establishment of an additional three posts to undertake the additional work that has been identified as a consequence of implementing this legislation. A new IT system which is designed for the new operational environment is being trialled and a consultant has been engaged who is currently drafting new customer information and preparing training for partner agencies.

Our work on tackling rough sleeping has received a boost following a successful bid for a property at Coten End in Warwick. The former hostel will provide around 12 bed spaces to enable people requiring support, to acquire skills to enable them to live independently. The property is currently with solicitors who are taking forward conveyancing prior to refurbishment work starting.

This acquisition is part of a wider approach to tackle homelessness in Warwick and is potentially a game changer for WDC as to how it addresses homelessness and rough sleeping within the District and starts to open up some new options for the Council. We are in the process of reviewing our entire homelessness strategy in light of the Homelessness Reduction Act, both for what we support as a Council and in conjunction with the voluntary sector such as the Salvation Army, Pet-xi and the night shelters at Radford Road Methodist Church and the Leamington Winter Shelter.

Leamington Winter Shelter (LWS) is currently based in the Priors Club, the owners of which are seeking permissions for the future development of the site. In summer 2017 Warwick District Council's Executive agreed to plans for the former Italian Club in Packington Place to be offered to LWS to operate their night shelter facility. This was to ensure that the LWS service did not cease at the point when LWS would be asked to vacate the Priors Club. It is commonly known that the premises are in a poor condition and will need substantial work. LWS have themselves raised monies towards these costs. The Council has also been working toward this ambition and last month announced that budget provision has been made for 2018/19 to cover the costs of the refurbishment. Discussions are due to take place shortly with LWS to work up the project in detail and to determine the potential to configure the project to deliver a wider range of support to rough sleepers than just a bed for the night. This move is part of a wider approach to tackle homelessness in Warwick a matter which the Council takes very seriously.

We are collaborating with strategic partners including Warwickshire County Council who have recently announced another £300,000 over the next two years to assist in tackling rough sleeping and are in discussions which will determine the scope and nature of the work to be funded and the detail of how this can support the work of local agencies to help rough sleepers to move away from the streets.

Our work on developing a student housing strategy has also been given a boost with the news that the Local Government Association has approved a further £14,000 for the work. This will enable the consultant to spend more time in developing the strategy

Report received at Overview & Scrutiny

Notable achievements/successes

Since the last report the former Housing & Property Services team has been re-designed with a new Assets team moving into the Chief Executive's Office and the remaining teams forming a new service area, Housing Services.

We have appointed a new Head of Housing Services to manage this new service area and ensure that it focusses on the delivery of 'people based' services for council tenants, homeless and other households seeking housing, tenants of private sector landlords and gypsies and travellers.

The Assets team has been re-established as a service team delivering 'property-based' services across the whole Council to internal clients within a range of service areas including Housing Services.

Housing Services

Delivery of Affordable housing

We welcomed tenants moving into our new development at Sayer Court. These provide 76 modern apartments with communal gardens and community facilities. The development also includes 5 bungalows specifically designed to meet the needs of disabled people. We held a very successful opening event in January 2017, with the daughter of Malcolm Sayer, the designer of the E Type Jaguar leading the celebrations. Residents at Sayer Court recently enjoyed a well-attended wine and cheese event.

We reopened William Wallsgrove House following the supported housing provider pulling out. Our staff accepted the challenge, and now manage and provide support to 11 young residents who would otherwise would be homeless.

In the last financial year we saw 284 new affordable homes completed, with a further 182 completed in the first two quarters of 2017/18.

With our partners, we continue to deliver homes that are affordable. Through our joint venture with W2 we are now onsite at Station Approach in Leamington which will deliver 212 homes (160 affordable) and will include a new Council owned 100 space car park and an improved cycle-path to the station via the underpass off Avenue Road. W2 is also on site at the Print Works in Warwick delivering 39 affordable homes.

The proposal to regenerate the Lillington area and build 600 new homes has been put on hold following the Inspector's decision to not approve Red House Farm being taken out of the green belt. This was unfortunate as it would have provided an additional 278 homes in the area, of which a net 111 additional would have been affordable/social homes. It would also have provided an opportunity to fundamentally address housing and social issues in the District's most deprived area.

Over the summer we submitted a bid to the Local Government Association for assistance with the development of the Student Housing Strategy. We were successful in obtaining £14,000 worth of free-to-WDC consultancy support, to help with data gathering and analysis that will provide a firm basis for the development of the final strategy document.

Housing register, allocations and lettings

Following implementation of the Council's new allocations policy, the number of households waiting for a home on the housing register has reduced by over 1,000. Of this number, over 200 existing tenants were helped to obtain a move to a new home, thereby freeing up their existing property for occupation by an applicant from the waiting list. The new policy has seen the number of applicants in Band 1 (highest priority need) halved. Additional statistics are included in appendix one.

The team were delighted to receive a 'substantial level of assurance' rating from the lettings and void control audit.

Housing Advice & Homelessness

Following consultation with voluntary and community services, other partners and with elected members, a new Housing & Homelessness Strategy for Warwick District Council was approved at Full Council and went live from 1st April 2017. This important document will help to shape the work of the Council and its partners over the coming three years with an aim of tackling homelessness across the district.

Considerable savings have been achieved through the significant reduction in the use of bed and breakfast accommodation for homeless families. The alternative accommodation used provides more suitable temporary accommodation for homeless families whilst their situation is assessed.

Working with fellow local authorities across the county we submitted a successful bid to government, receiving £865,000 of government 'trailblazer' funding over three years to provide a countywide early prevention service for homelessness and contribute to its implementation. The project will test new, innovative approaches to preventing homelessness to help the government to build an evidence base on what works and understand the effects of these approaches in different areas.

In recognition of the additional health problems that can result for rough sleepers, the Executive in November reduced the trigger for the SWEP (Sever Weather Emergency Protocol) from three days to one day where temperatures reach zero or below, thus providing a more extensive service for rough sleepers and offering additional opportunities for agencies to intervene.

Financial Inclusion

Councillors and officers have been working together to review the work around financial inclusion. This has led to the formulation of a Financial Inclusion Action Plan. The plan sets out actions around six themes: access to Money Advice; responding to welfare benefit changes; promoting affordable credit; reducing fuel poverty; tackling worklessness; and working with partners.

Our two Money Advice caseworkers have generated income in the form of benefit entitlements for tenants and or savings from prevention of evictions of around £300,000. Since April their work has prevented seven evictions giving an estimated saving of around £17,500 (Average void cost is £2500 per property x 7 = £17,500).

Income management

In November 2016, the Executive approved a new Rent Arrears Policy.

We have set a performance target for rent arrears to be no greater than 2.8% of total rent due. Performance improved for the year ending March 17 with our target being met. This was an improvement from 3.17% the previous year, and a considerable achievement given that other organisations in our benchmarking group experienced on average an increase of 1.82 percentage points in rent arrears.

In early summer, performance slipped primarily due to staff sickness. However the team is now up to strength and performance is now ahead of where we were last year.

Approval to participate in the Rental Exchange was granted by the Executive in November 2016. Letters went out to all tenants in June 2017 with go live planned for January 2018. This scheme, run by Experian and the Big Issue, aims to improve the credit scoring of our tenants by sharing details of their rental payment history.

Improved credit scores can mean easier access to obtaining mainstream credit facilities and avoiding the very high cost borrowing that many tenants otherwise find is their only option. It also is a way of incentivising customers to keep their rent accounts in credit. The initial analysis suggested that over 71% of our tenants will benefit from being part of the scheme.

There was a 3% increase in the number of customers paying by direct debit, with a total of 32% now paying by this method. Paying by direct debit results in tenants having better budgeting and therefore control over their finances, as well as lower administration costs for the Council.

We received a 'substantial level of assurance' rating for the rent and income collection audit.

Tenancy Management

The work of the Tenancy Officers has been dominated by fire safety and this has formed a major part of the work of the team. The Grenfell Tower fire tragedy generated a high level of enquiries from the media, councillors and residents.

We have always had a robust and safety first approach to fire safety, but we have used the tragic events of Grenfell to fully reappraise our approach and identify any further ways to upgrade our approaches to fire safety in all of our high rise blocks. We have kept all residents of our high rise blocks fully informed through both general communication letters and specific communication regarding cladding, fire alarm upgrades, flat inspections and the use of sheds, for example.

The team have refocused their work and have completed visits to all 400 individual high rise flats, undertaking an inspection of the flats and following up where the need for action has been identified, such as if smoke alarms were not working effectively or repairs were required. The work also helped the team to identify vulnerable customers which enabled support to be offered, and specialised equipment to be ordered (e.g. visual alarms for those who are hard of hearing), or a move to more suitable accommodation to be instigated. The safety of the blocks has been improved from carrying out these checks and inspections.

We await the outcome of the Grenfell enquiry to help identify any other areas that could be improved.

Over the last 12 months (November 2016 to October 2017) there have been 478 lettings of HRA property. We ask new tenants for their feedback through a survey, approximately

two weeks after the moving-in date. The survey information provides assurance that relevant technical information is being provided as part of the letting process and tenants understand their rent payment obligations at the point of occupation. The analysis shows tenants were kept up-to-date about when the property would be available (96%) and were generally positive about the property they moved in to (85%).

Over the last 12 months, of the 137 new households who responded an average of 98% were satisfied with the overall experience and appreciated the opportunity to raise any issues they had experienced since moving in.

In March 2017, Council approved two new policy documents, the Domestic Violence Policy and the Anti-Social Behaviour Policy. These documents set out the approach of the Council and provide clarity for the public and staff.

The team continue to take action on anti-social behaviour, having a current live case load of 36 cases. Over the past year we have served seven "Notices Seeking Possession" (NSP) on tenants causing nuisance, with five tenants subsequently being evicted. We have also made use of the Anti-Social Behaviour, Crime and Policing Act 2014 powers with a Closure Order gained in June 2017 and possession using mandatory possession powers gained in April 2017.

New procedures have been put in place for carrying out reviews following the Executive decision to wind down the Housing Appeals and Reviews Panel (HARP), and they are working well.

Estate Management

Our Estate Management service has at its backbone, four Neighbourhood Officers who look after our 279 high and low rise apartments. The team have been instrumental in providing our 'on-the-ground' response to the Grenfell tragedy. Despite a member of staff leaving during the year with a gap to filling the post, staff have worked flexibly, adapting and adjusting to new priorities, increasing their focus on the high rise blocks and ensuring that a daily inspection of each of our nine high rise blocks is undertaken. These regular inspections have meant that fire safety has been improved, repairs are ordered more quickly with other problems identified and actioned the same day.

We have established new procedures regarding inspection of the blocks and used new technology to record the inspection and its finding, providing an instant report to asset management and housing management staff of any matters requiring further action. We also revised our procedures concerning our response to the communal alarm ringing, providing training to staff and advice to all staff across the Council.

Our work has included updating the fire safety notices and general messages for residents and visitors that are displayed in our blocks.

The team have taken delivery of new liveried vans which promote the presence of Warwick District Council staff on the estates and at our high or low rise apartments.

Housing Support and Lifeline Services

Our Housing Support and Lifeline Services were subject to a full review during the year and a subsequent major restructure. The loss of £500,000 Supporting People funding from the County Council delivered a major blow and threatened the continued existence of our services. Whilst this has meant that we said goodbye to some staff, we are proud

to have protected our continued services, delivering important support to vulnerable and older residents.

Inevitably, there was a transition period whilst staff became familiar with new arrangements, different ways of working and completing their training. In the meantime we have kept residents updated, holding residents meetings at our five sheltered schemes in May and again in October to explain the changes and discuss how new arrangements are working in practice. The team have now settled in with the new team leaders now in post and the service working well.

Our Lifeline service now operates on a more commercial footing which has required some focus on marketing our Lifeline Services. We have undertaken a number of exciting publicity events and increased our marketing activity. Our new (electric) vehicles are now very clearly branded as Lifeline, and we have been active on social media as well as targeted marketing at key audiences.

Syrian refugees

Working with Warwickshire County Council who act as lead agency, and other partners, we have played our part to support vulnerable Syrian refugee families. The families are met at the airport by Warwickshire County Council staff and the Arabic speaking support workers. We meet the family when they arrive at the property with their support worker to welcome them and to ensure that the relevant tenancy documents are signed. The properties we use are owned and managed by private sector landlords. So far Warwick has welcomed four Syrian refugee families with a fifth arriving late November 2017.

Private sector housing

This year saw the introduction of the county-wide Home Environment Assessment and Response Team service (HEART) which went live on 1 April 2017. This service, involving the five Warwickshire District and Borough Councils and the County Council, provides specialist support for the delivery of home adaptations and related services.

Designed to speed up and improve the quality of services offered to people who need home adaptations, the introduction of a caseworker system, means that each customer has a single point of contact from the start to the finish of their adaptation work. At the end of September 2017 the time taken to carry out DFG work dropped to 117 days for Warwick District, compared with a pre HEART county wide average of 395 days.

The HEART service delivers a range of interventions, in addition to Disabled Facilities Grants to enable customers to remain independent in their homes.

A common Housing Financial Assistance Policy has been adopted across the county to enable applicants to be assessed in the same way.

In collaboration with Stratford-on-Avon District Council we have held two landlord forums in the last 12 months, bringing together 50 to 60 different stakeholders including private sector landlords, letting and property management agencies, and the National Landlords Association. These events enable the sharing of information and ideas and a place that landlords can find out about work elsewhere in the sector.

Topics have included: updates in legislation, awareness of property being used for criminal purposes, developing Houses of Multiple Occupancy legally, ARK passport (rent guarantee insurance offering tenants an online bank account which deducts the rent from incoming payments and holds it in a locked area until the payment is required. The

service includes a rent guarantee and legal costs insurance for landlords) and a talk from a representative of the Bank of England.

We will continue to vigorously pursue landlords who flagrantly breach housing regulations, whether related to HMO licensing, fire safety or overcrowding. This last year we have had two successful prosecutions.

The team were delighted to receive a 'substantial level of assurance' rating from the Private Sector Housing Regulation internal audit.

Gypsy and Travellers

Over the summer the District encountered a significant increase in the number of unauthorised encampments resulting in action through both the County and Magistrates courts. Over the course of the year, the team dealt with 20 incidents. This has led to increasing tensions and criticism from settled residential communities who seek effective responses from their local elected representatives.

In some instances it has led to criminal and anti-social behaviours from within and outside the encampment. Consequently the effects have impacted on local authorities, private landowners, the courts and the police in terms of resource, time and cost.

Liaising with the Police and Crime Commissioner Office we agreed a countywide Gypsy and Traveller protocol. This protocol is aimed at ensuring that the response to unauthorised encampments from local authorities, private landowners, the police and other salient agencies is cohesive, consistent, efficient and effective. It seeks to provide a set of shared principles and processes with clearly identified lead.

We have also decided to strengthen those open spaces owned by WDC to prevent unauthorised encampments in the first place. Much of the work has already been completed, with only the more complex projects remaining to be finished by the end of 2017/18.

Tenant engagement

Engagement work has continued with a number of local environmental projects completed following tenant consultation. These have provided new planting, seating and fencing, and "skip days" to help tidy up areas where tenants have requested it. The Annual Report to Tenants has recently been completed and will be circulated in the next couple of weeks to all tenants and councillors. Handbooks for tenants and for leaseholders are being reviewed at present and a new Tenant Engagement Strategy is being formulated to be taken forward and finalised in the coming months.

An independent satisfaction survey found that 82% of tenants were satisfied with the service provided by Warwick District Council.

Assets Team

Stock Condition Survey

A full survey has been completed for all the major building elements of every single HRA home. In addition a survey of the external building fabric of the Council's seven multi-storey blocks has been completed and additional surveys of the building fabric of those homes constructed on non-traditional materials. The analysis of this work is being fed

into the Housing Investment Programme for 2018/19 and the next HRA Business Plan review, papers on which will come to the Executive before year end.

Response to the Grenfell Tower disaster

In addition to the housing management response set out above the Asset team has undertaken significant work in respect of the seven multi-storey blocks and the two six-storey blocks that fall within the Warwickshire Fire & Rescue Service (WFRS) definition of a high-rise block.

Joint inspections of the communal areas of each block were undertaken with WFRS and a programme of initial repair work and additional safety measures implemented and completed, including the fitting of 'drench' systems to bin stores linked to the fire detection systems.

A major refurbishment programme for the communal parts of each block is now being designed and a specialist contractor has been appointed to undertake the work which will include, replacement of every door within or leading onto a communal area with a FD60S, smoke sealed fire door offering a minimum 60 minutes fire protection, re-wiring of the communal areas and redecoration.

In addition work has started to –

- Upgrade fire alarm systems so they can be connected to automatic monitoring systems and have the capability to be linked to heat detectors within individual flats

- Fit automatic opening vents, linked to the fire alarm system, to ensure smoke is dispersed from communal stairwells in the event of a fire and

- Investigate the feasibility of various fire suppression systems.

The visits to each individual flat within the blocks were conducted jointly between Housing Services and the Assets team and in addition to the management information collected, repairs and future maintenance issues were identified and information collected to enable flashing beacons and pillow sensors to be fitted for tenants hard of hearing who would otherwise not necessarily hear the fire alarm.

Procurement of Responsive Repair Contracts

A major task for the team has been designing and specifying the re-procurement of the main contract for responsive repairs and void properties within the HRA stock which is now out to tender. We will be appointing the new contractor in the first week of January allowing them to mobilise for a contract start date of 1 April 2018.

Support for corporate projects

The Assets team has continued to play a major part in the delivery of major corporate projects supplying technical expertise and support to a range of projects including the refurbishment of the Newbold Comyn and St. Nicholas Leisure Centres, feasibility work on the Myton Fields car park and Whitnash community hub and aspects of the Pump Room Gardens and St. Mary's Lands projects.

What is planned in the coming 12 months?

Housing Services

We will implement the new requirements brought about by the Homeless Reduction Act 2017, ensuring that our staff have the skills and support to make a smooth transition to the new arrangements and ensuring that our Homeless Strategy is revised accordingly.

Our review of the allocations scheme will be completed and brought back to the Executive and Council for approval.

Our work on improving fire safety will continue with the Housing and Assets team working closing to deliver the communal area refurbishment programme for the nine high rise blocks. We will be engaging with residents in respect of the improvements and to ensure that the requirements of individual residents are catered for as well as giving residents a say in the final colour scheme.

The delivery of affordable housing will continue to be a key priority. Plans for Europa Way continue to progress and whilst it is a longer term project between WDC and Waterloo we are expecting to be able to add approaching 400 affordable and social housing on the site.

We continue to look for opportunities to purchase small parcels of houses, and also for development land within the District.

Our new Head of Housing, Lisa Barker, has as a key part of her brief to consider whether delivery could be accelerated and extended including a full review of our options to increase the HRA stock (notwithstanding that we are still awaiting clarity from the Government on the future of the High Value Void Levy).

Implementation of Financial Inclusion Plan including actions to support residents on the transition to the full roll out of Universal Credit, which is scheduled for mid 2018 for Warwick District.

Implementation of the Rental Exchange project.

Continuing our work to ensure that our Lifeline services are developed, we will further rollout our Lifeline marketing plan

Review the possible restructuring of teams to deliver better management of teams and management of contracts for grounds maintenance and cleaning

Complete the Student Housing Strategy.

We will consider and put in place policies to accommodate new legislation in the Housing and Planning Act, as the detailed regulations and implemented dates are confirmed, starting with a report to the Executive on Civil Penalties.

We are still awaiting regulation concerning the implementation of fixed term tenancies. We will use this opportunity to update our tenancy agreements, updating and making the document more relevant to our tenancy management.

We will be preparing for the extension of HMO licensing expected to start in April 2018 and we will commission a new private sector stock condition survey.

Reviewing how we will engage with our tenants, whether via the Housing Advisory Group or by other means.

Assets Team

Consultation will be undertaken on a major re-design of the Assets Team with an aim of bringing a revised staffing structure tailored to suit the needs of our internal and external customers by March 2018 Employment Committee.

The mobilisation and implementation of the new responsive and void repairs contract will be a major challenge for the team in the next six months.

The continued learnings from the Stock Condition Survey will form a major part of the team's work, providing informative information into the investment requirement for our HRA stock.

Other development work will include the strategy and proposals for validating and maintaining updated stock condition data.

We will be developing and updating our Asset Management Strategy in relation to our HRA stock and Corporate assets.

Any areas you believe that the Overview and Scrutiny Committee might usefully examine/scrutinise to help.

To provide examination of the Council's approach to the Homeless Reduction Act

To assist with a review of the Homelessness Strategy in light of the Homeless Reduction Act

To assist with a review of the allocations policy once the revised policy has undergone a period of operation

The extension of private sector HMO licencing, for which we are awaiting further information from the Government and implementation of new practices

The emerging Student Housing Strategy

Appendix one – Allocations policy statistics

A) Composition of the housing register

Prior to implementation of the new system, in April 2016 the make-up of the housing register, by band and number of bedrooms needed, was as shown in the following table.

<u>Band</u>	<u>1 Bed</u>	<u>2 Bed</u>	<u>3 Bed</u>	<u>4 Bed</u>	<u>5 Bed+</u>	<u>TOTAL</u>
<u>1</u>	<u>19</u>	<u>6</u>	<u>3</u>	<u>0</u>	<u>0</u>	<u>28</u>
<u>2</u>	<u>134</u>	<u>37</u>	<u>85</u>	<u>20</u>	<u>5</u>	<u>281</u>
<u>3</u>	<u>972</u>	<u>287</u>	<u>73</u>	<u>16</u>	<u>3</u>	<u>1351</u>
<u>4</u>	<u>1087</u>	<u>571</u>	<u>148</u>	<u>15</u>	<u>4</u>	<u>1825</u>
<u>Young Person</u>	<u>3</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>3</u>
<u>Unbanded</u>	<u>6</u>	<u>0</u>	<u>2</u>	<u>0</u>	<u>0</u>	<u>8</u>
<u>TOTAL</u>	<u>2221</u>	<u>901</u>	<u>311</u>	<u>51</u>	<u>12</u>	<u>3496</u>

The introduction of the changes means that the current register is different because of the transfer band. However, within that context, the following table shows the analysis of the register as at 3rd November 2017.

<u>Band</u>	<u>1 Bed</u>	<u>2 Bed</u>	<u>3 Bed</u>	<u>4 Bed</u>	<u>5 Bed+</u>	<u>Total</u>
Band 1	10	3	0	0	1	14
Band 2	104	75	62	24	16	281
Band 3	614	112	22	5	1	754
Band 4	465	269	68	7	1	810
Young person	0	0	0	0	0	0
Transfer	363	203	28	2	1	597
Total	1556	662	180	38	20	2456

B) Allocations under the new scheme

The approval for the new allocations scheme allowed up to 100% of available properties to be available to transfer tenants and then to become available for Bands 1 to 4. As an initial trial we have been advertising 50% of available properties for transfer applicants to bid on while the other 50% are advertised for applicants in bands one to four.

As regards properties advertised for a numbered band, they are advertised with a preference for a particular band as follows: 50% for band one; 30% for band two and 20% for band three. The two exceptions to this are those properties where the age of the applicant is restricted (invariably this will be properties for people who are over 55 years of age) and properties where the rural local lettings policy applies.

For the 538 properties advertised in the normal way the following table show in percentage terms which bands properties have been advertised for and which bands properties were actually allocated to during the first twelve months of the scheme.

Band	Proportion advertised (%)	Proportion allocated (%)
One	25.5	30.5
Two	15	31.5
Three	6.5	14.5
Four	0	1.5
Transfer	53	22
TOTAL	100	100

* All figures rounded to the nearest 0.5%.

There were 234 age-designated properties allocated during the year. Exactly 50% were advertised to the transfer band and 32% of allocations went to the transfer band.

Of 39 properties advertised under the rural local lettings policy seven were allocated to a transfer case.

Overall 811 properties were allocated during the twelve month period of which 403 were advertised to the transfer band, resulting in 201 allocations to transfer applicants. The breakdown by band of all allocations completed was as follows.

Band	Number	Percentage
One	171	21
Two	218	27
Three	150	18.5
Four	71	8.5
Transfer	201	25
TOTAL	811	100

These can also be analysed by the types of property that have been available as follows.

Band	Bedsit	One bed	Two bed	Three bed	Four bed	TOTAL
One	2	54	78	34	3	171
Two	3	53	92	61	9	218
Three	2	76	56	15	1	150
Four	0	37	28	5	1	71
Transfer	2	90	82	26	1	201
TOTAL	9	310	336	141	15	811