

1. Introduction

This document is a formal response to Havant Borough Council Planning Services by Havant Civic Society and the New Lane / Eastern Road Residents group ('HCS et al'). The subject document is the 'Sixth Amazon Traffic Monitoring' report, dated 9 January 2025 and published to the public access Planning Portal on 14 January 2025.

The comments in this response also relate to:

- The 'Fifth Operational Traffic Report', dated 27 September 2024, published 1 October 2024
- The 'Third Operational Traffic Report', dated January 2024, published 24 January 2024
- The 'Second Operational Traffic Report', dated January 2024, published 24 January 2024
- *Note 1: A 'Fourth 'Operational Traffic Report' has not yet been published.*
- *Note 2: The Residents' response to the First 'Operational Traffic Report' was published on the Planning Portal on 19 January 2024. The issues raised remain the same.*

The response is set out under six headings:

- 1 Introduction
- 2 Report Content - Comments on the document and appendices
- 3 Report Benchmark – Review of Operational Management Plan
- 4 Actions Required
- 5 The wider impacts
- 6 Supporting data – 'Operational Management Plan Appendix A'

2. Report Content - Comments on the document and appendices

Background

At Section 1.2, Conditions 9 and 10 associated with the Planning Consent are quoted. In this response, we highlight one key sentence from each:

Condition 9:

*"Monitoring of movements via CCTV **with regular reporting via an independent third party** to the Local Planning Authority in accordance with the parameters of the OMP."*

Condition 10:

*"The occupier will comply with the monitoring and reporting measures specified in the Operational Management Plan, including **the use of independent data monitoring company.**"*

The significance of the highlighted text is addressed in Section 4 of this response.

At Section 1.3, the report quotes selectively from the Operational Management Plan (January 2022 version), including this significant extract:

OMP 5.11

"If necessary, changes will be identified to how the site is operating to ensure that it is in line with the requirements of the OMP."

The report omits, however, any quotation of Condition 4, which governs the Operational Management Plan and provides the reference benchmark for operational traffic monitoring. The relevant text is included below, with the pertinent sentence highlighted:

Condition 4:

*"The Full Operational Management Plan document produced by Vectos Ltd, dated January 2022 shall be implemented as approved, and be observed throughout the period that the lawfulness of activity at the development land relies upon this Planning Permission. **No significant deviation from the provisions of the approved plan shall be permitted, without the express written consent of the Local Planning Authority.**"*

HCS et al first highlighted the '**significant deviations**' from the text of the original draft Operational Management Plan in a detailed response dated 15 December 2021, published on the Planning Portal on the same date. These deviations have never been addressed and, to the best of our knowledge, no 'express written consent' has ever been given. The deviations are documented in detail at Section 3 of this response.

Traffic Data

At point 1.5, it is stated that:

"As requested by HBC previously a summary will be provided of the raw survey data provided by ATR. This will be a single page summary of the data for the period for the whole site and for each access divided into cars, vans and HGVs. This will be in addition to the raw survey data."

This single page summary is missing from the report completely, unless it relates to 'Appendix A Traffic Summary', in which case the content provided does not meet the specified requirement.

At point 1.6, we note that:

"HBC were contacted on 9th October 2024 to ask for whether specific weeks were requested for analysis, but no response was received."

If true, then this is a disquieting indication of the commitment being shown by Planning Services to the monitoring of operations at the Amazon site.

At point 1.10, we note that:

"Table 1 is an extract from Appendix A of the OMP which contains the predicted traffic data for the AM and PM peak periods and for the whole day. This is the benchmark against which the monitoring data is assessed."

'Table 1' records the data for an AM Peak Hour, defined as 0800-0900 and showing 339 vehicle movements, and a PM Peak Hour defined as 1700-1800 and showing 329 vehicle movements.

This raises two points:

- 1) These hours are completely irrelevant to Amazon's 7 day, 24 hour business operation, a critical point which has been raised by HCS et al on multiple occasions. See Section 3, 'OMP Document History', below.
- 2) The Peak Hour vehicle numbers are taken from the Operational Management Plan which sourced them from the data provided by ATR as input to the original planning application, APP/21/00200. These numbers have always been disputed by HCS et al and have been proven to be incorrect throughout the first two years of Amazon's operations at the site. (see Section 3, Observed Deviation 6, below)

Since the identity of the site occupier was confirmed as Amazon, it has been clear that these numbers, provided by the 'independent transport consultants' in support of the original planning application, were highly unlikely to be accurate.

Overall Traffic Levels

The data shown at rows 1 and 2 of Table 2 in point 1.11, and Table 3 in point 1.12, will always be low, and for Table 3, negative.

The derivation of the data shown at row 3 of both tables is unclear.

Traffic Heading South

Moving to Table 4 - Recorded Traffic on New Lane South of the Site – the data simply does not map to observations made regularly by the residents to the south of the site, and indeed other members of the DPO1 Community Liaison Panel living further north and regularly walking into the town via the New Lane railway crossing.

The following image was taken by a member of the Amazon DPO1 Community Liaison Panel¹ at 12:35 on 20 January, 2025, and is typical of the observed reality:



The image shows part of an outbound wave² comprising multiple DSP vans queued at the New Lane railway gates, readily identifiable by the piles of Amazon packages on the passenger seats. This is a common daily site at the New Lane crossing and is matched by empty vans arriving inbound via the A27 Warblington Interchange and travelling to the DPO1 site via East Street, Beechworth Road and Fairfield Road.

While we acknowledge that the bulk of the arriving and departing van traffic routes via Crossland Drive, the real volume of vans observed in New Lane to the south of the site is certainly far higher than the numbers quoted in the OMP and the Traffic Monitoring reports.

Appendix A Traffic Summary

If the content of this single page spreadsheet extract is intended to cover the requirement from HBC stated in point 1.5 of the report, then it completely fails to address the requirement.

¹ The DPO1 Community Liaison Panel was constituted by direction of APP/21/01244 planning approval, Condition 30, to enable community residents to raise issues with site operations to be addressed.

² DPO1 releases loaded vans in scheduled 'waves' from both the north and south exit of the site to manage throughput and minimise time on site. Arrival of empty vans for loading are similarly scheduled in waves.

Appendix C ANPR Data

Appendix C appears to contain records for each week in the quarter, with a number of vehicle movements noted across each hour of a 24 hour day. Vehicle movements are not broken down by either type of vehicle or direction of travel, inbound or outbound.

Separate pages are used to display data which relates to each of the entrances. To make this more usable and enable cross reference to the overall site summary, promised but not delivered, it would be preferable if the daily data for the three site entrances were displayed on the same sheet.

Since there is no breakdown by vehicle type or direction of travel, the data has neither meaning nor value.

Appendix B Traffic Data

Appendix B does not, as stated in the report, contain traffic to/from the site across the three site entrances for the three-month monitoring period. It contains instead, several records relating to the two-week monitoring periods. The data is presented under headings which make little sense.

'Site' is assumed to be 'Site Entrance', but there is no indication of how the entrances are numbered. For example, while one can assume that 'Site 2' might mean 'the central entrance', it is unclear whether 'Site 1' is the northern site entrance or the southern site entrance.

'Time Exiting' and 'Time at New Lane' are unexplained, and 'Duration', apart from clearly being the difference between the two times, is irrelevant.

Since all records in this appendix show a value in 'Time Exiting', we assume that there are no records displayed for vehicles 'Arriving' at the site.

3. Report benchmark – Review of Operational Management Plan

The Operational Management Plan cannot be divorced from a review of the Traffic Monitoring Report since it is the OMP which provides the process and data benchmark on which the reporting is based.

It should be noted that the OMP also provides the benchmark from which the local planning authority can verify compliance with the maximum permitted traffic generation at the 32 New Lane site. It is therefore critical that the document contains the correct current traffic generation baseline and that monitoring of actual traffic generation is accurately monitored.

The Operational Management Plan should satisfy the following condition of the Planning Consent for APP/21/01244:

Condition 4

"The Full Operational Management Plan document produced by Vectos Ltd, dated January 2022 shall be implemented as approved, and be observed throughout the period that the lawfulness of activity at the development land relies upon this Planning Permission.

No significant deviation from the provisions of the approved plan shall be permitted, without the express written consent of the Local Planning Authority."

Considering the sentence highlighted in bold text, both Havant Civic Society and the New Lane Residents believe that the proposed and current operations at 32 New Lane have always deviated from the published and agreed content of the OMP. (See 'OMP Document History', below.) These deviations are significant and are detailed below.

Observed Significant Deviations from OMP

The OMP describes the proposed business operations thus:

OMP 2.3

"The site will be used as a 'last mile' distribution centre where parcels are delivered via small vans to customers in the local area. The occupier is looking to consolidate their operations on one site. This is opposed to vans being stored in the local area on separate sites."

Observed deviation 1:

Van deliveries are carried out by sub-contracted third party Amazon Delivery Service Partners (DSPs) using externally stored vans which arrive empty to pick up loads, then do not return to the site but are stored 'in the local area' until returning to pick up their next scheduled load.

Neither the OMP nor any previous planning history describes the movements due to Amazon Flex deliveries by private cars, which form a significant observed component of the current daily traffic generation.

OMP 2.4

"Local drivers would arrive at the site by various means of transport, collect a van and leave the site to make deliveries. Once all deliveries have been made, drivers would return the vans to the site, collect their own vehicles (if they have driven to the site), or travel home by other means of transport."

Observed deviation 2:

This is not the observed business process, see previous comment.

OMP 2.5

"The operation is effectively a freight consolidation site with the number of HGVs to/from the site being minimised through the most efficient use of each vehicle to minimise

movements. The vehicle movements associated with the proposed development are already on the local road network as the occupier currently operates within the Havant area."

Observed deviation 3:

The occupier is Amazon, a company which did not previously operate from within the Havant area. Amazon's Delivery Service Partners and Flex drivers, working from Amazon sites remote to the Havant area previously delivered to addresses in 'the Havant area', but those vehicle movements amounted to only 5% of the total vehicle movements now attributable to DPO1, according to the data provided by Vectos/SLR with Planning Application APP/21/00200.

OMP 2.6

"The vans based on this site undertake the last mile element of distribution i.e. to the customer. They leave the site in the morning between 07:00-12:00 and return between 16:00-21:00. They are loaded to ensure that they can deliver goods for at least 6 hours in a single journey. This ensures efficiency of the operation and reduces vehicle movements."

Observed deviation 4:

This has been confirmed **not** to be the case by DPO1 Site Managers, speaking at the Community Liaison Panel meetings. Loads for delivery to customers are also collected after 12:00, often by privately-owned vehicles driven by Amazon 'Flex' gig-economy drivers. The DSP vans, which carry out the bulk of the van deliveries, are not stored on site overnight and do not return to DPO1 until their next scheduled pick-up slot.

OMP 2.8

"The proposals for the site involve the provision of 866 operational storage spaces for the van fleet which during the day would be used as parking spaces for drivers that arrive at the site by private car."

Observed deviation 5:

The 866 operational storage spaces are currently not used. They have been designed to meet a future strategic business operation which has not yet been implemented and has yet to be publicly acknowledged, given that it will involve confidential logistics outsourcing negotiations with significant commercial clients.

Once the Operational Management Plan has been correctly baselined and agreed, the local planning authority will need to monitor any changes to the traffic generation profile caused by changes in business processes at the site.

OMP 3.1

"A summary of the trip generation for the proposed development, for the AM and the PM network peak period and across the day is set out in Table 3.1. The trip generation for each hour across the day for the occupier for each vehicle type is contained in Appendix A of this report."

Observed deviation 6:

For ease of reference, 'Appendix A' of the Operational Management Plan is reproduced in its entirety at Section 6 of this response. The two 'Network Peak' hours are highlighted in grey in both tables and relate to 'normal' commuting patterns.

While the data appears to show that peak site traffic would occur during 'normal' daily peak hours, the peak traffic hours for an Amazon delivery station are completely different and relate to the actual business operations on site and the use of third-party delivery service partners. The high-volume peak hours for an Amazon Delivery station of this type are currently between 9:00am and 1:00pm and this has been evidenced by residents' observations since DPO1 began operations.

The negative figures which occur in all peak hour reporting by SLR are simply the result of the invalid data contained in Appendix A.

We understand that the traffic movements shown in these columns were originally sourced from data provided by ATR, and presented during the initial planning stages by Ian Dix, of Vectos, the Amazon-retained transport consultancy now absorbed into SLR but presented through these traffic reports as 'independent'.

At the planning stage, it was stated that *"Daily arrival / departure patterns have been obtained from the occupier, with these based on traffic for over 100 similar units that they operate across Europe."*³ In fact, the design of DPO1 adopted a new delivery station site architecture incorporating a multi storey van park ('MSVP') into the design. At the time of planning for the DPO1 site at 32 New Lane, the only such operational site was the DPE2 site at Peterborough.

The data presented by SLR/Vectos and ATR to HBC Planning Services with the original planning application⁴, repeated and expanded as Appendix A of the OMP, bears no resemblance to the actual traffic generation profile of this type of Amazon delivery station.

Our assumption has always been that this deliberate data obfuscation was simply a device used to maintain the anonymity of the 'intended occupier' at the planning stage, with the additional objective of ensuring that the data presented was, within acceptable tolerance, close to the previous maximum approved traffic generation for the previous site occupant, Pfizer. These facts underpin our assertion that the companies concerned, SLR/Vectos and ATR, cannot be considered 'independent'.

OMP 3.4

"The operation of site will accord with the agreed traffic generation set out above with there being no material changes to the levels of traffic generation assessed. There may be a need for additional assessment work if traffic levels at peak times are materially increased above the agreed figures used in the assessment of the extant planning consent. In line with the

³ 'Transport Statement Part 1' by Vectos for APP/21/00200. Published on Planning Portal 3 March 2021

⁴ APP/21/00200 – February 2021

relevant planning condition that form part of the planning consent, there should be no significant deviation from the operation set out, without the consent of the Local Planning Authority."

Observed deviation 7:

To the best of our knowledge and in the absence of published notification, there has been no consent given by Havant Borough Council as the Local Planning Authority for the 'significant deviation from the operation set out [in the OMP]'.

Note that future changes in business operations at the site will require revision of the OMP and re-baselining of the agreed traffic generation profile and ongoing monitoring for adherence.

OMP Document History

The Operational Management Plan was agreed and published in January 2022, before any demolition or construction activity took place at 32 New Lane.

At Section 1.4, it contains the following statement:

"The overall purpose of this Operational Management Plan (OMP) is to outline the proposed operation of the site to ensure it is consistent with the submitted assessments. A revised OMP would be prepared by any occupier coming to the site if there is a significant change in operation."

At the date of publication, the identity of 'the intended occupier' was well known to the community but still not openly acknowledged by Havant Borough Council. The expectation in the community was that a complete revision of the OMP would be documented, agreed and published **before** Amazon took ownership of the site and began operations.

This never happened.

The First draft OMP was dated November 2021 and published to the Planning Portal on 23 November 2021. A detailed response was written by HCS et al dated 15 December 2021, published on the Planning Portal on the same date.

The Revised OMP, dated January 2022, was published on the Planning Portal on 18 January 2022. A detailed response to Planning Application APP/21/01244 was submitted by HCS et al dated and published to the Planning Portal on 2 February 2022, including specific points relating to the 'Revised OMP'.

As a resident of New Lane, I first escalated the non-compliance with the OMP of the business operations proposed at the site in a letter dated 6 February 2023, **before site operations began**, addressed to the Case Officer, David Eaves, copying Mark Watkins, HBC Chief Legal Officer and Monitoring Officer, and Neeru Kareer – HBC Executive Head of Place. The executive officers responded with a request that I remove them from future correspondence on the matter.

Given the inadequacy of that response, the matter was escalated on 10 March 2023 to Kim Sawyer, HBC Interim Chief Executive, who agreed to handover the concern to her full-time replacement.

Following escalation to Steve Jorden, HBC Chief Executive Officer one year later, on 15 April 2024, Alex Robinson, HBC Executive Head of Place, confirmed that his Enforcement Team were now reviewing the case.

4. Actions required

Revision of the Operational Management Plan

The Operational Management Plan must be revised to ensure that it reflects the actual operation of the Amazon DPO1 site at 32 New Lane to enable accurate monitoring of traffic generation at the 32 New Lane site. Prior to the start of operations by Amazon, the OMP was approved by the local planning authority in good faith as a documentary record of the proposed operation which Amazon would implement at the site.

The generated traffic profile observed at 32 New Lane over the two years since the start of operations bears no resemblance to the expectation set in the agreed OMP. While it may be Amazon's long-term intention to deploy such a model, capitalising on the approved, constructed but currently unused multi-storey van park (MSVP), the current version of the Operational Management Plan (dated January 2022) documents a 'proposed operation' which is neither valid nor accurate as a current baseline for traffic monitoring.

Since it is evident that Amazon's operational model will continuously evolve, the revised content of the OMP should be version controlled from the new baseline, with future changes managed by the Local Planning Authority under formal version control along with regular revision of actual traffic generation.

The document should continue to be filed with APP/21/01244 on the HBC public access planning portal to ensure transparency.

Enforce timeliness and accuracy of traffic reporting

This is the sixth unusable Traffic Monitoring Report from Amazon's Transport Consultant. The frequency of presentation of these reports has also been poor, requiring regular chasing action by Planning Services to solicit a response.

Amazon UK Services has been operating at the 32 New Lane 'DPO1' site for almost two years with no valid and fit-for-purpose Operational Management Plan in place against which traffic reporting can be benchmarked in an accurate and transparent manner.

Rather than waste time and effort generating more worthless traffic reports, HBC Planning Services should require a complete revision of the OMP and define a fully independent method for benchmarking and monitoring the agreed traffic generation profile.

Once the Operational Management Plan has been revised and agreed, then the timetable for fully transparent traffic monitoring should restart, to the frequency stated in the planning approval Decision Notice for APP/21/01244.

Review relevance of the 'Peak Hours'

Given the complete departure from the documented and agreed business processes, the peak reporting periods, 0800-0900 and 1700-1800, which have always been shown in the ATR supplied data as the highest two single hour periods for traffic generation each day are in practice amongst the lowest hours for observed traffic generation. It seems highly likely that the morning and afternoon 'peak hours' shown in Table 1 were overstated in the original Transport Statement provided by Vectos with APP/21/00200, safe in the knowledge that Amazon's actual traffic profile would never approach, let alone exceed the figures given at those times. The reporting of 'actual' against 'documented' numbers for these hours therefore has no value.

While this concern was raised repeatedly during the planning process, constant observation of the traffic generation at the site over the past two years has proven that our concerns were valid. The traffic profiles presented with the planning applications and reflected in the OMP were not representative of the business profile of the then-anonymous occupant, a fact already known and deliberately exploited in the transport documentation which accompanied the applications.

Review Independence of Traffic Monitoring

While both this traffic monitoring report and the Planning Conditions to which it relates stress the need for independence of the monitoring and reporting body, it is clear from correspondence filed with the Planning Application, that the 'Traffic Monitoring Reports', which in early versions appear under the 'Vectos', 'now 'SLR' letterhead, are authored by Ian Dix⁵, formerly of Vectos and now of SLR Consulting. Ian Dix was the Transport Consultant engaged on behalf of Amazon to provide supporting data for planning applications APP/21/00200 and APP/21/01244 and is now employed by SLR, acknowledged by Amazon management at the DPO1 Community Liaison Panel meeting on 20 January 2025 as Amazon's retained Transport Consultancy.

We understand that the data collection third party is a separate company. However, in correspondence posted to the planning record on 1 December 2023, Mr. Dix states that:

"The independent survey company is: Advanced Transport Research (ATR). They are an independent traffic survey company based in Essex. They provide[d] the surveyed data used at the planning application stage and have provided and maintain the monitoring equipment that has been installed on the site."

This raises two further points on independence. If ATR were indeed the source of the disputed data provided with the original planning applications, then the independence of

⁵ See APP/21/01244 - 'Cover Letter for Fifth Operational Traffic Monitoring Report' filed 1 October 2024

that company (ATR) should also be called into question. The fact that, in further correspondence on the planning file, Mr. Dix provides further detail on recurring failures of the traffic monitoring equipment installed at the site, also raises questions over the credibility and efficiency of ATR's operations.

Given the deliberate obfuscation of traffic data attributable to Mr. Dix throughout the Amazon site planning history, we cannot accept that these Traffic Monitoring Reports are 'independently' produced.

5. The wider impacts

The significant deviations from the operational model being followed by Amazon at the DPO1 site have been observed since operations began in March 2023, deviations which had been predicted by the local community as soon as the identity of the intended site occupier became apparent. The issue has been raised, repeatedly and in detail, to Havant Borough Council since the first draft version of the OMP was published in November 2021, by Havant Civic Society, by this residents' group and most recently by the Amazon DPO1 Community Liaison Panel.

The traffic loading on the residential streets which provide sole access to the New Lane estate will continue to increase to everyone's disadvantage unless the local authority takes action to manage and control traffic generation across the entire New Lane estate.

It is a matter of great concern to the residents that significantly more traffic generation is now proposed from the former Dunham Bush site in Downley Road⁶, which will compete for the same restricted accesses to the New Lane estate shared by Amazon DPO1 and all other users of the New Lane employment area.

The New Lane estate is a sub-optimal location for the massive, state-of-the-art Amazon Delivery Centre constructed on it, with traffic generation already throttled by the capacity of the local street network. The estate is remote from the Strategic Road Network and can only be accessed via congested residential streets which also serve NHS community hospital facilities and local schools. As HCS et al have always maintained, the estate is entirely unsuitable for 'edge of town' warehouse and logistics operations with high volume traffic generation.

Response compiled by

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- Havant Civic Society
- The New Lane / Eastern Road Residents group
- The local resident members of the Amazon DPO1 Community Liaison Panel

⁶ Planning Application APP/24/00606

Response to Amazon DPO1 'Sixth Operational Traffic' Monitoring Report

6. OMP Appendix A

Daily Traffic Profile

		6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3	4	5
Cars	Total	206	157	121	-	39	-	-	-	43	11	-	105	157	71	-	37	133	1	-	-	-	-	-	-
	In	89	157	121	-	39	-	-	-	16	1	-	-	-	-	-	-	117	-	-	-	-	-	-	-
	Out	117	-	-	-	-	-	-	-	27	10	-	105	157	71	-	37	16	1	-	-	-	-	-	-
Vans	Total	-	144	216	94	-	81	45	45	45	30	164	223	94	-	50	24	-	-	-	-	-	-	-	-
	In	-	-	-	-	-	23	23	23	23	8	157	216	94	-	50	12	-	-	-	-	-	-	-	-
	Out	-	144	216	94	-	58	23	23	23	23	7	7	-	-	-	12	-	-	-	-	-	-	-	-
HGVs	Total	-	2	2	2	2	-	-	-	-	2	2	2	-	-	-	-	8	8	8	8	8	8	8	8
	In	-	1	1	1	1	-	-	-	-	1	1	1	-	-	-	-	4	4	4	4	4	4	4	4
	Out	-	1	1	1	1	-	-	-	-	1	1	1	-	-	-	-	4	4	4	4	4	4	4	4
Total	Total	206	303	339	96	41	81	45	45	88	43	166	329	252	71	50	60	141	9	8	8	8	8	8	8
	In	89	158	122	1	40	23	23	23	39	10	158	217	94	-	50	12	121	4	4	4	4	4	4	4
	Out	117	145	217	95	1	58	23	23	50	34	8	112	157	71	-	49	20	5	4	4	4	4	4	4

Indicative Daily Traffic Profile by Access

		6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3	4	5
Northern Access	Total	26	151	169	47	18	40	23	23	23	15	82	164	126	34	25	30	-	-	-	-	-	-	-	-
	In	26	79	61	-	18	11	11	11	11	4	79	108	47	-	25	6	-	-	-	-	-	-	-	-
	Out	-	72	108	47	-	29	11	11	11	11	3	56	79	34	-	24	-	-	-	-	-	-	-	-
Central Access	Total	154	-	-	-	2	-	-	-	43	11	-	-	-	2	-	-	133	1	-	-	-	-	-	-
	In	37	-	-	-	2	-	-	-	16	1	-	-	-	-	-	-	117	-	-	-	-	-	-	-
	Out	117	-	-	-	-	-	-	-	27	10	-	-	-	2	-	-	16	1	-	-	-	-	-	-
Southern Access	Total	26	153	171	49	20	40	23	23	23	15	82	164	126	34	25	30	8	8	8	8	8	8	8	8
	In	26	80	62	1	19	11	11	11	11	4	79	108	47	-	25	6	4	4	4	4	4	4	4	4
	Out	-	73	109	48	1	29	11	11	11	11	3	56	79	34	-	24	4	4	4	4	4	4	4	4
Total	Total	206	303	339	96	41	81	45	45	88	41	164	327	252	71	50	60	141	9	8	8	8	8	8	8
	In	89	158	122	1	40	23	23	23	39	9	157	216	94	-	50	12	121	4	4	4	4	4	4	4
	Out	117	145	217	95	1	58	23	23	50	33	7	111	157	71	-	49	20	5	4	4	4	4	4	4