



FINALISED AND APPROVED HEADS OF PLANNING SCOTLAND (HOPS) 6 MONTH SURVEY ON THE IMPACT OF THE 2017 MAJOR APPLICATION FEE INCREASE ACROSS SCOTLAND



Report prepared on behalf of HOPS by Jim Birrell, HOPS Planning Review Programme Manager, April 2018

CONTENTS

SURVEY KEY FINDINGS AND CONCLUSIONS	PAGE 3
1.0 INTRODUCTION	PAGE 4
2.0 BACKGROUND	PAGES 4/5
3.0 HOPS ASSESSMENT AND CONCLUSIONS FROM THE SURVEY	PAGES 5/7
4.0 HOPS RECOMMENDATIONS	PAGES 7/8
APPENDIX 1 - THE ONLINE SURVEY QUESTIONNAIRE	PAGE 9
APPENDIX 2 - SURVEY COMMENTS AND INFORMATION SUBMITTED BY THE RESPONDENTS	PAGES 10/16
TABLE 1 - HOPS SURVEY OF SCOTTISH LPAs - INCOME RECEIVED AND RANKING ORDER	PAGES 17/18

RESULTS OF THE HOPS SURVEY ON THE INCREASE IN FEES FOR MAJOR PLANNING APPLICATIONS - 1 June 2017 - 31 November 2017 (6 months)

SURVEY KEY FINDINGS

The survey questionnaire is attached as **Appendix 1 on page 9** and the detailed comments submitted by the Councils are attached as **Appendix 2 on pages 10-16**. The key statistics from the survey are highlighted in **Table 1 on pages 17 and 18**

- All 32 LPAs and the 2 National Park Authorities were surveyed, and 34 replies were received. This gives a survey return rate of 100%
- A total of 167 major applications were received during the 6-month survey period
- There were 10 authorities who received no major applications during this time
- £1,460,051 additional fee income was generated across Scotland
- The range of applications received was from 1 to 24
- Only 2 councils received income uplift of more than £200,000 (Edinburgh and Glasgow)
- 2 Councils received more than £100,000 but less than £200,000 (Moray and Highland).
- 10 Councils received less than £50,000 in additional income

CONCLUSIONS

- There is a wide divergence in the additional fee impacts across Scotland
- There was little benefit for small or rural authorities
- Edinburgh and Glasgow received the largest fee uplifts totalling £495,679. This represents 34% of the Scottish total
- The fee increase does not appear to have acted as a disincentive to developers
- The increases did not have any effect on MSC applications or Section 36 and Section 37 consents
- Most planning budgets are not “ring fenced” for planning purposes only so the benefits go towards the planning budget or the corporate budget
- The fee increase will not cover the disparity between income and expenditure identified in the “Costing the Planning Service” project
- The majority of Scottish Councils welcomed the additional fee income but felt it was only a partial solution to the longer term restructuring of planning fees and the resourcing of planning services
- A wide range of improvement opportunities were identified within the planning services who were able to reinvest some of the additional income generated

1.0 INTRODUCTION

1.1 HOPS agreed with the Scottish Government (SG) to carry out a short, interim survey of all LPAs to determine the extent of major applications submitted since June, 2017 and how any additional fee income generated has been reinvested in planning services.

1.2 It is important that the Minister and Scottish Government are aware of the financial impacts on planning services and as part of the ongoing discussions at the High-Level Group on Performance, the nature and relationship of the links between increased performance and increased fees, and particularly how fee increases can be used to reinvest in improvements and enhancements in the planning system, is an important element in taking discussions forward.

1.3 HOPS appreciates that the impacts will vary considerably across Scotland, but it is important that we obtain a 100% survey return, including nil returns where no major applications have been received since June, to assist the Scottish Government in assessing the current impacts of the fee increase.

2.0 BACKGROUND

2.1 The Scottish Government consulted on raising planning fees in December 2016 as part of its commitment to consult on enhanced fees, following on from the Independent Review of Planning recommendation that fees for major applications should be increased substantially so that the service moves towards full cost recovery.

2.2 The consultation paper sought views on a new fee maximum of £125,000 for major applications for most categories of development (£62,500 for applications for planning permission in principle). It included details of a reduced charge per unit or per 0.1 hectare for developments over a certain size to ensure that applicants in Scotland do not pay more than they would in other administrations for any size of proposed development.

2.3 This was termed a “Phase 1” approach as the Scottish Government were to consider wider changes to the fee structure, including scope for further discretionary charging taking account of changes to the planning system flowing from the planning review process. Recent discussions suggest that the further “Phase 2” consultation will not take place until the latter part of 2018 or possibly later.

2.4 Planning fees for major scale applications were increased from the 1st June 2017. The maximum planning application fees were increased from £20,050 to £125,000 and maximum fees for applications for planning permission in principle were also increased from £10,028 to £62,500.

2.5 At the time the fee increase was reported there was general industry support for increasing planning application fees, if the additional fees were used to improve the planning service.

2.6 HOPS submitted a detailed response to the Scottish Government in its Paper on Planning Fees and Performance setting out a case for a comprehensive review of the planning fee structure and categories for discretionary charging. This message has been repeated by HOPS in its submissions on the Financial Memorandum and the Call for Evidence for the Planning Bill.

2.7 HOPS considers that it is important to keep up the pressure for a more comprehensive, proportionate and sustainable planning fee regime and this short survey will assist in providing some additional interim data beyond what is currently collected in the Planning Performance Frameworks and the annual LFR7 returns prepared by Council Finance Officers.

3.0 HOPS ASSESSMENT AND CONCLUSIONS FROM THE SURVEY

WHAT DID WE FIND OUT?

3.1 The survey has been successful and has achieved total coverage of Scottish Planning Authorities, as well as the two National Park Authorities.

3.2 HOPS acknowledges that it is an initial and interim survey, with those limitations, but it would be worthwhile to repeat the survey for the second 6-month period, 1st December, 2017-31st May, 2018 to provide a fuller first year assessment. This follow up survey would provide a better and fuller understanding of the impacts in the first year of the fees increase.

3.3 The impact of the fee increase, not surprisingly, varies widely across Scotland. Currently, the main beneficiaries are the larger city councils, Edinburgh and Glasgow.

3.4 The smaller and more rural councils do not receive significant numbers of major applications, if any, and this dramatically influences the overall impacts across Scotland.

3.5 The total “additional” income generated by the fee increase was £1,460,051 in 167 separate applications. This averages out at £8,743 per application or £60,835 per authority (24) who achieved additional income levels.

3.6 The cities of Edinburgh and Glasgow dominate the fee increase impacts with a combined total of £495,679. This represents 36% of the total Scottish increase.

3.7 Aberdeen City, Cairngorm National Park, Inverclyde, Orkney, Renfrewshire and West Lothian received no major planning applications during the survey period. A nil return from the urban authorities of Aberdeen, Renfrewshire and West Lothian is surprising, and it will be interesting to see if the investment pattern reflected by major application submissions continues across Scotland in a similar pattern in the next 6 month period.

3.8 Dumfries and Galloway, Eilean Siar and Perth and Kinross all received major applications, but these did not generate any additional fee income.

3.9 There was no discernible increase in the number of major applications submitted prior to the fee increase.

WHAT DID WE LEARN ABOUT PLANNING BUDGETS?

3.10 The main points made by the planning authorities about funding and budgetary arrangement within councils and the reinvestment opportunities provided are fairly consistent.

3.11 Opportunities are few and far between and the additional income generated in most councils does not make any substantive difference to the budget available for any reinvestment.

3.12 Most council planning budgets operate on the basis of a predicted income level set against proposed expenditure levels.

3.13 There is little or no opportunity for reinvestment in the planning service, or indeed any other service, as increased income is set against any “savings targets”.

3.14 In a few councils the income is a corporate income and is not confined to or in the control of the planning service.

HOW WAS THE ADDITIONAL FEE INCOME REINVESTED?

3.15 General comments made about the fee increase levels demonstrate that the increased income was used by many councils to maintain and supplement current levels of service in many instances and the fee income generated from planning applications supports the wider planning service.

3.16 The spend was not restricted to development management staff and services.

3.17 Where specific reinvestment opportunities were identified by councils they covered a range of areas including,

- Local Review proceedings and planning appeals
- The use of consultants
- Opportunity to trial new approaches, e.g., the setting up of a dedicated small applications team.
- Recruiting vacant posts

- Extension of temporary contracts
- Enforcement resources
- Development Management and Development Planning

WHAT OTHER COMMENTS WERE MADE?

3.18 Other council comments included the need for a more sustained level of additional income if real reinvestment is to be realised.

3.19 A few councils commented on the recent decline in onshore windfarm applications which has had significant impacts on previous income levels. This is particularly evident in the rural and Island council areas.

3.20 This issue also attracted related comments about Section 36, Section 37 and Section 42 applications not providing any income to planning authorities.

3.21 This was clearly identified as a matter which requires to be reconsidered in the planning resources review work.

3.22 Many councils commented on the urgent need for a comprehensive review of the resourcing of the planning service and comparisons with the higher level of fees in England were made.

HOPS would like to thank all the respondents for taking part in this survey and for providing detailed assessments of the context of their organisation on how the increased fee income is being used or the comments made on the fee structure in general and the helpful suggestions for taking forward in the subsequent review process.

4.0 HOPS RECOMMENDATIONS

- 1. The survey of the impact of the fee increase for major applications should be repeated for the next 6 month period to provide a full year assessment of the fee increase impacts.**
- 2. The key findings and comments from this survey should be submitted to the Scottish Government to input in to the forthcoming wider process of planning fee restructuring and consultation on planning resources.**
- 3. The Scottish Government is asked to appreciate that increasing planning fee levels for major applications is only one consideration on the road to achieving a sustainable solution based on a full cost recovery model and that increases need to be across all levels of planning applications, including consents and discretionary fees, to spread the benefits of reinvestment opportunities across Scotland on a fair and proportionate basis.**

- 4. The Scottish Government should continue to work with relevant stakeholders to comprehensively review the context and issues around the funding and resourcing of planning services across Scotland. HOPS advocates and supports this approach and looks forward to continuing to work with the Scottish Government to inform and influence the new arrangements.**

APPENDIX 1-THE ONLINE SURVEY QUESTIONNAIRE

COUNCIL INFORMATION

Q1 - Name of respondent

Q2 - Name of Council

Q3 - Job Title

Q4 - E-mail address

SURVEY QUESTIONS

Q5 - Has your authority received any major applications in the 6-month period- 1 June 2017 - 30 November 2017 (6 months)

Q6 - How many applications were received?

Q7 - What has been the scale of uplift in £s?

Q8 - How much of the fee uplift was reinvested in the planning service?

Q9 - What service/projects were identified as benefitting from this?

Q10 - Did your authority experience a surge in major applications prior to the increase date? (1 June 2017)

Q11 - How many applications were received?

Q12 - Estimated lost income from this?

Q13 - Any further comments on the major application fee increase?

APPENDIX 2 - SURVEY COMMENTS AND INFORMATION SUBMITTED BY THE RESPONDENTS

Notes:

The comments below are extracts from the submitted survey response returns and are based on the responses provided by each Council.

The responses have been anonymised and subject to minor editing only, including spelling and grammar changes.

Geographical descriptions have been omitted.

The emphasis added in **bold text** has been inserted by HOPS

Comments submitted by Scottish Councils

That is not how LA budgets work, **all of the increased income went into the planning budget.**

In terms of the Council financial position, **the fee increase prevented the loss of 3 planning officer posts** which would have been lost through the percentage cuts.

Increased fees contributed to the fee target for the year.

Not as significant an increase as had been anticipated, given the need to increase fees as identified in the 'Costing the Planning Service' exercise.

The money has been retained within the Service and is being used to maintain the current levels of Service.

The major application increase has been very welcome. The main element of our increase has been a significant quarry scheme that was the maximum £125,000. We have also received a major application in December for an alloy wheel plant for about £96k — not included within survey figures as outwith the timeframe. At this current time of budget pressure, the additional funding is being used to maintain current level and justify the continued filling of vacancies.

We are continuing to try and find efficiencies in how we deliver the service and the additional funding does allow us some freedom to trial new approaches, for example, the setting up of a dedicated small application team.

The Planning Service receives all fees as an income target to fund the service. It has yet to make a significant uplift in fees. This was predicted when profiling the fee increase against the applications we typically receive.

No fee uplift involved in any of the applications - 2 x S.42 applications, 1 ROMP, 1 free go resubmission, 1 housing application with fee less than previous fee ceiling. Also received 2 x S.36 consultation notifications. The S 36 fees still mirror the old fee maximums so there was no additional income and no additional investment.

There are a number of issues highlighting the drawback of simply tinkering with one element of the fee regulations, which has generated avoidance tactics because of the failure to address loopholes elsewhere in the Regulations, especially the use of S.42 applications and the use of S.36 applications to the Energy Consents unit who still have not realigned their fees to reflect the new increased maximum fee.

The whole approach has been too simplistic and from our perspective will do nothing to address the inadequate level of fee income compared to our costs. For a rural authority the only real opportunity to realise the new maximum fees is through windfarm developments, which are drying up.

The application was submitted under S 42 (for a windfarm), involved a very significant amount of Officer time (EIA development) and the Fee was £202 (Two hundred and two pounds)

The fee increase will make no difference to small planning authorities such as ours which has perhaps one Major application a year or every two years.

I would take the opportunity to reiterate the views expressed to the Scottish Government during the last consultation period on planning fees. **Major applications of a scale likely to trigger the uplift are submitted on such an infrequent basis that the uplift will only rarely and infrequently generate any additional fee income.**

Major applications tend to be at the smaller end of the spectrum given the rural character and modest scale of even the larger settlements within the Council area. Whilst 3 major applications have been received within the study period it is noted that the nature and scale of these proposals were such that none of them reached the pre-1st June 2017 maximum fee level-the combined fees amounted to £45K. Within our area it is noted that one of the development types that does generate a regular number of submissions on an annual basis with maximum fees is that for aquaculture development which was excluded from the uplift. The other development type which does have potential to generate significant fee income is on shore wind energy; however there has been a significant downturn in onshore wind farm proposals over the past few years resulting from the change in the UK Government's approach to the subsidisation of renewables.

Whilst the uplift in the maximum fees for "major" developments is generally to be welcomed we would stress that within a rural planning context the costs of processing "local" applications will generally be higher than urban authorities taking into account the cost of time and travel required to provide a planning service across an extensive geographic area.

It is essential that the Scottish Government undertake a review of the planning fee regime as a whole, including fees for prior notifications and "local" development if it is to allow Local Authorities to deliver on the aspirations for a cost neutral Development management service

All planning fee income supports the delivery of the Planning function. It is too early to indicate whether additional staff can be appointed, but we are monitoring the fee income, application numbers, performance and a range of other matters. Planning application fees support the planning service in its widest sense, not just the development management process.

The number of major planning applications received varies considerably across authorities. The impact of the fee increases for an authority like ours, where few major applications are received, will likely be modest.

There has been absolutely no impact in our authority.

Whilst this Planning Authority does not receive a significant number of major applications it has proportionately lower staff numbers than other Authorities. It can be seen from the "lost" revenue of only one major application the significant additional resources that the fee increase for major applications will bring in assisting this Council in providing a proportionately costed Development Management service.

The budget for 2017/18 is £1.945m and the forecast is £1.713m including the uplift in fees. This demonstrates the need to resource Planning Authorities. More positively, the Planning Authority through the Workforce Youth Investment Programme has recently employed 2 Planning Graduates on 2-year contracts. This is in addition to a year out Planning student and a P/T, temp contract for 2 Planning students as they progress through their study year.

Generally, the £50k increase in fees within this period, is assisting in retaining posts and in delivering improvements. This is not only related to determining applications timeously, but also provides a little capacity across the planning authority to implement improvements to our processes, customer service, and how we deliver our work (e.g., digital transformation).

As yet no application has attracted the new maximum fee. Whilst, this is often used as a headline the way the new fees are calculated counteracts the actual fee to be paid. A full review of Fees is needed to ensure that issues around e.g. S 42 applications are addressed through the Planning Bill and related Regulations. **It is within these types of applications where the planning Authority is putting in considerably more work for a very small fee.**

The Planning Service budget has an assumed income from planning applications, so the income remained in the service's budget.

The fee increase is a start. It does not appear to have been a disincentive to developers; perhaps there is scope to review in a few years to see if we can achieve the fees paid in England.

Money used to address pressures in other services elsewhere in the Council.

It is too early to identify any real trend. There remains the anomaly that the fees for Section 36 applications have not been reviewed, meaning that the most major and resource-intensive proposals considered through that process continue to attract lower fees than those requiring a planning application.

We note as previously that the increase favours those Authorities who attract the larger applications and while welcomed the fee increases are not equitable and attention needs to be given to fees across all categories.

Monies are not ring fenced for the planning service.

Although monies have not been ring fenced to the planning service the increase in fees has assisted the Council in dealing with costs incurred by the planning service. In particular costs associated with Local Review Procedures, planning appeals, Planning Committees, use of consultants.

The increase in fees was welcome.

The SG definition of major does not include MSC applications. We registered a number of MSC applications which attracted the maximum fee, but which have been excluded from this survey.

We are currently working on identifying services and projects that could benefit from an uplift in planning fees. However, at present we have not benefited from a maximum planning application fee associated with a Major Development i.e. £125,000. This therefore restricts the scope of this work as the fee uplift has not yet been fully realised.

There has been no actual re-investment as this can only happen if there is a sustained increase in income which can be projected into future revenue budgets.

We are currently seeing a drop in the number of major applications which makes projecting of income vulnerable. However, the additional money has allowed us to recruit to vacant posts which would otherwise be kept unfilled due to budget pressures and to recruit 2 temporary agency planners to cover for staff vacancies. **This has benefited core development management service activity.**

The 20 applications are made up of 9 major applications but also 11 applications for approval of matters specified in conditions in relation to major applications to which

the new fee levels have been applied. This accounts for the apparently large uplift if only major applications are the subject of the survey, the fee uplift was £52,330 but this would not be an accurate reflection of the benefit.

The increase in the maximum fee is welcomed but there are a number of structural changes which would assist with the proper resourcing of the service.

In particular the fee of £401 for repeat AMC applications does not reflect the amount of work that these applications for major development matters entails and it can often be abused by developers. We do not consider that the circular on fees reflects the legislation in respect of this and we would want the Scottish Government to make it clear that every new AMC application should require the full fee to be paid for its processing. We believe this is what the legislation actually states, and the £401 fee is for very limited AMC applications for the same matters.

There is no direct link between fee income and service improvement. However, there is a significant indirect link in that bringing in higher fees helps us in the annual battle to protect the service from further budget cuts.

It is too early to indicate if any impacts or not.

- 1) 17/0858/PP: - Extraction of around 100,000 t of coal with restoration to semi-improved grassland, woodland and provision for a replacement steading
 - 2) 17/0865/PPP: - Mixed-Use Development Comprising Enterprise & Innovation Centre, Live/Work Studio, Urban Wave/Surf Leisure Swimming Pool (including Children's Innovation Hub Nursery) (Class 11), Light Manufacturing (Class 5/6), Office (Class 4), Ancillary Retail (Class 1), Food & Drink (Class 3), Residential Affordable Housing (33.3% quotient), Renewable Energy Centre, Place of Worship (Class 10), Sustainable District Heating Network (Geothermal Deep Well Technology), Urban Park/Landscaping, Road & Infrastructure Improvements.
 - 3) 17/0966/PP: - Erection of 67 residential dwellings with associated landscaping, parking and road infrastructure.
 - 4) 17/1072/PP: - Erection of 56 dwelling houses with associated landscaping, parking and access road at Residential Development.
- The four applications to date noted below have seen marginal increases from the original fee structure.

- 1) 17/0858/PP: - Extraction of around 100,000 t of coal with restoration to semi-improved grassland, woodland and provision for a replacement steading at OCCS
- 2) 17/0865/PPP: - Mixed-Use Development Comprising Enterprise & Innovation Centre, Live/Work Studio, Urban Wave/Surf Leisure Swimming Pool (including Children's Innovation Hub Nursery) (Class 11), Light Manufacturing (Class 5/6), Office (Class 4), Ancillary Retail (Class 1), Food & Drink (Class 3), Residential Affordable Housing (33.3% quotient), Renewable Energy Centre, Place of Worship (Class 10), Sustainable District Heating Network (Geothermal Deep Well Technology), Urban Park/Landscaping, Road & Infrastructure Improvements.
- 3) 17/0966/PP: - Erection of 67 residential dwellings with associated landscaping,

parking and road infrastructure at Bellfield Primary School.

4) 17/1072/PP: - Erection of 56 dwelling houses with associated landscaping, parking and access road at Residential Development.

Monies paid into the central Council budget.

As the increased fees goes into the central Council budget the Planning Service is not benefiting from the increase in fees. Separately the Council is facing a budget reduction which will impact its planning service with the potential loss of staff (Planning Officers).

The income has come in against our current year income target. That income will be reinvested through our 2018/19 budget process which has not been concluded.

Firstly, a clarification in respect to answers provided for questions 6-9 and question 11.

Q6-9: While 3 applications were received, 2 of these were S 42 applications not subject to a fee increase. The third was an Approval of Matters Specified in Conditions application for a Major site — albeit only for the erection of 8 houses and therefore the fee remained the same under the old and new regulations. The fee uplift was therefore £0.00.

Q11: 10 applications were received in the 3 months prior to 31 May 2017. This compares to 3 applications and 2 applications in the same period in 2016 and 2015 respectively.

While any fee increase is welcomed to offset the costs of delivering the service, there is still what we consider to be a significant shortfall between income and expenditure.

The aspiration for the Scottish Government and HOPS is to make the system cost-neutral; however, we believe that it will not be achieved through the most recent fee increase in The Town and Country Planning (Fees for Applications and Deemed Applications) (Scotland) Amendment Regulations 2017 for major applications. This view is informed, in part, by the work and findings of the Scottish Planning Service Costs Project undertaken in 2013-14.

It is uncertain what the evidence base was for the most recent fee increases in 2017 and, perhaps, any subsequent review needs to be better informed relative to the actual cost of service delivery. We would highlight the current disparity of application fees between Scotland and England as an example of this. The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017, which took effect in England on 17 January 2018, increased the maximum application fee for large-scale developments to £300,000 — from an already higher £250,000 — compared to the maximum fee in Scotland of circa £125,000. **The legislative and administrative similarities between the two systems would suggest a further review would support**

proportionate increases in fees for major applications to achieve cost neutrality.

For a small island planning authority proposal that fall into the major category (and are not otherwise avoided) are few and far between.

The fee increases have come too late to cover lifetime costs of major category developments granted in recent years.

Will the fees for S 36 and S 37 Applications under the 1989 Electricity Act be increased to cover lifetime costs for planning authorities of associated deemed consents?

No ring fencing of fees but re investment occurred

Staff resources across the planning service — extension of temporary contracts and Enforcement resources.

No evidence that the fees have prevented applications from being submitted.

Will evidence be forthcoming that the increase in fees actually covers the full resources of dealing with a major application from beginning to the end?

The fee increase is a reasonable approach in terms of detailed permissions/ AMSCs, however, for PPP applications, the lower maximum fee is not justifiable, partly as a lot of significant work and assessment is required for a PPP and because the site area calculation does not accurately reflect the level of housing a site would accommodate.

The increased income has assisted on a single case for a minerals application.

Overall major app numbers are low (3-4 per annum).

It is anticipated that the overall benefit to total fee income will be limited.

TABLE 1- HOPS SURVEY OF SCOTTISH LPAs-Fees for major applications			
Council	Applications received	Income (£s)	Ranking, high to low
Aberdeen City	0	0	0
Aberdeenshire	7	95,600	5
Angus	1	29,745	15
Argyll and Bute	3	0	0
Cairngorms NPA	0	0	0
Clackmannanshire	1	7,803	23
Dumfries and Galloway	5	0	0
Dundee City	2	14,590	18
East Ayrshire	4	10,990	20
East Dunbartonshire	5	29,985	14
East Lothian	3	29,000	16
East Renfrewshire	3	61,006	8
Edinburgh	20	295,679	1
Eilean Siar	1	0	0
Falkirk	5	8,800	22
Fife	23	50,760	11
Glasgow City	24	200,000	2
Highland	13	133,445	3
Inverclyde	0	0	0
Loch Lomond NPA	2	40,000	12
Midlothian	3	58,000	10
Moray	1	100,000	4
North Ayrshire	2	13,395	19
North Lanarkshire	8	81,809	6

Orkney Islands	0	0	0
Perth and Kinross	3	0	0
Renfrewshire	0	0	0
Scottish Borders	5	59,985	9
South Ayrshire	6	19,595	17
South Lanarkshire	11	69,000	7
Stirling	3	40,864	13
West Dunbartonshire	3	10,000	21
West Lothian	0	0	0
TOTAL	167	1,460,051	