

Cabinet 27 February 2018	 TOWER HAMLETS
Report of: Tom McCourt, Strategic Director	Classification: Unrestricted
Local Implementation Plan - Annual Spending Plan 18-19	

Lead Member	Councillor Amina Ali - Cabinet Member for Environment
Originating Officer(s)	Margaret Cooper, Head of Engineering
Wards affected	(All Wards);
Key Decision?	Yes
Community Plan Theme	Creating and maintaining a vibrant and successful place

Executive Summary

The Council adopted a 3 Year Delivery Plan to implement the existing long term strategy set out in the Local Implementation Plan (LIP) in December 2011. The Delivery Plan is updated on an annual rolling basis and, with the LIP, delivers the Mayor of London's Transport Strategy. This report gives a short overview of the LIP document and reports progress in the delivery of the current year's programme before focussing on the funding allocations for 2018/19 which was approved by Transport for London (TfL) in December 2017 through the Annual Spending Submission.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the allocation of the schemes proposed for funding in the LIP Delivery Plan 2018-19 (Appendix 1).
2. Note that the overall expenditure was approved in the Council's 2018/19 Capital Programme in the January 2018 Cabinet Budget Report with capital estimates being adopted for specific schemes.

1. REASONS FOR THE DECISIONS

- 1.1 Financial Regulations require the adoption of capital estimates for specific schemes to authorise expenditure by Council Officers on the delivery.

2. ALTERNATIVE OPTIONS

- 2.1 None considered

3. DETAILS OF REPORT

- 3.1 Local Authorities in London are each required to develop a long term strategy for local sustainable transport improvements to support healthier, greener lifestyles in line with strategic objectives and plans set out in the Mayor for London's Transport Strategy (MTS). The Local Implementation Plan 2 (LIP2) was approved in 2011 covering the period to 2030, but with the release of the consultation draft of the Mayor for London's new Transport Strategy in July 2017, there will be a requirement for all boroughs to produce a new LIP3 for approval by the Mayor for London by April 2019.
- 3.2 Each LIP includes a delivery plan for a three year rolling period which is revised on an annual basis and boroughs are allocated funding by Transport for London (TfL) for delivering this programme. The TfL LIP contribution in 2018/19 is £2.278 compared to £2.827m in 2017/18.
- 3.3 TfL issued draft guidance to boroughs on the preparation of the 18/19 LIP Annual Spending Submission in May 2018, which have now moved towards Vision Zero (for Road Safety), encouraging Cycling & Walking, Healthy Streets and improving Air Quality. In December TfL reduced the overall total of funding being made to all boroughs by approximate 15% as a result of Government cuts to TfL funding, Fares Policies and a downturn in rpassenger revenue from buses and LUL.
- 3.4 LIP funding is extremely important to improving traffic management and highways throughout the borough when viewed in the context of borough highway funding overall. Such schemes can be funded from 4 main potential sources and the current level of funding available is as follows:-
- TfL LIP: which must be allocated to schemes which comply with the criteria set out by the Mayor for London. £2.278 million p.a. The rest of this report concentrates on the allocation of this funding.
 - S 106 / CIL development schemes –
 - £3.276m in total approved by Infrastructure Delivery Board and included in the current Capital Programme
 - £3.813m in total ringfenced to specific transport and highways schemes identified within relevant planning applications and awaiting approval by the Infrastructure Delivery Board
 - S278 Highways Agreements fund essential reconstruction of surrounding footways following completion of development works - £1m p.a. approximately

- LBTH capital : currently £3m for Mayor's Neighbourhood Refresh. LBTH capital is the only source of funding with full flexibility to be used to deliver Mayoral priorities for enhancing streetscene and general public realm.

In addition, modest revenue budgets are available for planned maintenance work and reactive minor traffic management schemes.

- Traffic Enhancements Revenue : £ 198,600 p.a.
- Streetscene Enhancements Revenue : £ 532,800 p.a.

3.5 This report gives a short overview of the current LIP document and summarises the changes in approach recommended through TfL guidance. It reports progress in the delivery of the current year's programme before focussing on the detail of schemes included in the 2018/19 LIP Annual Spending Allocation.

3.6 **Progress on Delivery of 2017/18 LIP schemes**

3.6.1 The selection of schemes for LIP funding in previous years, including 2017/18, was based on the LIP2 Borough Transport Objectives which were established in 2011 as :

LBTH1: To promote a transport environment that encourages sustainable travel choices

LBTH2: To ensure the transport system is safe and secure for all in the borough

LBTH3: To ensure the transport system is efficient and reliable in meeting the present and future needs of the borough's population

LBTH4: To reduce the impact of transport on the environment and wellbeing

LBTH5: To ensure travel is accessible for all

LBTH6: To encourage smarter travel behaviour

LBTH7: To better integrate land use and transport planning policy and programmes

LBTH8: To contribute towards protecting and advancing the Borough's cultural and heritage assets.

3.6.2 Progress on the delivery of the schemes allocated funding in 2017/18 has been solid. Road safety work has been focussed on reinforcing slower speeds through reviewing traffic management in poorly performing existing 20 mph zones, and redesigning traffic management on streets more recently included in the boroughwide 20 mph limit. To date this work has covered :-

- Redcoat 20mph zone - design, consultation and implementation of traffic calming, traffic management changes and road closures;
- Arbour Square 20mph zone - design, consultation and implementation of traffic calming, traffic management changes and road closures ;
- Whitehorse Lane 20mph zone - design, consultation and implementation of traffic calming, traffic management changes and road closures;
- Salmon Lane 20 mph zone design, consultation and implementation of traffic calming, traffic management changes and road closures;

- Old Ford Road - design, consultation and implementation of traffic calming and road safety improvements;
- Antill Road 20 mph zone – design and consultation on traffic calming, traffic management changes and road closures with implementation to commence before the end of the financial year;
- Isle of Dogs residential areas – design of traffic calming, traffic management changes and road closures with consultation to follow by the end of the financial year;
- Weavers 20 mph zone (ie N of Bethnal Green Rd) – design and consultation traffic calming, traffic management changes and streetscene enhancements with implementation to commence by the end of the financial year;
- Cheshire St N 20 mph zone - design of traffic calming, traffic management changes, streetscene enhancements and road closures with consultation to follow by the end of the financial year;
- Cotton St – design review of the corridor to encourage slower speeds completed with consultation to follow by the end of the financial year;
- Prestons Rd - design review of the corridor to encourage slower speeds completed with consultation to follow by the end of the financial year
- Chrisp St corridor - design and consultation on a review of the corridor to encourage slower speeds with implementation to commence by the end of the financial year.

3.6.3 The main elements of work on cycle improvements funded through the LIP have been : -

- A post-consultation design review of traffic management proposals in the Cable Street area to reduce through traffic and conflicts with cyclists and pedestrians. Moving through to public consultation and Phase one implementation by the end of the financial year.
- A design review of the Manchester Road corridor with a view to slowing speeds and giving consideration to future provision for the potential growth in cycling - moving through to public consultation by the end of the financial year on phase one.
- A review of Cycling Level of Service on routes bordering Victoria Park
- Provision of secure residential cycle lockers, car shaped cycle parking hangars and Sheffield Stands.

3.6.4 Bow Area Traffic Management Review: progression of traffic signal designs and TfL Signals approvals for Wick Lane / A12 and Tredegar Road / Fairfield junctions, with part implementation planned for this financial year, to improve pedestrian safety; feasibility review of options to reduce rat-running through Coburn Road / Tredegar Rd between the A11 and the A12.

3.6.5 A series of pedestrian streetscene enhancements to North-South links between the A13 and A11 has been continuing as part of the Aldgate Connections and Whitechapel Vision Public Realm masterplans. High quality paving and greening of the streets has been carried out along John Fisher Street and is due to continue into New Road and Sidney Street area.

- 3.6.7 Further streetscene improvements in Bell Lane have supported the extension of the Goulston St food Court to the north.
- 3.6.8 Priorities for resurfacing of Principal Roads are determined by a London wide Condition Survey and work has been carried out along the poorest sections of Bethnal Green Road this year.
- 3.6.9 Delivery of “Supporting Measures” interventions throughout the year concentrates on cycle training, minor infrastructure improvements, and road safety education and awareness. In 2017/18 these initiatives included the following :
- Adult cycle training
 - Schools cycle training
 - Minor cycle permeability improvements
 - Road Safety Education in schools including Theatre in Education productions and facilitating the Junior Road Safety Officer scheme
 - School Travel Plan development and support for initiatives arising;
 - Bike Week, Accessibility Day and Walk to School promotions
 - Exchanging Places cycle / HGV safety awareness sessions

3.7 TfL LIP Guidance for 2018/19

- 3.7.1 The majority of LIP funding is determined by formulae for Corridors and Neighbourhoods and Supporting Measures based on population, accident data, traffic flow and road length. Tower Hamlets allocation for 2018/19 is £2.177m in this category. A total £0.100m has also been allocated for Local Transport Funding for preliminary feasibility and strategy development. Other LIP funding is determined on a London wide prioritisation framework for Principal Road Maintenance and Structures and via a new competitive bidding process for Liveable Neighbourhoods Schemes (£ 1- 10m in value). The borough submits its proposals for allocating this funding through the Annual Spending Submission forms in October each year.
- 3.7.2 Transport for London advised boroughs to focus on the following priorities which were expected to complement the Mayor for London’s emerging priorities:-
- The Healthy Streets Approach encouraging measures (and supporting policies) that effect significant mode shift from the private car to walking, cycling and public transport by helping to maintain or improve average bus speeds;
 - Encouraging measures (and supporting policies) that effect significant traffic reduction (including delivery and servicing activities); and
 - Working towards the Vision Zero target for improving road safety putting the elimination of road danger “at the very heart of the transport system”;
 - **tackling of poor air quality**, working to achieve a Zero Carbon City by 2050 and enhancing the natural environment;
- 3.7.3 TfL have indicated that they expect the Annual Spending Submission 2018/19 to facilitate the delivery of holistic or area-based interventions including,

cycling, walking, accessibility, safety measures, 20 mph zones and limits, bus priority and accessibility, freight, regeneration, environment, and controlled parking zones. It may also include expenditure on secure cycle parking, cycle training, shared space, car clubs, reduction of clutter, installation of electric vehicle charging points, school and workplace travel plans, behavioural change, education, training and publicity.

- 3.7.4 TfL have withdrawn the Major Schemes programme to be replaced by the Liveable Neighbourhoods programme – a competitive process for the allocation of discretionary funding: the total available budget over the next 5 years being £85m for the whole of London. These Liveable Neighbourhood projects are expected to fall into one of two categories:
- Smaller projects (i.e. less than £2m); characterised by a limited set of interventions based on the Healthy Streets Approach, to ensure routes are safe, comfortable, accessible and greener.
 - Larger projects (i.e. above £2m estimated full cost) forming the greater proportion of the programme. These schemes will consist of an area-wide set of improvements with a wide set of interventions and impacts across modes, delivering increases in cycling, walking and public transport use, encouraging modal shift and traffic reduction.

- 3.7.5 Funding for Liveable Neighbourhoods projects will be awarded through a competitive bidding process following a four-stage process : outline scheme with justification based on the Mayoral transport priority outcomes that will be delivered and the alignment of the schemes to areas with the most potential for delivering the objectives of the Liveable Neighbourhood programme; scheme development including consultation, detailed design and assurance requirements; implementation of project and post implementation monitoring and mitigation

3.8 **Proposed Borough Allocation 2018/19**

- 3.8.1 The Liveable Neighbourhoods application required a high level of detailed background material and analysis to have been completed and, with the relatively short notice of the detailed requirements, the only scheme at such an advanced level of preparation was the Bethnal Green Gateway junction improvement scheme. The area covered includes Cambridge Heath Road between Old Ford Road and Three Colts Lane, but particularly focussed on the junction with Roman Road and Bethnal Green Road. It was tailored to address the MTS priorities, incorporating improved routes from residential areas to the station, and coordinating with TfL plans for cycle routes and bus priority requests in order to present a truly holistic project. Unfortunately the bid was unsuccessful, and across London only 7 of 28 bids were awarded a total of £1.5m between them for development work.
- 3.8.2 Last year's Annual Spending Allocation was then reviewed in the light of the new guidance and progress on delivery and a Delivery Plan for 2018/19 submitted to TfL in October. In December TfL announced reductions to the indicative budgets for Borough LIP funding and requested a revised Annual

Spending Allocation be provided by the end of January with a total of £2.278m available, rather than the original £2.8m as anticipated.

- 3.8.3 In particular, the funding of Principal Road Maintenance (A roads) has been paused throughout London – when £270k was anticipated to be available for maintenance of Hackney Road.
- 3.8.4 This allocation is attached as an appendix for approval in order that it can be incorporated into the Council's Capital Programme for 2018/19 through Cabinet approval of this report. The programme is based on :
- Continuing funding for delivery of area-wide road safety reviews, corridor speed reduction reviews and the cycling strategy which addresses the Mayor for London's Vision Zero aspirations in particular, but can also contribute to the development of healthy streets through road closures and modal filtering ;
 - Additional funding to facilitate improvements in air quality through installation of more electric charging points, development of a mobile parklet to promote reallocation of road space projects and creation of a pocket park at Durant Street.
 - Further work to find bespoke solutions to local problems of anti-social behaviour involving vehicles, as identified through Community Safety Walkabouts.
- 3.8.5 Financial Regulations require the adoption of capital estimates for specific schemes to authorise expenditure by Council Officers on their delivery. In order to ensure the efficient delivery of the work programme, approval for the adoption of capital estimates for all schemes in the LIP Delivery Plan 2018/19 listed in Appendix 1 is sought through the Council Budget Report for 2018-19 and Medium Term Financial Strategy 2018-21.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 The report sets out the Local Implementation Plan (LIP) Delivery Plan funding allocation for 2018/19 of £2.278m. The schemes in Appendix One set out the priorities for the Council that formed the Annual Spending Submission to TfL submitted in December 2017. Now the submission is confirmed, adjustments will be made to Capital Programme for 2018 -2021 for the capital schemes that total £1.880m and the Revenue budget funding allocation for 2018-19 of £0.398m.
- 4.2 The report also provides details of the other funding sources that are available to support the Highways Capital Programme. A total of £7,089m is currently available from S106/CIL, £3.276m is already included within the current Capital Programme and the balance of £3.813m is ringfenced and will be added to the programme once approved and profiled across future years. A total of approximately £1m of funding will be available from developers under S278 Highways Agreements. The Mayoral Priority Growth is contributing a further £1m per annum over a 3 year period that has been invested into the Mayor's Neighbourhood Refresh programme.

4.3 The proposed LIP funding allocation for 2018/19 totals £2.278m and is broken down under the following themes:

	£m
• Corridors and Neighbourhoods	1.780
• Supporting Measures	0.398
• Local Transport Fund	0.100
Total LIP Allocation 2018/19	2.278

5. LEGAL COMMENTS

- 5.1 The Local Implementation Plan (LIP) is a statutory document prepared under section 145 of the Greater London Authority Act 1999 ('the 1999 Act') and sets out how the Council proposes to implement the Mayor of London's transport strategy (MTS). Transport for London (TfL) have the power to provide financial assistance for projects which improve transport under section 159 of the 1999 Act and the LIP funding is the process through which TfL provides this financial support to boroughs for schemes to improve their transport networks in line with MTS objectives.
- 5.2 This report provides an overview of the LIP and reports progress in the delivery of the current year's programme and funding allocations. It also asks Cabinet to agree the allocation of the schemes proposed for funding in the LIP Delivery Plan for 2018-2019. There are no direct legal implications arising from the recommendation in this report, however the legal implications of specific schemes will be considered as decisions are made on the individual schemes.
- 5.3 The Council has wide ranging powers which they will be able to rely on to implement the schemes, including the Road Traffic Regulation Act 1984, the Highways Act 1980, and the Town and Country Planning Act 1990. The most appropriate powers to be relied upon for each scheme will be considered as schemes move forward for delivery.
- 5.4 The Council has a statutory duty under Section 17 of the Crime and Disorder Act 1998 to consider crime prevention in all of their undertakings and do all they reasonably can to prevent crime and disorder. As such TfL's Local Implementation Plan (LIP) 2018/19 Annual Spending Submission Interim Guidance provides that LIP related projects should "embed" crime prevention within their design and management stages. This should be kept in mind as detailed assessment and design takes place.
- 5.5 Whilst statutory consultation is required for the LIP, there is no statutory or common law obligation to consult on the Delivery Plan 2018-2019. Where there is such an obligation in respect of the individual schemes, then this should follow any statutory requirements and the following common law criteria:
- (a) it should be at a time when proposals are still at a formative stage;

- (b) the Council must give sufficient reasons for any proposal to permit intelligent consideration and response;
 - (c) adequate time must be given for consideration and response; and
 - (d) the product of consultation must be conscientiously taken into account.
- 5.6 On 22nd February 2017 Council agreed the General Fund Capital and Revenue Budgets and Medium Term Financial Plan 2017-20. This is in accordance with the Council's Budget and Policy Framework. Once the Budget has been agreed then it is the responsibility of the Mayor, the Executive and officers to implement it.
- 5.7 Pursuant to Rule 3.1 of the Budget and Policy Framework, subject to the provisions of Rule 5 (virement) the Mayor, Executive, Committees of the Executive and any officers or joint arrangements may only take decisions which are in line with the budget and policy framework. If any of these bodies or persons wishes to make a decision which is contrary to the policy framework, or contrary to or not wholly in accordance with the budget approved by Council, then that decision may only be taken by Council.
- 5.8 From the Finance Comments, it is noted that adjustments will be made to Capital Programme for 2018 - 2021 for the capital schemes that total £1.880m and the Revenue budget funding allocation for 2018-19 of £0.398m. This will be part of the General Fund Capital and Revenue Budgets and which is for Council to approve.
- 5.9 When making decisions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). A proportionate level of equality analysis is required to discharge the duty. This report notes in paragraph 6 below that an Integrated Equality Assessment was undertaken on the Local Implementation Plan 2 and the outcome of that assessment. There are no additional equality implications arising out of this report, however equality implications should be further considered at the detailed assessment and design stage.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 An Integrated Equality Assessment was undertaken on the schemes proposed in the Local Implementation Plan 2 and this confirmed that all proposals sought to address the requirements of the entire community through detailed assessment at the design stage.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 All works will be delivered through Contract CLC 4371 which commenced on October 1st 2014 after an extensive competitive tendering process. This contract includes 4 LOTs for highway maintenance, capital improvements, streetlighting maintenance and streetlighting improvements.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 All proposals in this LIP are consistent with the aims of delivering a sustainable transport policy including support to the delivery of the Council's Air Quality Management Plan, the Green Grid and Sustainable Drainage schemes.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 In order to minimise financial risk, no expenditure will be incurred without confirmation of allocations being approved by TfL.
- 9.2.1 In order to minimise road safety and construction risk, road safety audits are carried out on all scheme designs, contractors are required to provide site specific health & safety plans and works are monitored through the Network Management permit process.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 LIP guidance requires schemes to take into consideration the Council's duties under Sn17 of the Crime & Disorder Act. This is exemplified by the scheme to tackle ASB driving, which may target areas of prostitution and road racing at the direction of the local Police.

11. SAFEGUARDING IMPLICATIONS

- 11.1 Appropriate DBS checks are required on all contractors staff entering schools to provide road safety and cycle training where they are in charge of children directly.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- None

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

Officer contact details for documents:

N/A

Appendix One : Proposed Allocation of LIP Funding 2018/19

Priority			2017/18	2018/19	Comments on changes to allocation for 18/19
	Corridors & Neighbourhoods	Scheme details	Current allocation	Proposed allocation	
1	Road Safety : Reinforcing slower speeds	Reviewing areas where further signage and traffic calming measures are required to make the speed limit more self-enforcing: focus on underperforming pre-existing 20 mph zones and new 20 mph roads being designed to slower speeds.	300	450	Complete works in Stepney area; Implement reviews done in Antill, Weaver's, Cheshire N and Isle of Dogs; Consult and initiate delivery on Cotton St / Prestons Road / Wick Lane slower by design schemes. Design Reviews in Wapping and Aberfeldy
2	Implementing Cycle Strategy	Cycle parking : Sheffield stands ; bike shaped cycle hangers, residential onstreet cycle hangars. Real-time cycle counters Old Ford Road Cycle Safety improvements Removal of CS2 left hooks at Mile End (Rhondda and Aberavon) in mini-holland style junctions.	375	350	Main new routes to be funded through TfL Strategic Cycle initiatives
6	Bow area traffic management	Roman Rd / St Stephens Rd junction remodelling; Protecting local residential areas from rat-running (mini Holland style)	125	120	Possibly extend in Liveable Neighbourhood Bid for 19/20 ?
	Improving Air Quality	Installation of on-street Electric Vehicle Charging Points		50	Match funding for GULCS grant
		Mobile Parklet design and construction		20	To support initiatives to create healthier streets
7	Legible London Improved wayfinding:	Map based wayfinding system. Progressing installation in Stepney, Wapping, Whitechapel then Bow and Bromley-by-Bow.	75	60	

3	Historic Streets	Streetscene improvements including hand-laying of recycled cobbles and improvements to pedestrian space in Wapping.	250	100	
4	Aldgate and Whitechapel Connections .	Improvement works arising from Whitechapel Public Realm Strategy focussing on complementing Crossrail Public Realm works in Durward Street and Brady St S road closure tying in with station opening.	250	0	18/19 Works could be entirely funded by potential GGF Bid or S106
5	Ben Johnson Rd area	New signals at Harford Street	250	150	
8	Chrisp St corridor	Streetscene improvements to complement the scale of development along this corridor incorporating improvements to pedestrian crossings of Chrisp Street itself and side roads, greening and traffic calming.	150	150	Building on Mayor's Neighbourhood Refresh
12	Green Grid	Pocket Park – at Durant St	50	50	Road closure integrated into public realm as useable public space with cycle access
11	Tackling ASB driving	Middleton St / Pundersons Gardens	50	50	
14	Sustainable Drainage Scheme	Suds scheme / Rain Garden – location to be confirmed	21	30	Increased due to popularity of schemes seen in Community Street Audits
10	LED Bridge Height sign replacement	As the borough is criss-crossed by many railways with substandard bridge heights, there are 90 bridges which would benefit from new LED bridge height signs : better visibility protecting the bridge from strikes and damage by overheight vehicles, and making maintenance more efficient. The bulk replacement programme would brings all bridges in line with current legislation over two years with £90k funding p.a.	90	90	Second year of two year programme
15	Secure Motor Cycle Parking	Addition of points in existing parking bays to secure motorcycles to	10	10	

13	Improving local accessibility	Minor works for dropped kerbs or decluttering to assist passage of people in mobility scooters, wheelchairs or those pushing buggies and shopping trolleys.	60	50	
		Improving access to kerbside parking with innovative improvements to arrangements		50	
	Housing Zone	This theme will provide support for measures to improve local accessibility in Poplar area which have been included in the Housing zone proposals. The scope includes new pedestrian bridges over the Lea and enhancements to connecting routes, as well as measures around Oban St to complement Leaway A13 crossing improvements.	100	0	No funding requests as yet from the Programme lead.
	Principal Road Maintenance	Resurfacing works to A-roads is prioritised from annual condition surveys. Hackney Road	281	0	Funding stream frozen by TfL for 2 years
	Local Transport Funding	Funding for preliminary feasibility and strategy development to be allocated to: <ul style="list-style-type: none"> • Healthy Streets audits • Liveable Neighbourhood bid development • Road Safety Plan Review LIP3 development	100	100	
	Supporting Measures Schools, adult and special needs cycle training, cycle and pedestrian safety, road safety education and training, school travel plans	Propose to increase the focus on cycle training, road safety education and safe urban driving in future years, reducing work on travel plans and sustainability awareness.	340	398	Increase support to increase sustainable travel awareness campaigns with schools and increase cycle training
	Total LIP Delivery Plan	<ul style="list-style-type: none"> • 17/18 Total includes funding in some categories which are not carried forward to 18/19. 	2827*	2278	