

LGA response to congestion, capacity, carbon: priorities for national infrastructure

12 January 2018



About the Local Government Association (LGA)

The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government.

We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

General Comments

The LGA welcomes the National infrastructure assessment. We have made comments on some of the questions below. Where a question is missing we have no comments to make on that issue at this time. Some of the questions are more appropriately answered together with other answers. Where we have taken this approach we have indicated rather than duplicating our answers.

1) How does the UK maximise the opportunities for its infrastructure, and mitigate the risks, from Brexit?

The risks and benefits of Brexit are still to be fully articulated and quantified. However we do know that one of the challenges we face will be to ensure that the regional funding that has come via the EU and which has supported economic growth and infrastructure development, must be fully replaced by the government. Currently we have certainty up to 2020, but there is much work to do now in partnership with local government to develop the regional funding scheme that will need to be in place beyond that date.

Infrastructure development will need to continue to be sensitive to environmental sustainability. The LGA supports the commitment to maintaining at least the same level of environmental protection as exists currently. This can be achieved through the adoption of EU laws via the EU Withdrawal Bill. However, Brexit also provides the opportunity to review the legislation to see how it can be improved to best meet the needs of the country.

4) Cost-benefit analysis too often focuses on producing too much detail about too few alternatives. What sort of tools would best ensure the full range of options are identified to inform the selection of future projects?

There is no doubt that cost benefit analysis could be improved but too often the quality of the metric is not at issue. Funding of infrastructure projects is too often based on a bidding process run by central government. This process is costly and expensive and rewards those authorities that have sufficient resources and

Submission

expertise to bid successfully rather than spending public money where it would be most effective.

The LGA has long argued that more infrastructure spending should be devolved to a local level in order for local authorities to prioritise low level local infrastructure improvements that have the greatest impact but are unlikely to meet the criteria of national competitive funding streams.

5) What changes are needed to the regulatory framework or role of Government to ensure the UK invests for the long-term in globally competitive digital infrastructure?

To prosper in the digital age, residents and businesses need access to fast and reliable digital connectivity. It is a fundamental pillar of a successful economy, a key driver of growth, a creator of jobs and an enabler of public sector transformation.

The role of Government

The provision of full fibre connectivity across the country will be vital to ensure residents have access to fast and reliable connectivity. We are pleased following the Government's announcements in the Spring Budget that local areas will be able to access funding to help catalyse the market to extend coverage. However, for those residents who won't be reached by full fibre connectivity for some time, the LGA has called for the Government to be more ambitious on the proposed speeds and scope of the Broadband Universal Service Obligation. A proposal that only aims to provide a guaranteed minimum download speed of 10Mbps to those it reaches and leaves approximately 60,000 premises unserved cannot be the limit of the Government's ambition.

We have also called on the Government to fund trials of 5G in rural areas, to better understand how it could work in rural areas and determine its potential to improve broadband and mobile coverage to the benefit of residents, businesses and crucial services like remote healthcare.

We note that the mobile coverage obligations agreed by Government with mobile operators to guarantee voice and SMS text coverage for 90 per cent of the UK landmass (all providers) and roll out 4G to cover at least 98 per cent of the UK population (O2 only) will both end by 2017. Ofcom, in its recent Connected Nations report 2017, reflected that these coverage obligations: "do not fully meet the needs of modern mobile users" and will mean in practice that that "all operators would provide outdoor coverage to 80% of the UK landmass (rather than 90%), and O2 would deliver an indoor data service to 88% of UK premises (rather than 98%)." As a matter of urgency the Government should agree a new set of coverage obligations more attuned to delivering a better consumer experience and a higher level of coverage in rural and not-spot areas.

We outline our views on the current regulatory framework in question 7.

7) What are the key factors including planning, coordination and funding, which would encourage the commercial deployment of ubiquitous connectivity (including, but not only, in rural areas)? How can Government, Ofcom and the industry ensure this keeps pace with an increasingly digital society?

Councils are best placed to understand the digital needs of their local areas. They have been at the centre of delivering the Superfast Broadband Programme, having committed over £730 million to extending connectivity to the hardest to reach. They

also upskill residents, helping them to take part in digital society, receive public services online and succeed in today's workforce.

In their role as local highway authorities, as well as planning authorities, councils must balance their responsibility to help facilitate the extension of digital infrastructure with their duty to protect the local environment and ensure the quality of their local road networks.

The Planning Regime

To deliver next generation digital connectivity, digital infrastructure suppliers and local authorities will have to work and collaborate in new ways. However, in order to do so we need a proactive, well-resourced planning system to deliver additional digital infrastructure the country desperately needs. At present planning departments are severely under-resourced with taxpayers subsidising the costs of planning applications by around £200 million a year.

Councils also need greater powers to encourage developers to connect new estates during the build phase, rather than expecting digital infrastructure suppliers to retrospectively fit properties after they have been sold. We have argued for local authorities to be given statutory backing to ensure digital infrastructure provision is linked to new housing developments.

The most recent example of councils unable to hold developers to account as a recent planning appeal in Basingstoke which found against the local planning authority when it attempted to hold up a development based on its poor plans for connecting units with broadband. After being taken to appeal, the Inspector determined, unhelpfully, that broadband connections are a matter for prospective householders, and not a planning consideration - "I find that the provision of broadband and telecommunications would not be necessary to make the development acceptable in planning terms. I was not advised of a particular local deficiency in this regard which required specific remedy. In any event, such matters are best left to the prospective occupiers."^[1] This makes it impossible for councils to hold developers to account.

Streetworks

Digital infrastructure providers carry out thousands of roadworks every year to maintain and upgrade their infrastructure via their own engineers, strategic partners (e.g. power companies) or sub-contractors. As pressure mounts to extend digital connectivity, there has been an increase in calls from the communications sector for Government to deregulate and weaken council control over planning and highways to speed up deployment. This would not be an acceptable position for councils or local residents.

Councils maintain strict control over the use of their roads to minimise the disruption faced by residents. In conversation with the LGA, councils have outlined that providers have a history of poorly managing roadworks' strategic partners and sub-contractors. After months negotiating an appropriate date and timescale for roadworks to take place, poor management from providers can cause confusion at a ground level resulting in engineers failing to turn up, or some roadworks being needlessly undertaken. Councils regularly cite examples of a contractors digging up a road only to quickly fill it back in as there was no adequate power supply to connect infrastructure. Incidents such as these show how issues could be foreseen if proper assessments of the 'areas power networks had been carried out beforehand.

^[1] <http://www.richboroughstates.co.uk/live/appeals/582a.pdf>

As a result of poor work or mismanagement, councils spend too much time and resource dedicated to agreeing roadworks timescales, inspecting sites, fixing faults and dealing with engineers not turning up. Poor planning can lead to further disruption and shoddy work which increases the risk of councils facing legal action from residents who injure themselves or damage their vehicles, ultimately increasing the cost to the public purse.

We must work more intelligently and more collaboratively in order to ensure that our roads are not gridlocked by constant streetworks nor our road surfaces destroyed by repeated reopening and reinstatement.

9) What strategic plans for transport, housing and the urban environment are needed? How can they be developed to reflect the specific needs of different city regions?

Councils already recognise that economic and housing markets and demand for infrastructure extend beyond their own administrative boundaries. This is why they already contribute to a range of strategic and sub-regional plans with neighbouring authorities and other tiers of local government, reflecting unique functional economic geographies. For example, some collaborate on spatial plans setting out the employment and housing development that is needed to promote economic growth and address housing needs. Others, across both city-regions and non-metropolitan areas, work with and through their Local Economic Partnerships on producing local economic strategies, and/ or specific strategies to address skills provision and employment demand.

Whilst councils have a track record of working together at a strategic level, it is important that different parts of Government and its agencies are fully plugged into sub-regional strategic plans. For example, investment by Highways England and Network Rail can have a profound impact on local economies, housing demand and demand on local roads. Stronger alignment of their investment plans would help ensure that the value of public investment is maximised and that local and national investment is coordinated, avoiding wastage of resources.

To be truly successful however, strategic planning must be more than just transport and include, for example, utilities, high speed broadband, and skills. Combined authorities, existing alliances and strategic partnerships should be the basis on which to build any new, strategic, cross corridor or city-region planning and delivery vehicles – maximising the momentum already developed.

10) What sort of funding arrangements are needed for city transport and how far should they be focused on the areas with the greatest pressures from growth?

Local authorities transport budgets should enjoy the same long term funding certainty that Highways England and Network Rail are given by the Government. Both have five year funding programmes which allow them to make long term commitments to strategic projects. Longer term certainty has allowed Greater Manchester to deliver a programme of improvements to its public transport system. All local authorities need the same level of commitment in order to plan the same kind of strategic projects to improve congestion on local road networks.

The sector would also benefit from considerable simplification of the transport funding regime. Currently funding is provided on a competitive basis by a number of different funders in a variety of different funding regimes. Competitive bidding takes considerable upfront investment from authorities with no guarantee of

results. Given the wide variety of schemes with different geographies and criteria it can be difficult for authorities to design schemes that tackle locally identified problems. Some funding comes directly to councils, whilst other transport funding goes to Local Enterprise Partnerships. We welcome the Government's commitment to simplify transport funding for areas with devolution deals but all authorities need a simplified regime in order to take local decisions on how to best combat congestion.

There are also infrastructure problems associated with areas with low land values. Areas with low values, often exacerbated by poor infrastructure, can struggle to gain sufficient funding through the Community Infrastructure Levy (CIL) or the section 106 process. Greater local discretion on funding could ease this vicious circle with targeted infrastructure investment part of wide-ranging regeneration.

11) How can the Section 106 and Community Infrastructure Levy regimes be improved to capture land and property value uplift efficiently and help fund infrastructure? Under what conditions are new mechanisms needed?

There is increasing recognition that councils need to be central to solving the housing crisis and it is vital that housing, transport and other infrastructure investment is able to happen in tandem and coordinated at the local level. This is to ensure that new homes are backed by existing communities and that they are not negatively impacted (for example because of additional traffic generated by new households) - as well as ensuring that new housing development is high quality and attractive to new communities. In order to achieve this, as well as adequate funding, local areas need maximum flexibility and certainty of funding to enable them to plan effectively for new housing growth.

Upfront funding to finance infrastructure investment to support new housing (and to reduce the impact on existing communities) is also important. Whilst government funding, such as through the Housing Infrastructure Fund, will be helpful in unlocking housing development in a number of areas, further exploration is needed to identify sustainable models for financing infrastructure long term.

This could include:

- Reforms to section 106 and Community Infrastructure Levy (CIL)

We have identified a number of areas where there is scope to make changes to the current CIL and section 106 processes to make them more effective tools for raising funds for infrastructure. This includes streamlining the process of setting up and revising CIL; removing restrictions on section 106 pooling; enabling councils to borrow against future CIL receipts and removal of national exemptions from CIL. More information can be found in [here](#).

However, it is important to note that whilst CIL is one tool available to councils to raise funding for infrastructure, it does not and cannot meet the whole infrastructure needs of an area.

- Giving councils the tools to help manage down the escalation of land prices developers pay, establishing a clear, robust and transparent viability procedure and giving councils real levers to require reasonable build out rates.

The functioning of the land market is central to delivering more homes faster, to a good quality, and with suitable investment in affordable homes and

supporting services and infrastructure. Currently there are no disincentives on a developer overpaying for land, often meaning the most bullish can outbid others which then determines their approach to viability, design and quality, and build out. Absolute clarity on a developer's section 106 obligations and build-out expectations (subject to market conditions) would help prevent overpaying for land, transferring a greater proportion of land value into community value. The government should also work with local government to establish a clear, robust and transparent viability procedure that helps to manage down the escalation of land values and ensure the delivery of affordable housing and infrastructure that communities need to back development.

- Explore routes for capturing greater proportions of land value uplifts resulting from planning permission in order to finance infrastructure for homes.

As well as seeking means to prevent the over escalation of land prices, the planning system could be much more effective in capturing uplifts in value created in the granting of planning permission. New flexibilities allowing councils to establish local development corporations will help enable this, but we are keen to explore other mechanisms for capturing value increases across the planning system which are, in part, currently disincentivised by the Land Compensation Act.

- Taking opportunities for joining up and devolving infrastructure and growth funding linked to local objectives to deliver homes.

It is essential that local planning authorities can work with the full range of partners to integrate housing delivering as part of a wider investment strategy for places. Different housing markets have different challenges and it is critical national partners respond to this. For instance housing delivery in many places is limited by the disproportionately high cost of remediating brownfield sites due to contamination which, combined with wider values, can render sites unviable. This means that national organisations, such as Homes England, should work with local areas to devolve national spending programmes to places with the flexibilities to knit together investments in ways that deliver additional homes that meet local need.

12) What mechanisms are needed to deliver infrastructure on time to facilitate the provision of good quality new housing?

See answer 11

14) What should be the ambition and timeline for greater energy efficiency in buildings? What combination of funding, incentives and regulation will be most effective for delivering this ambition?

Local authorities are already reducing the energy they use in the buildings they own. Many councils have been investing in energy efficiency measures for a decade, drawing on government funded support available through the Carbon Trust's Local Authority Carbon Management Programme between 2003 and 2013, or accessing expertise through programmes such as Re:Fit. Councils will be at different points in their energy efficiency strategies and implementation of energy saving measures. Any future ambition and timeline would need to be realistic, given the pressure on public finances.

Councils are best placed to lead efforts to tackle fuel poverty and increase the energy efficiency of homes in their area. They have local knowledge, are trusted by their residents and have been directly involved in the delivery of schemes such

as the Green Deal and Energy Company Obligation (ECO). In the future a new model of delivery that is locally led by councils would be better placed to address fuel poverty and meet targets for energy efficiency. Councils should have control of ECO and other funding in order to offer greater efficiency and local prioritisation of resources for those most in need. A stronger central commissioning role in the delivery of energy efficiency programmes and a locally based and targeted programme would support councils in leveraging in private funding and deliver programmes effectively.

With the withdrawal of government funding for the Green Deal and refocusing of ECO from 2018 it is difficult to see what will motivate “able to pay” households to install energy saving measures, with a potential knock-on effect to local installers and the insulation industry. We urge government to support an alternative model for those who can afford to pay, and to simplify complex processes that are a barrier to participation by councils and householders.

18) How should the residual waste stream be separated and sorted amongst anaerobic digestion, energy from waste facilities and alternatives to maximise the benefits to society and minimise the environmental costs?

Before waste enters the residual waste stream we should be doing as much as possible to prevent it. This will need the co-operation of every part of the waste chain, including organisations that design and manufacture products and packaging that cannot currently be re-used or recycled.

There is no one size fits all solution to the disposal of residual waste. What works in a densely populated inner city will not be right for a more rural area. It is right that councils have local flexibility to develop a waste disposal strategy. Any changes to national policy would need to have a sufficiently long lead time, as council investment in waste disposal infrastructure is made on a 15-20 year timeframe.

A longer term approach to food waste needs to consider what the ongoing processing options are for us as a country. About half of English local authorities currently collect food waste. Adding food waste to collection to existing recycling service adds significant upfront costs. This includes capital funding to pay for waste caddies and bags. Food waste must be kept separate from “dry” materials for recycling (for example, paper) to avoid contamination. This requires either the use of additional vehicles on the collection round or a specially designed collection vehicle with separate containers. In addition to this there will also be the revenue cost of running a collection service and then the final cost a council has to pay for getting food waste treated. Put together, these costs may make food waste financially unviable as a household recycling stream.

Once collected from households, food waste can be recycled through different technologies. Some councils have made long term investments in waste disposal infrastructure in order to reduce landfill use, such as in-vessel composting and energy from waste facilities, and will be committed to making these investments effective. Others will compare the charges from different recycling technologies and operators available locally in order to secure the best value for money on an on-going basis. For some councils it may be cheaper overall to collect food waste separately and pay for disposal through anaerobic digestion, but this will depend on local circumstances. The approach taken by councils will vary and local financial models for disposal are not uniform across the country. Past decisions and investments in food waste technologies will affect the direction of future policy.

Both anaerobic digestion and composting would need further incentivising by Government if they were going to be seen as long term solutions. The broader role of producers in the production of food waste also needs to be recognised so that they can help share the burden of additional collections through reform of the producer contribution regime. The food industry and retailers also have a role in developing better communication and supporting consumers' behavioural change so that food waste is reduced. The sector might consider the impact of certain bulk buy offers and the need for better labelling.

19) Could the packaging regulations be reformed to sharpen the incentives on producers to reduce packaging, without placing disproportionate costs on businesses or creating significant market distortions?

Producer responsibility is a concept which needs to be given much more consideration. The UK raises the lowest level of contribution from producers amongst all EU member states at less than €20 per tonne of material compared to €200 in Austria and over €150 in France and Spain. To further illustrate this the UK's limited packaging producer compliance scheme generated £111 million of compliance revenue in 2013, only £37 million of which went towards collection. This compares to the £550 million cost to local authorities for collection and sorting of packaging material.

The 'producer pays' principle invests responsibility for dealing with the cost of disposal of a product with the producer (and by association, the consumer). Where the majority of these costs are routinely paid by the taxpayer there will be insufficient incentive for the producer to design and manufacture a product that minimises the cost of disposal. To address this we suggest that firm direction is provided by the Government to establish producer responsibility regimes that raise the full cost of collecting and sorting material put on the market by producers

A focus on resource efficiency needs long term certainty and viable markets for secondary materials to attract and maintain investment. The manufacture of many products already make use of significant but varying proportions of recycled content such as glass, paper, some plastics and various metals. A commitment to increase resource efficiency and reduce reliance on primary material extraction will need to build in demand to overcome short term material price volatility. This could be achieved by increasing the amount of recycled content used in product manufacture. Specifically, this could start with key materials commonly used in product manufacture. This would help to increase the certainty of demand and help to support secondary material value. This would, in turn, help to underpin the financial viability of collection, sorting and reprocessing.

Sources:

[European Commission report: Development of Guidance on Extended Producer Responsibility, Final Report, 2014](#)

[National Packaging Waste Database](#)

[Wealth from Waste Report: The LGA Local Waste Review](#)

20) What changes to the design and use of the road would be needed to maximise the opportunities from connected and autonomous vehicles on: II motorways and 'A' roads outside of cities? II roads in the urban environment? How should it be established which changes are socially acceptable and how could they be brought about?

Connected and autonomous vehicles may need a higher standard of road surface. It has certainly been the case in the initial trials in other countries that the vehicles have struggled to operate without well maintained road markings to guide

much of their programming. This raises questions about whether these vehicles will require a superior maintenance standard to what is possible with current funding streams.

There are significant challenges to managing the transition phase with increasing numbers of automated vehicles sharing road space with conventional vehicles. It may be necessary to segregate some of our infrastructure in order for automated vehicles to be more widely accepted. Initial evidence through simulation has shown that human drivers have tended to drive more cautiously around simulated autonomous vehicles. Whilst more cautious driving could mean safer driving it could also result in slowing overall travelling speeds and increasing congestion.

In order for connected vehicles to reach their full potential they need to be both connected to other vehicles and the infrastructure around them. Live updates of infrastructure performance will significantly improve the performance of vehicles and the efficiency of traffic movements. However this will involve a significant programme of infrastructure upgrades. It is likely to be an incremental process with the most strategically significant infrastructure assets upgraded first as we are seeing with the roll out of smart motorways on the strategic network. Given the current state of local authority budgets and the large backlog for road maintenance and renewal it is likely that the process will extend over decades rather than years unless the Government prioritises it with additional funding.

Full automation could see significant changes to urban land use. Significant amounts of road space and urban land are designated to parked cars. In a fully autonomous future this valuable urban land can be released as communally owned cars will not need to park and individually owned ones can be parked remotely elsewhere. This could see significant extra road space released in urban centre to be used for greater capacity or something else entirely. However this is only possible in a fully or almost fully automated future. In what not be possible during a transition phase.

Ultimately social acceptability will be demonstrated by the uptake of the technology. The Government's initial approach to a regulatory regime is sensible clearly establishing liability for the vehicles that are technically possible at this time and allowing the market to develop.

21) What Government policies are needed to support the take-up of electric vehicles? What is the role of Government in ensuring a rapid rollout of charging infrastructure? What is the most cost-effective way of ensuring the electricity distribution network can cope?

The Government is right to look at ways they can mandate interoperability through the electric vehicles legislation it is bringing forward. Ideally we should look to develop a standard way of charging across Europe if not globally given how internationally integrated the world car market has become and also how important car exporting is for the UK economy. Interoperability of battery technology would also help consumers in as far as it is possible.

The Government could also consider disincentivising or banning charging models that rely on locking consumers into one provider through a subscription model. This reduces consumer choice and stifles the growth of the charging industry. Given how many private sector financial models are currently depending on large government subsidy of the initial capital investment central government has the financial levers to restrict certain financial models. Charging speeds will also be a key to future take up of electric vehicles. Once cars can be charged in speeds

comparable to those that a conventional engine can be refuelled take up will accelerate.

22) How can the Government best replace fuel duty? How can any new system be designed in a way that is fair?

The LGA does not have detailed proposals for the replacement of fuel duty although it is worth noting that given the smart technology that is being mandated for rapid charging infrastructure it would be technically feasible to monitor the amount of power that electric cars are using and charging a duty on top of this to use a model that is similar to the current system. Whether this scenario is a desirable one is open for debate but it is clear that minimal change from the current model is technically feasible.

It is also worth noting that since the creation of the roads fund the revenues from vehicle excise duty have been directly hypothecated for use on the strategic road network and in the future for funding the major roads network. The LGA feels it would be worth the commission considering whether this funding model is likely to be adequate for the entire duration of the NIA. With the uptake of automated vehicles and their integration with mobility as a service type applications it is likely that there will be far fewer vehicles in use being used more intensively. This would lead to a collapse in vehicle excise duty but no decrease in the use of roads.

Given the enormous backlog of repairs on the local road network, estimated to be £12bn by the ALARM survey, it is clear that more money is needed to be invested in our road infrastructure. It is difficult to see how this can be achieved with current funding mechanisms.

23) What should be done to reduce the demand for water and how quickly can this have effect?

One simple measure to reduce the demand for water, would be to introduce a tighter water efficiency standard for new dwellings. Current Building Regulations require all new homes to meet a mandatory national water consumption standard of less than 125 litres/person/day. They could also require recycling of grey water.

Local planning authorities can, where they can establish an evidence-based need (for example areas of serious water stress) introduce Local Plan policies requiring new dwellings to meet a tighter optional requirement of less than 110 litres/person/day. We consider that there is scope for this optional requirement to become the new mandatory requirement for all homes as soon as possible, with a phased approach to making the requirement even more stringent over time. Given that the additional cost (over the mandatory Building Regulations standard) of introducing the former Code for Sustainable Homes level 3 or 4 for water (which was more stringent at less than 105 litres/person/day), was estimated to be only between £6-9^[1] per dwelling, this would be a low-cost measure to help manage demand.

There should also be scope for local authorities to be able to set higher standards than any mandatory requirement, for example where the local development viability will support it.

24) What are the key factors that should be considered in taking decisions on new water supply infrastructure?

^[1] [DCLG Housing Standards Review Cost Impacts](#) (page 27)

We welcome the recognition of the importance of investment in flood defences and the need for infrastructure investment to be better aligned with local growth priorities outlined in the Industrial Strategy White Paper. It is vital that investment in capital and maintenance is joined-up as part of a long-term approach to improving local flood defence and resilience infrastructure. Devolving capital and revenue funding for flood risk management projects into a single, place-based pot (a total expenditure or TotEx approach) would allow local areas to support a more diverse set of outcomes and local priorities, including those to support growth.

Land drainage consent fees should also be set locally and councils' new statutory consultee role for surface water drainage should be fully funded. Funding for local flood risk management should be boosted by extending precepting powers and investing any surplus Flood Re levy into preventing damage before it happens.

As well as managing flood risk, it is also important that there is an effective plan for water infrastructure to support long term economic growth which recognises the need to move water around the country to meet future needs, as well as fully taking into account projected housing and employment growth as outlined in councils' Local Plans. Similarly, changing climate could result in greater weather extremes on a more frequent basis which will have disproportionate impacts on different parts of the country and local economies.

It is also crucial that decisions on new water supply infrastructure are decided through the locally democratic planning system, to ensure a thorough and detailed consultation with those communities affected. We are concerned by the proposals in the recent Defra consultation that would take decision-making on certain types of water infrastructure project out of local control, thus limiting the ability of councils and their communities to have a say on new infrastructure which will impact on their local area.

25) How can long-term plans for drainage and sewerage be put in place and what other priorities should be considered?

See answer 24

26) What investment is needed to manage flood risk effectively over the next 10 to 30 years?

See answer 24