

Attachment 7 – Economics

Memo

To: Planz Consultants / Woolworths NZ Limited
From: Natalie Hampson, Savvy Consulting Limited
Date: 26 February 2025
Subject: RFI and Officer Comments – Madras Street Consent Application

The RFI from Council made the following statement regarding the economic assessment carried out for the consent application:

The economic effects are unlikely to be resolved without a significant reduction in floor area for the supermarket to meet or be around the GFA identified for this Neighbourhood Centre [aka Local Centre pre PC14 decisions] – a centre I note is lowest in the hierarchy and has been confirmed as being appropriately so by the recent IHP and Council PC14 Urban Development NPS decisions.

For consistency with the economic report, my response retains the pre-PC14 term Local Centre when referring to the proposed development and other existing zoned centres at the bottom of the centre hierarchy in Christchurch. However, substituting this term for Neighbourhood Centre does not alter my response.

The comment above is not a specific request for certain information and so this response is necessarily general. I also assume that the “economic effects” referred by the Council planner are contained in PE’s advice (or perhaps Council’s own view) as the economic assessment completed for the application did not identify any adverse effects that were more than minor and therefore needing to be “resolved”. It is not known what economic effects PE have assessed, and what those findings were. The Council planner infers that the economic effects are significant.

The above RFI statement implies that:

1. An 800sqm GLFA supermarket permitted in the St Albans Centre is exactly what the surrounding community needs to meet their supermarket needs. This must apply equally

to the community that existed 15 years ago when that arbitrary value was determined by the private plan change proponent, still apply to the community that exists today, and will still apply to the community that will exist in the medium and long-term, and

2. That any supermarket floorspace provided in that location over and above 800sqm, which in this instance also pushes the total GFA of the centre over 3,500sqm prescribed for the St Albans Local Centre, will have significant adverse effects on the existing centre network and render the centre no longer a Local Centre (note, I discuss the relevance of the restricted discretionary activity (RDA) activity status for a breach of the permitted 800sqm GLFA (and 3,500sqm GFLA) further below).

For that logic of 1. and 2. above to be correct, it would mean that:

- the district plan (and plan developers) always gets the size of zoned centres and/or prescribed store sizes exactly right,
- supermarket (and centre) development economics remain static over time and never change,
- shopper preferences and shopping patterns are fixed and never change,
- the local catchment boundary is fixed and never changes over time,
- the density of housing in the local catchment never changes (whether this is the minimum density set by the plan or the housing preferences of the community),
- catchment household, employment and business growth in the local catchment was accurately predicted and never increases above that projection, and
- the anchor (supermarket) store size and overall centre size could never increase above 800sqm GFLA and 3,500sqm GLFA respectively. Even in the long term when projected demand had increased in the catchment, that the prescribed store/centre size would still be able to efficiently function to meet that local demand in the same footprint (i.e. there would be no constraints to achieving an ever increasing productivity, including no constraints on the way the stores function (service levels) and no constraints on car-parking).

None of these outcomes are true. The ODP for the St Albans Centre did not prove commercially feasible. Supermarkets in particular have evolved to meet customer needs and changing development costs and regulations. The way households shop today is different from the way they shopped 15 years ago. Housing densities and preferences in the St Albans area have changed. Growth projections have tracked upwards over time with increased migration. Retail stores and centres need to adapt to growth in demand.

In short, there are wider and local economic factors that mean the methods applied in district plans (including centre zone areas and prescribed GFAs) will not always be effective or sufficient to allow communities to provide for their economic wellbeing over time.

Zone areas and prescribed GFAs in district plans are based on an assessment at a particular point in time, based on growth projected at a particular time (and generally only over a medium-term horizon). It is relevant in this case that an 800sqm supermarket in the St Albans Local Centre was a value assessed 15 years ago and the 'medium-term' at that time has since been surpassed. I understand that the prescribed 800sqm GLFA value (for the supermarket anchor) and 3,500sqm GLFA value for the centre overall were not reassessed during the last district plan review to ensure that it was at least relevant for the life of the current plan (rather the provisions were carried over).

Prescribed GFAs (or GLFAs) in a plan exist to set a threshold between different activity statuses and should not, in my view, be relied on as being an accurate reflection of the threshold between minor and significant adverse effects. Nor are those prescribed values the only way to give effect to higher order objectives and policies.

The large volume of consents and plan changes lodged each year arise because permitted activity thresholds do not always match what is practical to develop on a particular site, what is commercially feasible to develop, or what is needed to meet demand. Importantly, the district plan provides flexibility for development to occur outside of zone boundaries and prescribed permitted activity limits in recognition of the fact that prescribed limits may not be accurate and/or because things change.

This includes at the objective and policy level – notably Policy 15.2.2.4. Controlled, RDA, discretionary and non-complying activity statuses throughout the plan provide scope for variations around permitted activities and standards to be tested. This includes testing (through a consent process) whether those variations or changes still give effect to objectives and policies, and that significant adverse effects are avoided.

This is directly relevant to the current application as the district plan provides a RDA pathway for an anchor development that exceeds 800sqm (and total centre GLFA that exceeds 3,500sqm) in the St Albans Centre.

The economic assessment has considered the following matters relevant to the proposed development and regulatory framework:

1. Whether the development fulfils the role of a local centre. The report addresses this by:
 - a. considering the size of the proposed site area relative to the gross and net size of the St Albans Commercial Local Zone, concluding that while it is different in shape, it is not substantially different in scale.¹
 - b. Considering the size of the proposed site relative to all local centres (by gross zones area in the plan), concluding that the scale of land proposed was similar to some other local centres.²
 - c. Considering the size of the proposed total floorspace relative to total floorspace permitted in the St Albans centre and the guidance for Local Centres generally, concluding that while the proposed floorspace was higher it was still closer to the guidance threshold than the mid-point of the guidance for larger Neighbourhood Centres.³
 - d. Considering the number and nature of tenancies proposed relative to the role of local centres described in the Plan, concluding that the proposal provided a small group of tenancies, expected to be primarily convenience in nature and significantly below the count and diversity of tenancies that occur in the higher-order Neighbourhood Centres.⁴
 - e. Comparing the potential business and total employment count of the proposed centre relative to other nearby Local and Neighbourhood Centres, concluding that it would be substantially smaller than Neighbourhood Centres on both accounts even with the full size supermarket.⁵
 - f. Considering the extent of a local primary trade catchment (with regard to the location of other centres that provide a Local and/or Neighbourhood Centre role) around St Albans and estimating the current and projected demand for food, grocery and liquor retail within that catchment, concluding that a localised catchment would sustain the proposed development (and it is therefore appropriately scaled to respond to that catchment growth), particularly given the strong increase in households projected for the local catchment over time.⁶

¹ See for example page 11 of the application's economic report.

² See for example Appendix A of the application's economic report.

³ See for example page 11 of the application's economic report.

⁴ See for example page 12 of the application's economic report.

⁵ See for example Table 3.1, Figure 3.2 and page 19 of the application's economic report.

⁶ See for example Table 4.3 and Table 4.4 of the application's economic report.

- g. Modelling the primary trade catchment of the proposed centre over time using a gravity model,⁷ further confirming that the centre would attract the majority of its sales from a localised area.⁸
- 2. Whether the development avoids any significant adverse effects on the strategic role, functional amenity, and vitality of other existing centres. The report addresses this by:
 - a. Considering the scale and mix of businesses and employment in nearby Neighbourhood and Key Activity centres relative to the proposed scale and mix of businesses and employment in the proposed centre, concluding that higher-order centres would be resilient to trade competition effects (notwithstanding that 3,500sqm GFLA of commercial floorspace was already anticipated in the Plan).⁹
 - b. Carrying out a comprehensive gravity model analysis of distributional effects of the proposed Woolworths supermarket in 2028, 2033, 2038 and 2043, concluding that the centre is estimated to have only minor direct effects on food, grocery and liquor supply in existing centres, that are short-lived and quickly offset by projected growth in demand within all centre catchments. Further, that when considering impacted centres as a whole, that the proposal would have no material adverse effect on functional amenity, vitality and strategic role of existing centres (including the City Centre).¹⁰

The economic assessment has been careful to consider the economic role and effects of the proposed centre in the context of the rules specifically for the St Albans Local Centre, the general rules for the Local Centre Zone, the relevant objectives and policies of Chapter 15 of the Plan, and the matters of discretion for a restricted activity consent (where GFA exceeds the thresholds of the St Albans zone standards). It also addresses the relevant assessment matters for other objectives and policies in the plan that have not been explicitly identified in the report but that also apply to the proposal – for example those in relation to brownfield sites. I have been clear on the data sources, approaches, assumptions and limitations of any analysis included in the economic report (with further technical information also provided in Appendix 1 below).

⁷ Gravity modelling is described in the application's economic report in Section 5.2 and further explanation is included in Appendix 1 of this memo.

⁸ See for example section 5.4.2 of the application's economic report and Appendix 1 Figure 8 below.

⁹ See for example page 12 of the application's economic report.

¹⁰ See for example Section 5 and page 40 of the application's economic report.

As set out in the economic report and discussed above, the St Albans Outline Development Plan and rules are no longer commercially feasible or appropriate in the context of the surrounding local community. An 800sqm supermarket would not adequately meet current and projected community needs and would lead to inefficiencies in the centre network and significant opportunity costs for the efficient use of this brownfield site.

A consent pathway is provided to contemplate if a larger centre and supermarket anchor in St Albans would be a more efficient use of the land resource while still given effect to higher order objectives and policies. A moderately larger centre than prescribed as a permitted activity by the Plan, including a full size, full service supermarket on the site has been found to be appropriate to meet the current and projected growth of the local catchment. I consider that the scale of the proposal does not elevate the centre to a higher role in the centre hierarchy and that the proposed centre will function (in absolute and relative terms) as a Local Centre¹¹ in the centre network as anticipated by the Plan. This is confirmed by the fact that it will have no material adverse effects on the amenity, vitality and continued growth of other nearby existing centres.

Savvy Consulting and Market Economics maintain their evidence based conclusions set out in the Economic Report. Namely that:

- 1) The provisions in the District Plan for St Albans (including the Outline Development Plan) have not delivered a convenience centre for the St Alban's community over the last 15 years (to the detriment of the community's economic and social wellbeing) and would be unlikely to in the foreseeable future if development was constrained to the permitted floorspace standards and zone extent in our view;
- 2) The proposed centre will remain within the ambit of the role of centres at the bottom of the hierarchy i.e. a convenience centre that draws from a primarily local catchment;
- 3) The proposed centre will not have any adverse effects on the function, amenity, and or vitality of other existing centres that are more than minor, and certainly fall well short of significant adverse effects; and
- 4) The proposed development will have negligible effects on the role and function of the CBD.

¹¹ Using pre-PC14 terminology.

Appendix 1 – Response to ‘Other Matters’

This technical appendix has been included to provide further technical information for the benefit of Council’s economic peer reviewers. The following further comment was included with the RFI:

The economic assessment provided has been reviewed. Advice (PE) is that the assessment is flawed in that the catchment methodology (modelling ME) has been misidentified and on that basis do not support the application from a retail economic point of view.

A phone meeting with Property Economics (PE) was conducted on the 24th January 2025. The brief statement above was relayed to PE and it was agreed that it did not provide much clarity on PE’s review findings. Based on the discussion, I understood that PE’s principal concern was that the economic assessment did not assess the proposal relative to the operative provisions. We discussed this briefly and agreed that the issue was more of an overarching policy and planning issue that applied to the application. I refer to the main body of this memo for my formal response to that issue (to the extent that it relates to economic assessment).

PE’s secondary concern was the technical basis and functioning of the retail gravity model that was relied on in the economic report. PE noted that they had not reviewed the assessment of demand, supply and distributional effects (which the economic report is focussed on) in much detail on the basis that the economic assessment did not match their view of the wider policy framework (primary concern above).

The gravity model was briefly discussed. I provided further information on how the model worked, where else it has been applied in Canterbury, and the confidence I had in the model to match the function and outputs of gravity models that would alternatively use sales or floorspace as the metric for distributional effects.

PE indicated that a map showing more detail on the catchment that sales were drawn from for the proposed store would be helpful for them, in the event that they would give the findings of the economic assessment further consideration (setting aside their policy issues).

To that end, I have worked with Market Economics (M.E) who are joint authors of the economic assessment, and owners of the gravity model used to analyse distributional effects, to provide

some additional technical outputs from the modelling. The following text is a combined response from Savvy and M.E.

Overview comments on how gravity models work

All gravity models tie spend (demand), generated in dollars by households (plus a little bit for workers and businesses) to locations. In the case of M.E's gravity model, that spend is limited to spend in food, grocery and liquor stores and those locations are SA2s across Waimakariri District, Christchurch City and Selwyn District (the physical extent of the model). They then allocate that spend to centres based on some pulling power (attractiveness). The model is calibrated (through iterative adjustments) so that allocated demand for food, grocery and liquor stores in this case, matches employment supply.

You can use floorspace as the pulling factor (if you have accurate and complete coverage) or employment (again, if you have accurate and complete coverage). The more floorspace that a centre has, the more it can pull demand. Equally, the more employment a centre has, the more it can pull demand.

Both approaches have limitations because sales may not rise in a perfectly linear manner with increases in floorspace or employment. This is a limitation of most gravity models. The M.E model has the benefit of being checked back against Near Data (a very large sample of cell phones owned by residents across New Zealand (coded to SA2 'origins') and the movements of those phones over the course of a year). The cell phone data gives good information about where supermarket shoppers visiting any particular store actually live. This data is used to help calibrate the model (along with known sales information from Woolworths).

Floorspace *may* be a better predictor of the pulling power of food, grocery and liquor stores (as a combined centre of supply) – but only if the relationship between floorspace and sales was *more* linear than the relationship between employment and sales. However, comprehensive and consistent floorspace data is not easy to access/obtain (particularly because the model must cover all food, grocery and liquor stores and not just supermarkets). Employment data is however both consistent and easy to access (sourced from the StatisticsNZ Business Demography dataset). As such, there are both advantages and disadvantages of using an employment metric (proxy) for the gravity model, but it is considered that the advantages outweigh the disadvantages.

As explained in the economic assessment report, demand for food, grocery and liquor stores has been estimated at the SA2 level in dollar terms and projected over the long-term. Ultimately, the results of the gravity model *could* be converted back into dollars, but this step is not considered necessary in order to show the scale and significance of distributional effects of a proposed store – as it is the relative changes in employment supply that count.

We appreciate that reporting distributional effects using an employment proxy for sales impacts makes it difficult for PE to directly compare the results with their own proprietary models (should they have wanted to). However, the inputs to the model (household growth projections, demand and current supply of employment by store type and location) are all easily verified. A peer review need not repeat the modelling exercise – it can be focussed on the robustness of the data used, assumptions applied, and approach used. Gravity modelling is a recognised approach for understanding distributional effects.

Additional Detail on the Functioning and Outputs of the Gravity Model

Further to the overview explained above, the following has been prepared to provide further insight on how the M.E gravity model used for the economic assessment operates (runs). The detail below is technical in nature and was not considered appropriate in an economic assessment report that was intended for a mixed audience.¹²

The gravity model computes the probabilities of demand in each SA2 in the model's geographic extent going to each of the centres included in the model. These are the raw outputs of the gravity model. There is a matrix produced for each SA2. As an example, below is a section¹³ of the matrix for a single SA2 in the model – Richmond (SA2 326800). The column circled in yellow is the calculated probabilities of demand in that SA2 being attracted to each centre, while the columns to the right are the absolute MEC equivalents of demand for each projected year (discussed further below).

Two scenarios are run. The first table (Table 1) is from the calibrated 'no St Albans Centre' scenario and Table 2 is the modelled probabilities in the 'with St Albans Centre' scenario. The probabilities in these tables and in the example maps that follow are low because there are numerous competing centres in the model and Christchurch is easy to move around, so the demand for

¹² It was also assumed that anyone required to carry out a technical review of the report would have a basic understanding of the way in which gravity models worked.

¹³ Only a sample of rows have been shown in these screen shots.

each SA2 gets allocated to many centres. It is the relativities between these probabilities that is key.

There is only a small change in the probabilities in the Richmond SA2 between the two scenarios. This is because of the low travel costs and presence of other relatively large/attractive centres close to that SA2, especially the Richmond-Stanmore centre, shown as “Richmond” in the centre list. I.e. the probability of demand in the Richmond SA2 going to the Richmond-Stanmore centre changes from 0.0535 (Table 1) to 0.0518 (Table 2) when the new St Albans Centre is included in the model.

Table 1 - Without the Madras Supermarket – Richmond SA2 probabilities and projected absolute MEC demand equivalents by centre

sa2 centre <db1> <chr>	probability <db1>	demand_2023 <db1>	demand_2028 <db1>	demand_2033 <db1>	demand_2038 <db1>	demand_2043 <db1>
326800 Addington/CC South	0.129	3.17	3.25	3.40	3.62	3.85
326800 Riccarton	0.0563	1.38	1.41	1.48	1.58	1.67
326800 Richmond	0.0535	1.31	1.34	1.41	1.50	1.59
326800 Pak'nSave Papanui	0.0463	1.13	1.16	1.22	1.29	1.38
326800 Fendalton	0.0366	0.898	0.920	0.963	1.03	1.09
326800 St Martins	0.0356	0.873	0.895	0.937	0.997	1.06
326800 Central City	0.0320	0.784	0.804	0.842	0.896	0.952
326800 Papanui/Northlands	0.0312	0.764	0.783	0.819	0.872	0.927
326800 Shirley	0.0306	0.750	0.769	0.805	0.857	0.911
326800 Barrington	0.0287	0.704	0.722	0.755	0.804	0.854

Table 2 - With the Madras Supermarket – Richmond SA2 probabilities and projected absolute MEC demand equivalents by centre¹⁴

sa2 centre <db1> <chr>	probability <db1>	demand_2023 <db1>	demand_2028 <db1>	demand_2033 <db1>	demand_2038 <db1>	demand_2043 <db1>
326800 Addington/CC South	0.125	3.07	3.15	3.30	3.51	3.73
326800 Riccarton	0.0545	1.34	1.37	1.43	1.53	1.62
326800 Richmond	0.0518	1.27	1.30	1.36	1.45	1.54
326800 Fendalton	0.0355	0.869	0.891	0.933	0.993	1.06
326800 St Martins	0.0345	0.845	0.867	0.907	0.966	1.03
326800 Woolworths Madras	0.0313	0.767	0.786	0.823	0.876	0.931
326800 Central City	0.0310	0.760	0.779	0.815	0.868	0.922
326800 Papanui/Northlands	0.0302	0.740	0.758	0.794	0.845	0.898
326800 Shirley	0.0297	0.727	0.745	0.780	0.830	0.882
326800 Barrington	0.0278	0.682	0.699	0.732	0.779	0.828

Below are two versions of the same map (one for a broader trade catchment and one for an indicative primary trade catchment) that pull together the probabilities of demand from each SA2 that the model calculates will be attracted to the proposed St Albans Centre. For the top map (Figure 1), M.E has filtered the SA2s to only map those with a probability of ≥ 0.015 (1.5%) to help focus on the areas where the proposed store has the most material attraction (note any cut

¹⁴ Note, the St Albans Centre is labelled Woolworths Madras in Table 2.

off point can be applied for the map, but this threshold is considered indicative of the main trade catchment revealed by the gravity model for the St Albans Centre). The second map (Figure 2) increases the probability threshold to ≥ 0.025 (2.5%) and is probably approximate to the primary catchment of the centre.

The maps show that the main redistribution of demand (based on the relative probabilities) will be around Saint Albans, Edgware, Richmond, and the northern/eastern reaches of the central city as they're the closest. They show up darkest on this map.

Further examples are provided from the gravity model. Note, these maps also only show the SA2s with a probability ≥ 0.025 , so focus on the likely primary catchment of each centre.

Figures 3 and 4 show the relative probabilities for the Richmond-Stanmore Centre (without and with the St Albans Centre). Based on the bands/thresholds set in the legend, these particular maps do not show any material changes in the probability of demand within primary catchment SA2s (or the extent of the primary catchment). We note that there are minor modelled changes in the probabilities in each SA2 (as shown in Tables 1 and 2 for the Richmond SA2) but these are just not sufficient to change which 'band' the SA2s sit within on the legend).

Figure 1- SA2 Relative Probabilities for St Albans Centre (greater or equal to ≥ 0.018 (1.8%))

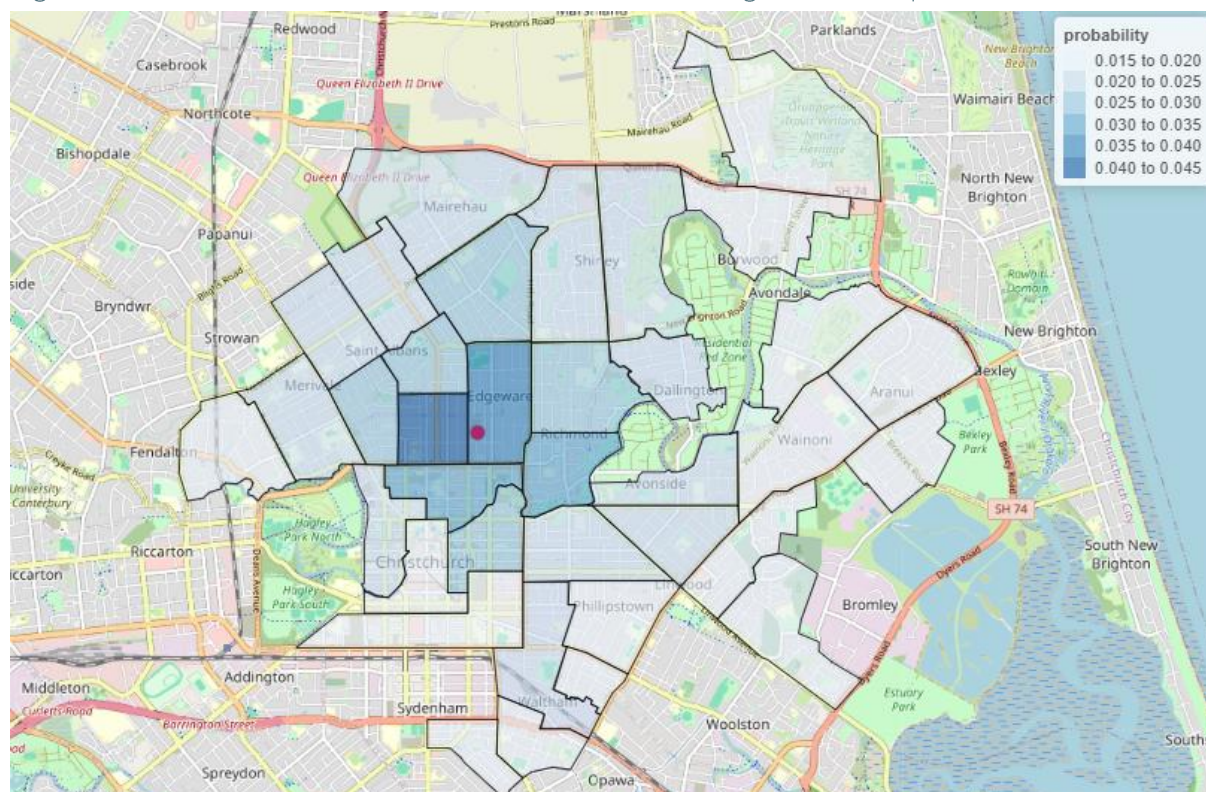


Figure 2 - SA2 Relative Probabilities for St Albans Centre (greater or equal to ≥ 0.025 (2.5%))

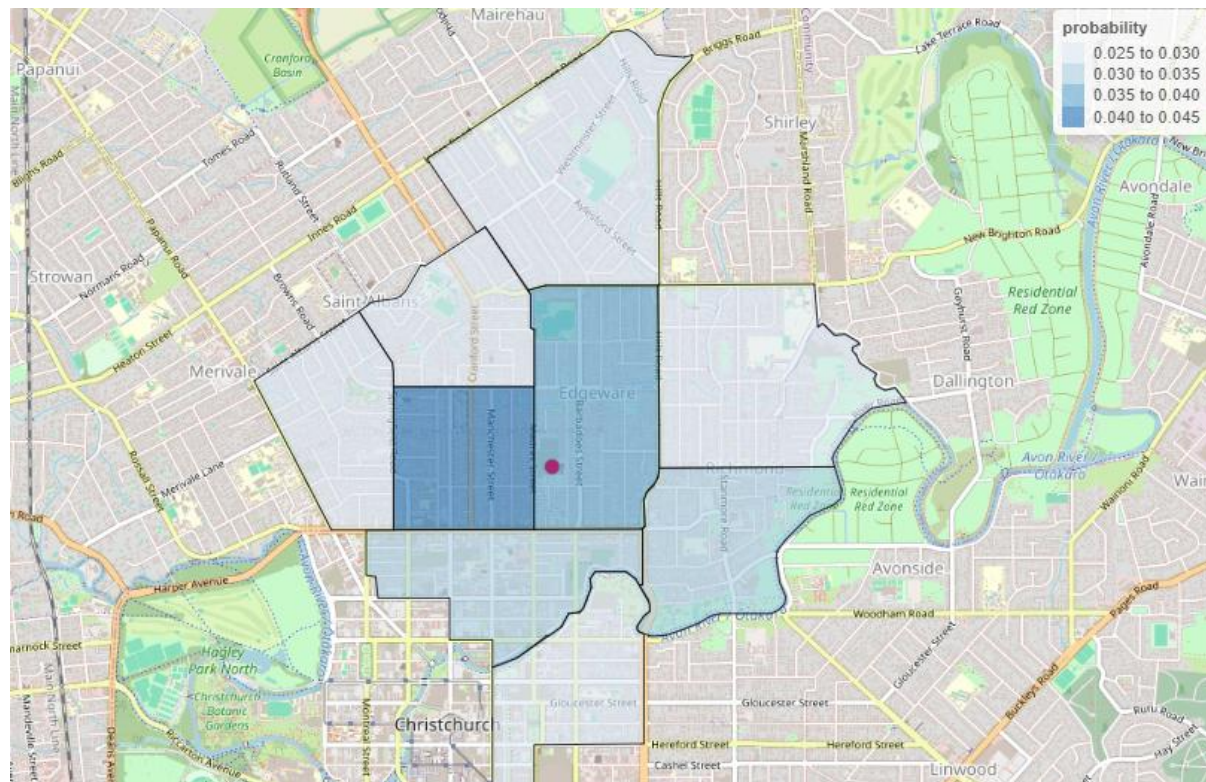


Figure 3 – SA2 Relative Probabilities for Richmond-Stanmore Centre – Without St Albans Centre (greater or equal to ≥ 0.025 (2.5%))

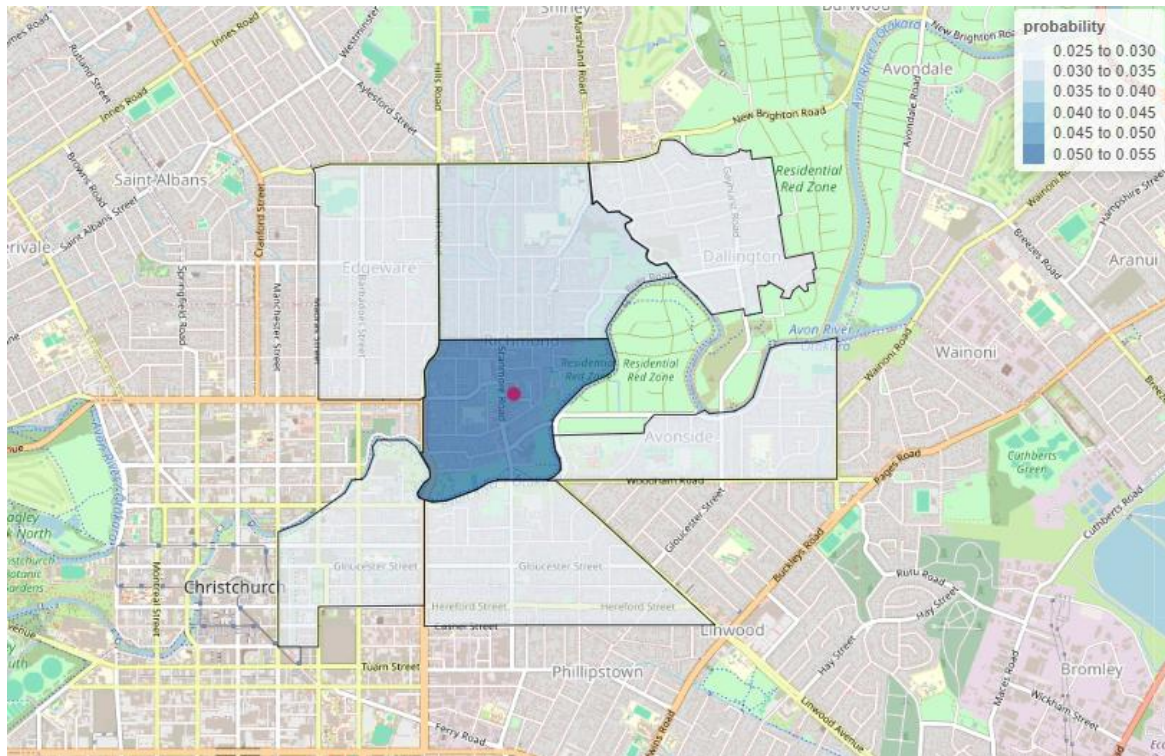


Figure 4 – SA2 Relative Probabilities for Richmond-Stanmore Centre – With St Albans Centre (greater or equal to ≥ 0.025 (2.5%))

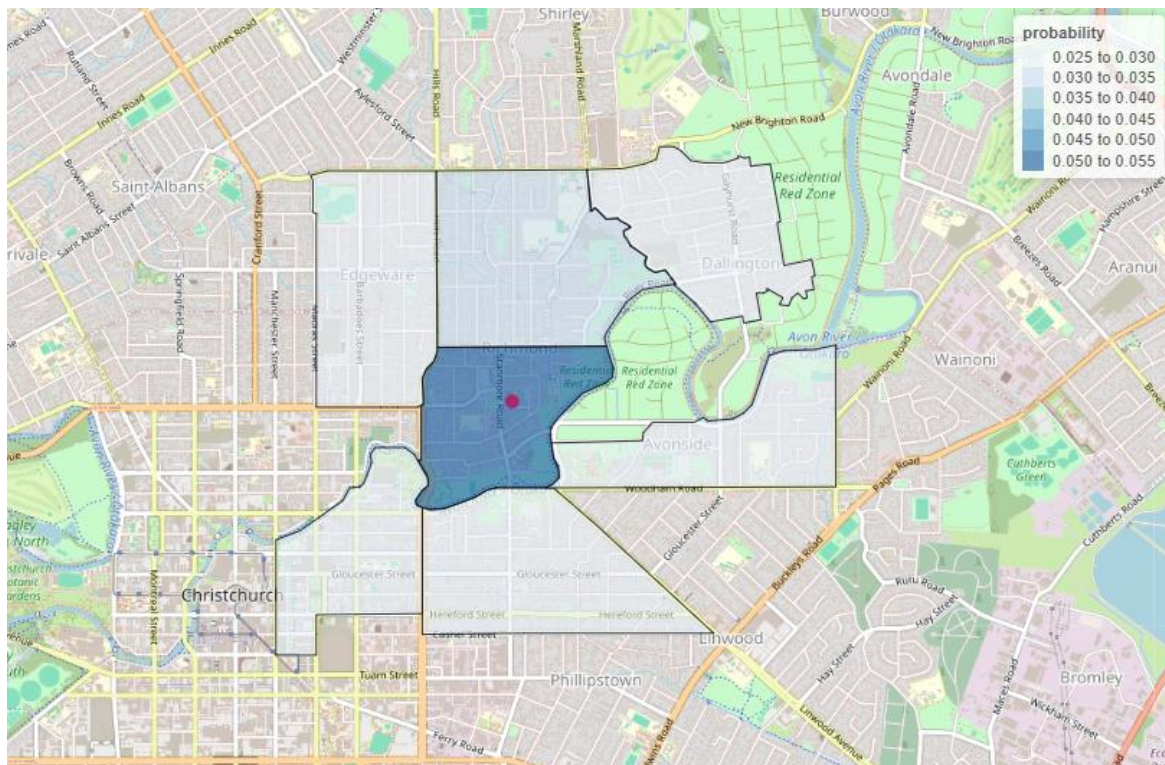


Figure 5 – SA2 Relative Probabilities for Edgeware Centre – Without St Albans Centre (greater or equal to ≥ 0.025 (2.5%))

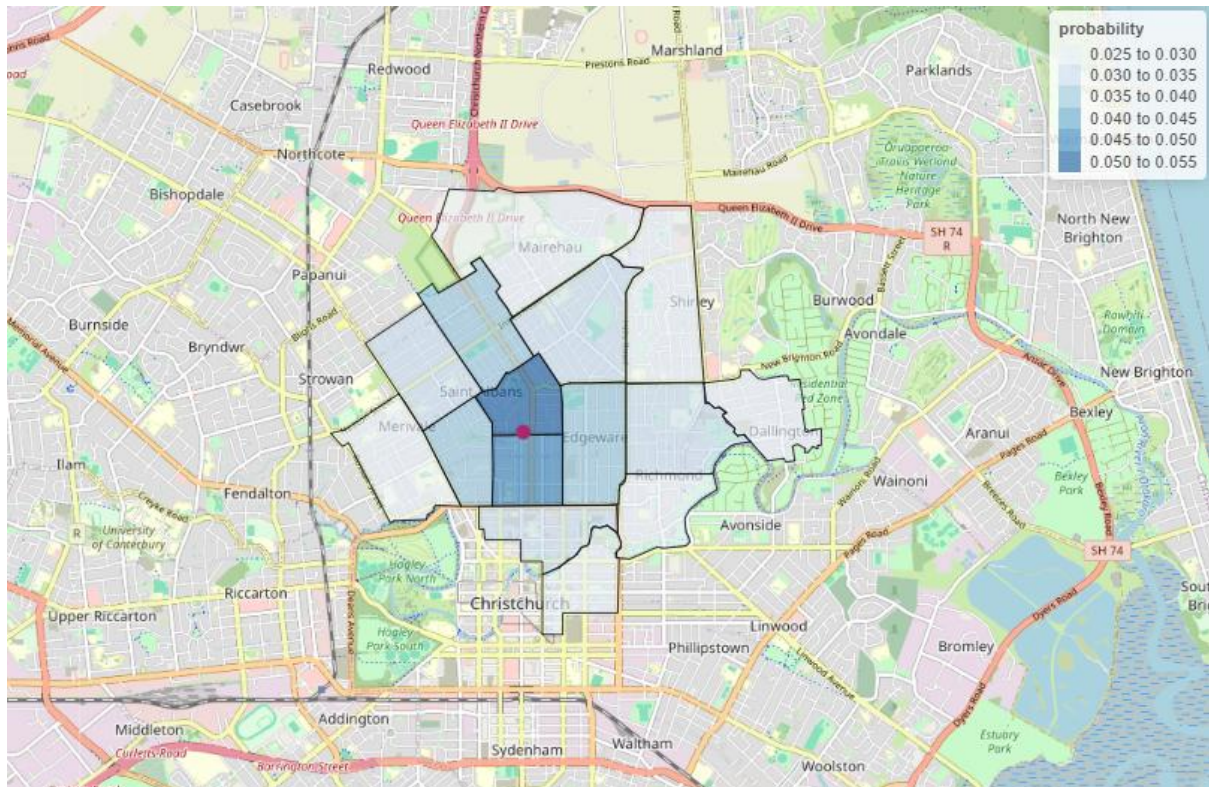
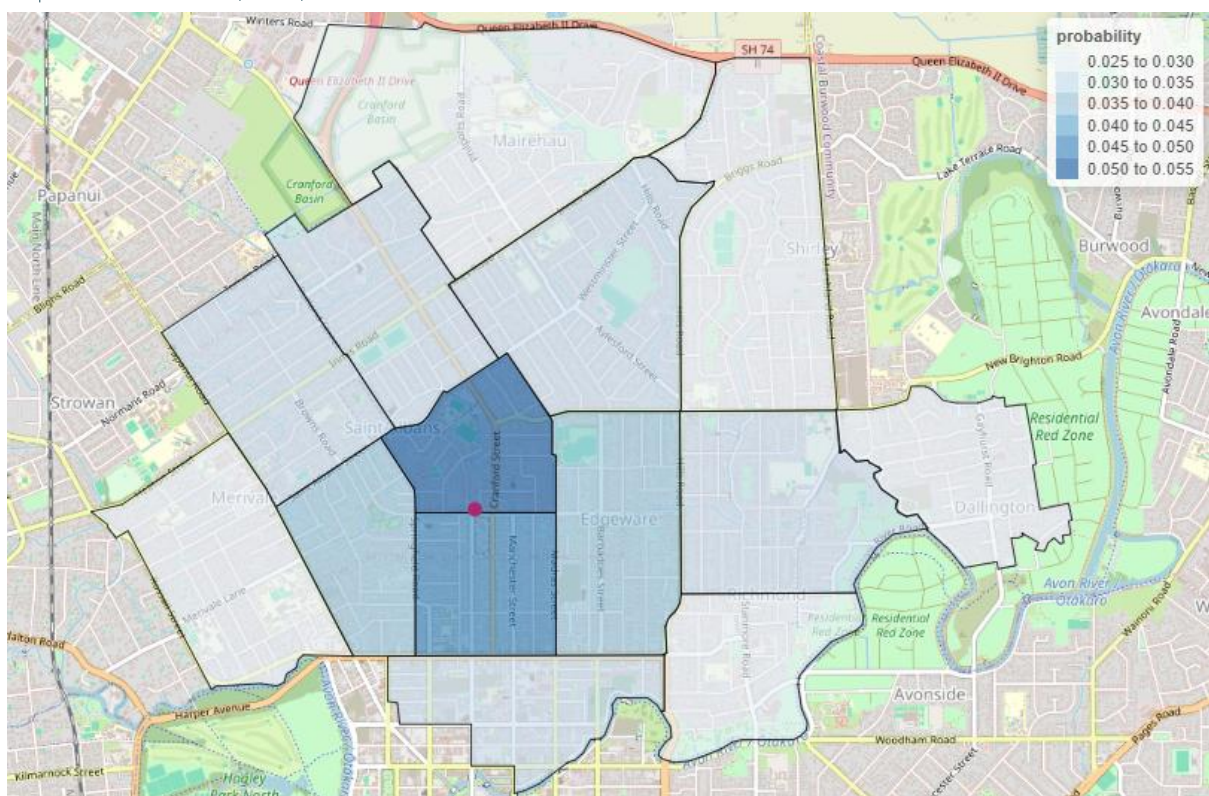


Figure 6 – SA2 Relative Probabilities for Edgeware Centre – With St Albans Centre (greater or equal to ≥ 0.025 (2.5%))



Figures 5 and 6 show the relative probabilities for the Edgeware Centre (without and with the St Albans Centre). Based on the bands/thresholds set in the legend, these particular maps do not show any material changes in the probability of demand within most primary catchment SA2s. Again, there are minor modelled changes in the probabilities in each SA2, but these are just not sufficient to change which 'band' most of the SA2s sit within on the legend. However, one SA2 north of centre changes probability enough to drop down to the next 'band' in the legend, and one SA2 in the central city falls below the 0.025 probability threshold and therefore is no longer shown in Figure 6. This could be interpreted as a contraction in the geographic extent of the centre's primary catchment.

The next step in the gravity model is for the raw probabilities of each SA2 (and each scenario) to be multiplied by the MEC equivalent of demand calculated for each SA2 (in each year). For example, the SA2 containing the proposed St Albans centre has a modelled probability of demand being attributed to the new centre of 0.0384 (Figure 1) and a 2028 MEC demand equivalent of 50.7, so $50.7 * 0.0384 = 1.94$ MEC equivalents of demand allocated to the new centre in that year.

This value of 1.94, and all the same calculations for the other SA2s, are what is shown in the maps further below (see also the columns to the right of the probabilities in Tables 1 and 2). Figure 7 shows the absolute MEC equivalent demand for the St Albans Centre in 2028 (the first modelled trading year¹⁵) and Figure 8 shows the absolute MEC equivalent demand for the St Albans Centre in 2043.

A comparison of these two maps shows that for the proposed centre to achieve the employment assumed in 2028 (a fixed input determined by Savvy/M.E) that sales (aggregated MEC demand equivalents) initially come from a range of SA2s, although relatively more in the SA2s immediately north and south of the centre. With the growth of demand in each SA2 – largely driven by population growth and housing intensification, particularly in the SA2s in the central city and on the northern fringe of the central city as discussed in the economic assessment – most sales are anticipated to be sustained by an increasingly localised catchment (i.e. a relatively small group of SA2s).

¹⁵ Noting that it may be able to trade sooner than that if approved.

Figure 7 - Absolute MEC Equivalent Demand Attracted to St Albans Centre - 2028

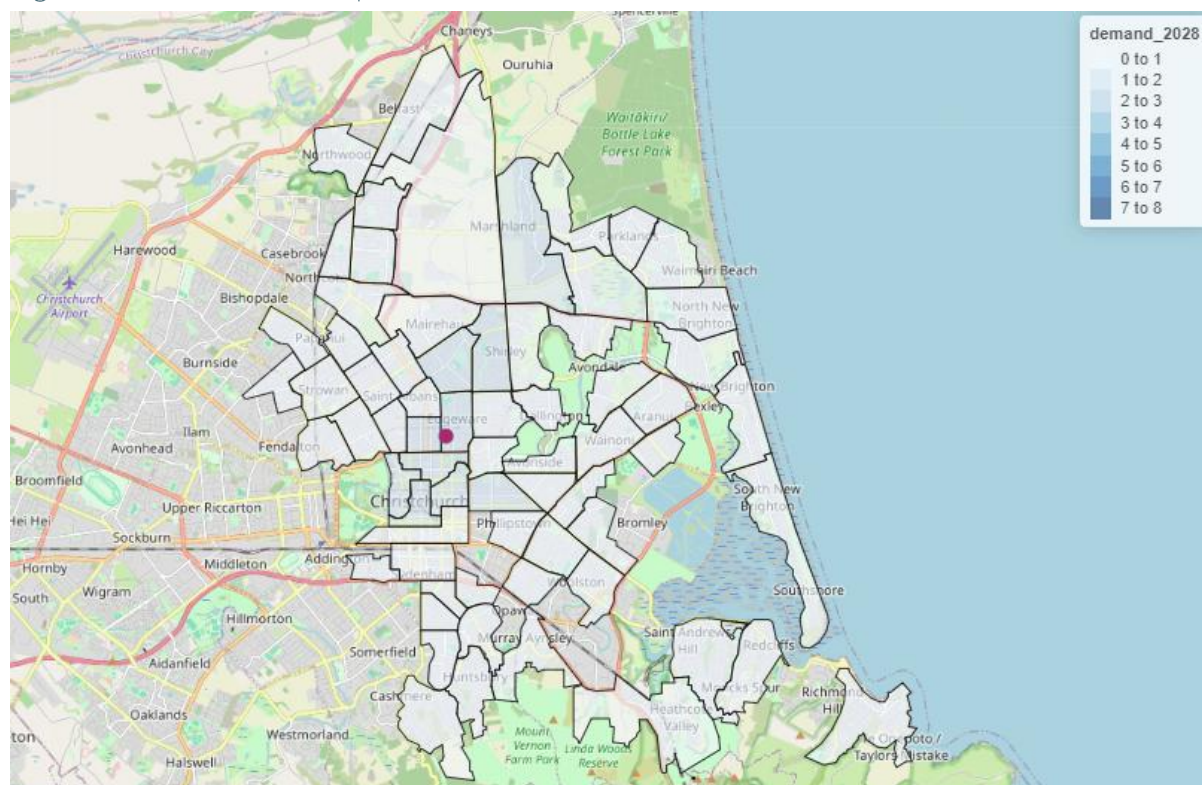
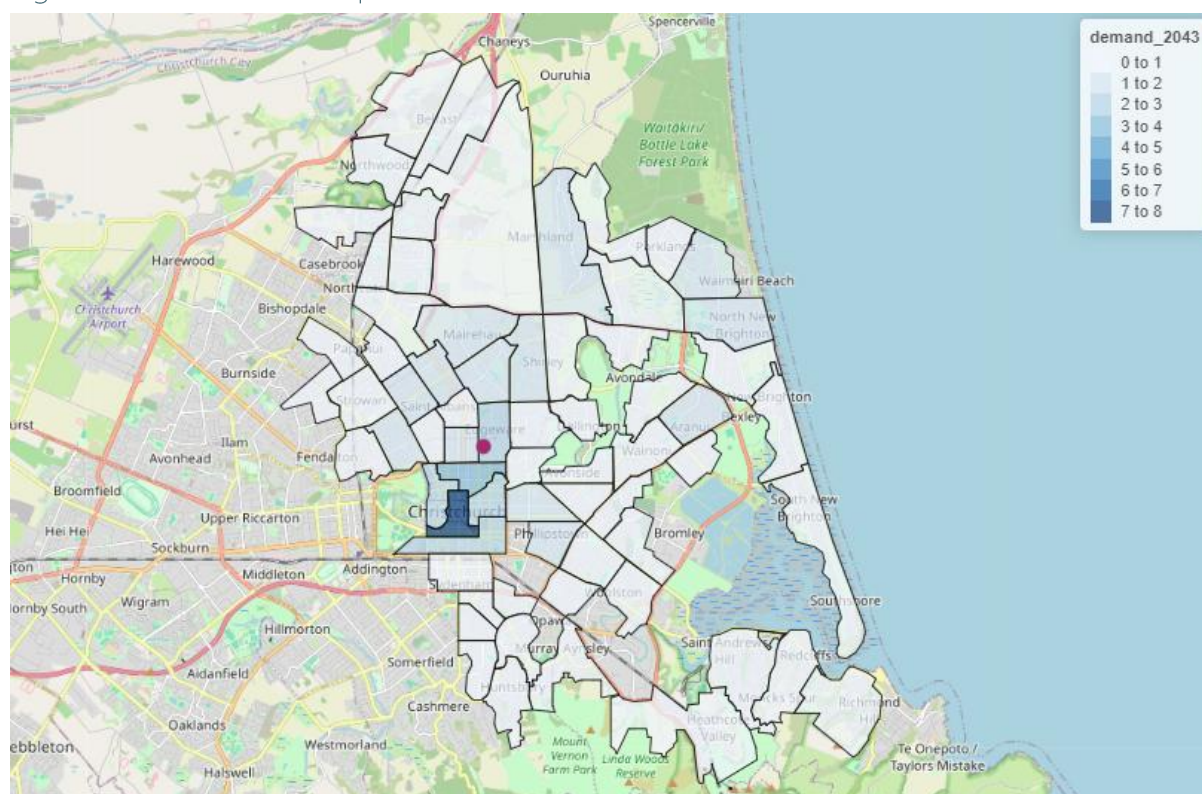


Figure 8 - Absolute MEC Equivalent Demand Attracted to St Albans Centre - 2043



In reality, the assumed sales (employment proxy) of the new centre may not hit the level assumed upon opening for the purpose of the gravity modelling and may build more gradually over time commensurate with demand growth in its local catchment. This has not been modelled – only a worst case distribution effect where its attractiveness is equal to other well established centres of similar or equal employment from day 1. Had we modelled a more gradual increase in expected store employment (as a proxy for sales and attractiveness), this is expected to have shown a sales catchment closer to that in Figure 8 above, in the short, medium and long-term.

Once the probabilities are generated for the two scenarios (without and with St Albans Centre), and the absolute MEC equivalents of demand are calculated, the absolute MEC equivalent demand attributed to each centre from all SA2s that have a probability greater than zero are summed. This gives the final aggregate results of the model (as presented in Table 5.2 and Figure 5.1 of the economic assessment report).

We trust that this additional insight to the inner workings of the gravity model provide PE with greater confidence that the model is working appropriately. M.E and I maintain our view that the Food & Liquor Retail Gravity Model for Greater Christchurch is fit for purpose and robust in terms of its inputs, gravity model algorithms and outputs (notwithstanding that all models rely on assumptions and have limitations in terms of their ability to accurately predict projected shopper behaviour).

In our phone meeting, PE did not signal that they had any material concerns with the demand and supply analysis sections of the economic assessment and as such, I do not provide any further comment on those aspects at this stage.

If PE require any further information of the analysis underpinning the economic assessment to complete their peer review, please let me know.