

Matter 3 – the Council’s Response to the Inspector’s Questions

Housing – Chapter D

Is the Plan’s approach to housing justified, consistent with national planning policy and capable of effective implementation?

General – Policies D1 and D2

- 1. What is the justification, based on any up to date needs assessment, for not including allocations for Traveller Sites? Is the approach consistent with national planning policy?**
 - 1.1. The Council is fully aware of the responsibilities it has to plan for the accommodation needs of Gypsies and Travellers and Travelling Show people. In producing the Council’s Local Development Framework the need for accommodation and sites was considered based on assessments and past trends within the Borough.
 - 1.2. Historically Gypsy and Travellers and Travelling Show People travel through the Borough rather than settle here. In terms of the evidence to support this position the Council has not received any presentations to the homelessness team from Gypsies and Travellers and Travelling Show people over the last five years.
 - 1.3. Further Evidence is found within the Lancashire Gypsy and Traveller Accommodation Assessment (GTAA) (2007) (CD4.8) which also found that there is no proven need for Gypsies and Travellers and Travelling Showpeople pitches from 2006-2016, within the Borough.
 - 1.4. However the Council does recognise that a further study will be required in order to assess the need for such provision beyond 2016 in accordance with the document which focuses on Planning Policy for Traveller Sites which is a supplementary to the NPPF (CD4.7). The Council intends to commence discussions with neighbouring authorities with a view to commissioning a new study at that time (2016).
 - 1.5. Further to the above the Council is also preparing to carry out a Housing Needs Assessment over the next few months. This assessment will look at housing needs across the Borough including

such things as size, type and tenure. The assessment will also consider the potential need for travellers' accommodation. Information to understand needs will be collected through various research methods such as questionnaires and dialogue with appropriate housing colleagues and organisations. Depending on the results of this assessment further work may need to be commissioned. If this proved to be the case a Gypsy and Travellers and Travelling Show People study could be carried out at this stage along with an appropriate review of the Site Allocations DPD in parallel.

- 1.6. It is also important to note that the Council also carries out annual spot checks/counts which include assessing the sites were Gypsy and Travellers and Travelling Show People generally locate during transit. These spot checks/counts have resulted in a nil return on gypsy and traveller settling in the Borough over the last several years.
- 1.7. Further evidence suggests that in the last two years there have been only ten recordings of Gypsy and Travellers and Travelling Show People on land within the Borough, however it should be noted that this has occurred when Gypsy and Travellers and Travelling Show People are in transit and passing through the Borough to another destination.
- 1.8. However to ensure contingency and in the case of applications being submitted to the Council, a policy focusing on Gypsy and Traveller and Travelling Showpeople has been included within the Central Lancashire Core Strategy (SRE002), Policy 8. This policy will allow the Council to deal with any applications appropriately.
- 1.9. It is also important to note that on 7 June 2012 the Inspector's report on the Central Lancashire Publication Core Strategy Local Development Framework Development Plan Document was issued with the Inspector finding the Core Strategy to be sound. In respect of the Gypsy and Traveller accommodation in Central Lancashire he found that Policy 8: Gypsy and Traveller and Travelling Show People Accommodation was effective, justified and accorded with the National Planning Policy Framework (NPPF).
- 1.10. On this basis the Council believe the criteria included in Core Strategy policy 8 will adequately deal with planning applications for sites if applications are submitted. In line with the document which focuses on Planning Policy for Traveller Sites which is a supplementary to the NPPF, the criteria includes - (a) Location in respect of proximity to services (b) Suitable road access and sufficient space within the site for parking (c) Avoidance of residential use on contaminated and otherwise unsuitable land although such areas may be suitable for business use and in any event taking account of the opportunities for

mixed use and (d) No unacceptable impact on the immediate surrounding areas and the wider Landscape.

- 1.11. In conclusion the Council feels the correct and appropriate procedures are in place to deal with applications for Gypsy and Traveller and Travelling Show People and that the appropriate monitoring methods and future assessments have been identified to ensure the Council is aware of any future accommodation needs for Gypsies and Travellers and Travelling Showpeople in the Borough.

2. Is sufficient land allocated to meet the objectively assessed needs over the plan period? Is the approach consistent with the CS? Is there a need to identify additional land for housing?

- 2.1. The Council considers that it has allocated sufficient land within the Site Allocations DPD to meet the assessed needs over the Plan's period and the approach taken is consistent with the Central Lancashire Core Strategy and on this basis there is no need for further land to be allocated.
- 2.2. The National Planning Policy Framework requires local planning authorities to identify a supply of specific, deliverable sites to provide five years' worth of housing against their requirement. The NPPF states that figures should include a buffer of 5% to enhance competition and choice in the market for land (moved forward from later in the Plan period) and a 20% buffer where appropriate. In addition to this, local planning authorities must include a supply of specific, developable sites, or broad locations for growth, for years 6 – 10 and where possible years 11 – 15.
- 2.3. Policy 4 of the Central Lancashire Core Strategy (SRE002) sets out the number of new houses required in the Borough in line with figures contained in the Regional Spatial Strategy (CD4.10), which equates to 417 dwellings per year from 2010 – 2026, this is a total of 6,255 dwellings for the 15 year Plan period.
- 2.4. In order to allocate the sufficient amount of land in line with the targets set out in the Core Strategy and as identified in the Site Allocations DPD, the Council had to plan ahead for future housing needs and be clear about what supply of land was available for development in the Borough.
- 2.5. One of the methods used to identify the land was to carry out a Strategic Housing Land Availability Assessment (SHLAA) (SRE015a-e). The SHLAA allowed the council to have a picture of the position through periodic updates of the land available within the main

settlements of the Borough. The SHLAA has also been updated and reviewed periodically; this was done in support of the Core Strategy examination process (March 2012). The information in the SHLAA has also been updated on a regularly basis (due to recent planning applications and permissions) to present the most up-to-date five year housing land supply position in the Borough.

- 2.6. The housing land allocation process also included a call for sites method which asked landowners and developers to put forward sites for development which could be assessed to see whether they were appropriate for development. This assessment included measuring the site's sustainability, location and infrastructure needs by carrying out a sustainability appraisal proforma (CD5.3.1) for each site and holding regular meetings and dialogue with land owners and developers (This is detailed further in the answer statement to Matter 3, Question 3.)
- 2.7. Following this work the Council has indicated land which will allow 7,059 dwellings to be built over the plan period (Please see updated Table 2, February 2013). The Council has allocated land for 4,108 dwellings, as set out in Policy D1 of the Site Allocations DPD. This figure includes new allocations and major sites for development that will be led by residential development. The accompanying tables for Policy D1 also set out the proposed phasing periods for these sites. The sites within Policy D1 are in suitable locations for housing development and have the most appropriate prospect of being available, developed and fully delivered within the plan period.
- 2.8. To meet the remainder of the housing requirement, there are existing housing commitments including residential sites with planning permission, sites with a current planning application, other sites which consist of small sites with permission (average of under ten dwellings), other small sites that are accounted for in the Strategic Housing Land Availability Assessment (SHLAA) and large sites that are currently under construction as shown within Table 2 of the Site Allocations DPD. Table 2 within the Site Allocations DPD shows the Council's total housing supply for the plan period.
- 2.9. To allow some flexibility the Council would also expect to see some windfall development to come forward over the plan period. However it is important to point out that the Council do not rely on this to deliver the housing figures over the plan, as the Council has clearly allocated enough land to facilitate the provision of dwellings in line with the National Planning Policy Framework (CD4.7) however it would be unreasonable to ignore this further supply.
- 2.10. Based on previous windfall trends and on an assumption that each small site that receives planning permission will be built, an indicative total of 45 windfall dwellings may be built annually over the Plan period

which will also offer further flexibility to the housing supply. Paragraph 48 of the NPPF states that local planning authorities may make allowances for windfall sites. Any allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future trends.

- 2.11. There has been reduced housing delivery due to lower average build rates in the Borough in recent years; however this can be made up over the plan period. As of March 2012 there was a shortfall of 560 units, however, having considered the phasing of housing delivery, the Council is of the view that there is potential for this to be made up in the first phase of the plan or over the full plan period if necessary, this is line with the Inspector's Report on the Core Strategy, which states that shortfalls can be made up over the plan period.
- 2.12. The Council has identified land to deliver 7,059 dwellings over the plan period which is over the 15 years requirement. The first phase of the plan identifies land for 2,692, which equates to a five year supply, plus 20%+. The Council also notes that flexibility within the NPPF states that land for housing 'where possible' should be identified in years 11 – 15.
- 2.13. It is important to note that since the Publication Version of the Site Allocations DPD was produced a number of the allocated sites now have either planning applications submitted to the Council or have recent planning permission, thus showing the deliverability of these allocated sites and the fact landowners and developers are very keen to bring them forward for development. (Information on each of these allocations is contained within the Site Portfolios (CD5.3.2).
- 2.14. To ensure contingency and ensure that the Council can manage the Borough's sustainability, economic growth and housing supply, the plan also adopts a phasing and monitoring approach (Policy D2) to the residential sites which are allocated and identified (Table 2 of the Site Allocations DPD). This will mean that the Council can ensure housing sites are delivered sustainably by delivering the necessary infrastructure and housing supply in the right locations in the appropriate timescales.
- 2.15. In terms of conformity with the Core Strategy, Strategic Objective 5 (SO5 of the Core Strategy) states that the LDF will – *make available and maintain within Central Lancashire a ready supply of residential development land over the plan period so as to help deliver sufficient new housing of appropriate types to meet future requirements. This should also be based on infrastructure provision, as well as ensuring that delivery does not compromise existing communities.*

- 2.16. SO5 is being delivered through Policy 4 of the Core Strategy which sets the 417 target for the Borough and sufficient land to deliver this target has been allocated in the Site Allocations DPD. This has been done by identifying housing sites on land that is deliverable within the plan period and within the appropriate settlements of the Borough in line with Core Strategy Policy 1 of the Core Strategy which states - *Focus growth and investment on well-located brownfield sites and the Strategic Location of Central Preston, the Key Service Centres of Chorley and Leyland and the other main urban areas in South Ribble, whilst protecting the character of suburban and rural areas. Some Greenfield development will be required on the fringes of the main urban areas. To promote vibrant local communities and support services, an appropriate scale of growth and investment will be encouraged in identified Local Service Centres, providing it is in keeping with their local character and setting, and at certain other key locations outside the main urban areas.*
- 2.17. Further to this, Table 1 within the Core Strategy sets out the predicted proportions of housing development by location. This table was put together using the indicative housing allocations within the Site Allocations DPD process; this was possible as the Site Allocations DPD was being prepared during the same time as the Council were finalising the Core Strategy. This of course illustrates the important connection between the Core Strategy and the Site Allocations DPD and that the Site Allocations DPD has allocated enough deliverable housing sites in the appropriate locations, in line with Policies 1 and 4 of the adopted Core Strategy.
- 2.18. The scale of sites allocated varies from small urban and edge of settlement sites to larger broad locations. Collectively, they will provide sufficient capacity to help meet the strategic housing needs as set out in Policy 4 of the adopted Central Lancashire Core Strategy. The inclusion of larger sites provides the opportunity to deliver new infrastructure such as schools, health centres and highways infrastructure which will help build sustainable communities and integrate existing and new residential areas as the smaller sites will be delivered earlier within the plan period and ensure a five year land supply is secured.
- 2.19. In conclusion the Council has allocated the sufficient amount of housing land by using the most appropriate and deliverable sites for residential development as set out in the Site Allocations DPD, in line with the NPPF and the presumption in favour of sustainable development and Policies 1 and 4 of the Central Lancashire Core Strategy.

Housing Sites (pages 34 – 41 of the Plan)

3. Are the allocated sites, on the available evidence, appropriate, justified and deliverable having regard to the alternatives? Have alternatives been subject to adequate sustainability appraisal and consultation?

- 3.1. The Council considers that the allocated housing sites including the major development sites are indeed appropriate, justified and deliverable. The Council has carefully considered the alternatives. All allocations and alternatives have been subject to a sustainability appraisal, various consultation stages and general assessment to understand the site's deliverability and appropriateness to justify its allocation.
- 3.2. This statement sets out the background evidence and justification for the allocated housing sites contained within the Submission Version of the South Ribble Site Allocations Development Plan Document (DPD). This statement also explains the assessment methodology used by the Council to evaluate the sites which were put forward and considered as potential housing allocations.
- 3.3. The assessment overall determined the most appropriate locations for new dwellings. The Council considers that the site selection process was carried out in a fair and transparent way at all stages of the consultation process – this is detailed below.
- 3.4. Details for the decisions are contained within the appendices of this statement in the form of site portfolios (CD5.3.2). The site portfolios have been produced to offer background information on each of the sites allocated by the Council and the reasons for these allocations. Portfolios for the alternatives have also been produced.
- 3.5. The Site Allocations DPD process provided the opportunity to review land allocations and consider the relative need for different land uses. The Council has given priority to the most deliverable and developable previously developed land wherever possible. There has also been a need to consider greenfield sites within and beyond the built up area in order to help contribute to housing needs. As far as the sites outside the urban area are concerned, the smaller edge of settlement sites primarily involve greenfield land. Whilst one of the larger sites Moss Side Test Track comprises previously developed land the other larger and major development sites are greenfield land this mix of land types is considered a sustainable approach that reflects the broad aims and purposes of the NPPF and should ensure the efficient deliverability of housing allocations within the plan period.

- 3.6. The location of proposed sites has been influenced by locational policies in the Core Strategy, primarily Policy 1 – Locating Growth. This directs development to the core central areas of the borough in the first instance and then to the defined settlements in the more rural areas in a lesser degree. Developments within the central urban area of the Borough have obvious advantages such as good transport links, a mix of facilities and a good range of services. Locating development here will help minimise the need to travel and maximise the use of public transport, cycling and walking - this will also assist delivery and contribute to the Council's plans to ensure the Borough's future vitality, viability and economic growth.
- 3.7. The deliverability of sites has been fully considered; some sites have come forward through the Strategic Housing Land Availability Assessment (SHLAA) process and others have been submitted as a result of the call for sites process whereby landowners and developers put forward their sites for housing development.
- 3.8. The SHLAA has also been updated and reviewed periodically; this was done in support of the Core Strategy examination process (March 2012). The information in the SHLAA has also been updated on a regular basis due to recent planning applications and permissions, to present the most up-to-date five year housing land supply position in the Borough. This information has been submitted in support of this statement (SRE014a).
- 3.9. The Council has considered viability and supporting infrastructure in its broadest sense for each of the sites. In the assessment of sites we have used the evidence collected in the SHLAA Assessment, the sustainability appraisal proforma process, discussion and ongoing dialogue with landowners and developers and the viability work carried out to inform the Community Infrastructure Levy.
- 3.10. It is considered there are no obvious viability challenges or identified abnormal costs relating to the allocated sites which would affect overall deliverability within the plan period. It is recognised by both the Council and developers that housing developers will need to contribute to the delivery of essential infrastructure (notably highways improvements as addressed in the Central Lancashire draft transport Masterplan.) This will be secured through the use of Section 106 agreements until the Community Infrastructure Levy (CIL) is adopted. The CIL is at an advanced stage and was submitted to the Secretary of State in February 2013. Core Strategy Policy 2 and Site Allocations Policy A1 will also help to secure the necessary infrastructure linked to particular developments.
- 3.11. Updated Housing Supply and Requirements (SRE014a) have also been produced, which gives an indication of the timing of various sites.

Estimates are based upon knowledge of the existing use of sites, infrastructure requirements and developer intentions through the ongoing dialogue with landowners and developers. Whilst some of the smaller sites will come forward in the short term, in the longer term, larger sites will come forward ensuring we have a steady supply of housing land throughout the plan period.

- 3.12. The scale of sites proposed varies from small urban and edge of settlement sites to larger broad locations. Collectively, they will provide sufficient capacity to help meet strategic housing needs. The inclusion of larger sites provides the opportunity to deliver new infrastructure such as schools, health centres and highways infrastructure which will help build sustainable communities and integrate existing and new residential areas.
- 3.13. The mix of site sizes should help provide a continuous supply of housing (market and affordable) across the plan period. The need for preparatory works and significant supporting infrastructure means that the strategic sites are unlikely to start delivering completed dwellings for some years. However, a number of smaller sites are available now, and, subject to being granted planning permission, have the capacity to deliver housing in the shorter term and therefore contribute to the five year supply of housing land and towards economic development.
- 3.14. It is also important to note that developers and landowners have already submitted planning applications on a number of the proposed allocations since the publication version was produced, which reflects their keen interest and the sites value in terms of deliverability. Where planning applications have not been submitted yet, on-going discussions and draft proposals are continuously being drawn up. The site portfolios detail where planning applications have been approved or submitted on particular sites, supporting the argument for their inclusion as a housing allocation in the DPD.
- 3.15. Availability of the sites has also been checked at various stages in the plan preparation process – in many cases ongoing dialogue with landowners and developers has been carried out to help understand the most up-to-date position. Support from developers has also been obtained through the preparation of Masterplans, development briefs and draft proposals – where these are available they have been submitted in support of the matter statements.

The Methodology – Potential Housing Sites, Assessment Process and Consultation

- 3.16. The process of evidence gathering and identifying potential sites began in 2005, with a 'call for sites' exercise, where the Council invited people to suggest places that could be used for new housing, employment, retail, community or leisure uses, as well as land that should be protected from development in some way. A further 'call for sites' was held in 2007. From these, the Council received over 200 site suggestions for a variety of development types or protection including housing.
- 3.17. In December 2010, the Council began an eight week public consultation exercise on the Issues and Options Discussion Paper (SRE053). This paper contained all of the sites that had been suggested to the Council, highlighted local issues, and proposed development management policies. It also contained a number of questions relevant to each chapter.
- 3.18. Responses received during the consultation were carefully considered, and each site was then subject to a detailed Sustainability Appraisal to ensure that decisions on all available options were made in accordance with the principles of sustainable development and the sustainability objectives included within the sustainability appraisal framework. This framework is the same as the one used for the Core Strategy to ensure this document is in conformity.
- 3.19. The Council then carried out the consultation on the Preferred Options stage development plan document, from November 2011 – January 2012 (SRE054a). This contained a preferred list of sites that the Council proposed to allocate. The consultation responses at that stage were then considered to help formulate the Publication Version of the document, which was then submitted in October 2012.

Assessing the Potential Sites – The Filtering Exercise

- 3.20. As the purpose of the Site Allocations DPD is to determine specific sites for development, before carrying out any detailed Sustainability Appraisal of each site suggestion received, a filtering exercise was undertaken to eliminate sites suggested for housing or employment that were not in accordance with the Core Strategy. This exercise is set out below and was carried out at the earliest stage of the process ie before the issues and options consultation. Sites that were not in accordance with the following steps below were filtered out and shown as a green colour on the issues and options maps.

Step 1

3.21. Eliminate sites that are not within the following locations and therefore not in accordance with the Core Strategy Publication version Policy 1: Locating Growth:

- The Preston/South Ribble urban area (including Penwortham, Lostock Hall, Bamber Bridge, Walton-le-Dale and Higher Walton)
- The Key Service Centres of Leyland and Farington
- The Rural Local Service Centres of Longton.

Step 2

3.22. Eliminate sites in the Green Belt or Open Countryside that are not adjacent to the boundaries of those settlements listed in Step 1.

Step 3

3.23. Eliminate any of the remaining sites that are in Flood Zone 3. These will only be assessed if insufficient land for housing and employment is available within Flood Zones 1 and 2.

Next Stage

3.24. Once this process was carried out a pool of remaining potential sites were indicated meaning that a preferred list of sites could be established using a combination of desk based research, dialogue with landowners and developers, site visits and consultation feedback.

3.25. Work on the sites also included using the Council's mapping information held on its Geographical Information System (GIS), to develop an overall picture of each site, its key characteristics and surrounding areas to help provide an initial assessment of site suitability. (Site maps and photographs are included within the site portfolios.)

3.26. Planning history and existing local knowledge has also been used to support decisions on individual sites. Some of this has been submitted in the form of evidence documents as part of this examination process; this includes the Central Lancashire Core Strategy, the Site Allocations DPD Sustainability Appraisal (SRSD005), the draft Central Lancashire Community Infrastructure Levy and associated documents, the Strategic Housing Land Availability Assessment and updates, Housing Land Position Statements (SRE014b), the Employment Land Review (CD4.11), Water Cycle Study (SRE027), Strategic Flood Risk Assessment (SRE042a-h), Open Space Study (SRE019a-e), previous planning applications, Masterplans, development briefs and draft proposals.

3.27. The sites were then subject to a Sustainability Appraisal under the requirements of section 19(5) of the Planning and Compulsory

Purchase Act 2004. The Sustainability Appraisal also incorporates the requirements of Strategic Environmental Assessment (SEA) in accordance with European Union Directive 2001/42/EC.

- 3.28. The Sustainability Appraisal Framework used consists of objectives, targets and indicators to provide a means by which the sustainability of the plan could be tested. The SA Framework for assessing the Site Allocations DPD (CD5.3.3) is based on the same SA Framework used for assessing the Core Strategy to ensure the two documents are aligned.
- 3.29. The tables included in CD5.3.3 set out the SA Framework that formed the basis for the appraisal of each of the sites. Table one details the objectives and questions asked about each site and Table two is the SA measurement proforma. This process provided a means for the Council to test the sustainability, deliverability and viability of each site against each objective.
- 3.30. A full Sustainability Appraisal Report has been produced detailing the results of each of the site and policy appraisals and the document was submitted in support of the Site Allocations DPD (SRSD005). The results of the appraisal on each site is set out in the Sustainability Appraisal Report – this document gives reasons for the decision to include a site or not. This information is also included in the site portfolios.

Summary of the Alternatives

- 3.31. In terms of alternative housing sites put forward for consideration, a large number of these were in green belt (52 of the alternative sites). Sites in green belt that were not adjacent to an urban area within Core Strategy Policy 1 were filtered out at the beginning of the process, as a decision was taken early in the LDF process not to review the wider green belt boundaries in line with the North West Regional Spatial Strategy (RSS). Development was to focus in the urban areas of South Ribble where an efficient amount of land is available including some of the safeguarded land from the previous Local Plan (2000) (CD4.9) in line with Core Strategy Policy 1. The filtering stage is detailed earlier within this statement and includes three steps as set out. At the Preferred Options stage a decision was then made to take all green belt sites out as sufficient housing land was available within the areas set out within Core Strategy Policy 1.
- 3.32. Other alternatives included sites on land classified as existing built-up area (33 of the alternative sites) which means that the council will not halt the delivery of housing development on these sites (if proposals came forward), as long as the proposals are in line with the criteria in Policy B1 and other relevant policies within the Site Allocations DPD.

- 3.33. A small number of alternatives were sites on land allocated such as Green Infrastructure (six of the alternative sites), Green Corridor (two of the alternative sites) Protected Open Land (four of the alternative sites), Safeguarded Land for future Development (seven of the alternative sites), Biological Heritage Site (one of the alternative sites), The Central Park (one of the alternative sites) and area of separation (one of the alternative sites). The council has not allocated these sites for housing as this use is inappropriate for these particular sites (within the plan period). Reasons are contained within the appropriate site portfolios – submitted as CD5.3.2 also within the relevant policies in the Site Allocations DPD, which protects these sites from development.

Summary of the Housing Allocations

- 3.34. The main justification for the majority of housing allocations within the site allocations is that they are located in the central urban areas which ensures that the site allocations is in conformity with the core strategy, in particular Policy 1. These areas include Penwortham, Leyland, Farington, Bamber Bridge and Lostock Hall.
- 3.35. These areas have the most appropriate available land, which enable developments to maximise access to public services and facilities, minimise the distance from local employment opportunities and increase more sustainable travel choices by home owners in the Borough. The priority is to develop sites which offer the opportunity for redevelopment or the re-use of land wherever possible, which results in less harm to the environment and areas such as green belt. Allocations are also focused where development would contribute towards regeneration, and vitality of the Borough, and are close to existing or proposed public transport corridors. These sites are seen to be more deliverable due to their location, developer interest and the existing infrastructure and networks that surround them.
- 3.36. Where housing sites have been allocated in areas such as Longton, these have occurred within the settlement boundary avoiding green belt release. These allocations are smaller in nature and reflect the size of the overall settlement to ensure development is more in keeping. Allocations in this area will help maintain a viable village and also accords with Policy 1 of the Core Strategy that states some development should be focused in Longton. In addition to this housing sites have been allocated in Hutton and Walmer Bridge, this is due to previous development or safeguarded allocations on these particular sites in the South Ribble Local Plan (2000). Housing allocations in these locations are seen to maintain the vitality of the western rural areas, it is important to note that these allocations reflect the overall size of the settlement.

- 3.37. In conclusion the housing sites (including the major residential development sites) within the Site Allocation DPD are appropriate, justified and deliverable and the Council has taken consideration of the alternatives. The appropriate methodology and assessment to arrive at these decisions has been carried out.